# **DEVELOPMENT BRIEF**

SITE AT VICTORIA AVENUE ST SAMPSONS



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# INTRODUCTION

This Development Brief relates to an area of land at Victoria Avenue, St Sampson's, which is currently utilised for States housing, primarily in the form of flats, along with associated open space and access.

The site is currently being considered for redevelopment for residential purposes by the States Housing Department, with a view to enabling a new development of mainly bungalows, specifically targeted at providing suitable accommodation for older couples and single people whose housing needs would be appropriately met by the provision of such one-bedroom accommodation. The development would be undertaken by the Guernsey Housing Association.

This brief provides guidance on how the policies of the Urban Area Plan (UAP) will be applied to produce an appropriate and beneficial form of development. The brief has been formulated by the Environment Department in conjunction with the States Housing Department.



# **POLICY CONTEXT**

Whilst individual policies of the Urban Area Plan should not normally be taken out of context, the policies that are particularly relevant to this site are listed in the table below. The policy reference should be used to find the appropriate policy in the UAP Written Statement. The table indicates the relevance of each policy to the site. References in the policies to the "Committee" or "IDC" should be taken as referring to the Environment Department.

UAP Reference	Policy Relevance
GEN1	The proposed development will benefit the community being redevelopment of previously developed land in a location that is well related to the existing overall pattern of urban development on the Island.
GEN2 GEN3	This development brief provides guidance for the comprehensive development of the site.  The new development should be in sympathy with and respect the landscape setting of the area, taking account of existing features of significant landscape, ecological or wildlife value and seeking the appropriate provision of new or improved landscape, ecological or wildlife features.
GEN4	The proposals should take account of the need to conserve and enhance the quality of the built heritage, particularly in relation to the impact of the development on and its relationship with the Château des Marais.
GEN5	The proposed development should be of good quality in terms of its design and the materials to be used, and buildings should be of appropriate siting, layout and scale in relation to their surroundings.  The development should respect any locally distinctive features and characteristics of the
GEN7	environment.  Proposals for development of this site will need to take account of the adequacy of roads and public utilities to cope with increased demand.
GEN8	Adequate, safe and convenient vehicular and pedestrian access will be required, and should have regard to the needs of people with mobility problems. Safe and convenient pedestrian routes should be provided through the development.
GEN9	Adequate levels of parking and open amenity space should be provided, in accordance with the guidance contained in the UAP.  The Department will take into account the need to safeguard and, where appropriate, create
GEN12	opportunities for public enjoyment. There is a particular opportunity to enhance public access to the adjoining open land and ancient monument.  Care should be taken to ensure that the new development is not detrimental to the reasonable
DBE1	enjoyment of adjoining properties, for example by virtue of significant overlooking or overshadowing.  The development should achieve a good standard of overall design and make a positive
	contribution to the urban environment, whilst respecting the general scale and massing of existing buildings in the vicinity.
DBE2	The development should make a positive contribution to townscape quality in terms of layout, density, height, massing, architectural style, materials and landscaping, should facilitate safe and convenient access and where possible should retain, enhance and/or create urban spaces, public views or other townscape features, which make a significant contribution to the character of the area, or take opportunities to reveal such features to public view.

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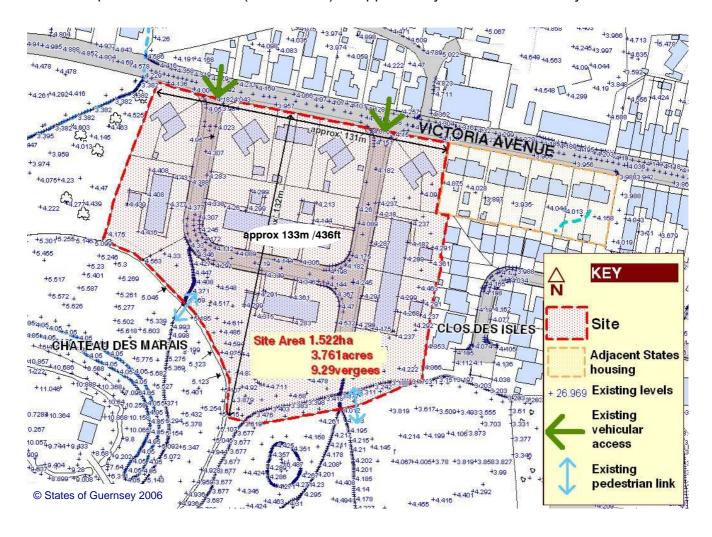
UAP Reference	Policy Relevance
DBE3	New buildings will be expected to generally conform to the height of existing residential development in the vicinity of the site.
DBE4	The Department will require proposals to incorporate a comprehensive landscape scheme of good quality as an intrinsic part of the design, particularly in relation to public areas within the site and to help to integrate the development with its surroundings.
DBE5	The impact of development on existing open spaces must be carefully considered and development will be resisted if it leads to the loss of open space which provides a valuable contribution to the character or amenity of the area, a valuable wildlife habitat, corridor or link, an important opportunity for public access and enjoyment, or a buffer between incompatible uses or a link between other open spaces.
DBE8	The Château des Marais and its setting will be protected from development that would detract from their special qualities. Development will only be permitted where it respects the building and its setting in terms of siting, scale, massing, form, proportions, detailing and materials and it would not result in loss of ancillary features which contribute to the character of the setting of the building.
DBE9	The existing buildings on the site are not considered to contribute significantly to the character or appearance of the area. The demolition of the existing buildings can be considered, in principle, subject to compliance with all other relevant policies of the Plan.
DBE10	The site is within the area of the marais surrounding the Château des Marais, a scheduled ancient monument, and is a highly sensitive one of known archeological importance. The Château des Marais is designated as an Area of Archaeological Importance in the UAP. Proposals that would adversely affect areas of archaeological importance will only be permitted where the applicant makes appropriate and satisfactory provision for mitigation measures to avoid damage to the remains, or for archaeological investigation and recording, in accordance with a scheme to be agreed by the Department. Conditions will be attached to planning permissions to ensure the implementation of the agreed mitigation and/or investigations.
	In this case, in view of the extreme sensitivity of the area, an archaeological excavation should take place in advance of any major building works on the site. This investigation would be likely to be concentrated in the southern part of the site, which has remained hitherto undeveloped. A watching brief would thereafter be required during any groundworks.
HO1	The development will contribute to meeting the requirements for housing provision in the urban area.
HO2	The development must be of an acceptable standard in terms of design, density and amenity, and not conflict with other relevant policies of the Plan.
НО9	The development should retain or if possible increase the number and quality of housing units on the site.
HO10	The density of development will be constrained by height and amenity considerations, parking requirements and the achievement of a satisfactory design and layout which respects the surroundings.
HO11	The majority of housing provided should be of a size, form and type suitable for smaller households (no more than two bedrooms per home - i.e. 4 habitable rooms or less).
HO12 HO13	The needs of the mobility impaired should be considered in the design and layout of the dwellings.  The provision of sheltered housing for the elderly will be encouraged in appropriate locations, having particular regard to the following: a) Sites should be conveniently located for local shops, public transport, health care services, and community facilities; b) the local terrain should be reasonably level; c) the site should be capable of offering a high standard of amenity, security, accessibility and comfort for the special needs of prospective residents.
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UAP Reference	Policy Relevance
CEN2	Consideration has been given to providing a "corner shop" type retail facility at the site.  However, this can only be considered on a demonstrably exceptional basis, with substantial justification provided to rebut the normal presumption that the provision of further new retail developments (other than at Admiral Park) on sites away from the Central Areas of Town and The Bridge will be resisted.
WWM4	There is evidence of occurrences of flooding in the vicinity of the site. Proposals for development on sites that are susceptible to flooding or that would be likely to cause flooding off site will not normally be permitted. Development proposals will only be permitted where:- a) satisfactory flood alleviation measures are incorporated into the scheme; or b) the type of development will not be adversely affected by flooding nor increase the risk of flood events.
СОЗ	The new development should be in sympathy with and respect the distinctive landscape features of the area.
CO5	The site is adjacent to a Site of Nature Conservation Importance (SNCI). Careful consideration will be given to proposed developments likely to affect SNCI's. Where a development close to or physically within a SNCI is proposed, it will be the responsibility of the developer to demonstrate as part of the application for planning permission the effect of the proposed development on the nature conservation interest of the site. Development that would adversely affect Sites of Nature Conservation Importance will not normally be permitted. Development will only be permitted where:- a) the benefits to the community clearly outweigh the nature conservation value of the site; and b) adequate provision is made within the development for the protection of features of nature conservation significance.

# THE SITE AND ITS CONTEXT

This Brief relates to a site at Victoria Avenue, St Sampsons, within a Settlement Area defined in the adopted Urban Area Plan (Review No.1) as approved by the States on 31 July 2002.



# The Site

This is a relatively flat site situated adjacent to the south of Victoria Avenue at the western end of built development on that street. The area of the site is approximately 1.522 hectares / 3.761 acres / 9.29 vergees overall.











Development existing on the site comprises 10 houses and 36 flats, a total of 46 units of accommodation, in semi-detached, two storey States housing fronting onto Victoria Avenue and four, three storey blocks of flats to the south of those.

Vehicular access to the site is via two access points from Victoria Avenue, serving a connecting two lane, two way estate road.





There is currently good pedestrian access through the site serving the Chateau des Marais to the south, and thence through to the Bouet. A second pedestrian access at the south east of the site appears to be presently blocked off, but has potential to be re-opened to allow an alternative path to the Bouet across open land and through the recently constructed housing development to the south which features good pedestrian permeability.



Over 50 trees have been recorded within the area of the site. Although it is not anticipated that all of these would be retained, the character and quality of the trees is a notable feature in the area, assisting the character transition between urban built form to the north and east of the site to areas of natural beauty and landscape to the south and west. Their potential to contribute to any redevelopment of the site is an important consideration.



A preliminary tree survey has been carried out and is included at Annex 3 together with an accompanying plan indicating the approximate location of the trees.

#### Context

The site is within the area of the St Peter Port/St Sampson's Marais landscape character area as described in the Urban Area Plan. The Marais landscapes are sub-zones of the Lower Wetlands Landscapes, and are essentially flat, freshwater marshlands, still locally flooded, but more often drained to "improve" the land. Although relatively treeless, the Marais landscapes are also characterised by scrub hedges, limited areas of trees and occasional scattered Hougues, or low rocky hills, within the flat wetlands. Where building development has occurred trees are frequently effective in reducing the impact of that development on these flat, sensitive landscapes. Despite the pressures for development in the Marais, the remaining agricultural land and other areas of vegetation manage to retain much of their original character, and provide important habitats for plant and animal life.





Running west from the east coast road, Victoria Avenue is generally characterised by mixed development around its junction with the coast road followed by a distinctive area of two storey, terraced housing on both sides of the road, providing well defined building lines and a sense of containment to the street.

There is a perceptible change in built form character where the two storey terraces terminate, giving way to a single storey workshop, a meeting hall and single storey development to the north of the road, and to two storey, semi-detached States housing to the south of the street. Those States houses lie within land directly adjacent to the east of the site subject of this brief and that area is also within the Settlement Area.

A modern clos housing development sits to the rear / south of those States houses, also adjacent to the east boundary of the subject site, and is accessed from Les Banques.





The site itself marks the end of housing development encroachment into the more natural, agricultural landscape and, as referred to above, plays an important role in softening the transition from built to natural environment.





The undeveloped, rough grassland area to the south of the site, between development on Victoria Avenue and recent housing development to the north of Le Bouet, is outside the Settlement Area and is an Area of Landscape Value as defined in the Urban Area Plan. Land to the east of this area is defined as an Area of Landscape Value and Site of Nature Conservation Importance.



Land to the south west and west of the site is outside the Settlement Area and is in an Area of Landscape Value and a Site of Nature Conservation Importance. Directly adjacent to the south west of the subject site is the important historic and archaeological site of Chateau des Marais, a defensive building considered to date back at least seven hundred years.





To the west of the site subject of this brief, adjacent to the walls and amenity grassland of the Chateau des Marais, is a small area of wet woodland. This might provide a useful amenity for future residents of the subject site, but the woodland itself is an important landscape feature and its character would need to be fully respected if any proposal to provide access is to be considered.



Beyond the woodland area to the west are marginal agricultural fields, many of which are recognised as parts of the Marais Site of Nature Conservation Importance. To the west of that open land is the Bowl leisure facility.



On the northern side of Victoria Avenue, opposite the site is suburban development, including a series of single storey, "model cottages" which retain original character. much of their Although to a lesser extent than the two storey terraces to the east, these cottages have a consistent building line and clearly define street alignment and containment. Street frontage residential development to the north of the site is within the Settlement Area whilst the Belgrave Vinery Housing Target Area (HTA8) is situated outside the Settlement Area to the north of this.

To the north-west are sports fields and associated recreational facilities of the Track, with further Areas of Landscape Value and Sites of Nature Conservation Importance outside the Settlement Area further to the north.





# ISSUES RELEVANT TO THE DEVELOPMENT OF THE SITE

#### Introduction

A number of significant issues relevant to the development of the site have been considered having regard to the results of consultations with other States Departments and bodies carried out during the course of preparation of this development brief. These issues are discussed in broad terms in this section of the brief, and have implications for and/or are referred to again in the next section of the brief which sets out specific guidelines for the development of the site.

#### **Traffic**

Victoria Avenue has a difficult traffic management history in terms of its suitability to accommodate the volumes of traffic that use the road whilst maintaining the need for on-street parking and also due to the perceived speed of traffic using the road. Victoria Avenue links with the main highway network at its junction with Les Banques. This junction is substandard in terms of both road width and the visibility splay in the direction of oncoming traffic for drivers attempting to exit Victoria Avenue when vehicles are parked in the un/loading bay located outside the adjacent retail premises. It is also difficult for drivers to exit south onto the seafront and when exiting to the north they are faced with a zebra crossing.

There are some traffic management and road safety concerns regarding Victoria Avenue and its exit onto Les Banques. However, given the existing use of this site for residential development there would be no particularly significant concerns provided that the scale of any proposed development in terms of generated vehicular movements does not exceed that of the existing development on the site.

There is consequently a compelling argument that the density and consequent car parking provision associated with any redevelopment of the site, having regard to the type of residential accommodation envisaged by the Housing Department in this case (one-bed units, specifically targeted to accommodate older single people and couples), should be limited such that vehicular movements are no greater than at present with the existing development on the site (which consists of 2 and 3 bedroom accommodation housing families where vehicle ownership is often far more than one per household, and notwithstanding that there is no dedicated off-road parking on the site at present).

Should proposed vehicular movements exceed the existing, a Traffic Impact Assessment may be required.

# Accessibility and Transport

The accessibility of the site for those without a car and for whom walking is difficult is not particularly good. However, for those residents that are able to travel the quarter of a mile down Victoria Avenue to Les Banques the accessibility of public transport and facilities for walkers and cyclists is very good.

The nearest bus stop is located on the seafront. Frequency of service for persons wanting to travel to Town or the Bridge during the daytime is approximately every 15 minutes. Cycling and pedestrian needs are well served once residents have negotiated crossing Les Banques.

In the case of walkers there are also already established, public pedestrian routes accessing the Bouet to the south.

#### Archaeology / Chateau des Marais

The site is next to the Château des Marais, one of the most important of Guernsey's ancient monuments. The perimeter of the site abuts the perimeter of the outer bailey of the medieval castle. The Château was built on a hougue which rises from the surrounding marais, or marsh. The marais would not have been suitable for settlement, but people would have needed to come to and from the hougue and it is likely that trackways of some kind crossed the marais. The wet nature of the soil in this area could also help to preserve organic remains such as wood or fabric and also environmental evidence, such as pollen and insect remains; these can tell about past landscapes.

A recently identified group of standing stones has its southernmost point close to the site to which this brief relates. These probably represent either prehistoric or medieval land division and it is quite possible that more once existed. They may be associated with the Château itself.

Part of the site, particularly that closest to the Château, has remained undeveloped to this point, and it is therefore likely that if there is any archaeology here it will survive.

In view of the extreme sensitivity of the area, an archaeological excavation should take place in advance of any major building works on the site. This investigation would be likely to be concentrated in the southern part of the site, which has remained hitherto undeveloped. A watching brief would thereafter be required during any groundworks.

# Sewage Treatment Works

The Public Services Department has indicated that land to the south may be considered in the future for the construction of a sewerage and wastewater treatment facility. Reference is made to Billet d'Etat I, 2006 which confirms, inter alia, that: "Using the latest technology full treatment may now be achieved on a site of 3.7 vergees (6,000 square metres)." "To make maximum use of existing sewerage infrastructure and avoid significant additional cost, the site must be located as close to the existing Belle Greve Headworks as is practical". "If a sewage treatment plant can not be constructed on land adjacent to the existing headworks, a suitable site may have to be purchased, reclaimed from the sea or identified from other land in public ownership, with due regard to the impact on neighbouring properties".

It therefore appears possible that land to the south of the site subject of this Development Brief might, by virtue of its proximity to the existing headworks, potentially be considered at some time in the future for the development of a sewerage and wastewater treatment facility. It would be prudent for a landscaped buffer zone to be provided along the southern boundary of this site as part of any proposed redevelopment for residential purposes not only for landscape enhancement as described elsewhere in this brief, but also in order to mitigate any potential adverse amenity impact in the event that such a possible future development is pursued.

# Flooding

Although there is no history of the site of the existing States flats flooding, the north-eastern part of the site is within an area known to be prone to flooding, along with much of Victoria Avenue and adjacent properties to the east of the site. The lowest part of the site is about 4.0m above datum, i.e. at least 1.0m below sea level of the higher spring tides. (See plan below)

The fields to the west of the site and some other fields upstream towards the Pitronnerie Industrial Estate also have a tendency to flood during periods of heavy rain.

The potential for flooding and any necessary mitigation should be taken into account in the development of proposals for this site.



The High voltage substation serving the area is situated within the proposed redevelopment site (marked Victoria Avenue 0433) and Guernsey Electricity request that the location be retained in future proposals. Attention is also drawn to a high voltage cable in land to the east of the site (north of existing flats 31-38) that may influence building location. (See Plan above)

Early notification of any proposal to alter the existing road layout is requested by Guernsey Electricity due to current issues regarding formalisation of "wayleave" rights.

#### Open space and landscape.

A management plan for the Château des Marais site was drawn up on behalf of the former Board of Administration. The château site is a Site of Nature Conservation Importance in the UAP. Land immediately to the south of the site to which this brief relates, whilst not within the designated Site of Nature Conservation Importance, is classed along with the SNCI areas as an Area of Landscape Value. This is described in the Management Plan as a "Green Play Area" and is a raised field of semi-improved grassland. This forms an important part of the overall site, which includes a large wet meadow and woodland habitat and is managed by the Environment Department as a Nature Conservation Area.

The "Green Play Area" has considerable potential, given the right investment, in terms of both recreational space and improving the nature conservation potential of the site. The Department's Environmental Services Unit would be keen to be involved in the formulation of proposals to improve this area. For example, there is potential for a pathway to be installed which could link the Victoria Avenue development with the Bouet. Tree planting schemes could also help to improve the area in terms of both screening development and improving the habitat value afforded by the existing woodland.

There is also potential for some provision of recreational amenities in this area, subject to sponsorship/funding in relation to provision and ongoing maintenance costs. The management of some of this area could also be changed to the benefit of wildlife, for example through the creation of a wildflower meadow.

Similarly, the Culture and Leisure Department, which is responsible for the Château des Marais fortification and ramparts, is of the view that there is an opportunity to bring more prominence and access to the Château des Marais and the surrounding area as part of the development process. Residents of the area have a high regard for the green space, in itself an important environmental area, and for the Château itself as a feature of the landscape and of their enjoyment of the area for walking, etc. The Culture and Leisure Department has indicated that it would be happy to assist, at the planning stage, with any initiative designed to improve access, perhaps including parking for visitors, and interpretation and signage, etc, that would improve the current position.

# Landfill and pollution

The Environmental Health Department (EHD) confirms that the site is in close proximity to the Victoria Avenue landfill site, a site that is currently producing landfill gas which may cause concern for any future development. EHD considers that any proposed development should use a risk-based approach as set out in the UK Department of the Environment, Planning & Pollution Control, PPG23. Any developer should be made aware of the potential for the site to pose a risk and they should undertake suitable risk assessments accordingly, particularly with reference to the migration of landfill gas. The outcome of these risk assessments may influence the type of development proposed, or be used to recommend or otherwise control, any potential remedial works, before certain forms of development can take place. It is also recommended that any investigations for the assessment of risk should follow the British Standard 10175:2001, Investigation of potentially contaminated sites-Code of Practice. Having assessed the risks to development it may be appropriate for any approved development to be guided by the Construction Industry Research Association (CIRA) document "C552 – Contaminated land risk assessment. A guide to good practice".

The control of the landfill rests with the Public Services Department, who should be contacted for information concerning the above, including monitoring data for landfill gas.

#### Water Issues

The site is situated adjacent to a controlled stream within the Marais Stream catchment area and in this respect the following pollution prevention measures must be addressed as part of any development:

- Oil Installations. Any oil installation must fully comply with Section 4 (1) (c) of "The States Water Supply (Prevention of Pollution) Ordinance, 1966". Guernsey Water will require details regarding any proposed oil installation particularly any installation which may be installed below ground.
- Surface Water Drainage. Any car parking area, dependent on the number of parking spaces, must drain via an approved oil interceptor prior to discharging into any stream, surface water drain or soakaway.

Mains Water Supply. It is not envisaged that any new development works will impact on Guernsey Water's ability to provide mains water to the development. However, it is advised that the developer contacts Guernsey Water at a later planning stage to discuss any proposed layout of water service pipework.

A Permit will be required from Guernsey Water under the "States Water Supply (Prevention of Pollution) Ordinance, 1966" and "The Prevention of Pollution (Guernsey) Law, 1989".

#### Crime Prevention

The Guernsey Police Architectural Liaison Officer/Crime Prevention Design Advisor advocates achieving a balanced approach towards the design whilst endeavouring to reconcile the need for a high quality environment that is safe, secure and sustainable.

It is suggested that reference should be made to the UK Office of the Deputy Prime Minister publication "Safer Places, The Planning System and Crime Prevention", which puts Crime Prevention and community safety on the planning agenda and which "best practice" suggests is a useful framework on which to base sound practical judgements.

The Police advisor recommends that adherence to the national Certification scheme, "Secured by design", which is promoted by the Association of Chief Police Officers and supported by the UK ODPM would ensure the most effective integration of these principles into the plans for this site. "Secured by design" certification is awarded in recognition of a satisfactory standard in security design.

#### Retail Element

Consideration has previously been given by the Housing Department to providing a "corner shop" type retail facility at the site. This raises a planning policy issue and can only be considered on a demonstrably exceptional basis, with substantial justification provided to rebut the normal presumption that the provision of further new retail developments (other than at Admiral Park) on sites away from the Central Areas of Town and The Bridge will be resisted. Consequently any proposal for development of this site that proposes the incorporation of a retail element will need to demonstrate the exceptional circumstances upon which that proposal is based.

# Constables' Views

The Constables of St Sampson have expressed concern regarding any significant increase in the density of housing in this location, having regard to traffic (particularly Victoria Avenue/Les Banques junction), parking problems in the area (particularly on-pavement parking which blocks both pavements and roads and creates safety and access problems – including for pedestrians and refuse collection), and refuse collection (including access for refuse collection lorries (there is a request to ensure that roads within the site are large enough, including turning areas, for lorries to enter and exit without reversing) and the type of bins to be used).

# **DEVELOPMENT GUIDELINES**

#### Access and Traffic

As detailed above, Victoria Avenue has a difficult traffic management history that will have a bearing upon the density of development on the site and consequent car parking provision within the site. Should proposed vehicular movements exceed the traffic movements associated with the existing development on the site, a Traffic Impact Assessment may be required.

Vehicular access to the site will be from Victoria Avenue and should be designed to achieve satisfactory access design, including the provision of adequate sightlines in the direction of oncoming traffic (i.e. 33 metre sightline in the direction of oncoming traffic). As in the existing road arrangement, there is scope to provide a "through route" configuration for any proposed development, with two access / egress points onto Victoria Avenue. This could also encourage continued public permeability of the site (see below). Alternatively, a single access / egress point could serve a core / main street serving secondary spurs / spaces, and terminating at a "destination" point / turning area (for example the possible provision of a shared, informally landscaped parking area serving visitors to the site and to Chateau des Marais).

The general provision of access, parking and garaging (if proposed) shall be carefully considered in order to protect the overall character and interest of the site, for example adopting an "informal approach" to parking areas, avoiding large areas of hard surfacing and using existing and enhanced landscaping to soften the impact of car presence. Vehicular access within the development shall be of minimum width commensurate with the safe passage of traffic, and shared surfaces with pedestrian priority should be used where it is practical to do so.

As stated in "Context" above, the site currently enjoys good public permeability with easy access to and from the Chateau des Marais and the Bouet beyond. A second access at the south east of the site, although currently blocked off, was also a long established route to and from the open land to the south of the site and through to the Bouet. This offers further opportunity for good pedestrian links via the recently developed "Rue des Marais" housing development which itself incorporates good, through pedestrian routes. Any development proposal for this site must demonstrate that good public pedestrian access and thoroughfare will be retained and, where appropriate, enhanced in any development proposal for this site.





#### Landscape Strategy and Nature Conservation Requirements

Existing trees on a development site can be a major asset, providing, for example, an immediate appearance of maturity. However, excessive retention of trees can also be an undue constraint on the development of a site and potentially detract from the amenity of subsequent occupiers.

The plans and table attached at Annex 3 illustrate a survey of existing trees, their type, viability and relative importance. Areas of protection required if those trees are to be retained are defined within that annex.

The constraints (both roots and above ground) posed by existing trees are plotted on the tree constraints plan (TCP) within this Brief. Of the existing trees, 10 are identified as Category A – Trees of High Quality and Value, and every effort should be made to retain these. In particular, tree 48 (Turkey Oak) is strategically important in relation to views along Victoria Avenue. While Category B or C trees within the site may not be of sufficiently high quality or value as to dictate any design or layout, many are worthy of retention. The TCP should therefore be used to inform site layout design.

General areas where new structural planting could provide the greatest benefit are also indicated on the TCP, and where possible should be incorporated into the site layout design.

Existing trees and planting should also be reinforced by additional planting. In this respect a comprehensive, high quality landscape scheme will be required for the site presenting positive enhancement of the general locality as well as contributing to the creation of pleasant living spaces within the site. The scheme should include areas of protection for existing trees as defined in Annex 3, as well as similar protection for proposed tree planting areas to protect the existing soil structure.









#### Density and General Form of Development

The density and form of development shall be designed in conformity with the relevant guidelines set out elsewhere in this brief to assimilate with the overall character of the surroundings, and having regard to the access and traffic considerations outlined above. New buildings should be no higher than two storey in height.

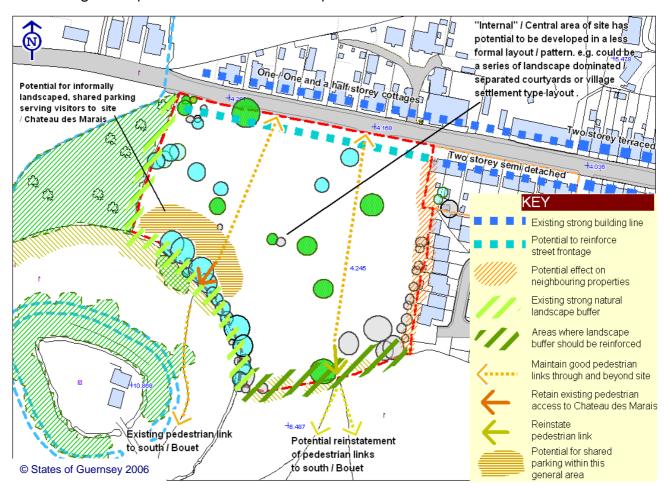
The majority of accommodation provided should be no more than two bedrooms per home (i.e. 4 habitable rooms or less).

Adequate amenity space/outlook and parking shall be provided within the development to conform to normal standards (see also in this regard relevant extracts from the Urban Area Plan at Annex 1 and Annex 2 of this document). Issues such as refuse storage and disposal shall be considered at an early stage in the design process.

#### Layout of Development

The site is located within a Settlement Area bounded to the south and west by important Areas of Landscape Value and Sites of Nature Conservation Importance. As referred to above the site itself currently makes a significant contribution to the character and amenity of the area by providing a useful transitional buffer between these latter areas of natural beauty and the urban forms of development in the Settlement Areas to the north and east. As a general rule, this character contribution should be maintained and enhanced where possible.

The layout of the development shall be carefully designed to create a high quality residential environment both in its containment and creation of spaces and in reflecting, maintaining and enhancing where possible the natural landscape attributes of the site.



Frontage development to Victoria Avenue has the potential to reinforce street alignment and "containment." Any such development should not exceed two storeys in height and may even be lower towards its western end, reflecting existing lower development to the north and again providing a transitional element towards the west. Given the "avenue" designation of the street, it may also be worth contemplating the planting of an avenue of trees along this frontage.

Within the site proposals should aim to create cohesive, well contained and high quality spaces, albeit there is potential to adopt a less formal layout than nearby urban patterns. For example a series of pleasant, landscape-dominated / separated enclos or courtyards could capitalise on the site's natural features. Again any such development should be no higher than two storey in height and should be designed to create high quality, pleasant spaces, engendering a distinctive sense of place. This approach could be achieved using either of the access solutions suggested above (see Access and Traffic above).

Also, as mentioned above, there is potential within the site to make provision for a shared, informally landscaped parking area close to the entrance to Chateau des Marais, for use by visitors to either the site or to the Chateau des Marais.

The design of any scheme should also consider the need to create a high quality environment that is safe and secure. Crime prevention principles set out within the "Secured by Design" initiative, as promoted by the Association of Chief Police Officers and supported by the U.K.'s Office of the Deputy Prime Minister, is an established and appropriate reference point in this respect and should be taken into account in any proposed layout design. Key aspects of "Secured by Design" of potential relevance to the layout and permeability of development on this site would be avoiding linking culs de sac by footpaths, avoiding back access footpaths and making sure that all roads and footpaths, including through footpaths, are properly covered by natural surveillance (e.g. overlooked by living rooms and designed to be regularly used / busy).

Access, parking and garaging (if proposed) shall be carefully considered to respect the overall character and interest of the site. The provision of appropriate pedestrian routes through the site will be encouraged (see Access and Traffic above).

# **Neighbour Amenity**

The development shall be carefully designed to protect the amenities that occupiers of adjoining residential properties might reasonably expect to enjoy. Particular care will need to be taken regarding the relationship of new development to existing properties adjoining the site.

#### Archaeology

(see also "Archaeology / Chateau des Marais" above)

In view of the extreme sensitivity of the area, as described previously in this brief, an archaeological excavation should take place in advance of any major building works on the site. This investigation would be likely to be concentrated in the southern part of the site, which has remained hitherto undeveloped. A watching brief would thereafter be required during any groundworks.

#### Flooding

(see also "Flooding" above)

The potential for flooding and any necessary mitigation should be taken into account in the development of proposals for this site.

# Landfill and pollution

(see "Landfill /pollution" above)

The advice of the Environmental Health Department as set out in the earlier section of this brief relating to landfill and pollution should be taken into account in the development of proposals for this site.

# Services and Infrastructure

(see "Electricity Board Issues" and "Water Board Issues" above.

The matters described in the earlier sections of this brief relating to Electricity Board and Water Board issues should be taken into account in the development of proposals for this site.

# Parking standards

The parking standards apply to both new build and change of use applications. They are not inflexible. Variations will be allowed depending on the individual characteristics of each site. The criteria for assessment will include:

- the built environment
- on street parking capacity and proximity to public car parks
- · access and amenity implications for other residents
- highway safety
- · type of development proposed
- · accessibility to the Central Areas by foot or bicycle
- · level of public transport provision

All floor area relates to gross floor area (GFA) or, where stated, public floor area (PFA). Policies GEN9, HO4, EMP3, 6, 7, 11, 13, 14, and 15, CEN1 and 6, and SCR6 of the Plan refer specifically to parking standards.

Type of	Standar	d Required
Development	Central Areas	Rest of Plan
HOUSING		
Less than 3 habitable rooms	Assessed on merits	1 space per dwelling
3 to 4 habitable rooms	1 space/dwelling	space/dwelling allocated to the dwelling plus is space per dwelling in the form of adjacent communal parking.
5 to 6 habitable rooms	spaces per dwelling allocated to the dwelling plus 1 space per dwelling in the form of adjacent communal parking	2 spaces per dwelling allocated to the dwelling
Above 6 habitable rooms	2 spaces per dwelling allocated to the dwelling plus 1 space per dwelling in the form of adjacent communal parking	3 spaces/dwelling allocated to the dwelling.
Sheltered housing	8 space/10 dwellings (of which at least 1 space/2 dwellings to be provided as adjacent communal parking) + 1 space for warden	8 space/10 dwellings (of which at least 1 space/2 dwellings to be provided as adjacent communal parking) + 1 space for warden
Hostels and residential establishments	Assessed on merits	1 space/3 occupants
RETAIL		
Shops	Assessed on merit	1 space/20 sq metres
Public houses/ Restaurants	Assessed on merit	1 space/8 sq metres PFA
OFFICES		
Professional services	Assessed on merits	1space/70 sq. metres
Other offices	1 space/100 sq metres	
INDUSTRIAL PREMISES		
General developments	Assessed on merit	1 space/50 sq metres
Wholesalers	1 space/25 sq metres up to 200 sq metres and 1 space for every succeeding 30 sq metres	1 space/20 sq metres
Distribution warehousing	1 space/50 sq metres	1 space/50 sq metres

OTHERS		
Hotels	1 space/bedroom and provision for restaurants, bars, function rooms	space/bedroom and     provision for restaurants,     bars, function rooms
Function Rooms	Assessed on merit	1 space/4 sq metres PFA
Cinemas/Theatres	Assessed on merit	1 space/30 sq metres PFA
Churches/Halls	Assessed on merit	1 space/20 sq metres PFA
Medical Health Centres	4 spaces/consulting room plus 1 space/2 staff members	4 spaces/consulting room plus 1 space/2 staff members
Others (not specified)	Assessed on merit	Assessed on merit
SPECIAL		
NEEDS		
- parking		
spaces		
for disabled		
people		
people Employment premises	1 space where total space is 10-20 2 space where total space is 20-50 5% of total spaces, where total is 50-200 2% plus 6 spaces, where total is 200+	
Employment	2 space where total space is 20-50 5% of total spaces, where total is 50-200	

Cycle parking provision will be sought in conjunction with new developments, both for employees, and the public as appropriate. For retail, commercial and industrial premises, as well as places of assembly it is recommended that one secure (loop type) cycle parking stand be provided for every 10 car parking spaces. A higher level of provision may be appropriate for facilities likely to attract a high number of trips by cycle. All long stay cycle parking (ie. that provided for residents or employees as opposed to shoppers, users of leisure facilities, etc) should be both covered and secure where this is practical and possible. Where spaces are to be provided for customers, visitors or the public, these should be located in a convenient location with good visibility. The standards relate to "Sheffield" racks (or similar).

PFA	- public floor area.	
Communal parking	- provision within the proposal dedicated to the development concerned.	

# Residential amenity guidelines

# What are residential amenity guidelines?

They are flexible guidelines to ensure that residential development provides the occupants with a satisfactory quality of living environment.

Policies HO7, HO9, EMP2 and SCR6 of the Plan refer specifically to 'residential amenity'. Several other policies refer to the more general concept of 'amenity'.

You will note that no rigid standards are set. This is because the IDC believes that the imposition of strictly enforced standards does little to encourage innovation and often results in bland, regimented developments taking place. All cases should be treated on their individual merits with, of course, full reference to the policies of the UAP and to the characteristics of the site and its surroundings.

For example, an upper floor flat in the centre of Town will not normally be able to achieve the same level of amenity as a large detached family house on the edge of Town. Similarly, a dwelling resulting from a conversion or change of use of a building not originally designed for residential use would not be likely to have the same level of amenity provision as a purpose built dwelling. The location, original design of buildings and the density, urban grain and general form of neighbouring developments all have a significant bearing on the scale and nature of amenity provision for any given dwelling.

The lack of specified standards does not mean that the IDC will tolerate poor development forms with insufficient amenity space nor those that would result in unacceptable overlooking, overshadowing or loss of outlook. These guidelines will help to ensure that new developments are planned and built to offer a comfortable and healthy living environment without harming the amenities of neighbours.

# The amenity objectives

Amenity objectives relate to those basic conditions that can make life more pleasant for occupants of housing. The IDC has specific objectives relating to; - privacy, outlook, open space, and daylight.

# Privacy

Privacy afforded by habitable rooms and in particular, main living rooms and private sitting-out areas should be protected from other dwellings and from people using public areas. This can usually be achieved through good design principles.

# Outlook / Open Space

All forms of housing should have easy access to some form of open space. This may take the form of a garden, balcony or, particularly in the case of flats, a pleasant outlook. A combination of these may also be acceptable.

Walled patios or private courtyards may be considered where there is only limited space available.

The availability of nearby informal recreational areas may be taken into account when looking at the suitability of open space provision, particularly in the case of flats in the Central Areas.

# Daylight

All dwellings should be able to receive an adequate amount of daylight within habitable rooms. It is also important that new developments do not result in insufficient daylight for existing dwellings.

The IDC does not, however, expect all dwellings to have rooms that receive direct sunlight, although attempts should be made to try and ensure that a principal room, garden, balcony or communal open space can receive direct sunlight, if at all possible.

# How can the objectives be achieved?

The easiest way to comply with the amenity objectives is to ensure that the design and layout of the building itself incorporates sensible measures to provide and protect the amenities of occupiers and neighbours alike. This is known as a 'design solution' and should always take preference over less satisfactory ways of achieving the objectives such as screen fencing or simply placing buildings a minimum distance from each other.

There are various ways in which the objectives can be met, with the most appropriate option being determined by the particular site characteristics and the surroundings. It may be the case that a combination of measures is required or even an innovative solution to overcome a unique problem. Given below are some of the more common methods of securing the amenity objectives through design solutions; -

- Direct views of the habitable rooms and private open space of neighbouring dwellings can be avoided by the careful location and orientation of habitable room windows and balconies.
- Adequate 'interface' distances, increasing the distance of windows and doors from boundaries, screening or high-level windowsills can be used where capable of being integrated in the overall design. The use of obscure glazing alone to achieve privacy will not, normally be considered to be acceptable.
- Locating active areas such as play equipment and pools away from the habitable rooms of neighbouring dwellings, and ensuring that quiet areas such as bedrooms are located away from potential sources of noise can reduce disturbance.
- It will usually be possible to ensure that garden areas and at least one main window receive sunshine during at least part of the day and that new developments do not result in permanent shade.
- Gardens will be more private if they are situated to the rear or, where appropriate the side of the dwelling.
- Well designed and generously proportioned interiors with a pleasant outlook can sometimes compensate for limited outdoor amenity spaces and vice versa.
- The orientation and internal layout of individual dwellings can help to maximise the amount of daylight within habitable rooms as well as helping to achieve an adequate level of privacy.
- Developments involving flats should include secure, covered storage facilities and enclosed refuse storage within the grounds. Such facilities should form part of the integral design of the development.

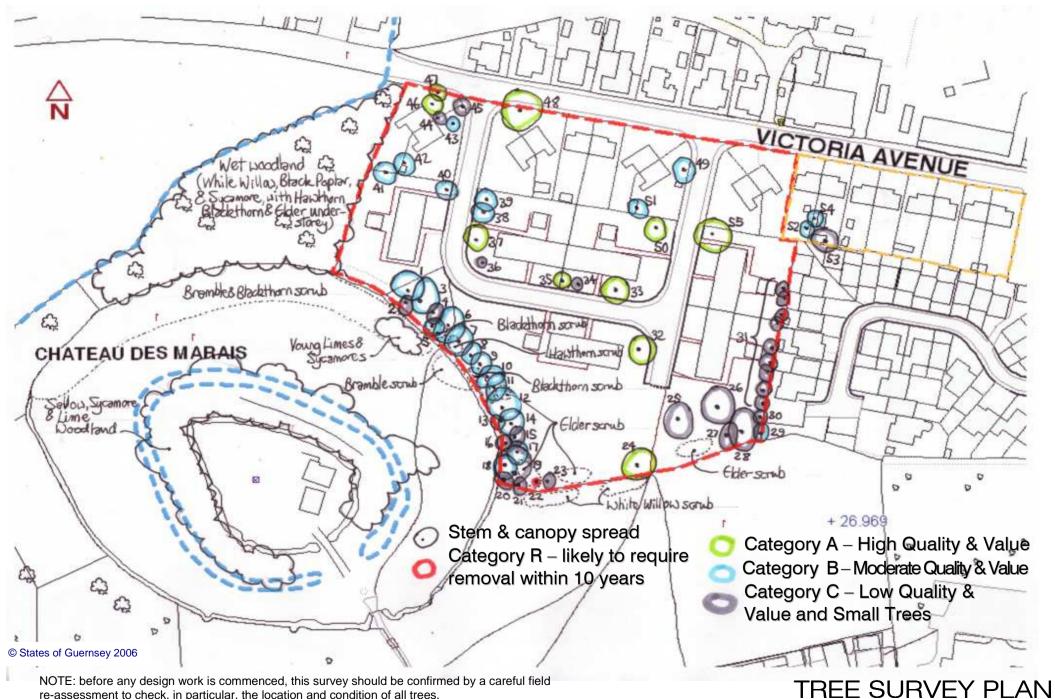
#### **End Note**

These amenity objectives should not be taken out of context. Instead, they must form an integral part of the thought process behind all residential development schemes if they are to be successful.

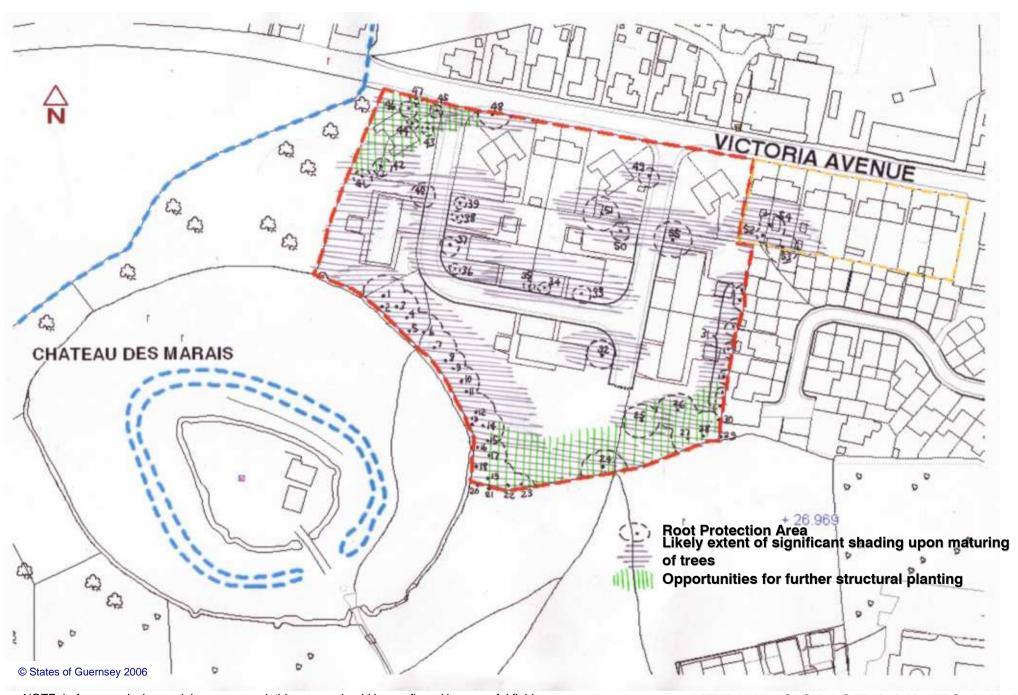
Innovation and novel design solutions will be encouraged in order to achieve the various objectives without resulting in bland, uniformity of development.

If you are planning an extension to your home, it may be helpful if you talked through the proposals with your neighbours first, in order to iron out any potential amenity conflict.

Officers of the IDC will be happy to offer advice and guidance on your proposals, before you submit an application for planning permission.



re-assessment to check, in particular, the location and condition of all trees.



NOTE: before any design work is commenced, this survey should be confirmed by a careful field re-assessment to check, in particular, the location and condition of all trees.

TREE CONSTRAINTS PLAN

# **Tree Survey Schedule, Land at Victoria Avenue**

Tree No.	Species	Height (metres)	Stem diameter (mm)	Canopy spread (metres)	Height of crown clearance (metres)	Age class	Condition	Preliminary recommendations	Estimated remaining years	Category
1	Populus nigra var (Hybrid Black Poplar)	16	600	N 7 E 4 S 3 W 7	1	middle aged	Good	No pruning needed	>40	В
2	Fraxinus excelsior (Common Ash)	12	300	N 0 E 2 S 4 W 1	2	young	Growing to S, with co-dom stems at 2m	Remove co-dom stem	>40	С
3	Populus nigra var (Hybrid Black Poplar)	16	600	N 8 E 6 S 5 W 3	2	middle aged	Good	No pruning needed	>40	В
4	Fraxinus excelsior (Common Ash)	10	200	N 3 E 3 S 3 W 1	1.5	young	Damaged crown, with dom branch to NE forming new crown	Crown lift?	>40	С
5	Fraxinus excelsior (Common Ash)	12	250	N 3 E 3 S 3 W 4	2	young	Good	No pruning needed	>40	В
6	Populus nigra var (Hybrid Black Poplar)	14	600	N 7 E 6 S 6 W 4	1	middle aged	Good	Crown lift?	>40	В
7	Populus nigra var (Hybrid Black Poplar)	14	600	N 5 E 4 S 5 W 3	1.5	middle aged	Good	Crown lift?	>40	В
8	Populus nigra var (Hybrid Black Poplar)	14	500	N 3 E 3 S 3 W 2	2.5	middle aged	Good	No pruning needed	>40	В

Tree No.	Species	Height (metres)	Stem diameter (mm)	Canopy spread (metres)	Height of crown clearance (metres)	Age class	Condition	Preliminary recommendations	Estimated remaining years	Category
9	Fraxinus excelsior (Common Ash)	10	300	N 3 E 4 S 3 W 3	1	young	good	No pruning needed	>40	В
10	Populus nigra var (Hybrid Black Poplar)	14	500	N 4 E 4 S 5 W3	1	middle aged	Good	No pruning needed	>40	В
11	Fraxinus excelsior (Common Ash)	10	300	N 5 E 4 S 4 W 1	1.5	young	Good	No pruning needed	>40	В
12	Populus nigra var (Hybrid Black Poplar)	14	600	N 6 E 5 S 6 W 5	2	middle aged	good	No pruning needed	>40	В
13	Alnus glutinosa (Common Alder)	5	100	N 0 E 1 S 2 W 2	1	young	Over- shadowed: growing to SW	No pruning needed	>40	В
14	Populus nigra var (Hybrid Black Poplar)	14	600	N 5 E 3 S 3 W 5	1	Middle aged	Good	No pruning needed	>40	В
15	Fraxinus excelsior (Common Ash)	8	150	N 4 E 2 S 2 W 1	0	young	Several co- dom stems	Thin to single dominant stem	>40	С
16	Alnus glutinosa (Common Alder)	5	100	N 0 E 1 S 2 W 2	1	young	Over- shadowed: growing to SW. Limb from adjacent tree hung in crown	Remove hung limb from adjacent tree, if retained	10 - 20	С
17	Populus nigra var (Hybrid Black Poplar)	14	500	N 3 E 3 S 4 W 3	2.5	Middle aged	Minor storm damage to crown	No pruning needed	>40	В

Tree No.	Species	Height (metres)	Stem diameter (mm)	Canopy spread (metres)	Height of crown clearance (metres)	Age class	Condition	Preliminary recommendations	Estimated remaining years	Category
18	Populus nigra var (Hybrid Black Poplar)	15	500	N 3 E 4 S 4 W 3	2.5	Middle aged	Good	No pruning needed	>40	В
19	Salix Alba (White Willow)	12	900 at base (multiple stems	N 8 E 2 S 4 W 7	3	Over mature	Decay at base	Check for safety & prune accordingly	<10	С
20	Alnus glutinosa (Common Alder)	4	200	N 1 E 3 S 3 W 2	1	young	Over- shadowed: growing to S	No pruning needed if retained	10 - 20	С
21	Fraxinus excelsior (Common Ash)	5	150	N 0 E 1 S 2 W 1	1	young	Over- shadowed: growing to S Co-dom stems at 1.5m	Thin to single dominant stem	>40	С
22	Salix Alba (White Willow)	10	800 at base (multiple stems)	N E S W		Over mature	Multiple stems, collapsed into other trees	Remove	Dead?	R
23	Populus nigra var (Hybrid Black Poplar)	13	300	N 2 E 2 S 2 W 0	0	Middle aged	Wind- scorch/die back on NW side	No pruning needed if retained	20 - 40	С
24	Populus nigra var (Hybrid Black Poplar)	14	600	N 5 E 5 S 5 W 5	0	Middle aged	Good, but with steel post embedded at base	No pruning needed. Grind off steel post at base	>40	A
25	Salix X chrysocoma (?) (Weeping Willow)	8	500	N 5 E 5 S 7 W 4	0	Middle aged (Planted ca 1981)	Decay in trunk with major lean to SW	Check for safety & prune accordingly	10 - 20	С
26	Salix X chrysocoma (?) (Weeping Willow)	8	600	N 7 (touches building) E 5 S 5 W 6	1	Middle aged (planted ca 1981)	Minor decay in trunk	Contorted trunk and branches. Check for safety & prune accordingly	20 - 40	С

Tree No.	Species	Height (metres)	Stem diameter (mm)	Canopy spread (metres)	Height of crown clearance (metres)	Age class	Condition	Preliminary recommendations	Estimated remaining years	Category
27	Populus nigra var (Hybrid Black Poplar)	14	500	N 5 E 2 S 3 W 2	3	Middle aged	Wind damage to crown. Steel stake embedded at base	Remove hanging branches from crown, grind off steel stake	20 - 40	С
28	Salix Alba (White Willow)	12	900 at base (multiple stems)	N 8 E 5 S 7 W 6	0	Over- mature	Fungus at base, tree collapsing slowly	Check for safety, and prune accordingly	20 - 40	С
29	Populus nigra var (Hybrid Black Poplar)	13	300	N 2 E 2 S 3 W 1	3	Middle aged	Good	No pruning required	>40	В
30	Populus nigra var (Hybrid Black Poplar)	10	300	N 3 E 2 S 1 W 1	2	Middle aged	OK. Previously pollarded at 8m and 8.5m	No pruning needed at present, if retained: reassess by 2011.	>40	С
31	Row of 10no Cornus sanguinea (Dogwood)	Av 6	Av 150	N - E - S - W -	Av 2	Middle aged	Some wind scorch, and vandalism damage	No pruning needed if retained	10 - 20	С
32	Alnus cordata (Italian Alder)	10	400	N 4 E 5 S 4 W 4	2	Young (planted ca 1981)	Good, with balanced conical form	No pruning needed	>40	A
33	Fraxinus excelsior (Common Ash)	8	250	N 4 E 3 S 3 W 4	1.5	Young (Planted ca 1981)	Good	No pruning needed	>40	A
34	Fraxinus excelsior (Common Ash)	5	100	N 1 E 1 S 1 W 2	1.5	Young (Planted ca 1981)	Poor form, co- dom stems, torn off branches, etc. Wound-wood developing	Thin to single dominant stem	>40	С

Tree No.	Species	Height (metres)	Stem diameter (mm)	Canopy spread (metres)	Height of crown clearance (metres)	Age class	Condition	Preliminary recommendations	Estimated remaining years	Category
35	Fraxinus excelsior (Common Ash)	6	150	N 3 E 3 S 2 W 3	1.5	Young (planted ca 1981)	Good	No pruning needed	>40	A
36	Fagus sylvatica purpurea (Copper Beech)	3	50	N 1 E 1 S 0 W 1	2	Young (Planted ca 1981)	Stunted form	No pruning needed if retained	>40 (as stunted form)	С
37	Fraxinus excelsior (Common Ash)	8	200	N 5 E 4 S 4 W 4	1.5	Young (planted ca 1981)	Good, but with some poor pruning to lower branches	Re-prune lower branches	>40	A
38	Fraxinus excelsior (Common Ash)	7	150	N 3 E 3 S 2 W 4	2	Young (planted ca 1981)	Some wood exposed – stripped bark and torn off branches	No pruning needed. Good wound wood development	>40	В
39	Fraxinus excelsior (Common Ash)	6	150	N 2 E 3 S 3 W 3	2	Young (Planted ca 1981)	Good, some minor broken branches	no pruning needed	>40	В
40	Alnus cordata (Italian Alder)	10	400	N 3 E 4 S 4 W 4	2.5	Young (planted ca 1981)	OK, with some bark canker	No pruning needed	20 - 40	В
41	Acer pseudoplatanus (Sycamore)	7	300	N 4 E 4 S 3 W 3	1	Middle aged	Good	No pruning needed	>40	В
42	Cupressus macrocarpa "Lutea" (?) Golden Cypress	6	Est 300	N 3 E 3 S 3 W 3	1	young	Good	No pruning needed	20 - 40	В
43	Salix X chrysocoma (?) (Weeping Willow)	6	150	N 2 E 2 S 2 W 2	1	young	Good	No pruning needed	>40	В

Tree No.	Species	Height (metres)	Stem diameter (mm)	Canopy spread (metres)	Height of crown clearance (metres)	Age class	Condition	Preliminary recommendations	Estimated remaining years	Category
44	Acer pseudoplatanus (Sycamore)	6	150	N 2 E 2 S 1 W 1	1	young	Good, but growing directly against house wall	Remove if house is retained, or <i>vice versa</i> No pruning needed	>40	С
45	Prunus cerasifera "Pissardii" (Purple–leaved Plum)	5	150	N 2 E 2 S 2 W 2	2	Middle aged	good	No pruning needed if retained	10 - 20	С
46	Betula pubescens (Hoary Birch, Common White Birch)	7	200	N 3 E 3 S 3 W 3	2	Middle aged	good	No pruning needed	20 - 40	A
47	Betula pubescens (Hoary Birch, Common White Birch)	6	150	N 2 E 2 S 2 W 2	2	Middle aged	good	No pruning needed	20 - 40	A
48	Quercus cerris (Turkey Oak)	10	500	N 5 E 7 S 7 W 6	4	Middle aged	Good (some pruning cuts callusing well)	No pruning needed	>40	A
49	Prunus "Kanzan" (Japanese Ornamental Cherry)	5	300	N 3 E 3 S 3 W 4	2	Middle aged	good	No pruning needed	10 - 20	В
50	Fraxinus excelsior (Common Ash)	7	200	N 3 E 3 S 3 W 3	2	young	good	No pruning needed	>40	A
51	Cupressus macrocarpa (Monterey Cypress)	10	600 (at base)	N 3 E 3 S 2 W 2	1	Middle aged	Multiple stems from base	No pruning needed	20 - 40	В
52	Salix X chrysocoma (?) (Weeping Willow)	6	200	N 2 E 2 S 2 W 2	1	young	good	No pruning needed	>40	В

Tree No.	Species	Height (metres)	Stem diameter (mm)	Canopy spread (metres)	Height of crown clearance (metres)	Age class	Condition	Preliminary recommendations	Estimated remaining years	Category
53	Populus alba (White Poplar)	7	400	N 4 E 4 S 2 W 4	2	Middle aged	Good, except for some pollarding to S	Check and re-prune pollarded branches as necessary	20 - 40	С
54	Cupressus macrocarpa (Monterey Cypress)	6	400 (at base)	N 2 E 2 S 2 W 2	1.5	young	Multiple stems from base	No pruning needed	20 - 40	В
55	Populus nigra var (?) (Hybrid Black Poplar)	15	500	N 5 E 6 S 6 W 5	0	Middle aged	good	Consider crown lifting	>40	A

Survey by AR; date of survey 3/5/06; Trees not tagged; Weather warm and still.

Categorisation of the viability of existing trees in accordance with BS 5837 1991

7

