

Formal planning queries and objections with application ref: BDB / 65185			
KEY	Section A: Planning Statement		
	Section B: Design Statement		
	Section C: Access Statement		
	Section D: Transport Assessment (Jubb)		
	Section E: Acoustic Assessment		
	Section F: Drainage Strategy		
	Section G: Visual Assessment		
	Section H: Other Technical Info		
Nr.	Item	Applicant's comment	Brookvale Community Association objections / suggestions.
Planning statement			
A1	Development plan	3.6 "...Revised development plan.....is more sustainable....and has minimal effect on the local road network"	Thus "minimal" does not equal a signalised car crossing junction.
A2	Parking	4.1	"...Parking strategy (does not) deal with the demand and provision of parking spaces and (does not) avoid use of the site (per Victory Hill Phase 1) by shoppers and commuters" without a parking permit scheme from Day 1.
A3	Parking	4.9	There is no need to have a "dynamic process to monitor and develop over time" parking usage.
A4	Disability Scooter Parking	4.13	To be secure with electric access and to be calculated from 10% of the total site car parking space provision.
A5	Contribution of development to Brookvale / wider town unaddressed	The way in which the development of this site could contribute to the wider town is expressly discussed in the Council's adopted "Central Area Action Plan". This Action Plan is adopted Supplementary Planning Guidance and the developer of this site will be required to meet its objectives.	To be seen if achieved. Not agreed unless demonstrated before approval.
A6	Condition: Continued Community Involvement		BCA to have access to site at any time and to be able to attend monthly liaison meetings to satisfy themselves that the requirements and conditions are being met.
A7	No mention of public art developer contribution/sponsorship with community consultation (VH Phase 1 "artefact" unacceptable)	The Planning Authority has a requirement for "% for art" to be considered and included in new developments where appropriate.	Details awaited, commitment required prior to planning approval. The water fountain near Eastrop park is a great success, cannot the east end of the CWW dev land have a similar piece of public art/open space?
A8	No benefit to Brookvale with already overloaded infrastructure		Bridge over CWW by Village Hall seen as a major benefit to Brookvale. Can be provided by commuting the cost of the signalised crossing into European tender to build bridge.

Design statement		
B1	Overall design	In terms of the overall design of this development we would like to quote CABA's letter to Lisa Souden of 7 Dec 2006. "We regret to say that we can find very little to commend in this proposal, which seems to be a confused assemblage of disparate buildings and maze like road layouts. We can find little to support the claim in the Design and Access Statement that CABA's <i>By Design</i> has informed this proposal"
B2	Competition	The Developer dismissed this criticism in a document received by Development Control on 5 Jan 2007 and suggested, wrongly, that the design "was subject of a successful design competition" . Whereas it was the result of a process of commercial tender.
B3	Block C	In addition to agreeing wholeheartedly with CABA's evaluation we are strongly opposed to block C. Our opposition to block c is on the following grounds:
B4	Block C	Loss of privacy, overshadowing and overlooking existing Victory Hill Residences. The concept of the building has also lost relevance due to the more recent landmark development of Victory Hill and the further development opportunity at Brook House.
B5	Block C	In the developer's consultation response, which contradicts the Landscape & Visual Appraisal, the developer says "It is unlikely that the focal building will have any significant impact upon views attainable from Victory Hill" and ".... That the residents in Victory Hill will not be unduly affected by the proposed focal building."
B6	Block C	In DWH's Landscape & Visual appraisal it states (page 20) Paragraph 9.36 "The additional interruption to views by the taller landmark building (feature block C) is not easily mitigated against" Paragraph 9.38 "There will be interruption to long views from Victory Hill at ground level and from the apartments at ground floor and some at first floor level. The residual effect is considered to be substantial adverse to the apartments affected." Paragraph 9.39 "There will be additional interruption to long views from the eastern part of Victory Hill at ground level and from the ground, first and second floor apartments as a consequence of the taller landmark building (feature block c). This will also cause some interruption to oblique and eastward facing views from apartment blocks further west in Victory Hill. The residual effect is considered to be substantial adverse to the apartments affected."
B7	Block C	Block C is close to two Victory Hill blocks and on it's north facing elevation has bedrooms and lounges which would face existing bedrooms and lounges. The Victory Hill blocks concerned currently have a completely open aspect, and this open aspect and the privacy which goes with it, would be lost to the residents of the two or three floors. Residents of the higher flats will look down on a vast expanse of silver roofing; which is not unlike a factory roof.

B8	Block C		There is a document on file from Lisa Souden which states " Block C should perhaps be a feature building, rather than a landmark building given context of adjoining built form. Need to ensure it relates to remainder of site and does not appear as an isolated, detached building. " We believe that this issue has not been addressed. In the Design and Access Statement the Architect's impressions show that block C is a visually isolated structure that neither blends in with Victory Hill or the proposed development
B9	Block C		The Developer's Landscape and Visual Impact Appraisal states more than once that " the positioning and form of Block C responds directly to the B&DBC requirements for Landmark features at the western and eastern limits of the site ".
B10	Landmark building Block C	Tweaked only	Is not a landmark building, now dwarfed by the Brook House scheme. Needs a complete rethink, suggest opportunity for some radical design say three storeys high with innovative roof line and perhaps grass on the roof. The 60's style tin shed is unacceptable especially with so many looking down on it..
B11	Cheap flats provided unworthy of a town gateway. Doorways opening directly onto public paths noted, ref. crime issues.	The Council's vision for the development of this site is to create an attractive living environment with its own sense of place in a sustainable location. Flats should not be automatically assumed to have a lesser design quality when compared with other forms of housing provision but the selected developer will need to demonstrate that it will provide a high quality scheme that meets the objectives of the Central Area Action Plan.	B&DBC to obtain written assurances of Design Out Crime techniques used also to obtain the CRO report on the proposals. Such written assurances to be obtained and copied to interested parties prior to any granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application.
B12	No innovation in appearance or design to include positive energy saving measures. Target should be towards carbon neutral development.	The Design Guidance provided to the tenderers made it clear that the Council would expect the site to be developed to a high standard, demonstrating best practice in sustainable housing design and layout. In line with Council policies the Council will also expect the developer to put into practise it objectives of sustainable design and construction, which include measures to maximise a healthy, comfortable environment and to minimise the environmental impact of building design, water and energy consumption and surface water drainage. Furthermore it is to be recommended to Cabinet that the scheme as a whole must achieve a "Very Good" rating. The developer will need to demonstrate how this can be achieved through the design of the scheme and may well need to investigate innovative ways in order to reach this standard.	Officers to assess and report on the rating of the scheme. To confirm that water tanks will include the provision of pipework for future connection to solar hot water and water softeners. Consumer units to include spare ways for the future installation of wind generation and/or photo voltaics. Officers to require of Developer costing and marketing exercise to advance the incorporation of solar and wind energy capture mechanisms with minimal retro installation disturbance and costs. Reference is made to the Barratt development in Chesterfield where solar water heating panels are being designed into the house from the start. These points are positive marketing items for sales and the reduction of running costs for the housing association.

B13	Design details inconsistent and unsympathetic to Brookvale		Why no cills and lintels on the flats, why only one detail on the houses ? What colours are proposed for the rendered facades? Will there be any patterned brickwork on larger areas. Will any contrasting brick coursing be introduced. ? Sash windows ? Recessed porches ?
B14	"Natural" open space		Intensive plan has produced many problems which may only be solved by a reduction in expected numbers of units built. Ensure proposed areas are not subsequently reduced in the detailed development of the plan. Measure extent and agree dimensions prior to approval. B&DBC to confirm that open space provisions are as the original sizes.
B15	No Community facilities within the site	Essential to provide additional access to Brookvale (in addition to Victory Roundabout and College Road underpasses)	The two sides of the dual carriageway to be accessed via a new bridge to mirror the bridges provided to the East of Victory Roundabout near to Brookvale Village Hall, funding to come from the saving of not providing a signalled right turn and pedestrian crossing though a gap in the central reservation.
B16	Dangerous for children near high speed road, needs bridge	TA places pedestrians at grade on dual carriageway ring road system	Children will run out from play area. Have safety issues been addressed ? Where is the risk assessment? B&DBC to obtain written statement from HCC as above.
B17	Traffic Lights for Pedestrian Crossing with traffic calming		Safety would be compromised. Develop College Road underpass with better access both sides. Place bus stops at considerate positions especially when the bridge is built.
B18	Schooling where?		Has HCC commented on the additional school children? Funding school places/education infrastructure expansion will be needed
B19	Blocks 11 and 16		Strange window sizes and arrangement, not in character.
B20	No provision for waste recycling or its minimisation		Recycling bin location to be decided and reviewed by BCA. B&DBC to include the condition that defined waste and recycling bin positioning to be included in the design, this will avoid the hazard of bins causing obstruction. B&DBC to obtain and distribute comments on the scheme from the B&DBC waste management team.
B21	5 storey blocks		Large areas of brickwork to be broken up by use of Architectural features, balconies, brick patterning, alternative materials.
Access statement			
C1	Safety audit S38 Reports 1 & 2		Cycle Audit IS required as there is no safe route between Brookvale Village Hall and Victory Hill Phase 1 Rialto through the LNOCCW (BCA BVH AOB) site.
C2	Traffic flow on the site		Implement one-way system running east-west throughout the whole site to create more space for parking scheme from day 1, enabling emergency vehicles, pedestrians and cyclists to move throughout the site with left-in (Victory Roundabout) left-out (Main Entrance reversed) junctions not impeding traffic flow as signalised junction unnecessary.
C3	Emergency link	2.1	Must be a no parking zone and 2 way also served by a left-in left-out junction. New footpath from VH PH1 to connect to Courtyard 7 East Square.
C4	Visibility	3.1 Remove trees on central reservation	No trees shrubs bushes to be "adjusted" as car RHT across CWW centre reservation not required.
C5	Speed limits	3.3 Unaddressed	Support 20mph people zone throughout site.
C6	Pedestrian crossing	Reliance on earlier flawed recommendation by HCC to use people to slow down traffic.	Will need traffic calming IF a pedestrian crossing is implemented across a designated high speed town ring road through route for emergency vehicles.

C7	Provisions for DDA compliant pedestrian link from Victory Hill	4.3	Provide "Footpath Link" that connects existing cycleway with Courtyard 7 East Square with the end of Winterthur Way direct along the boundary fence of the existing allotments (not via Alencon link) to include disabled friendly gradient BEFORE works commence.
C8	Disabled access	Unaddressed	Emergency link and within site gradients to be disabled friendly.
C9	Pedestrian link to Victory Hill	5.11	Agreed but must be DDA compliant and to be implemented BEFORE building works commence.
C10	Bus stops	5.17	Where is Stagecoach commitment to using the new bus stops?
C11	Travel Plan	6.0	Travel Plan" details required BEFORE approval
C12	Through emergency access	7.9	".through emergency access" does NOT cover the far east end of the site near Block C which needs a left-in at the Victory Roundabout end.
C13	Well lit paths	Not detailed	We insist upon additional lighting along the existing or replacement footpath to the south of the site. The light on the dual carriage has little to no impact on that pavement especially between college road subway and the water works. It is currently a muggers paradise, perhaps the fire service would like to carry the can for someone being mugged? Please note many disabled mobility scooter users use this route on a daily basis, many now come along lower brook street as a result of fear of being mugged, can you blame them?
C14	There appears to be no SAFE Pedestrian crossing that can be provided at Churchill Way West for site access and bus users. See HCC paper 7Mar02 attached on the problems caused by at grade pedestrian crossings to traffic, pedestrians and emergency vehicles (Churchill Way is a key route for emergency vehicles).	The HCC paper relates specifically to Victory Roundabout and the problems associated with at grade crossings at a signal controlled roundabout (see also comment above under 5: safety). The TA demonstrates that the at-grade pedestrian crossing at the new light-controlled junction is appropriate and, as stated in 5 above, should improve safety for cyclists and pedestrians wishing to cross CWW.	The safety principles identified and established at Victory roundabout apply equally 200m to the west. The use of the response "should" is unacceptable and the response is herewith rejected. Previous MVA report referred in Jubb TA to be made available. BCA formally request copies of all traffic reports and papers prepared in respect of this development. See requests for assurances from HCC above. B&DBC to obtain written assurances from HCC that the development will not cause any additional road traffic accidents than at present. Such written assurance to be obtained and copied to interested parties prior to any granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application.

C15	No disabled access to Phase 1(<i>Victory Hill</i>) and this unclear in Phase 2 (<i>CWW</i>)	Whilst land levels rise around 10 metres between the lowest (south east) and highest (north west) corners of the CWW site, gradients across the site are 6% or less, which is within the limits recommended in the Council's guidance on accessibility. It has always been understood that the existing steep slope between Victory Hill and the CWW site precludes a pedestrian or cycle route directly between these two sites that can meet 'adoptable' standards (at least without significant engineering works, land take, and/or mechanical facilities that would impose significant costs for construction and future maintenance). The provision of steps down from Victory Hill towards Victory roundabout was always on the understanding that this could not be adopted by the Highway Authority but may at least be usable to the able-bodied as a complete route.	The developer for Victory Hill drew an acceptable solution. This matter is well documented and still leaves a sour taste in the mouth. The BCA fought hard to get proper access and now the fact that the council backed off is being used to further deny proper access for all. Require new 2.4m wide footpath/cycle route with no steps and DDA compliant from CWW developer running from west of VH around northern boundary and linking with College Road underpass. Also the existing truncated path and steps from Victory Hill to be completed with handrailing and lighting. B&DBC to included these conditions in any permission that might be granted. Developer to contribute to the costs of these provisions. B&DBC to included the condition to contribute to the provision of wider access in any permission that might be granted.
C16	Disabled access to be linked with Victory roundabout , Alencon link improvement scheme and the rebuild at Brook House will also have to be integrated, including the proposals for an external lift to overcome the gradient issues	The problems of pedestrian and cycle access across and under the Victory roundabout pre-date the allocation of the CWW site. However, the development of site could contribute to resolving some of the problems and the TA recommends specific improvements local improvements to the footpaths and cycle ways around the site and wider improvements to the footpath networks, including " <i>a contribution towards general footway / cycleway and streetscape improvements through the Victory Hill subway system and links to town</i> ".	Request councillors and planners keep an integrated view of aiming for the highest quality of access for all at all times throughout these interlocking developments. An example would be the opening up of the NW portal of the allotment subway at Victory Roundabout to remove the 90deg. angle, to remove the steps and to build the slope to comply with DDA law.
C17	No linkage between Phase 1 (<i>Victory Hill</i>) and Phase 2 (<i>CWW</i>) and Brookvale, community centre not recognised in the plans	The TA proposes a number of improvements including a new footpath link on the northern side of Alencon Link, providing a link to Chapel Hill and Victory Hill (see 7 above). The developers will also be required to provide a connection from the CWW footpath to the newly constructed access steps from Victory Hill down the embankment (see 7 above). One of the main factors in determining the location of the new junction on CWW is to align the light-controlled pedestrian/cycle crossing with May Street to allow safe access to the Brookvale Community Centre.	Ref BDB59783 and the unsatisfactory solution of the dangerous and impractical steps, this matter hotly debated and BCA concerns ignored by planners resulting in a failure of planning. Access for cyclists, disabled and pedestrians required at western end of Victory Hill into CWW. No pedestrian access at May Street. A bridge access next to the Community Centre should be provided, this bridge could mirror the bridge at the other end of Churchill Way serving Crown Heights. The saving of NOT providing a right turn on the dual carriageway and NOT providing signalised crossings will save an estimated £ 600,000, a simple pedestrian bridge 2.5m wide will cost approximately £750,000 the difference easily found in this £50million scheme. The principle of permeable access for all to be demonstrated in the detail. B&DBC to included a specific condition to that effect in any approval that might be given.
C18	Disabled access issues with the site linkages	Not fully addressed	Site to be disabled friendly and DDA compliant throughout.

C19	Clear pavements for disabled vehicles		Vehicles constantly park on pavements elsewhere in the town thus obstructing the pavement, given that the road will open out onto a major road can we insist upon pavements with full kerbs, dropped kerbs and designated road crossings.
C20	Access via T junction	5.3 access via T junction	Insist on "left in / left out" only with one-way system east to west within site. Extend deceleration and acceleration lane lengths. See email "Bus pull-ins too short" comment below. No pedestrian at-grade crossings.
C21	Toucan pedestrian at grade crossing	5.9 Toucan pedestrian at grade crossing	Delete as unsafe, no at-grade crossing - see Fire and Ambulance comments and HCC own guidelines. B&DBC to include condition that a bridge over be provided.
C22	Bus stops		Suggest easterly direction lay-by extended by combining pull-in to waterworks with new acceleration lane. Suggest westerly direction bus stop located next to the Village Hall to serve Brookvale.
C23	Prevent rat runs		No direct link to May Street.
Transport assessment (Jubb)			
D1	Basic criteria	1.4 Relies on MVA TA	Basic Criteria for Assessment, Impact and Mitigation Assumptions in Jubb TA rely upon MVA TA. No visibility of how these assumptions were introduced and propagated as MVA TA unavailable for review.
D2	Traffic Analysis	3.6, 3.7 MVA figures used	Over provision admitted. Revised report not made available, BCA formally herewith request copy of the report. Reduced traffic flows negate the need for right turns. B&DBC to obtain written third party assessment of the report. B&DBC / DC to obtain firm written assurances from HCC. Such written assurances to be obtained and copied to interested parties prior to any granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application.
D3	Access via T junction	5.3 access via T junction	Insist on "left in / left out" only with one-way system east to west within site. Extend deceleration and acceleration lane lengths. See email "Bus pull-ins too short" comment below. No pedestrian at-grade crossings.
D4	Signal controlled crossing	5.3	".....of a new signal controlled T- Junction" is not agreed and should be a left-out only (one-way system left-in feeder at Victory roundabout near Block C)
D5	Signal controlled crossing	5.9	No "....Town Crossing" WITHOUT traffic calming and is incompatible with a designated high speed town ring road through route for emergency vehicles.
D6	Toucan pedestrian at grade crossing	5.9 Toucan pedestrian at grade crossing	Delete as unsafe, no at-grade crossing - see Fire and Ambulance comments and HCC own guidelines. B&DBC to include condition that a bridge over be provided.
D7	Signalised junction		Unnecessary, risk to life and limb, places council at risk of legal action. High speed dual carriageway integral to ring road should not provide right turns or pedestrian at grade crossings. DELETE WHOLE OF SECTION 7.
D8	Signal controlled crossing	8.5/8.8	Signalised Junction NOT agreed as Victory hill Phase 1 has more units with no crossing and no queues seen at peak or any other times, suggesting that overcapacity does NOT need to be built in (due to less cars than prediction due to increased rental occupiers (including social housing) who do not have/use cars.

D9	Car crossing Churchill Way West executing right turns will cause safety, congestion and pollution issues	LDF: The Adopted Development Framework envisaged that a new signalised junction will be required to allow safe, regulated access to the site. This was also identified in the Central Area Action Plan. A Transport Assessment was commissioned by the Council and this assessment formed the basis of discussions with the Highway Authority, which accepts the principle of a signalised junction. A further Transport Assessment will need to be submitted by the Developer as part of the planning process, at which point the Highway Authority would be formally consulted and would need to approve the detailed design of the junction, together with associated improvements.	The further transport assessment has been submitted and relies on the assumptions made in the previous MVA TA, together with the vision and briefing stages. The plans indicate an eventual traffic link with May street which is unacceptable. B&DBC / DC to obtain firm written assurances from HCC that May street will not be opened to any form of traffic onto the dual carriageway. Such written assurances to be obtained and copied to interested parties prior to any granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application. The proposed crossing of the central reservation will permit right turning traffic to cross the dual carriageway of this integral part of the ring road system, this will be the only place on the system where this will be permitted. The risk of accident, injury and death by this means on Basingstoke's ring road is currently zero (probability = 0).
D10		Safety. One of the main reasons for proposing a signalised junction on CWW is to allow a safe crossing of the road by pedestrians and cyclists in accordance with the Council's adopted objectives for the Central Area. The proposed traffic lights will modify vehicle speeds along CWW and provide a protected crossing for pedestrians and cyclists. The investigation of personal accident injuries along CWW, undertaken as part of the TA, noted that, whilst the overall level was not considered to be more than expected, all recorded pedestrian and cyclist accidents occurred near to Victory and Thorneycroft roundabouts and that " <i>it is likely that these accidents occurred due to the <u>lack</u> of surface crossing opportunities</i> ". It is the Council's view that the junction should improve safety by reducing vehicle speeds on CWW and that pedestrians and cyclists will have a safer crossing point than currently exists.	The introduction of a crossover gap is deplored , such gaps are being closed across the country yet here the planners are encouraging motorists to take risks. Planners to consider legal risk of prosecution by future claimants. The route is an emergency route for Fire and Ambulance vehicles to access the M3, both agencies have previously strongly objected to restrictions on this route. The proximity of two major roundabouts makes the right turn provision unnecessary on safety grounds. The further transport assessment has been submitted and relies on the assumptions made in the previous MVA TA, together with the vision and briefing stages. The proposed pedestrian crossing of the dual carriageway will introduce pedestrians to this integral part of the ring road system, this will be the only place on the system where this will be permitted. The risk of accident, injury and death by this means on Basingstoke's ring road is currently zero (probability = 0). The introduction of a pedestrian crossing is deplored. Planners to consider legal risk of prosecution by future claimants.
D11	Proposed pedestrian crossing the ring road on an emergency services high speed route to the M3	No comment	The dual carriageway to the south of the site is an emergency route for Fire and Ambulance vehicles to access the M3. Both agencies have previously (Victory Roundabout consultation and subsequent cabinet decision) strongly objected to the introduction of pedestrians onto this route. The proximity of two underpasses at College Road and Victory Roundabout makes the provision of pedestrian crossings unnecessary on safety grounds. B&DBC to obtain written assurances from HCC that the risk of any accident at the proposed pedestrian crossing across the dual carriageway has a probability not greater than zero. Such written assurances to be obtained and copied to interested parties prior to any granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application.

D12		<p>Congestion. The Highway Authority has raised no objection to the allocation of the site. The Council's TA referred to above concludes that <i>"the development transport impact can be accommodated on the transport network subject to the various mitigating measures"</i> and that <i>"the proposals are acceptable in transport planning terms and help support sustainable development principles"</i></p>	<p>The introduction of a crossover gap is deplored, such gaps are being closed across the country yet here the planners are encouraging motorists to take risks. People should not be used as a human shield to slow the traffic, planners to consider legal risk of prosecution by future claimants. The route is an emergency route for Fire and Ambulance vehicles to access the M3, both agencies have previously strongly objected to restrictions on this route. The proximity of two major roundabouts makes the right turn provision unnecessary on safety grounds. Both the HCC and B&DBC have the congestion aspect seriously wrong, the introduction of a traffic signalled crossing across a dual carriageway timed to allow the slowest pedestrian/cyclist/disabled person to cross the 7m wide carriageways safely will clearly slow traffic flows and cause congestion (Refer HCC papers on VR). The calculations and amended calculations are wrong and are disputed B&DBC to obtain third party assurances relative to the veracity of the traffic analysis</p>
D13		<p>Pollution. Whilst there may be a marginal and very localised increase in pollution from vehicles waiting at a new light-controlled junction on CWW, the Principal Environmental Health Officer advises that CWW is not identified as being an area of concern as regards air quality. Given the open nature of CWW, prevailing south-westerly winds and the fact that the dwellings in Brookvale are set well away from the road, it is not considered likely that a new junction to serve the development site will cause a significant increase as regards air pollution in the locality.</p>	<p>Disputed. The existing traffic levels, future growth and the additional cars encouraged by the development will be forced to queue at the proposed crossing to get out of the site. The carbon absorbing potential of the site will be much less than at present causing a considerable increase in pollution of noise, dust, hydrocarbons etc. A simple left-in left-out junction will help to reduce pollution. B&DBC to obtain written assurances from HCC that the development will not cause any additional road traffic pollution than at present. Such written assurances as mentioned above to be obtained and copied to interested parties prior to any granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application.</p>
D14	Bus stops		<p>Suggest easterly direction lay-by extended by combining pull-in to waterworks with new acceleration lane. Suggest westerly direction bus stop located next to the Village Hall to serve Brookvale and gain access to the new bridge.</p>
D15	HCC transport policy inconsistent		<p>Emails from HCC not conclusive. B&DBC / DC to obtain firm written assurances from HCC that traffic provisions are sound. Such written assurances to be obtained and copied to interested parties prior to any granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application.</p>
Acoustic assessment			
E1	Preamble		<p>The report from Nov 2006 alludes only briefly to the subject, observing there was no information available at that date. In what follows we have commented on the key conclusions of the Assessment, drawing attention to the relevant findings which the conclusions are based on or, in some cases, pass over. There are conclusions concerning the buildings, concerning garden and open spaces and one on vibrations in general.</p>
E2	Buildings	<p>9.3 The South facing facades fall within NEC C for Daytime. The North facing facades fall within NEC B for daytime and NEC B for night-time.</p>	<p>In the case of NEC C that planning permission 'MAY be granted' if conditions are imposed (7.2.4). Taken to mean that the fulfilment of the conditions is not BOUND to lead to planning permission. Taken that data was insufficient to establish the noise level at night for South facing facades. (See 5.2.2)</p>

E3		9.4 Glazing units have been recommended which would meet the recommended internal noise levels as specified in BS 8233.	The recommendations concern both North and South facing facades with their different insulation requirements. However, no other routes for noise are mentioned in the conclusion. The body of the report though does make this observation: that glazing is just ONE way of letting noise in. Other noise routes are not considered, nor are ways of insulating them. Why not? (See 7.3.1 and 7.3.6).
E4	Garden and Open Spaces	9.5 Provision should also be made for a form of barrier to be erected alongside the local equipped area of play and public open space to the south side of the site to protect the areas from road traffic noise.	Note that this neglects the north side of the development, but 7.4.3 says noise levels at Location 2 (north) are slightly above the recommended limits for gardens. True, it also says that the difference is not likely to be perceived. This is at least contestable. The report adds that an extensive barrier would be needed to bring the noise level down. Calculations could be carried out to determine the height of the barrier. The layout of the site is considered an adequate form of insulation against noise for gardens in the southern part of the development. This seems contestable.
E5	General	9.8 Both daytime and night-time V(ibration) D(ose) V(alue)s fall into the category “ <i>Low probability of adverse comment</i> ” according to the VDV criteria set in BS 6472.	Statement requires explanation and checking, it is an incredible statement for a site set between a busy four track railway and a main dual carriageway road.
E6			The problem of sound insulation outside is important. It could be solved by green barriers, which would enhance the appearance and the ecological credentials of the development this aspect is passed over rather lightly in the report. The way noise infiltrates buildings from outside through other means than glazing should be taken up. Other forms of insulation than glazing units should be considered. This might overlap with heat insulation matters and the development’s carbon footprint. Objection to the inadequate noise study.
E7	Traffic noise reduction		Road surface materials to assist quieter traffic with extensive site screening on both sides to benefit VH too.
Drainage strategy			
F1	Site drainage issues to be addressed as soakaways are unlikely to remove surface water quickly enough in in water level periods due to saturation of ground at certain times of the year (see Victory Roundabout reports, Loddon flood plain issues)	1.1 An earlier report advises that surface water soakaways should be possible but that the use of soakaways would require approval by the Environment Agency. This would need to be addressed by the developer as part of the detailed design of the scheme.	Has the Environment Agency responded in detail? B&DBC / DC to obtain written assurances from the EA given the suspect trial hole tests. Recent soakaway tests were conducted in the dry season. Flooding of the Victory roundabout subway in the Autumn of 2006 is evidence that ground water levels are high in the late autumn and winter period. Great concern for the long term effect of hard area surface water drainage being concentrated into localised soakaways where previously evenly dispersed. Hydraulic survey of valley bottom river flood plain not conducted at peak of wet season to establish capacity in substrate to cope in deluge conditions. 20Nov06 - recent experience of flooding of homes in Lower Brook Street would suggest that the Environment Agencies models require further investigation that they accord with reality with water flood mitigation built into the site BEFORE building commences. Doubt enhanced by reference to consideration to incorporate French drains. Written assurances to be obtained prior to granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application.

<p>F2</p>	<p>Risk of flooding</p>	<p>The site can be clearly seen to lie well above the flood plain of the river Loddon. Hence, there are no flood risk issues associated with the proposed development. Appendix G Site is within 500m of a flood plain. There is potentially contaminative past land use within 250m of the study site. The EA river study shows the Loddon to be chemical grade B, and Biological grade C.</p>	<p>Strongly object. The statements in the Jubb report make it clear that the location of soakaways is going to be concentrated in the green space areas. The flow rates from the test show that the lower areas (eg SA3) had higher water levels and slower infiltration rates. The concentrated flows will exacerbate the likelihood of flooding. The proposed development will greatly increase the risk of flooding in lower Brookvale and reduced the load bearing capacity of the chalk which reduces if saturated for prolonged periods (see CIRIA report C574 ref. point 6.7 page 30 appendix F and EA letter 13Nov06 and web references copied at appendix H). Also list of EA requirements to be met as letter 13Nov06 (drawings , details, 100 year storm event, swales) all are a prerequisite to any planning approval. If the EA concerns are not satisfactorily answered the proposal should be refused.</p>
<p>F3</p>	<p>Risk of flooding</p>		<p>The discharge of surface water into grouped soakaways rather than the current natural dispersal over the whole site, brings with it the high risk of concentrated flows following the chalk folds towards the line of the river. The Loddon river is culverted from the eastern edge of Victory park, this restriction forces the surrounding water table levels higher than the subway pavement levels in Victory Roundabout for most of the Autumn and Winter. Standing water is often seen around the BCA Village Hall. The increased discharge in the wet season will increase the height of the water table. It is noted that the soakaway tests were undertaken in the dry season.</p>
<p>F4</p>	<p>Risk of flooding</p>		<p>Yet the central town area continues to be served by the Victorian brick sewer, which at times is known to flow fully charged and under positive pressure, is not yet to be replaced or improved. It is noted that both Crown Heights and Victory Hill are almost fully occupied, the redevelopment of the IBM building is in progress and the Old Kempshot Lane 290 unit housing site has started. All these will add tremendously to the pinch point at the 300mm diam sewer in Lower Brook Street where the CWW intends to connect. B&DBC to require definite calculations and flow predictions against time to ensure "adequate foul sewer capacity" statement from the model to be true before granting permission. Replacement programme for brick sewer to be detailed and dated and legally bound into the agreement, new full length sewer beyond Basing to be in place and Sewage Treatment station upgraded before CWW dev. occupation begins. B&DBC / DC to obtain assurances from TW and copy interested parties prior to any granting of planning permission, failure to provide adequate assurances will mean refusal of the application.</p>
<p>F5</p>	<p>1 in 100 year storm</p>	<p>Overall system will be checked as required by the EA against a 1 in 100 year storm event to ensure there is no resulting off site run off.</p>	<p>Calculation to be provided and EA approval required. If the EA requirements are not demonstrated by calculation the proposal should be refused. (Note: Climate Changes will increase the frequency of what was previously considered a 1 in 100 year storm likelihood)</p>

F6	Groundwater source protection zone at western end of site	See appendix H. Roof rain water run off the be allowed to run to soakaways in SPZ1 area at west	Water provider top confirm acceptability of this given pollutant content of roofing materials, proximity of metal particle pollution from railway, increased hydrocarbon content of atmosphere in highly developed town centre. EA approval required. If the EA requirements are not met the proposal should be refused. See 6.7 page 31 Appendix F.
F7	Sewerage system to be uprated at all stages of the process, adequacy of capacity, zero risk to health, discharge of effluent to watercourse.	Proposed scheme would require connection to the public foul sewerage system. Thames water have checked and confirm adequacy of capacity.	Provision of a sum of money to "achieve" connection to the main sewers is insufficient for planning purposes. Thames Water have only referred to a model done in 2005 before other major developments in the town centre were approved. B&DBC / DC to obtain firm written assurances with calculations, regarding the flow capacity figures from Thames Water for the 300mm sewer in Lower Brook Street following bitter experiences of "blown" manhole covers outside Queens Road old post office, at the Moose Centre and in the basement of the Anvil where double seal screw down covers are now installed. Thames Water to confirm planned dates for replacement of Victorian sewer to east of the town, programme for enlargement of the treatment works and the rates of discharge to the Loddon and compliance of those discharge rates with EU rules. Calculations including flow patterns to be requested, received and understood from Thames Water before planning approval granted. Assurances to be obtained and copied to interested parties, failure to provide adequate assurances will require the officers to recommend refusal of the application.
F8	Capacity	1Jun06 email from Thames Water	Thames water have only confirmed an apparent acceptability based on a model only from a hydraulic viewpoint. Thames water state that their advice does NOT constitute approval or consent pending receipt of a formal application. Written assurances to be obtained prior to granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application.
F9	Grey water	Grey water management principles to be considered	What principles will be considered, are reed beds proposed. How will sodium build up be dealt with.
Landscape visual assessment			
G1	No calculation of additional trees to counter additional emissions created	Landscaping proposals for the site, including new tree planting, will need to take into account many issues and will be expected to contribute towards the creation of attractive, usable public places and spaces. There is currently no requirement for new residential development to be assessed in terms of emissions offsetting nor is it known whether there is a satisfactory methodology for calculating such factors. The structure planting along Churchill Way will help reduce pollution for residents of the new development and will obviously have a wider impact. However this site should not be seen in isolation and general tree planting and vegetation around the town including on other sites in Brookvale will have a benefit.	B&DBC to obtain written assurances regarding the development carbon offset calculation and to require sites for these trees to be identified. Trees and street lamp positions to be coordinated so that trees do not grow to obscure the lights. Carbon offset tree planting required as near as possible to the site

G2	Open space to include preserved trees and bushes, community woodland, kickabout, play area, sensory garden and pond	The priority on-site is informal recreation space and particularly play space i.e. kickabout space. This is because of the limited distance children are able to travel and the lack of alternative provision on this side of Churchill Way. Accessible natural green space is important and is included in the Local Plan Standard. Such areas can be provided through the detailed design of the landscaped areas within the development, including the open space, to incorporate native species and wildlife links wherever possible and by the use of off site contributions to enhance existing open space such as Victory Park and King George V Playing Field. There is more scope on these site to provide meadow areas, a pond and other wildlife habitats.	BCA to be include the condition in any approval to be advised of any request, however small for the developer/builder to change the approved arrangement of trees vegetation, moving soil out of the area, etc.
G3	Infestation of allotments once building works start		Western boundary Fence to incorporate vermin / rabbit proof detailing and to be build early before topsoil is stripped.
G4	Agreement/Provision to publicise allotments within the development to encourage allotment use/uptake		Developer to promote allotments within their sales information.
G5	Original allotment soil to be retained for site green areas and communal green space/gardens		Developer to re-use in green area and make available to allotment holders free of charge.
G6	No relationship with CWW Corridor Treatment		B&DBC to provide preliminary corridor scheme that includes the dual carriageway Brook House to Leisure Park with new footbridge at Brookvale and confirm the site linkages with this corridor scheme
Other technical information			
H1	Further technical details	DWH / BMP letter 5Jan07 refers to further technical information to be issued by Jubb	BCA not been advised of the arrival of this further information, B&DBC to advise, BCA to review when issued.
H2	High Voltage power lines need to be rerouted	The power lines will be relocated at the developers expense.	How will the existing 11KV cables be replaced what will be the new route? Others should pay for this work including the substation, not the Borough/Developer. B&DBC / DC to obtain written assurances from NGP of how and where the power cables will be rerouted and to require the cost of the work to be done by NGP with no reduction in value to the sale of the land. Such written assurances to be obtained and copied to interested parties prior to any granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application.
H3	Sufficiency of power supply	A new substation will be provided	The provision of a new substation does not generate nor distribute the additional power. The new town centre required considerable additional distribution from the glebe garden main distribution centre, will additional / new cables be needed to be laid from the East of the town at the 330Kv intake station?

H4	Assumption that capacity for fresh water is available.	Details of the location of services, including the location of water mains were provided to the tenderers as part of the tender information. A connection to the existing services in the area will be required and this together with the issue of capacity will need to be agreed with South East Water as part of the detailed design of the scheme.	Have Thames Water agreed to the supply of fresh mains water to the site? B&DBC / DC to obtain firm written assurances with calculations. Such written assurances to be obtained and copied to interested parties prior to any granting of planning permission, failure to provide adequate assurances will require the officers to recommend refusal of the application.
H5	Solar collectors to help with water heating in the flatted buildings		Including provision of water softening and large hot water storage tanks with min 200litre capacity compatible for and with the provision of or for connection to solar hot water heating.
H6	Photovoltaic to help with lighting		Preferably fitted from Day1. May accept provision in consumer units for the retro fitting of input to lighting circuits (also to central heating and fridge / freezer circuits) from local power sources.
H7	Combined heat/power generation for the site gaining economy of scale in energy bills and supply continuity/future proofing		Studies and consideration for use in flatted blocks to be undertaken and responded before approval. (Note: GSP with Aquifer heating /cooling proposed by Bewley for Brook House)