

**DESIGN AND CONSTRUCTION UNIT
ENVIRONMENT TEAM (ET)**

Application No: LCC/2021/0012		Consultation Ref No: LCC/2021/0012/ASPJMH	
Proposed Development/Plan/Project: Extraction of sand and gravel including construction of new Access road and new junction with a59 Preston new road, creation of plant site, weighbridge and stockpiling area, silt ponds, landscaping including screen mounding, with progressive restoration to wetland and passive flood management facility, woodland and agriculture			
Location: Lower Hall Farm, Samlesbury			
District: South Ribble			
Type of Consultation: Planning application		Date: 4/6/2021	
Officer: Steven Brereton, Senior Landscape Architect, ET			

I have reviewed the documents submitted with the above planning application and provide the following comments which I have grouped under two main headings:

1. Applicant's ***Landscape and Visual Impact Assessment, Revised June 2019***, document produced by Richard Payne CMLI

Some of the terminology used in section **5. Landscape Character and Methodology Assessment Elements** of the **Landscape and Visual Impact Assessment** (LVIA) is confusing, lacking in transparency and seems to be at variance with some of the requirements of GLVIA 3 which was allegedly used to inform the applicant's assessment. Examples of this include:

a) Para. 5.4 of the LVIA states, *"The determination of the sensitivity of the landscape resource is based upon an evaluation of each key element or characteristic of the landscape likely to be affected. The evaluation will reflect such factors as its quality, value, contribution to landscape character, and the degree to which the particular element or characteristic can be replaced or substituted."* This makes no reference to one of the key requirements espoused by GLVIA 3rd Edition which is determining a receptor's susceptibility. Judgements on susceptibility are combined with those on the value attributed to the landscape to determine the overall level of sensitivity to the proposed development.

b) **Table 1: Sensitivity of landscape** fails to make any reference to landscape susceptibility instead focusing on landscape capacity (but without explaining what the assessor means by this in the context of the requirements of GLVIA 3rd Edition) and it is not clear whether the level of sensitivity is specific to the type of

development proposed or a more general judgement of the wider landscape. Usually, a table identifying landscape sensitivity to the type of development proposed would combine judgements made on landscape susceptibility (derived from a consideration of physical and perceptual factors together) and landscape value (the relative value that is attached to different landscapes by society, bearing in mind that a landscape may be valued by different stakeholders). There is nothing wrong with deviation from GLVIA 3rd Edition or using terminology interchangeably but to ensure transparency, details of the changes/variations should have been provided.

c) Para 4.3 details the applicant's assessment of the area's landscape value, but the language used is overly subjective and lacking in transparency. Examples of this language include:

- *"landscape is no more than ordinary"*
- *"the landscape itself has no particular scenic appeal"*
- *"a typical piece of ordinary lowland landscape"*

In the context of landscape and visual impact assessment, this kind of subjective/dismissive language is unhelpful. It is also an approach which has lost ground with many landscape professionals, especially with the emergence and development of landscape character assessment which, amongst other things, is underpinned by a principle that *all landscapes have a value*. For these reasons then, I advise caution when considering the assessor's opinion that *"It does not pass the test of being 'valued' landscape."* It should also be noted that *"the landscape itself has no particular scenic appeal"* does not withstand any objective or subjective scrutiny as evidenced from these extracts from the applicant's visual survey:

"No particular scenic appeal"?





d) **Table 3: Assessment of potential significance of landscape impacts** in para 5.9 is useful but there is no indication of whether the levels of significance would likely be beneficial or adverse. In addition, no descriptions of the significance categories have been provided so for example it is not clear what impacts of substantial significance would involve. Would the development greatly enhance the character (including quality and value) of the landscape, create an iconic high quality feature and/or series of elements, enable a sense of place to be created or greatly enhanced or would the development be at considerable variance with the character (including quality and value) of the landscape, degrade or diminish the integrity of a range of characteristic features and element and damage the sense of place?

e) Confusingly, section **8. Landscape Character Assessment** does not contain details of any landscape character assessment and judgements made on the scheme's likely effects on published landscape character types and areas have not been provided. Para 8.1 states, "*Using desk-top and published studies, site surveys, aerial photographs and computer analysis, the baseline character of the landscape has been identified, confirmed and assessed*" but in the absence of any information in section 8 it is not clear whether reference should be made to other sections of the LVIA or even if key features of the landscape's character are well represented at the application site and wider landscape. Instead section 8 focuses primarily on presenting the findings of the applicant's assessment of landscape sensitivity (Table 1), assessment of magnitude of the proposal's likely effects (Table 2) and overall significance of effects (Table 3). It is section **4. Landscape Policies and Guidelines** which provides details of landscape character assessment applicable for the application site and wider landscape. It should be noted that the assessments of magnitude and significance of effects do not state which stage of the works they are applicable to. Good practice requires – and I would argue it is essential for development proposals like this which have a very long timescale – that assessments of impacts are provided for various stages of the development proposals.

The usability of the **Field Study Sheets** in Para 8.8 which identify "*elements that make up the immediate character of the area*" is diminished by various weaknesses including:

- **Dominant Landcover and Landscape Elements** are identified but it is not clear which of them are dominant.
- As we are dealing with the immediate area is it appropriate to list Industry as one of the key or dominant features?

- Trees are listed under the heading 'hydrology.'
- 'Winterbourne' is listed under **Communications** which makes no sense at all.
- *"Rarity within the character type : typical of character type so not rare."* Which character type is this referring to?
- *"Capacity to Accommodate Change."* No criteria provided to explain how this is determined.
- A description of features is provided by there is no actual classification of the landscape character. No explanation of how this description 'nests' within published landscape character assessments referred to earlier in the LVIA is provided.

Aside from these issues the **Field Study Sheets** do not provide a classification of the local landscape character – no local character types or areas are identified.

f) Para 9.2 refers to visual envelopes and zone of visual influence. However, no reference is made to the zone of theoretical visibility (ZTV) which is a key GIS map-based data assessment tool to provide a worst-case visibility scenario necessary for selecting viewpoints and identifying potential visual receptors. ZTV mapping provides complete coverage of the study area to a level which cannot be achieved by field work. Para 9.2 also fails to clearly identify and describe the study area used for the visual impact assessment. Of the drawings provided with the application, no study area is identified and in the case of the ZVI boundary in drawing 1040/PL388 Rev 8 areas from which the site is visible are not included. Similarly, with the assessment of effects on landscape resources, a study area is not defined or shown on drawings. Good practice for landscape and visual impact assessment requires the identification of a study area defined using various tools including ZTV mapping. The study area is where landscape and visual effects of moderate and above significance, i.e. those that are material for the purposes of determining the planning application, are likely to occur so clearly defining and presenting this area through map based data is essential.

Para 9.2 also advises that *"A viewpoint schedule defines the impact from each location in terms of sensitivity and magnitude that the development would have on that viewpoint."* Despite this, the LVIA does not provide a table(s) or schedule(s) identifying **for each specific visual receptor**, their sensitivity, change in view, magnitude of change and significance of effects at different stages of the scheme. **Table 3: Assessment of potential significance of visual impacts** for example in para 11.3 is provided to support the applicant's judgement on the overall significance of the visual impact of the proposals

g) The visual assessment shares the same flaws as the landscape assessment in that the susceptibility of visual receptors is not assessed or even referred to. In addition, the visual assessment uses terminology interchangeably which in the absence of a LVIA glossary is not very helpful.

In para. 11.1, a summary of the impact assessments of the development from viewpoints is provided but as these are just a value, e.g. 'High', it is not clear what is being referred to; magnitude of change, significance of effect? The same judgements are provided on the individual **Visibility Photograph Sheets** (Drawing Nos. 1040/PL30A-37 inclusive) but again no indication of what the value relates to has

been provided. Value judgements are provided for – note, inexplicably for i) to iii) only – *"during construction"* and *"at other times"*. The latter is of concern as it is too vague and, on a long lasting aggregate extraction scheme such as this, it seems unlikely that an *"at other times"* assessment would be sufficient to cover all of the visual effects. The appearance and extent of the scheme's impacts during Phase 1 and Phase 7 for example would likely be quite different and as such may have merited separate assessments of visual effects.

Where viewpoints have been chosen, many of them are clustered close to each other essentially duplicating information already provided. Perhaps as a consequence of this grouping, some areas have no viewpoints at all, e.g. the public right of way to the west of the application site (GR 358179,431678) and the public right of way within Red Scar Wood (GR 358206,432027). The latter is especially important as Red Scar Wood forms part of the setting to Preston Crematorium which has a locally important historic designed landscape. Viewpoints 29 and 30 were chosen even though they offered no visibility of the application site. Had the applicant undertaken ZTV mapping these viewpoints would likely have been scoped out early on in the LVIA process.

The absence of photomontages and/or site cross sections is a serious omission from the applicant's LVIA, especially given the scale and duration of the works and, the site's proximity to Brockholes Nature Reserve. No reasons for these omissions have been provided. In addition, the visibility photograph sheets only show the landscape in summer – photographs should have been provided for the winter to show the worst-case visibility scenario, i.e. when all the leaves are missing from the trees and shrubs. This would have been especially useful for determining the extent of visibility from Red Scar Wood.

Para. 11.2 states *"The overall sensitivity is determined as Medium."* This is of little use as, presumably, it is simply a mathematical average of the identified sensitivity levels of the selected visual receptors which, as outlined above, have been determined without any reference to visual susceptibility. Visual impact assessment is best undertaken with a process which focuses on the sensitivity of individual receptors and effects on their views rather than attempting to average out the level of sensitivity for all the visual receptors. Determining the overall visual sensitivity of the landscape would require substantially more work and evidence than that provided in the LVIA. Para. 11.5 also follows a similar averaging approach as this is stated, *"The overall magnitude is therefore assessed as Low."* This judgement should also be disregarded.

Para 11.2 also states, *"The assessments of sensitivity of the ZVI and the magnitude of impact are used to determine the overall unmitigated significance of the potential visual effect as the following table illustrates"*. The problem with this is the table referred to, Table 1, relates to the sensitivity of viewpoints.

Para 11.5 concludes that by *"Using the above tables and overall assessments the sensitivity of the potential visual impact has been determined as medium and the magnitude as low."* The misuse of terminology – sensitivity of a visual impact(?) – is confusing and undermines the reliability of this judgement.

h) Section **12. Mitigation Measures and Cumulative Impacts** has several weaknesses including:

- the assessment of cumulative impacts does not provide specific details of the applications in planning/post planning but not started on site that have been considered.
- para 12.6 confirms that *"There are no views from the existing industrial land"* but no details of this land's location are provided. Para 12.6 also refers to *"Views from further proposed extensions to the industrial site"* but again the name and location of this site are not provided. In the absence of this information it is not possible to validate judgements presented on cumulative impacts such as this, *"such development will still be screened by woodland and topography."*
- notwithstanding the problems arising from a lack of information on the type and location of existing development considered for the cumulative impact assessment, this judgement simply does not withstand scrutiny *"Therefore, as illustrated in the Visual Impact Analysis, no cumulative visual or landscape effects will arise in association with other mineral activities or any other development."* No cumulative visual or landscape effects... with... any other development? The applicant's own photographs clearly show existing development that would be seen in combination with the proposed scheme.

i) Of concern is the absence of a tree survey within the suite of application documents and, no reference is made to one in the LVIA. In the absence of such a document, it has to be assumed that the scheme proposals were developed without critical information on the application site's trees. Para 7.3 confirms that with regard to siting of the site access track it will be *"keeping at least some 10 metres from such features so as to protect root systems and allow for marginal shrubby ecotone planting in that gap."* Without a tree survey and no detailed root protection area data, it cannot be assumed that a 10 metre separation distance will be sufficient. In addition, it is not possible to determine the true effects of the scheme in terms of tree losses without information on tree root protection areas. And without certainty concerning tree losses, it is not possible to undertake habitat losses/gains calculations which are essential for determining the proposed scheme's overall significance of effects on landscape character and biodiversity.

Until a tree survey has been provided and the implications of it in relation to the proposals are assessed, the planning application should not be determined.

j) The various phasing plans provided to support the LVIA do not provide details of how long the phases would last and when the scheme elements would be implemented. Similarly, no programme is provided for the final restoration proposals. I cannot find this information in the application documents.

k) The LVIA makes no reference to the proposed extraction project's timescale.

l) The LVIA contains little in the way of assessment of the likely effects of the proposals on heritage assets. This is disappointing as the landscape setting and specific landscape features are invariably key components of a structure's historic interest.

To conclude, it has to be said that whilst the applicant's LVIA makes a number of valid points particularly in relation to the area's landscape characteristics and restoration proposals, for the reasons briefly outlined above, caution is advised in regard to reliance placed on the judgements made on the proposed scheme's likely landscape and visual impacts.

2. Proposed Sand and Gravel Extraction at Lower Hall Farm, Samlesbury

The extent to which I can comment on the elements of the proposed scheme which may/may not affect trees is greatly limited by the absence of a tree survey, photomontages/sections and information on in planning and consented development proposals which the proposed scheme may have cumulative effects with. The inadequacy of information concerning the programme of works for the various stages over what would be a 25 year extraction period also limits the extent to which the landscape and visual effects of the proposals can be evaluated. A 25 year period for the proposed works is materially significant as this is approximately half of a person's adult lifetime. In addition, given that there would be a rolling programme of extraction work and the restoration scheme would take at least 15 years to establish, we are effectively looking at a 'landscape on loan' for as much as 40 years.

Using the information submitted by the applicant, I make the following comments:

a) Application site and wider landscape

According to the County Council's Landscape Character Assessment (also referred to in the applicant's LVIA) the application site is situated within the following:

05 Undulating Lowland Farmland Landscape Character Type

05c Lower Ribble Landscape Character Area

11 Valley Floodplains Landscape Character Type

11a Lower Ribble Valley Landscape Character Area

The key features of the landscape character types are well represented at the application site and surrounds. The wooded river valley sides which provide a sense of enclosure, hedgerows and hedgerow trees which frequently define the field pattern, wooded cloughs and small mixed woodlands some of which are ancient are all characteristic of Lancashire's undulating lowland farmland. Similarly, the key features of the valley flood plains are all well represented by the open, flat floodplain, steep wooded bluffs (Red Scar Wood in particular), river meanders, low weirs, and mature spreading floodplain trees. Whilst there are gaps in some of the hedgerows and some trees in poor condition (not uncommon in a flood plain), generally the key features of the landscape character exhibit an intactness and the overall condition of individual elements is good. Taking these factors into account in combination with the general rural character, variety of farmland cover, broad open spaces, reasonable distribution of semi-natural vegetation (including ancient woodland), trees, hedgerows the site and surrounds have a **good** level of landscape quality.

In terms of landscape value it should be noted that the site and surrounds are within Green Belt, Brockholes Nature Reserve is there, there is a historic designed landscape at Preston crematorium, various listed buildings, areas of ancient woodland, broad views of the meandering river, steep wooded bluffs and large

mature trees. These features in combination with the recreation value afforded by the footpath network through what is still essentially a rural landscape with a distinctive sense of place afforded by the contrast between valley floodplain and undulating lowland farmland indicate that there is a **medium** landscape value.

The application site's relatively close proximity to the city of Preston is an important consideration. An analysis of GIS map data produced by the Campaign for the Protection of Rural England indicates that the application site and much of the surrounds provide a **low-moderate** level of landscape tranquillity – similar in fact to areas much further to the east along the Ribble Valley on the fringe of the Forest of Bowland AONB – which is important for an area so close to a city. The application site and surrounds are vital not only to city residents as they provide nearby places to escape to for recreation and social activities for example but also they are critical to maintaining local biodiversity and habitat connectivity (the River Ribble for example is a Biological Heritage Site).

Whilst the application site is only crossed by two public rights of way, the landscape amenity afforded by the surrounds is **moderate to high**. This is largely due to the network of footpaths and bridleways which include the regionally important published long distance trails, the 'Ribble Way' and the 'Guild Wheel' which, connect large residential areas with open countryside. The extremely popular 250 acre Brockholes Nature Reserve is close to the application site and to the north is the historic designed landscape at Preston Crematorium. To the east is the nationally important Grade I listed Samlesbury Hall and there are numerous historic listed buildings which in combination with the ancient and post medieval enclosure field patterns enhance the area's sense of place and cultural history. Due in part to the presence of ancient woodlands, Brockholes Nature Reserve and the River Ribble the area is rich in wildlife which is reflected in the high number of Biological Heritage Sites all of which are within close proximity to each other.

In determining whether the landscape of the application site and surrounds is susceptible to the proposed change depends on the extent to which it can have accommodated them without undue harm. As the application site is situated in a flat floodplain with good intervisibility with the surrounds, much of which is elevated, it is vulnerable to the introduction of relatively large scale aggregate extraction as the extensive screening required would be inappropriate in the flat landscape with its open character. Due to the site's location and lack of extensive areas of screening vegetation nearby, there is little that could be done to assimilate the development into the landscape. Because of these unavoidable issues, the application site and surrounds landscape susceptibility is deemed to be of a **moderate** level.

Since the landscape has good landscape quality, medium landscape value, a low-moderate level of landscape tranquillity, moderate to high landscape amenity and moderate landscape susceptibility, overall, the level of landscape sensitivity to the proposed development is deemed to be **medium**. It is only the absence of nationally important landscape and cultural designations which prevents the level of landscape sensitivity from being high.

In terms of visibility of the application site, the applicant has provided visual envelope and zone of visual influence data but as outlined above, the value of this information

is diminished by the absence of the widely used GIS based zone of theoretical visibility mapping. The application site is situated within a flat valley floodplain which has good intervisibility afforded to it due to the flat open spaces and elevated bluffs and ridges. This visibility is enjoyed by users of the extensive network of public rights of way and visitor attractions such as Brockholes Nature Reserve. In views from Brockholes, the application site is clearly visible and seen very much within a rural context – the broad views to the east up the Ribble Valley beyond the site have few man-influenced detractors. Similarly, in views of the application site from the north in the vicinity of Red Scar Wood (winter time) and south of Elston Old Hall farm and across the river and, to the east in the vicinity of Bezza House, the application site is visible and seen within a rural context with few man-influenced detractors although it seems likely that the proposed incinerator will eventually impact on views. In the majority of views from these areas, the steep wooded bluffs lend a sense of enclosure and the juxtaposition between broad low-lying open valley floodplain and steep wooded bluffs creates a distinctive sense of place. The fact that this visual experience can be attained within a short period of time and little travel from sizeable residential areas within a city greatly emphasizes the importance, in visual terms, of the application site and surrounds.

The application site would also be visible from the Ribble Way, Guild Wheel and M6 motorway (winter, glimpsed views). In views from areas to the south there would be little visibility of the application site due to intervening vegetation. However, there would be near distance views of the southern extent of the application site from residences such as Seed House Farm and public rights of way in the vicinity of Potter Lane.

Whilst it is beyond the remit of my response to undertake a full landscape and visual impact assessment – that should be provided by the applicant – it has to be said that of the visual receptors in the areas referred to above, the vast majority of them are **highly sensitive**, e.g. residents, users of public rights of way including the published long distance trails whose attention is likely to be focused on the landscape and visitors to Brockholes Nature Reserve where views of the surroundings are an important part of the experience.

Whilst my judgements on the likely landscape and visual effects of the proposed scheme are presented below, it must be borne in mind that as outlined above, the applicant has not submitted all of the information required for determining in full the true scope of likely impacts. In the interests of making progress I have done the best I can with the information provided. I will of course review and update my assessment of the proposals likely landscape and visual impacts should the applicant provide the missing information.

The magnitude of impact and the degree of change in the local landscape that would occur during the establishment and operation of the proposed extraction works would be **moderate - major adverse**. Within the site area formed by the river meander there would be a complete loss of many of the site's existing landscape features and Valley Floodplains Landscape Character. These losses would be replaced by spoil heaps, up to 8m high engineered and artificial looking screen bunds, engineered rectilinear shaped pools, access tracks, and other infrastructure. These new man-made and incongruous features introduced and maintained over a

long **25 year** timescale and significantly affecting 50+ hectares of land would appear in stark contrast to the pastoral valley floodplain landscape and be widely visible from numerous locations including Brockholes Nature Reserve, the Ribble Way, Guild Wheel, Bezza House, Seed House Farm, Red Scar Wood, M6 motorway, and other public rights of way.

As highlighted above, options for assimilating the extraction operations into the landscape are extremely limited due to effective mitigating features such as screen bunds being inappropriate for the largely flat open landscape. Furthermore, there are no areas of existing trees and woodlands adjacent to the application site (there is an area of scrub within the main extraction site but this would be removed) which could be used to screen the proposed works. Any new temporary screen planting would take at least 15 – 20 years to have any significant mitigating effect unless alien non-native fast growing species such as Eucalyptus were used. However, even if such an option was chosen, the resultant screen planting would appear as an inappropriate and incongruous feature in the flood plain landscape.

The magnitude of impact and the degree of change in views that would occur during the establishment and operation of the proposed extraction works would also be **major adverse**. Where visible within a 0.5km radius from the application site, due to the sheer scale of the proposed works, the main part of the site affected by aggregate extraction would become the dominant feature or focal point of the view. Views to the east from Brockholes Nature Reserve in particular would be significantly changed from wide, largely flat and pastoral valley flood plain to industrial. There would also be a major loss of landscape tranquillity. These effects would be compounded by the applicant's extraction phasing as phases 1 – 4 would be carried out in the part of the application site closest to the nature reserve.

The magnitude of effects on views would also vary depending on the phase of the scheme and the location of the viewer. During phases 1 – 4 when no riverside mitigation would be provided and the application site would see significant changes from open grassland to aggregate extraction, the magnitude of impact and the degree of change in views from Brockholes Nature Reserve looking east would be **major adverse**. These effects would subsequently be reduced to **moderate adverse** in the later phases as riverside mitigation planting began to establish and the rectilinear pools within the site closest to Brockholes were combined to form a more natural looking large pond with irregular edge profiles. By comparison, even though no mitigation planting is proposed for the river bank to the north of the application site, in views from locations such as Bezza House the effects of distance and limited amounts of intervening vegetation would reduce the magnitude of effect to **moderate adverse** irrespective of the phase that the extraction works were in.

Beyond a 0.5km radius from the application site, the effects on views would be increasingly mitigated by distance – helped by the absence of tall structures within the application site – and intervening vegetation to **moderate – minor adverse** level, i.e. where visible, the scheme would be perceptible but not alter the overall balance of features and elements that comprise the existing view.

The magnitude of impact and the degree of change to the landscape and views post completion of extraction works and restoration would likely be **moderate beneficial**.

New features would be created using landscape elements associated with the local landscape character, e.g. scrub, grassland and wetlands. Set against this would be the loss of distant views up the valley from the eastern side of Brockholes Nature Reserve owing to woodland planting along the edge of the river within the application site. In addition, the completed restoration scheme with its mosaic of habitats would be completely different than the removed floodplain pastoral landscape – this would not be a reinstatement of what had been lost and within the application site, the landscape would have been irreversibly changed. However, on balance and taking account of the significant potential for biodiversity gains likely to arise from the restoration scheme, the overall effect would likely be beneficial, i.e. a noticeable improvement of character by the addition of new characteristic features. The restored landscape would in effect be a new layer in the local landscape's history of aggregate extraction.

Support for this beneficial effect should be tempered by the very long timescale involved between commencement of the application site establishment and maturity of the completed restoration scheme – potentially a significant portion of a person's adult lifetime. Native trees and shrubs in particular would require at least 15 years to achieve a noticeable presence in the landscape and adequately mitigate the effects of the proposed scheme. This could mean – and again I have to point out that detail provided by the applicant on the timescales of the various phases is light – a period of 40 years before the landscape is 'returned' to a state of maturity and semi-natural appearance. Whilst assessing the acceptability of this is beyond the scope of my work, I do recommend that the council attach great weight to the timescales involved when determining the application.

Regarding the significance of overall landscape and visual effects, there is a marked difference between those during the extraction and restoration stages.

The extraction stage of the project would result in a complete and permanent loss of many of the site's existing landscape features, harm landscape tranquillity, introduce industrial processes and infrastructure that would cause obvious deterioration to the views of moderate and highly sensitive receptors. These 'industrialising' changes would be in conflict with the open and largely flat pastoral valley flood plain character of the landscape, change the setting and character of some listed buildings, adversely affect visual amenity of Green Belt land and diminish the sense of place and landscape amenity, particularly that experienced from the path network, some of which form parts of regionally important published long distance trails. For all these reasons, the effects of the extraction works are deemed to be of **moderate adverse** significance. And, as highlighted previously these effects would be experienced over a substantial period of time – it could be as much as 40 years (most of a person's adult lifetime) before the landscape is returned to a semi-natural appearance.

The significance of landscape and visual impacts post completion of extraction works and restoration would likely be **moderate beneficial**. Creation of wetlands, open water features, reedbeds and woodland, some of which have previously been lost or degraded either through no or inappropriate management and development would enhance the local landscape character and sense of place. There would be no net loss of key features of the landscape character and in some cases, e.g. trees, there would be a significant increase in numbers. Whilst no public access is proposed for

the restored site, the increased wildlife that would be visible within it from the surrounding footpath network and the obvious enhancement of views would increase landscape amenity and help restore landscape tranquillity lost during the extraction works stage. The restored site would largely have a low lying near flat topography (no proposals for the creation of large landforms comprised of surplus aggregate or other excavated materials) in keeping with the valley floodplain character and enabling the openness of the Green Belt evident before extraction works began, to be maintained. The restoration scheme's new landscape features would be arranged to create a diverse semi-natural landscape that would bring about an obvious improvement in views from moderately and highly sensitive receptors over a wide area. It seems likely that the site would develop into a locally valued landmark that through its diverse mix of habitats and acceptable 'fit' with the landscape character, added visual interest to users of the footpath network and published long distance trails.

To mitigate some of the moderate adverse effects of phases 1 – 4, in particular on views from Brockholes Nature Reserve and the footpath network, I recommend that consideration be given to swapping the location of these phases with phases 5 – 9. This would delay effects of the extraction works on views from Brockholes for a significantly longer period. This beneficial effect could be enhanced further if advance planting was undertaken along the edge of the site closest to Brockholes and along the southern boundary of phases 1 – 4. If fast growing native tree species were planted, by the time phase 6 was starting (about 15 years after extraction works commenced?) these trees should have achieved at least 8 – 10m in height which would have a noticeable mitigating effect. Along the southern boundary of phases 1 – 4, I recommend Eucalyptus tree planting many varieties of which exhibit astonishing rates of growth. However, as Eucalyptus sp. are non-native trees, they would have to be removed as part of the restoration scheme when their mitigation of extraction works visual effects was no longer required. **It would not be appropriate in landscape and ecological terms to retain these trees as permanent features of the restoration scheme.**

For all the reasons identified in these comments, the landscape and visual impacts of the proposed restored application site are deemed to be acceptable in landscape and planning policy terms.