

Preston and South Ribble FRMS Planning Conditions 12 & 13 - LCC Landscape Comment Tracker
Meeting Minutes 21.02.2022.

Attendees: Steve Brereton (LCC Landscape), John Jones (LCC Ecology), Connor McIlwraith (EA), Lance Farlam (EA Landscape), Simon Keys (Jacobs), Anna Ruffell (Jacobs Landscape)

Please refer to document ENV0000009C-JAC-ZZ-ZZ-TN-L-0002 for a summary of the landscape updates undertaken following LCC Ecology comments.

Ref	LCC Landscape comments	Jacobs comments	LCC meeting minutes 21.02.2022	Jacobs LHEMP / Drawing updates 28.02.2022
	<p>I have reviewed the applicant's documents submitted in connection with the above scheme, particularly with regards to discharging planning conditions 10, 12, 13 and provide the following comments on them:</p> <p><u>2. Planning Condition 12</u> Regarding landscape resources, this condition states, amongst other things, that, "No development shall commence until a landscaping and habitat establishment and management plan for land within the application site, has been submitted to and approved in writing by the County Planning Authority. The plan shall include the following: a) The nature and depth of any soil making materials. b) The design, construction and planting of waterbodies. c) Locally native tree/shrub planting and seed specification. f) Details of the ongoing maintenance and management of the landscaping and habitats at the site for a period of 15 years."</p> <p>No specific document devoted to a) the nature and depth of soil making materials has been provided but there are some details on dwg ENV0000009C-JAC-ZZ-ZZ-DR-L0032 Rev C03. The information on this dwg alone is insufficient, particularly regarding the following:</p>			
1	<ul style="list-style-type: none"> "8. All disturbed ground to be reinstated and decompacted where necessary" How will this be done and which areas will require these works (they need to be shown on a dwg)? 	Landscape specification Section Q28, clause 675a Not usually shown on drawings, areas to be agreed with the CA on site upon completion of the engineering works.	Agreed to add decompaction areas at site compounds and haul routes to landscape drawings.	Landscape specification added to LHEMPs as an appendix. Covered under Section Q28, clause 675a. Note added to drawing to
2	<ul style="list-style-type: none"> "9. Topsoil profiles to be reinstated with a mix of site-won topsoil sourced from working areas and imported topsoil as necessary to make up the shortfall." How will the site topsoil be stripped, stored, transported and cultivated? Where will the soil be stored? Thickness of topsoil layer for shrub planting and grass seeding at completion of spreading/compaction/cultivation works should be stated. 	Landscape specification Section D20, clauses 220 to 454 Topsoil depths: Section Q28, clause 710A Soil preparation: Section Q30 Seeding, clauses 205 to 290. Section .Q31 Planting, clauses 300A to 375A	Agreed that there would be subsoil improvement for shrub borders. Note added to drawings and spec.	Note 8 on sheet 20 updated. Compound areas hatched on drawings sheets 3,4,9,10 and 12. Haul routes are on tarmac routes except for the BAC sports pitch which has been hatched. Covered in landscape specification Section D20, Q28, Q30 and Q31.
3.	<ul style="list-style-type: none"> "9. ...Imported topsoil shall comply with BS 3882:2015" The BS topsoil grade is not stated. Where will imported topsoil be stored and how will it be handled, spread, compacted and cultivated? 	Landscape specification: Section Q28, clause 315A, 705 to 920	Noted.	Covered in landscape specification Section Q28 Note 9 on sheet 20 updated
4	<ul style="list-style-type: none"> "11. Flood embankment and reinstatement areas to have a minimum depth of 100mm topsoil and seedbed prepared and sown with species-rich grassland and wildflower mixes as detailed on drawing" Wildflowers should not be sown in topsoil. Topsoil's high fertility disadvantages wildflowers when competing against grasses and unwanted 'weeds.' Initially topsoil 	Landscape specification: Section Q28, clause 315A General purpose except for species-rich grassland areas to have no topsoil. Flood	Agreed.	Covered in Landscape Specification Section Q28. Note 9 on sheet 20 updated.

	provides a good display of wildflowers, but after a few years grasses always become dominant. A sandy granular subsoil type material rather than would be more appropriate for wildflowers.	embankment will be low fertility topsoil to reduce risk from erosion / instability due to slow sward establishment.		
5	<ul style="list-style-type: none"> "13. BAC sports pitches ground preparation, drainage, turf and seeding reinstatement to be undertaken by a specialist sport pitch contractor... All disturbed areas to be made good." This is too vague to be of any real use, e.g., how will the ground preparation, turf and seeding reinstatement be done? How will disturbed areas be made good? 	Undertaken as a separate contract, specification to be provided.	Sports pitch works to be undertaken in 2024 by a Sport England approved sports pitch contractor. EA to submit details of contractor, and agreed specification to be submitted when available.	Sports pitch contractor details: PSD Labosport (Sport England approved) have undertaken an agronomy report and will do one post remediation too to ensure that reinstatement is correct. Specification to be submitted when available as per meeting note.
6	<ul style="list-style-type: none"> "14. Shrub planting plots to have a minimum of 300mm depth topsoil. Subsoil to be decompacted and topsoil cultivated to full depth." Given the size of some of the chosen ornamental shrub species at maturity, is a topsoil depth of 300mm sufficient? I suspect not, but a decision on this needs to be informed by information on the existing subsoil's make up (not provided). How will the soil decompaction and cultivation be undertaken? 	300mm depth agreed with stakeholders Refer to item 1 for decompaction.	Agreed depth to be 300mm depth with subsoil improvement/decompaction.	
7	<ul style="list-style-type: none"> "16. Refer to the specification Section Q31 for tree pit preparation, planting and staking information." I cannot find 'section Q31' in any of the applicant's documents. 	Landscape specification provided. Section Q31.	Agreed.	Covered in landscape specification, section Q31
8	<ul style="list-style-type: none"> "17. The maintenance establishment period for the contract is one year post construction." This should be for 5 years to ensure that the scheme is handed over with all the new plants and habitats are fully established. 	LHEMP updated as part of LCC Ecology updates Maintenance establishment period is 5 years.	Agreed. Maintenance responsibilities are as per the LHEMP. LCC will not be responsible for the maintenance of any of the areas.	Section 4 of the LHEMP updated as part of the LCC ecology comment updates.
9	A key document necessary for reviewing b) <i>The design, construction and planting of waterbodies</i> is referred to on dwg ENV000009C-JAC-ZZ-ZZ-DR-L0025 . I cannot find this dwg – Ribble Sidings Landscape Sketch ENV000009C-JAC-ZZ-42X-DR-L-0002 – in the applicant's suite of documents so am unable to comment on this aspect of the scheme. Until this drawing is provided, I recommend that b) of Planning Condition 12 should not be discharged.	Ribble Sidings proposals submitted as part of the LCC Ecology comments updates. Proposals for Ribble Sidings have been agreed with South Ribble Borough Council who were also involved in the preliminary design for the area.	Jacobs/EA to check Ribble Sidings L0002 drawing was submitted as part of drawing package.	
10	Part c) of planning condition 12 requires <i>"Locally native tree/shrub planting and seed specification."</i> Two dwgs, ENV000009C-JAC-ZZ-ZZ-DR-L0032 Rev C03 and ENV000009C-JAC-ZZ-ZZ-DR-L0033 Rev C03 only provide some of the required specification information (to be expected as they are primarily plant schedule dwgs). No actual tree/shrub planting and seed specification document has been provided. Consequently, little or no details of the following have been provided: <ul style="list-style-type: none"> native tree, shrub and grassland seed provenance. shrub and bulb planting method. grass seeding method. as indicated above, little information on pre planting and seeding preparation. planting programme 	Provenance: Section Q30 Seeding, Clause 308 and Section Q31 clause 121, 200A Shrub planting – Section Q31, clause 375a, 405A – 487A Bulb planting – Section Q31, clause 489 Grass seeding: Section Q30, clause 205 to 590 Planting programme:	Noted.	Landscape specification added to Appendix A of the LHEMPs.

		The planting will be implemented within the first planting season upon completion of the engineering works. Section Q31, clause 125		
11	Aside from a lack of specification information referred to above, there are other issues relating to dwgs, ENV000009C-JAC-ZZ-ZZ-DR-L0032 Rev C03 and ENV000009C-JAC-ZZ-ZZ-DR-L0033 RevC03 including: <ul style="list-style-type: none"> an extra heavy standard tree pit detail has been provided even though no extra heavy standard trees are proposed. 	Updated to heavy standard as part of LCC Ecology comment update.	Agreed.	Updated as part of LCC ecology comment updates
12	<ul style="list-style-type: none"> no tree pit planting details have been provided for the proposed light standard, half standard, standard and heavy standard trees. 	Landscape specification, section Q31, clause 505A to 596	Noted.	Covered in landscape specification. Section Q31 Landscape specification added to appendix A
13	<ul style="list-style-type: none"> transplants are proposed over – in most cases – cell grown plants. Cell grown plants are much easier to establish and exhibit faster rates of growth than transplants. 	Updated to cell grown as part of LCC Ecology comment update.	Agreed.	Updated as part of the LCC ecology comment updates
14	<ul style="list-style-type: none"> heavy standard trees are expensive and difficult to establish without a lot of post planting aftercare. They tend to sit in the ground for years doing very little and are usually quickly overtaken by trees which were planted at much smaller sizes. unless trees are being planted close to a carriageway or footpath, why chose 'lollypop' shaped standards over feathered trees which retain their full complement of branches and hence have a natural appearance? 	Tree planting specification and locations agreed with Preston City Council and South Ribble Borough Council.	Agreed.	
15	<ul style="list-style-type: none"> I am not convinced that planting fruit trees in what WILL be a low or no future maintenance public realm scenario will be successful. Fruit trees with their pollination needs, complicated pruning requirements and vulnerability to pests can be challenging even for professionals growing them in a commercial orchard. 	Fruit trees requested by South Ribble Borough Council and Preston City Council for Ribble Sidings and Broadgate Gardens.	Agreed.	
16	<ul style="list-style-type: none"> Holly is shown in the schedule twice, one entry of which has nothing proposed for planting. Why? 	Updated as part of LCC ecology updates.	Noted.	Sheet 20 plant schedules checked and updated.
17	Part f) of planning condition 12 requires <i>"Details of the ongoing maintenance and management of the landscaping and habitats at the site for a period of 15 years."</i> This information is provided in Landscape and Habitat Establishment and Management Plan and Landscape and Habitat Establishment and Management Plan - Fishwick Bottoms . Landscape and Habitat Establishment and Management Plan This document is confusing as it provides information on design concepts, biodiversity net gain and specification for some of the pre- landscape and habitat establishment and management plan (LHEMP) period construction works, some of which contradict information provided in other documents. The following concerning this document are also worth considering: <ul style="list-style-type: none"> Section 3.1 Landscape Design of the LHEMP states, <i>"The flood defences have been carefully designed to minimise impacts on existing landscape and visual resources and to integrate the proposed scheme as sensitively as possible into the receiving landscape. The proposed works have been developed so as to minimise direct impact on vegetation of landscape value, particularly specimen trees."</i> In light of the scale of tree loss (approximately 500) for the flood defence scheme, particularly along Broadgate, and with reference to my comments on the planning 	Noted. The text is from the LVIA submitted as part of the planning permission. It has not been possible to avoid the loss of the self-sown trees along the wet side of the existing flood wall and along the footprint	Noted	

	application for this scheme (<i>"Of most concern with these proposals, is the tree loss, which would be on a scale rarely seen in the city of Preston"</i>), I cannot accept the premise that flood defences have been carefully designed to minimise impacts on existing landscape and visual resources.	of the existing flood embankment.		
18	<ul style="list-style-type: none"> I agree with the county council ecologist that the proposed 1 year establishment maintenance/replacement planting period is not sufficient to ensure successful establishment of habitats. This period should be at least 5 years long. 	LHEMP updated as part of LCC ecology comment updates. Maintenance establishment period is 5 years.	Agreed.	
19	Section 4.2 Monitoring confirms that <i>"The EA (or their agents) will monitor the success of the habitat creation areas for a period of 15 years."</i> I strongly recommend that a <u>suitably qualified professional ecologist</u> is part of the team carrying out the monitoring and reporting back work throughout the 15 year LHEMP period.	LHEMP updated as part of LCC ecology comment updates.	Agreed.	
20	The planting density of 3m as stated in section 5.1 Native Broadleaved Woodland is too low. Good practice for forestry planting requires 2m spacing for trees. In addition, reference is made to provenance, but the wording is too vague to be of much use. Confusingly, section 5.2 provides detailed specification information on works, e.g., tree and shrub planting, that would be completed <u>before</u> the LHEMP period commences. As these works fall outside the scope of the LHEMP it is not clear why they have been included or whether they would take precedence over the contractual works specification (not submitted).	Planting density has been agreed with South Ribble Borough Council The landscape specification takes precedence.	SB to check this is okay for the small areas of woodland within Ribble Sidings	Section 5.1 Woodland planting density is 1.5m centres not 3.0m centres, the LHEMP text says taller tree species to be planted at 3.0m centres within the mix.
21	The maintenance works described in 5.1 Native Broadleaved Woodland have a number of weaknesses and omissions. Site clearance works are described but no information has been provided on pre-planting cultivation/preparation and whether additional topsoil will be required. The backfill material for the planting pits should be a mixture of excavated topsoil and suitable compost.	Landscape specification: Section Q31 Backfill material – clause 475 and 586A	Noted.	Covered in Section Q31 of the landscape specification. Site clearance and preparation, weed control summary text and reference to landscape specification added to LHEMP,
22	In 7) Hand Weeding , this is stated even though there is no reference to weed control anywhere else, <i>"Keep tree and shrub bases (and guards/tubes) clear of weeds, by hand weeding to ensure there is no weed growth within the ring spray area."</i> If weed control is to be undertaken by herbicide applications, then full details of this work should be provided.	Weed control Section A34, clause 347 Section Q35, clause 125, 198, 645, 650, 670	Noted.	As above, weed control text updated in LHEMPs
23	10) Replace Losses , it needs to be stressed that replacements are planted in the first planting season after the failures have been identified. This is to prevent contractors from 'saving up' all replacements till the end of the establishment maintenance period. Plant failures <u>throughout</u> the establishment maintenance period should be replaced, not just those within year 1. Reference is made to <i>"ENV0000009C-JAC-ZZ-ZZ-SP-L-0001 for full details of the landscape specification for the landscape and habitat establishment and management proposals"</i> but this document has not been submitted.	Section Q35, clause 635 Agreed. Plant replacements undertaken each year for the 5 year maintenance establishment period.	To be updated in LHEMP so the text is clearer.	Covered in Section Q35 of the landscape specification. LHEMP text for each habitat type updated.
24	<ul style="list-style-type: none"> According to 14) Thinning/Coppicing, <i>"Thinning and coppicing operations to be undertaken at year 5 and subsequently on 5 yearly cycles."</i> Given the low planting density and the species to be planted, it is very unlikely that any thinning would be required by year 10 at the earliest. The Activity and Timings table states that only two hand weeding's per year would be carried out. This is insufficient. No pest control measures have been provided and there is no reference to undertaking the spot treatment of persistent weeds deemed necessary for specimen trees. 	Landscape Specification: Section Q35, clause 720A. Planting densities have been agreed with stakeholders as previously noted. Thinning and coppicing clauses may not be required as a result of the densities of planting but they are incorporated in case the need arises. Planting densities selected reflect a balance of capital and revenue costs and a variety of other constraints. Management of planting at these densities	Add timing subject to review to be added to LHEMP text	LHEMP text on page 14 states thinning and coppicing operations would be subject to development of planting and following a review: Thinning and coppicing operations to be undertaken at year 5 and subsequently on 5 yearly cycles subject to development of the planting and following a review by the landowner. or suitably qualified personnel Pest control added to weed control, and refers to the pesticide/herbicide section A34 of the landscape specification

		<p>must adapt accordingly and as noted thinning or coppicing may not be required as early as a consequence of the decisions agreed by the stakeholders.</p> <p>Timings: Section Q35 Clause 120 and</p> <p>LHEMP notes after Table 1 state that the number of visits indicated for the maintenance establishment period is to be taken as a minimum, the contractor is to ensure enough additional visits or combine operations to ensure compliance with the clauses in section 5.</p> <p>Pest control / herbicides Section A34</p>		
25	<p>Section 5.2 Specimen Trees contradicts the planting schedule ENV000009C-JAC-ZZ-ZZ-DR-L0032 by stating the following for fruit trees, "An area of Orchard tree planting is proposed at Ribble Sidings. Tree planting species include the following are specified as heavy standards 12-14cm girth." On the drawing the orchard trees are specified as 6 – 8 cm and 8 – 10 cm girth. Which document is correct?</p>	<p>The drawing is correct.</p>	<p>LHEMP to be updated.</p>	<p>Section 5.2 of the LHEMP updated</p>
26	<p>In addition to this, section 5.2 Specimen Trees shares many of the same issues as those referred to above on section 5.1 Native Broadleaved Woodland. These include lack of information on pre planting preparation and soiling and, insufficient and replacements of failures in year 1 only. Does the information provided on tree planting method, staking, etc. supersede that shown on dwg ENV000009C-JAC-ZZ-ZZ-DR-L0032? There are inconsistencies between the two. Section 5.1 confirms that unlike the native broadleaved woodland, the specimen trees will be mulched – why is there a difference in mulching proposals for different types of vegetation? Other inconsistencies of approach relate to spot treatment of persistent weeds (not proposed for native broadleaved woodland) and weeding by hand only (reference made to herbicide for broadleaved woodland).</p>	<p>see previous comments</p> <p>Mulch areas agreed with South Ribble Borough Council and Preston City Council and other stakeholders.</p> <p>Ornamental planting beds and trees within amenity grassland areas will be mulched. Native planting plots are within seeded plots.</p> <p>Herbicide treatment as per landscape specification Section A34 and Q31</p>	<p>Agreed.</p> <p>Mulch for hedge ornamental planting and individual trees, and seeding for native planting plots.</p> <p>Herbicide all areas, hand weeding if weeds in tubes.</p>	<p>Site clearance, preparation, weed control text and reference to landscape specification added to LHEMP,</p>
27	<p>Section 15) Remove Stakes, Ties and Guards confirms that once trees have successfully established the various supports will be removed. I recommend a more cautious approach which gradually weans the trees off their stakes.</p>	<p>Noted Section Q35, clause 510</p>	<p>Note to be added to LHEMP.</p>	<p>Note added to LHEMP for each habitat</p>
28	<ul style="list-style-type: none"> In the Activity and Timings table, only 1 mulch top up per year is proposed. A more flexible approach is needed, especially in more exposed and well used areas. No pest control measures and orchard tree specific maintenance measures have been provided. 	<p>Frequency agreed with stakeholders.</p> <p>Pest control as per Landscape Specification, Section A34</p>	<p>Agreed.</p>	
29	<p>Privet is proposed in section 5.3 Hedgerows but as this is not typical of Lancashire hedgerows, I do not think that it is an appropriate choice of species. If an evergreen plant is required, Holly is a more appropriate choice and unlike Privet it does not tend to lose</p>	<p>A mix of holly and privet agreed as part of LCC ecology updates.</p>	<p>Agreed.</p>	

	some of its leaves in winter. It is worth noting that hedgerows have a very limited screening effect as they tend to be cut to heights of 1.5 – 2.0m			
30	. In addition, section 5.3 Hedgerows shares many of the same issues as those referred to above on section 5.1 Native Broadleaved Woodland . These include lack of information on pre planting preparation and soiling, insufficient hand weeding operations, and replacements of failures in year 1 only. The bottom 150mm of the trench that the hedgerows will be planted in will need to be broken up in the same way as that proposed for the specimen trees and native broadleaved woodland. Unlike the specimen trees there are no proposals for mulching the hedgerows. Why? In	See ref. 10 and 23 above Landscape Specification, Section Q31 Mulch: Clause 485A Hedgerow added.	Noted. Agreed. Hedgerow to be mulched.	Covered in section Q31 of the landscape specification. Mulch added to Hedgerow section of LHEMP
31	<ul style="list-style-type: none"> 7) Hand Weeding, this is stated even though there is no reference to weed control anywhere else, "Keep tree and shrub bases (and guards/tubes) clear of weeds, by hand weeding to ensure there is no weed growth within the ring spray area." If weed control is to be undertaken by herbicide applications, then full details of this work should be provided. This note also refers to 'trees' even though the hedgerow plant species mix does not contain any (although I accept that there is some debate about whether Hawthorn is a tree or large shrub). The proposal to maintain the hedges to a height of 1.2m means that they would have little screening effect – I recommend cutting them to a height of around 2m. If space allows the hedgerows should also be cut so that they are wider at their base than at the top. In addition, longer term, consideration should be given to hand laying some sections of the hedgerows. No pest control measures have been provided and there is no reference to undertaking the spot treatment of persistent weeds deemed necessary for specimen trees. 	Weed control – Section A34 and Q31 Hedge heights agreed with stakeholder, the hedge is within the grounds of Miller Garden Apartments. Lower section of hedge is in front of new flood wall glass panels with hedge maintenance height selected as necessary to suit this arrangement.	Agreed.	Weed control covered in section A34 and Q31 of landscape specification. LHEMP text updated.
32	<ul style="list-style-type: none"> Section 5.4 is titled Native Shrub Planting, but it should be noted that Cherry laurel in shrub mixes C and D is not native. For the same reasons given above, I recommend that privet is substituted for Holly in the planting mix identified in section 5.4 Native shrub planting. In addition, section 5.4 Native shrub planting shares many of the same issues as those referred to above on section 5.1 Native Broadleaved Woodland. These include lack of information on pre planting preparation and soiling, insufficient hand weeding operations, and replacements of failures in year 1 only. Unlike the specimen trees section, there are no proposals for mulching the shrub planting. Why? Whilst there is no reference to undertaking the spot treatment of persistent weeds deemed necessary for specimen trees, unlike the weeding proposals for broadleaved woodland, specimen trees and hedgerows, something more specific for weed control by herbicide – herbicide ring spraying (ref. Timings table) – has been identified for the native shrub planting. Unfortunately, no specification information has been provided for this 'ring spraying' and there is no explanation of why it was considered necessary for the shrub planting only. No pest control measures, or thinning proposals have been provided for the shrub planting. 	Cherry Laurel replaced with Holly and Privet as part of LCC Ecology comment updates. Privet and Holly agreed as part of LCC Ecology comments See ref 1, 23 and 26 above Weed/pest control – section A34	Agreed.	
33	<ul style="list-style-type: none"> Unlike the planting types referred to above, section 5.5 Ornamental shrub and perennial planting does state requirements for pre-planting cultivation although no specification has been provided for sub-soil preparation. Herbicide application is required for the site clearance works but if there is a long gap between this and the pre-planting ground cultivation works, then an additional herbicide application would be required up to two weeks before they were started. Unlike the native broadleaved woodland, the ornamental shrub planted areas would be mulched. Why is there this difference of approach? There is also inconsistency regarding weeding as unlike the native shrub planting, the ornamental shrub and perennial planted areas would not have any ring spraying. Again, why is there this difference of approach? In 10) Replace Losses, it needs to be stressed that replacements are planted in the first planting season after the failures have been identified. This 	Sub soil prep – see ref 2 above. Mulch agreed with South Ribble Borough Council and Preston City Council. Landscape specification: Herbicide treatment/pest control – Section A34	Agreed.	Section 5.5 plant replacement text updated in LHEMP

	<p>is to prevent contractors from 'saving up' all replacements till the end of the establishment maintenance period. Plant failures <u>throughout</u> the establishment maintenance period should be replaced, not just those within year 1. In the Timings table, only 1 mulch top up per year is proposed. A more flexible approach is needed, especially in more exposed and well used areas. No pest control measures have been provided. A 'one size fits all' pruning regime is proposed – "Pruning and removal of dead plant material. February" which is sub optimal for some ornamental shrubs. Plant specific pruning proposals would be more appropriate.</p>	<p>Replacements are annually, See ref 1, 23 and 26 above.</p> <p>Pruning: Section Q35, clause 540-580</p>	<p>LHEMP text to be updated for replacements so it is clear replacements are to be undertaken every year.</p>	
34	<p>Section 2) Cultivation of 5.6 Amenity Grassland states "<i>Remove stones and clay balls larger than 50mm in any dimension.</i>" For areas that are to be mowed, I recommend a maximum stone/clay ball size of 25mm in any dimension.</p>	<p>Section Q30, clause 250 - updated to 25mm</p>	<p>Agreed.</p>	<p>Section Q30 Section 5.6 LHEMP text updated to 25mm</p>
35	<p>Some specification details are provided in 6) TURFING but nowhere near enough the level of information required, presumably because the developer is relying on a specialist sub-contractor to produce this at a later stage. If that is the case, then I recommend that this information is submitted to the planning authority for approval before any turfing commences on site</p>	<p>BAC Sports pitch is a separate specification</p>	<p>See item 5 above.</p>	<p>Turf text deleted from LHEMP, see item 5 above. Reference to sports pitches deleted.</p>
36	<ul style="list-style-type: none"> Section 7) Grass Cutting/Maintenance Cuts confirms that "<i>At the end of each cut, trim all grass edges, around the base of trees.</i>" As the trees are mulched around their bases, is this work necessary or even desirable? Section 7) also states "<i>Cut to maintain height of between 50-75mm.</i>" Does this include the sports pitches? 50-75mm is too long for pitches used for football, rugby, cricket, etc. The maximum permissible stone size should be 25mm not 50mm as stated, especially for the sports pitches. "<i>Weed control with a suitable selective herbicide</i>" is referred to in the Timings table but no specification has been provided for it. The Timings table provides mixed information on the length of the maintenance period it relates to, e.g., "<i>Re-seed areas that are dead or failing to thrive of dead/damaged lawn (first 5 years only)</i>" compared with "<i>Fertiliser once per year (first year only).</i>" Why the difference? 	<p>Deleted from spec.</p> <p>Does not include sports pitch see ref 35 above.</p> <p>Stone size – see ref 34 above</p> <p>Weed control as per sections A34 and Q35</p> <p>Fertiliser 5 years, Q35, clause 350</p>	<p>Agreed.</p>	<p>Section 7 LHEMP text updated to remove reference to 1 year for fertiliser.</p>
37	<ul style="list-style-type: none"> Yet more inconsistency can be found in section 5.7 Grassland as unlike some of the other section's, a specification has been provided for subsoil cultivation (see my comments above). Set against this is the absence of any reference to site clearance which can be found in other sections. In 2) Final cultivation a different maximum permissible stone size is referred to – "<i>surface stones/earth clods exceeding 38mm for general areas</i>" – which is <i>smaller</i> than that allowed for the sports pitches. A maximum size of 25mm is recommended for all grasslands. Unlike all the other planting/seeding proposals, no watering is proposed for grassland – why? No frequency for herbicide applications has been stated. 	<p>Site clearance Section A34, D20, Q30</p> <p>Stone size – see ref 34 above</p> <p>Watering Section Q35, clause 155A – 160A</p>	<p>Noted.</p>	<p>Covered in Landscape specification. LHEMP text updated.</p>
38	<ul style="list-style-type: none"> In section 5.8 Pre-planted Coir roll sub-section 4) confirms that these would be hand weeded. Given their proximity to a river with strong currents and tidal fluctuations, this may not be a safe option. 	<p>Section Q35, clause 897</p>	<p>Noted.</p>	<p>Landscape specification provided as an appendix to the LHEMP</p>
39	<ul style="list-style-type: none"> Section 5.9 Wetland Planting and Management of Waterbodies provides yet another example of inconsistent level of specification detail as it contains much information on the plants to be planted – something which is absent from the other sections. Planting cell grown aquatic/marginal plants can be problematic as they can bring with them other unwanted highly invasive plants. Strict quality control assurances should be sought from the plant suppliers or, alternatively, consideration should be given to seeding instead. I recommend that the developer liaise with the county ecologist on this matter. Regarding "7) Silt Removal: Remove litter, debris, accumulated silt offsite" is this work necessary and would it 	<p>Wetland planting removed as part of LCC Ecology comments, area to be seeded to reduce risk of invasive plants.</p>	<p>Agreed.</p>	

	not be damaging to the wetland's ecology if carried out? This operation is not referred to in the Activity and Timings table.			
40	<ul style="list-style-type: none"> Insufficient specification information has been provided in section 6.1 Injurious and Problem Weed Control. In principle, the proposal is to try control these weeds by grass cutting, and if that fails, hand weeding and herbicide application. The problem with this approach is that within the planting areas, there would be no grass to cut. Hand weeding and herbicide application would be required from the start. This section also confirms that <i>"Attention is required during the initial 1 year establishment period, where there will be spot checking two times a year and immediate remedial action taken as required. The LHEMP review will determine after year five, whether</i> <i>the frequency of inspections can be reduced."</i> Surely spot checking/remedial action will be required throughout the LHEMP plan period not just in year 1 especially as the landscaped areas will be under constant barrage from wind borne seed? The same weaknesses and omissions can be found in the 6.2 Invasive Non-Native Species Control section too. 	Landscape Specification: Section A34	Noted.	Covered in section A34 of the landscape specification.
41	<p>. Planning Condition 13</p> <p>Regarding landscape resources, this condition states, amongst other things, that, "No development shall commence until a landscaping and habitat establishment and management plan for land shown on drawing number no. ENV0000009C-JAC-ZZ-ZZDR-L0010, Rev P03 - 'Environmental Masterplan, Sheet 9 of 9 - Fishwick Bottoms', has been submitted to and approved in writing by the County Planning Authority. The plan shall include the following details:</p> <p>a) <i>The nature and depth of any soil making materials.</i></p> <p>c) <i>Locally native tree/shrub planting and seed specification.</i></p> <p>d) <i>Detail of habitat establishment (including seasonal timing), management, monitoring, and review and reporting methods.</i></p> <p>f) <i>The ongoing maintenance and management of the landscaping and habitats at the site for a period of 15 years."</i></p> <p>Landscape and Habitat Establishment and Management Plan - Fishwick Bottoms</p> <p>Section 2.4 Scheme description of this document states the following in relation to tree replacements, <i>"All trees removed to enable the construction of the defences will be replaced on a 5:1 ratio. Due to limited space for tree planting adjacent to the replacement flood defences a nearby location has been identified at Fishwick Bottoms through discussions with Preston City Council where trees will be planted at a 5:1 ratio."</i> No explanation of how this ratio was determined has been provided. In my opinion, this is an inadequate level of compensation for the 500+ trees and habitat that have been removed for the flood defence scheme. Metrics now available for calculating tree/habitat losses that would fall under the scope of the Environment Act for example produce a <i>significantly greater</i> number of trees. This is easy to see why as 5, 60cm high cell grown trees spaced 2.0m apart provide a totally inadequate amount of compensation for an irreplaceable large mature tree. There is also of course no guarantee that these 5 trees will ever reach maturity in 60 – 100 years' time.</p>	<p>5:1 ratio is the agreed replacement ratio used for this project and is based on the discussions and agreements made with the Rivers Trust made in context with the constraints of the site and the operational requirements of the proposed flood defences.</p> <p>The design, specification and planting density have been agreed with the Rivers Trust</p>	<p>BNG report was submitted as part of planning application.</p> <p>Agreed BNG report would be submitted again.</p>	
42	This LHEMP shares the same weaknesses and omissions that I have highlighted above for the other LHEMP, e.g., inconsistency, inadequate weed control and insufficient specification information. Section 3.3 Landscape and Habitat Areas states that <i>"The river bank is heavily impacted by cattle poaching."</i> Despite this, there are no proposals in section	See ref 1 above.	See ref 1.	Site preparation reference added to LHEMP
43	Section 3) Undertake Planting states, <i>"All plants to be slit/ notch planted, into a T-shaped opening of sufficient size to accommodate a cellgrown plant without breaking the root plug."</i> Why is this method being used instead of pit planting as proposed for all the other plants? The approach to dealing with plant losses as described in section 6) Replace Losses <i>"Where there are losses representing a threat to the establishment of woodland</i>	Updated to pit planting Section Q31, clause 405A	Agreed.	Section 3 LHEMP text updated

	<i>or more than 15% at year 5 losses will be replaced"</i> seems to be requiring replacements in year 5 only. Losses should always be replaced annually not 'saved up' until the final year of the establishment maintenance period.	Replacements are to be made annually		
44	<p><u>4. Other Information Submitted</u></p> <p>Landscape Proposals Planting Plans These have been submitted to illustrate the detailed landscape mitigation and enhancement scheme. The design proposals have a number of weaknesses, the principal being:</p> <p>a) excessive use of bitmac surfacing. b) use of fruit trees to replace some of the large mature riverside trees that will be removed for the flood scheme. c) planting densities for some of the shrub planting is very high. d) some plants would be too big at maturity for their beds. e) grass seeding is proposed within tree root protection areas. f) Grass seeding within RPA</p>	Fruit trees requested by South Ribble Borough (SRBC) Council and Preston City Council (PCC) Plant species and densities, and areas of grass seeding have been agreed with PCC, SRBC and the Rivers Trust and other stakeholders.	Accepted. Bitmac areas are reinstatement of existing footpaths. Resin bound surface proposed at Miller Park entrance and informal paths at Ribble Sidings.	
45	There is a lack of clarity and certainty over works to and protection of existing trees to be retained. Some of the drawings confirm that <i>"Existing trees within grass verge along the south side of Broadgate to be protected and retained"</i> (sheet 4 of 21) but how that will be done is unclear. Sheet 4 of 21 also confirms that <i>"Tree canopy work to enable construction to be agreed with and supervised by the project arboriculturist."</i> Unfortunately, this tells us little about what work will be done to the tree and what it will look like upon completion. Tells us nothing about what we can expect to be done.	Tree protection areas are as shown on the tree protection drawings.	Tree protection area plans to be submitted as part of CEMP package. Plans to include root protection areas.	
46	<p>Sheet 1 of 25 shows the location of the <i>"replacement concrete slipway and access."</i> The chosen location requires the removal of two trees – was an alternative option explored which allowed these trees to be retained? Is removal of these trees unavoidable?</p> <p><u>5. Recommendation</u> I recommend that planning conditions 10, 12 and 13 should not be discharged until all of the problems outlined above have been addressed.</p> <p>Regards</p> <p>Steve</p> <p>Steven Brereton Senior Landscape Architect Design and Construction Lancashire County Council T: 01772 534135 M: 07557 030544 www.lancashire.gov.uk</p>	Slipway location has been revised to avoid the trees. Landscape drawings updated as part of LCC ecology comment updates.	Agreed.	Sheet 1 updated as part of the LCC ecology comment updates

