

TECHNICAL NOTE

Technical support for LCC

SUBJECT

LCC/2024/0008 Lytham Green Drive
Golf Club

PROJECT NO.

5218724

DATE

16 May 2024

AUTHOR

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Client

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Document history

Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
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Application Documents

We have reviewed the following information submitted to inform the planning application for LCC/2024/0008 Lytham Green Drive Golf Club.

Document Title	Author/Date
Proposed Land Reprofilling / Landscape and Drainage Engineering at Lytham Green Drive Golf Club Transport Statement (230876)	SCP Feb 2024
Lytham Green Drive Landscape Proposals Plan (2419_03)	Appleton's Feb 2024
Lytham Green Drive Golf Club BIODIVERSITY NET GAIN ASSESSMENT	Appleton's Feb 2024
Lytham Green Drive Golf Club DESIGN AND ACCESS STATEMENT	Appleton's Feb 2024
Appendix 1 – LVA (Landscape and Visual Appraisal) appendices	Appleton's Feb 2024
Landscape Appraisal	Appleton's Feb 2024
Appendix 6 - Viewpoints	Appleton's Jan 2024
Lytham Green Drive Golf Club PRELIMINARY ECOLOGICAL APPRAISAL	Appleton's Feb 2024
Lytham Green Drive Golf Club TREE SURVEY REPORT & ARBORICULTURAL IMPACT ASSESSMENT	Appleton's Feb 2024
LYTHAM GREEN DRIVE GOLF CLUB NEW FOURTH HOLE CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (V1)	Booth Ventures 2024
Lytham Green Drive Golf Club – Course Improvements – CROSS SECTIONS (GGD-350-3093)	Gaunt Golf design 09/04/2024
Lytham Green Drive Golf Club – Course Improvements – EARTH WORKS PLAN (GGD-350-3091)	Gaunt Golf design 09/04/2024
Lytham Green Drive Golf Club – Course Improvements – MASTERPLAN (GGD-350-3090)	Gaunt Golf design 16/02/2024
Lytham Green Drive Golf Club – Course Improvements – ECO/LANDSCAPE PLAN (GGD-350-3092)	Gaunt Golf design 16/02/2024
Lytham Green Drive Golf Club – Course Improvements – CROSS SECTION PLAN (GGD-350-3095)	Gaunt Golf design 16/02/2024
Lytham Green Drive Golf Club – Course Improvements – Isopachyte Plan (GGD-350-3094)	Gaunt Golf design 16/02/2024

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LYTHAM GREEN DRIVE GOLF CLUB - NEW FOURTH HOLE CONSTRUCTION - IMPORTED MATERIALS SPECIFICATION	Booth Ventures Mar 2024
Location Plan - Planning Portal Reference: PP-12851292v1	06-Mar-2024

Context

AtkinsRéalis has been employed to undertake a technical review of the information submitted as part of the planning application made by Booth Ventures (applicant) for realignment, reprofiling and improvements to the 4th hole area through the importation of inert material, drainage infrastructure, levels changes, highways works and landscaping (hereafter referred to as 'the Scheme'); at Lytham Green Drive Golf Club, Ballam Road, Lytham St Annes (hereafter referred to as 'the Site').

Review Observations

This technical review was conducted in accordance with the Landscape Institute Technical Guidance Note 1/20 (issued on 10 January 2020) for Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs). No visit to the Site was conducted while reviewing the submitted landscape and visual chapter and supporting information. The technical recommendations are based on the information provided with the planning application and Environmental Impact Assessment (EIA).

Methodology, criteria, and process

Scope

Pre-application and screening opinion was submitted to Lancashire County Council on 27th April 2023, and a formal response (Appendix 5) was supplied on 28th June 2023. It was stated within the response that:

'Landscape – you will not need to provide a full landscape appraisal. However, your proposal should include sufficient detail (contour plans and cross sections) to allow the impact of the proposed landform to be adequately assessed. It should also include information on any existing landscape features (trees and hedges) that would be lost and those that would be retained. A tree survey should be prepared showing the location and value of significant trees/hedgerows on the Site.

Retained vegetation should be protected by an adequate stand-off distance. The tree belt close to the northwest corner of the Site is subject to a TPO. From the Site visit, it appeared that the Site is well enclosed by the tree belt to the north and east and that views into the Site are limited. You should ensure that the degree of land raising is restricted such that the existing boundary vegetation will be effective in providing screening to the tipping operations. Cross-sectional or photographic information may help to demonstrate this.'

This inclusion of full appraisal was not required; however, a Landscape Appraisal has been submitted along with the planning application supporting documents. Upon study of the document, it was difficult to ascertain if the submitted document was a Landscape Visual and Impact Assessment (LVIA) or Landscape and Visual Appraisal LVA.

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Note: LVA is a method used to evaluate how a proposed development may affect the character and appearance of an existing landscape. Unlike LVIA, which is a more detailed assessment and is sometimes statutorily required, LVA is a simpler process that does not require a judgment on the significance of any effects.

The scope of the document is set out in Section 1: Introduction and Terms of Reference of the submitted Landscape Appraisal Document. Para 1.3 states *‘This assessment considers the baseline for both landscape and visual amenity and seeks to identify the sensitivity of each, before considering the change that the introduction of the proposed golf course hole area will produce. Potential landscape/ landscape character and visual impacts of the proposals are assessed together with any cumulative impacts and recommended mitigation proposals to ameliorate such impacts should they occur.’* This statement indicates that the document is an LVIA.

Neither LVIA/ LVA were required to support the application.

Consultations

Pre-application and screening opinion was submitted to Lancashire County Council on 27th April 2023, and a formal response (Appendix 5) was supplied on 28th June 2023. The response outlines the following information required to support the planning application:

- Landscape Proposals Plans
- Existing Landscape features
- Contour plans and cross-sections
- Tree survey
- Cross-sectional or photographic information to evidence operations around Tree Preservation Order (TPO) tree or groups

The information above has been identified within the submitted information – however, specific details around TPOs are unclear (this is addressed later within this technical note).

Methodology

The scope and methodology of the LVIA have not been formally agreed upon with the determining authority. The document is titled Appraisal, though the methodology is for an LVIA. The purpose of the document needs to be defined fully, and whether the assessment of the significance of effects serves a purpose or is proportionate needs to be determined.

Para 1.7 of the submitter Landscape Appraisal document states, *‘Principles and good practice for undertaking an appraisal are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA, April 2013). The methodology used for this assessment is based upon this guidance. A summary of the methodology employed for this assessment is set out in Section 2 and in detail at Appendix 1. Where any deviation from the Guidelines occurs in order to appropriately undertake the assessment in a manner which provides clear evaluation, this will be justified, and an explanation provided (see Section 2.0).’* After reviewing the methodology, it was determined that the report and appendices do not specifically define the LVIA/LVA process, and although the document is titled Appraisal, the methodology is for an LVIA.

The definition of effects and impacts has not been clarified within the methodology or the LVIA. This clarification is explained in GLVIA3 Para 1.15: *‘This guidance generally distinguishes between the ‘impact’, defined as the action being taken, and the ‘effect’, defined as a state the change resulting from the action, and recommends that terms*

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should be used consistently in this way'. The Guidance goes on further to state that, as per paragraph 1.16, *'The terms should be clearly defined at the outset.'*

In conclusion, regarding the methodology, the appraisal/assessment document has several irregularities and deviations from the best practice guidance and does not appear to have been tailored to the Scheme.

Consideration of Landscape and Visual Effects Separately

Section 2.7 considers landscape visual effects separately, a detailed landscape and visual effects assessment is provided separately within the appendices, as per the GLVIA3 guidance.

Receptors

The assessment provides a comprehensive identification of receptors and all potential effects. However, during the construction phase, the indirect effects of construction along routes do not seem to have been considered. The impact on the landscape and visual receptors is not evident in the LVA. Additionally, it is not clear from the submitted information which route construction traffic will be using or how the proposed access on Saltcoates Rd (B5259) will be reinstated/ retained following construction.

Clarity

The LVIA (Landscape and Visual Impact Assessment) follows the guidelines set out in the GLVIA3. These guidelines emphasise a proportionate approach to assessing the potential significant effects of the proposed development. It is noted that the conclusions drawn from the LVIA are based on professional judgment, supported by reasoned justification, and evaluated within a structured assessment framework. The findings are clearly presented and easy to understand.

Clarification is required as to the purpose of the LVIA and to demonstrate how the LVIA is a proportionate assessment.

Baseline, content, and findings of the assessment

Visual baseline

No ZTV was evidenced in the submitted documentation – however, it is referenced within the methodology. This is indicative that a standard LVIA methodology has been applied to this document and not checked to ensure that the methodology is appropriate for appraisal purposes, specifically for this Scheme

However, Visibility Mapping has been included see para 2.5 *'The visible envelope of the Site has been considered through desktop analysis of topographical data combined with field surveys to investigate visual enclosure arising from landform, vegetation and built form. A series of representative viewpoints were subsequently taken to represent typical views from publicly accessible areas within the study area, which may give rise to views of the proposed development. Mapping of a Zone of Visual Influence (ZVI) has been prepared and included at Figure 5 (Appendix 4).'*

A further explanation of visibility mapping used is given in para 8.18: *'This is based on field analysis and with reference to existing screening, including built structures and vegetation identified from mapping and aerial photography. The*

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Zone of Visual Influence is indicative of the part of the landscape from which views of the proposed development might be gained. This approach is considered appropriate.

The criteria for determining levels of sensitivity and magnitude of change have been clearly and objectively defined, avoiding scales that may distort conclusions.

The assessment supporting data and survey are winter only, representing the worst-case scenario on which to base assessment judgments; this is deemed appropriate, and any planting implemented as part of an early phase of restoration would help mitigate adverse effects.

Landscape baseline

Section 3 of the LVIA covers the study area, baseline conditions, and Site context. Section 4 covers landscape character.

A full description of the Site at baseline has been included, along with a review of the landscape designations, landscape character, and landscape features on the Site. Of pertinence to this application, paragraph 3.12 notes: *'The majority of the Site falls evenly from the south to the north; it is largely flat with only minor/ localised undulations in some areas. Beyond the Site, the golf course to the west follows similar gradients as on Site.'*

LI Guidance cross-references the SNH Handbook 2018, which states that assessment should allude to legislation, policy, and guidance – this is covered in sections 2 and 3 of the LVIA.

The description in Section 4 is thorough; the Site is described as generally devoid of features, open flat grassland, with maintained narrow tree belts with semi-mature to mature trees and thick hedgerows, 4.16 states *'The Site is both influenced by some tranquillity being adjacent/ part of an outdoor recreation activity and being close to wider countryside with large swaths of countryside.'*

The LVIA overall addresses landscape value; the assessors concluded, 'The landscape is therefore judged as (moderate in value) and ordinary in quality and condition.' However, no reference was made to TGN 02-21: Assessing landscape value outside national designations (Landscape Institute, 2021).

Regarding value and tranquillity, it is stated in para 7.6 *'There is moderate perceptible tranquillity within the Site'*

Table 7.2 summarises the Site's sensitivity to changes in its main landscape features. The criteria for determining sensitivity levels and magnitude of change have been clearly and objectively defined, avoiding scales that may distort reported results.

Cross-over with other topics

The baseline addresses natural and cultural heritage and refers to specific features such as the SSSI and the historic park and gardens at Lytham Hall.

It is not evident beyond one reference (see para 3.13) that Biodiversity Net Gain (BNG) has not been considered fully within the LVIA. One of the principles of the National Planning and Policy Framework (NPPF) is that *"opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity."* The LVIA has mentioned the removal of trees, and an arboricultural assessment has been submitted as part of the application. Due to the extent of the tree and vegetation removal, however, no reference to habitats or long-term management has been considered or evidenced to accompany the LVIA.

Vegetation removal is referred to and further detailed in the submitted Tree Survey and AIA

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Iterative assessment-design process

The LVIA does not provide definitive evidence of an iterative assessment design process. While it describes the baseline conditions and the proposed Scheme and refers to its effects, it does not mention how the Scheme's design has been influenced through the appraisal process. Additionally, there is no evidence of other options or indication as to why the Site design is proposed as considerably different in topography and height compared to the surrounding landscape. In conclusion, there is no evidence of an iterative assessment-design process within the LVIA, and therefore, this omission undermines the completeness of the LVIA.

Viewpoints

Para 2.3 of the LVA sets out the selection of viewpoints '*Viewpoints were identified based on public viewpoints (Public Rights of Way), and the best effort was made to establish where potential sensitive, partial, and open views of the Site could be observed. The selection of public vantage points from Public Rights of Way and highways for the viewpoints used in the landscape and visual impact assessment has been arrived at using professional judgement in accordance with 'The Guidelines for Landscape and Visual Impact.' Private viewpoints (residential properties) were also considered where applicable, and key distant viewpoints were identified to determine the wider impact on the landscape and where development would have the potential to affect the value and character of an existing view.*' This is deemed appropriate for appraisal purposes.

The survey was conducted during winter only, when the views of the Site are most unobstructed due to leafless vegetation. This is deemed appropriate as it is considered the worst-case scenario at baseline.

Mitigation

Mitigation has been partially addressed but does not go into detail in the LVIA.

Para 7.25 states, '*Careful design consideration has been taken to not increase the topography to such a degree where the new landform will be visible above the boundary tree line or the nearby man-made mound, which in turn would create a greater visual effect.*' It goes on further to state that much of the existing vegetation along the boundaries will be retained, with only a small section of hedgerow/ scrub to be removed to allow the widening of the existing access point. New landscaping and tree planting is proposed to the boundaries of the proposals, forming a denser screen between the new golf course hole and the wider landscape to the north and east.

However, it is noted that Para 9.2 of the LVIA states, '*Although not identified as mitigation to reduce or remove adverse effects, the landscape proposals will greatly enhance the Scheme and is part of the overall design process and planning of the improvements. Adverse visual impacts can be offset and in the long term, may give rise to further positive effects and contribute to the overall quality of the landscape in this locality.*'

Although the LVIA indicates embedded mitigation by way of the Scheme height has been made and that essential mitigation regarding post-construction planting is included – the LVIA does not directly refer to the mitigation as such, and in conclusion, the LVIA does not demonstrate that mitigation has been fully considered.

Consistency and objectivity

In general, is there consistency and objectivity in applying the criteria and thresholds set out in the methodology for assessing the sensitivity of receptors, the magnitude of changes arising from the Scheme, the degree/nature of effects, and the approach to judging the significance of the effects identified.

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However, some of the conclusions do not seem as objective as they could be, the beneficial effects need to be further evidenced, and consideration of the significant landscape change within the Site boundary needs to be considered fully.

Completeness of the information

This application requires further detail regarding the proposed phasing of the works, considering the timeframe and scale of the proposed material to be moved. A soil management plan would be a welcome addition to the supporting information; this should demonstrate how existing topsoil on the Site will be managed and how imported material will be stored and spread on the Site.

Additionally, the following information is required to allow a full landscape planning appraisal of the Scheme to be made:

- A full detailed planting plan indicating the size, species, no.'s and planting densities of plants
- Details of SuDS and drainage
- A landscape management and maintenance plan, with details of habitat management and monitoring as per the requirement for BNG; additionally, this should cover 30 years.
- Further detail as to the mitigation proposed, including further details regarding the landscape proposals and any long-term management/ maintenance plans referenced along with details of any BNG (include in assessment where and how this creates a positive effect);
- Detail as to indirect effects on receptors outside of the Site including road users, footpath users etc;
- A section covering compliance with planning policy would be useful for the reader.
- Evidence of an iterative design process is lacking in the LVIA and should be included, the LVIA should illustrate the development of mitigation and establish principles to be embedded into the long-term management;

Landscape and visual effects

The LVIA clearly defines landscape and visual effects, though during the review, several inconsistencies were evident. Additionally, there are other queries about how some of the decisions have been made, particularly regarding landscape effects.

The summary of the significance of effects indicates there will be significant adverse residual visual impact and significant beneficial landscape impact. See para 10.4 and 10.5.

LCC specifically stated that the proposal should not be seen above the existing tree line; having examined the site photography and Google Earth imagery, it is concluded that the scheme would likely be partially visible from along Saltcoats Road and to receptors to the east through the boundary vegetation (particularly during winter), at least until establishment of planting on the Scheme embankments.

Given the landscape character at baseline, the proposals are incongruous with the existing landscape form. The Site will be raised significantly from the baseline and further enclosed with planting. The low-lying topography, which is a feature of this landscape, will be lost permanently. The slope gradients are at odds with the natural surrounding landscape. The sections demonstrate that the gradients and heights proposed do not adequately tie to the existing landscape; of note is the area around the TPO and along the Saltcoats Road boundary.

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This boundary has a significant difference in elevation compared to the top of the proposed Scheme. The vegetation along this route is not particularly tall or dense, and some of the trees are at the same level as the top of the proposed fairway. Despite new tree planting, the landform would be noticeably changed.

Additional tree planting is proposed to '*enhance landscape quality*' whilst it may improve biodiversity and habitat in the locality; given the existing trees and boundary vegetation on Site, improvement in the landscape quality has not been demonstrated.

Presentation of the findings of the assessment

Transparency, objectivity, and clarity

Though the document is intended to clearly define the assessment, its overall premise does not sufficiently address its purpose or scope. It requires definition as either an LVA or LVIA. It is not clear how the document has informed the design or how the resulting LVIA conclusions have been considered in terms of mitigation.

Communication of assessment

During the pre-application, a request was made by the LPA to '*... ensure that the degree of land raising is restricted such that the existing boundary vegetation will be effective in providing screening to the tipping operations. Cross-sectional or photographic information may help to demonstrate this.*' This is not entirely evident from the submitted information, and it is recommended that Section G is drawn up in detail, showing the location of the TPO RPA in relation to the section.

The assessment, otherwise, overall is clear and comprehensive, and the findings were communicated well and accurately. The supporting figures and documents were clear and enabled the reader to understand the location, development, and baseline, though the figures contained some inconsistencies, including:

- Figure 2 shows two redline boundaries
- Figure 5 shows items in the key not referred to on the plan, as the vegetation has not been shown how the conclusions on visual were reached; there is not sufficient information on this plan to indicate why views are screened or filtered. Clarity is required to assure the reader that the ZVI analysis has been undertaken properly, particularly as this was the basis for visual receptor assessment selection.
- Figure 7 does not adequately illustrate Site characteristics. It is an aerial with labels on it, and the lack of boundaries between areas is open to interpretation by the reader. The figure does not easily link back to the landscape character text included in the LVIA.
- Appendix 6 shows the Site photography from each of the viewpoints and is broadly aligned with the landscape institute guidance contained within Photography and Photomontage Guidance (TGN 06/19), though labelling was often not appropriately positioned.

However, it is considered that the landscape proposal plan does not contain sufficient information to reassure the reader that the landscape Scheme can be implemented and established. There are several errors on the landscape proposal plan:

- Site access is shown as a single track when the design and access statement indicates this will be double-width
- The access surface to Saltcoats Road is shown as grass
- There is a patch of yellow, possibly a print fault, in the centre of the drawing it looks like an unmarked bunker

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- The trees indicated on the plan differ from those in the schedules
- The redline boundary does not match that submitted on the Location Plan; additionally, it seems to follow an indicative tree canopy line taken from a topographical survey
- Not all landscape features are within the key
- No area sizes or densities for planting are included in the schedules
- The handling of topsoil does not reference BS3882, and there is no mention of subsoils

It is concluded that the assessment does not demonstrate sufficient clarity of purpose and that the supporting information has several inconsistencies that undermine the robustness of the landscape proposals and assessment.

Overall conclusion

The document outlines the technical review conducted by AtkinsRéalis for the planning application submitted by Booth Ventures for the Lytham Green Drive Golf Club project, identified as LCC/2024/0008. It includes a detailed examination of various documents provided by the applicant, focusing on aspects such as landscaping, drainage, biodiversity, design, and ecological impact. The review adheres to the Landscape Institute's Technical Guidance, although no Site visit was conducted. The recommendations are based on the submitted materials, aiming to assist the Lancashire County Council's planning decision. AtkinsRéalis emphasises that their technical advice is an independent assessment of the application's suitability, and their recommendations are given in good faith, with any actions being at the discretion of the LCC Planning Officer.

It is unlikely that the clarifications requested or recommendations outlined in this technical note would change the overall reporting of the findings in the LVIA; however, regarding information required to support a planning application, further detailed information regarding the landscape proposals and establishment is required.

The following recommendations are put forth to address the identified concerns and to ensure the Scheme aligns with the planning application submission requirements:

- **Enhance Documentation and Clarity:** Ensure all documents, especially those related to landscape and ecological assessments, are updated to reflect the most current data and findings. This includes revising the assessment to incorporate any new insights or changes in project scope that might have occurred since the initial submission.
- **Incorporate Comprehensive Environmental Appraisal Documents:** Given the scale and nature of the project, it is critical to conduct a thorough Appraisal that considers the potential impacts on biodiversity, local wildlife habitats, and the broader ecological network and includes mitigation strategies for any adverse effects identified.
- **Detailed Landscape and Visual Impact Assessment:** Follow the Landscape Institute Technical Guidance Note 1/20 closely to ensure the Landscape and Visual Impact Assessment (LVIA) is comprehensive. The LVIA should also outline measures to mitigate visual impacts, such as strategic planting or landscape design alterations.
- **Public Engagement and Consultation:** Conduct public consultations with the local community and stakeholders to gather feedback on the proposed changes. This will help identify any additional concerns and ensure the project aligns with local values and expectations. The feedback received should be incorporated into the project planning and design phases.
- **Sustainable Design and Construction Practices:** To minimise environmental impacts, emphasise sustainable design and construction practices throughout the project. This includes considering the use of recycled or locally sourced materials, implementing sustainable drainage systems (SuDS), and exploring opportunities for habitat creation or enhancement to achieve biodiversity net gain.
- **Monitoring and Adaptive Management Plan:** Develop a comprehensive monitoring plan to assess the effectiveness of the implemented landscape and ecological mitigation measures. This should include predefined indicators of

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success and an adaptive management approach to address any unforeseen impacts or challenges that arise during the project implementation phase.

By addressing these recommendations, the project can significantly mitigate its environmental impact while enhancing the Site's landscape and ecological value. It will also align with the planning application requirements and contribute positively to the local community and environment.

The following are examples of pre-commencement conditions that could be included (subject to suitability and checking by LCC Planning Authority):

- *Prior to the commencement of development, a landscape management plan shall be submitted to the Local Planning Authority for approval. The management plan should be prepared by a suitably qualified and experienced landscape/ ecology specialist. The plan should include long-term design objectives, implementation specifications, maintenance schedules, and management responsibilities for all landscape and habitat areas; and cover the period of 30 years post-commencement of the landscape works. The development shall be carried out in accordance with the approved management plan.*
- *Prior to the commencement of development, including demolition, earthworks, or vegetation clearance, a landscaping Scheme must be submitted and approved by the Local Planning Authority. The Scheme should cover hard and soft landscape works and earthworks and be phased in relation to the development. The Scheme approved by the Authority should be implemented in the first planting season after each development phase is completed. If any trees, shrubs, or plants die within five years after completion of each development phase, if any trees are removed, seriously damaged, or diseased during that period, they should be replaced promptly with similar-sized and same-species ones Unless the Local Planning Authority has given prior written permission for any variation.*