

BIRMINGHAM
BRISTOL
CAMBRIDGE
CARDIFF
EDINBURGH
GLASGOW
KINGS HILL
LEEDS
LONDON
MANCHESTER
NEWCASTLE
READING
SOUTHAMPTON

Mr R Hope
Development Management Group
Lancashire County Council
PO Box 100
County Hall
Preston, PR1 0LD

Our Reference: 21616/A5/EIA Letter
10th February 2023

Dear Mr. Hope,

RE: LANCASHIRE CENTRAL (LCC/2022/0044) – LANDSCAPE AND VIEWS LETTER OF COMPLIANCE

We write on behalf of Lancashire County Council (LCC) and Maple Grove Developments (the Applicants) in respect of the Lancashire Central Site within Cuerden, Lancashire. The purpose of this letter is to set out the minor amendments made to the Landscape and Views ES Chapter following comments made by LCC Landscape Officer Steven Brereton (see Appendix 1).

Background

An outline planning application, supported by an Environmental Statement, for employment led development with commercial and residential uses was submitted to LCC in August 2022 (validated 19th August 2022). The formal description of development states:

'Application for Outline Planning Permission (with all matters reserved save for access from the public highway and strategic green infrastructure/landscaping) for a mixed-use development including the provision of Employment use (Use Classes B2/B8/E(g)); retail (use Class E(a)); food, drink and drive-through restaurant use (Use Class E(b))/Sui Generis Drive-Through); hotel use (Use Class C1); health, fitness and leisure use (Use Classes E(d)/F(e)/F2(b)); creche/nursery (Class E(f)); car showrooms (Use Class Sui Generis Car Showroom); Residential use (C3) the provision of associated car parking, access, public open space, landscaping and drainage, and the realignment of Public Right of Way Ref 9-12 FP12, 9-12 FP6/FP7/FP8, 9-12 FP9 and 9-12-BW11'.

Amendments to the Environmental Statement (December 2022)

On 22nd December 2022 a Letter of Conformity was issued to LCC confirming that changes to the planning application boundary did not affect any of the findings or conclusions of the August 2022 ES. The Letter of Compliance concluded that there were no new or amended effects following the changes and conclusions set out within the 2022 ES and therefore the conclusions are still valid.

2023 Amendments to the Submitted Landscape and Visual Effects ES Chapter

As detailed within Appendix 1, and set out in summary in Table 1, the following comments were issued by Steven Brereton in November 2022, regarding the Landscape and Views ES Chapter which was included as Chapter 7 of the 2022 ES.

Table 1: Summary of Landscape and Views ES Chapter Comments Issued by Steven Brereton

Comment Number	Comment
1	Assessment of effects upon the visual amenity of the surrounding Green Belt not considered
2	Clear definition of the proposed development parameters not given. Clarification required on building heights, massing and lighting assessed
3	Assessment required of phasing over extended delivery period over 20-30 years
4	Baseline omits identification of historic parks and gardens
5	Definition of study area unsound
6	Methodology for assessment of cumulative effects inconsistent/ unclear
7	The introduction to the assessment should set out more clearly for the lay person what the assessment does, including the assessment of effects
8	Fine grain site-specific assessment and summary takes in only the site extents and does not include all the character areas which extend beyond the site. The descriptions are inadequate and focus upon detracting features
9	Viewpoint selection refers to use of the ZTV to identify viewpoints which should be based upon a range of factors
10	Summer visual assessment omitted
11	15 representative viewpoints are not enough to cover all visual receptors in the study area, especially as 7 of the 15 viewpoints show little site visibility and the majority are from road (lower sensitivity) whereas viewpoints are missing from PRoW 6, 7, 8 and 12 and from Woodcock Estate
12	Tabular form, as normally presented, would enable appraisal of the full extents of visual effects
13	Reasons for scoping out views not included
14	Comments on photographs include poor lighting conditions for photography, contextual panoramas only supplied for some viewpoints and no metadata provided (or viewpoint co-ordinates)
15	Poor description of the visibility of the site and the features of the site which make up the view
16	High proportion of limited intervisibility viewpoints biases overall effects
17	Omission of some landscape and visual effects during construction and operational phases
18	Lack of detail regarding construction phase mitigation
19	Lack of key on Proposed Landscape Mitigation plan
20	Lack of rationale for landscape mitigation proposals
21	Assessment of residual effects limited to site and immediate setting
22	Omission of assessment of effects on adjacent Green Belt and non-registered historic designated landscape
23	Inadequate judgements of susceptibility of LCA1 and LCA2 and therefore their value and level of significance of effects
24	Inadequate judgements of sensitivity of pedestrians on PRoW
25	Proposed landscape mitigation is not judged to sufficiently reduce adverse effects
26	Summary of effects on landscape character does not include LCAs other than those within which the site lies
27	All receptors within the study area should have been assessed, potentially including over 100 visual receptors
28	The Landscape and Views ES chapter should not be relied on in making a determination
29	A revised Landscape and Views chapter should be submitted

The comments within Table 1 have been reviewed by Barton Willmore, now Stantec (BWnS) who were appointed to review the Landscape and Views chapter authored by Smeeden Foreman and used to amend the chapter submitted as part of the 2022 ES.

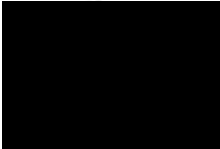
Table 2 – Review of the Comments and Amendments Made to the Landscape and Views chapter

Comment Number	Comment
1	<ul style="list-style-type: none"> The Landscape and Views chapter is not required to assess on visual amenity of adjacent Green Belt; Green Belt considerations only feature within the Landscape and Views chapter as part of judgements of the value of views; No further information required.
2	<ul style="list-style-type: none"> The parameters were described in Chapter 3 of the ES and the Landscape and Views chapter formed part of the ES therefore there was no requirement to repeat information, however, for clarity a clear definition of the parameters and relevant text has been provided in paragraph 7.3.
3	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended with and relevant text has been provided in paragraph 7.89 stating the phasing over an extended delivery period.
4	<ul style="list-style-type: none"> The nearest nationally Registered Parks and Gardens are outside the study area; The site of Lostock Hall to the north of the roundabout junction of Lostock Lane and Watkin lane is not designated; Registered Parks and Gardens are noted to be outside the study area within paragraph 7.42.
5	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended with a clearer definition of the study area at paragraph 7.46.
6	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended with updated text on the cumulative landscape assessment at paragraph 7.49.
7	<ul style="list-style-type: none"> The Landscape and Views chapter introduction sets out the purpose of the Landscape and Views chapter, no additional text is required.
8	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended at paragraphs 7.78 and 7.79
9	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended at paragraphs 7.83 and 7.85 to provide further explanation over the visual baseline and viewpoint selection.
10	<ul style="list-style-type: none"> Explanation provided in covering note from Smeeden Foreman (Appendix 2).
11	
12	
13	
14	
15	
16	
17	<ul style="list-style-type: none"> The effects listed by the Landscape Officer are omitted from the relevant paragraphs in the Landscape and Views chapter, no substantial text has been added to the Landscape and Views chapter.
18	<ul style="list-style-type: none"> The Landscape and Views chapter has been added amended with further text at paragraph 7.92
19	<ul style="list-style-type: none"> The Proposed Mitigation Plan has been amended with a key.
20	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended with further text at paragraphs 7.94 and 7.96 setting out the rationale for landscape mitigation proposals.
21	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended at paragraphs 7.78 and 7.79
22	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended with further text on registered parks and gardens at paragraph 7.42 and issues regarding the Green Belt is covered within the covering letter.
23	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended further text on landscape quality at paragraph 7.102
24	<ul style="list-style-type: none"> Sensitivity of visual receptors and Assessment of effects has been reviewed within the 2022 ES by Smeeden Foreman and not found deficient.
25	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended and further text added at paragraphs 7.94, 7.95 and 7.96
26	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended at paragraphs 7.78 and 7.79
27	<ul style="list-style-type: none"> The requirement for assessment of all receptors is impractical and unnecessarily onerous
28	<ul style="list-style-type: none"> N/A
29	<ul style="list-style-type: none"> The Landscape and Views chapter has been amended.

Conclusion

Tables 1 and 2 set out the comments made by the LCC Landscape Officer and the subsequent and comments made by BWnS. The amendments to the ES chapter have not identified any significant effects, that were not assessed or identifiable at the time of the preparation of the 2022 ES. It is therefore considered that the conclusions of the August 2022 ES and December 2022 ES Letter of Conformity remain valid, and that the information provided comprises non-substantive amendments.

Yours sincerely,



MARY MESCALL

Environmental Planning Associate Director

Appendix 1: LCC Landscape Comments

Appendix 2: Smeeden Foreman Covering Letter

APPENDIX 1 – LCC LANDSCAPE COMMENTS

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
SUSTAINABLE VALUE

INFRASTRUCTURE & ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS

This product is printed
on stock and in a process
that conforms to the PEFC
standards for sustainably
managed forests.

LANDSCAPE UNIT

Application No: LCC/2022/0044	Consultation Ref No: N/A
Proposed Development/Plan/Project: Application for Outline Planning Permission (with all matters reserved save for access from the public highway and strategic green infrastructure/landscaping) for a mixed-use development including the provision of Employment use (Use Classes B2/B8/E(g)); retail (use Class E(a)); food, drink and drive-through restaurant use (Use Class E(b)/Sui Generis Drive-Through); hotel use (Use Class C1); health, fitness and leisure use (Use Classes E(d)/F(e)/F2(b)); creche/nursery (Class E(f)); car showrooms (Use Class Sui Generis Car Showroom); Residential use (C3) the provision of associated car parking, access, public open space, landscaping and drainage.	
Location: Cuerden Strategic Site, East of Stanifield Lane, North of Clayton Farm, West of Wigan Road, Lostock Hall	
District: South Ribble	
Type of Consultation: Planning application	Date: 22/11/2022
Officer: Steven Brereton, Landscape Team, Design and Construction	

Comments

I have reviewed the information submitted in support of the Cuerden Strategic Site planning application with specific reference to landscape and visual issues. The findings of my review which are outlined below covers all of the applicant's relevant supporting documentation and the actual scheme proposals.

It should be noted that as the use of the application site for employment purposes has long standing planning policy support, I have made no attempt to challenge this land use in principle, instead concentrating on landscape and visual issues specific to the current planning application.

1. Applicant's documentation

1. a) **DESIGN CODE 21017 Lancashire Central Rev P5**

The applicant's design code is one of the most important documents submitted in support of the planning application. As required by good practice, a design code

provides a set of simple, concise, illustrated design requirements that provide specific, detailed parameters for the physical development of a site.

The design code submitted with this planning application has substantial weaknesses and omissions which seriously undermine its value and usefulness as a tool for informing and guiding development proposals for the Cuerden Strategic Site. According to the design code, *"Through carefully considered design, the development will provide high quality facilities, a mix of complimentary uses, recreation and well-being opportunities that will all be serviced by a strong and clearly defined infrastructure that creates a long-term platform for true sustainable development and regeneration."* These are appropriate aspirations for developing the Cuerden Strategic Site but with so many problems inherent in the applicant's design code, it is difficult to see how these can be achieved.

Of particular concern with the contents of the design code are the following:

- Far too many of the design code's sections fail to provide specific, detailed parameters for the physical development of the site and there is an over reliance on rather vague and generic non-site specific design requirements. In addition, the detailed description of the design proposals duplicates information provided elsewhere in more appropriate documents. Section **4.1 General Introduction**, states that *"The purpose of this statement is to describe the evolving design process and key design and development principles leading to the preferred scheme for the application site"* but this information is largely absent from the design code. The zoning of development, access, etc. shown on the current **Character Areas Plan** is largely unchanged from that shown on the **Cuerden Strategic Site Masterplan** produced by AECOM on behalf of Lancashire County Council (LCC) and adopted by South Ribble Borough Council in April 2015. The design code provides no information on the development proposal's evolving design process neither is there any options appraisal, no area use selection criteria, etc. for the current iteration of the development site masterplan.
- The map provided on page 5 within the local context section should have shown the large area of Green Belt land which bounds much of the application site. Within the document overall, there is only one reference to Green Belt in section **1.1 Site Context**. The impact of development proposals on the visual amenity of Green Belt land is an important planning consideration and as such should have been given more attention in the Design Code document.
- Some of the pages have photographs of the site but they are of limited use as their viewpoint locations have not been provided. Similarly, the usability of some of the plans of the development site showing various proposed features is undermined by the absence of keys explaining what the features are. A scale bar should also have been provided on all of the plans.
- Section **2.1 Using the Cuerden Design Code** unhelpfully states *"Development proposals will be assessed by the Planning Authority against Local Plan Policy C4 and the adopted Masterplan (April 2015) and their*

success in achieving key design objectives, set out in Section 2 and according with the design aspirations set out in Section 4 of this design code."

Development proposals have to be assessed against a wide range of other requirements such as, for example, those of the National Planning Policy Framework (NPPF) and environmental legislation.

- Criteria are provided for considering development proposals that depart from the requirements of the design code but none of them refer to any landscape or biodiversity considerations – a serious omission contrary to the requirements of national planning policy.
- Presumably, to satisfy design code good practice which, amongst other things, requires stated/illustrated design requirements that provide specific, detailed parameters for the physical development of a site, section **3.3 Design Principles** lists the key design drivers that the applicant has used to guide the scheme's design. Unfortunately, this list is far from comprehensive with many key elements of the scheme being excluded such as:
(Please note, this list is not intended to be exhaustive)
 - a) building scale and massing.
 - b) building vernacular
 - c) lighting
 - d) types of hard surfaces materials and their locations
 - e) street furniture
 - f) planting types
 - g) fencing types
 - h) visual elements such as vista's, focal points
 - i) public art requirements
 - j) enhancing biodiversity
- The design principles provided in section **3.4 Green Infrastructure & Ecology** make no reference to landscape character even though consideration of this key landscape element is required by national planning policy. It should be noted that the term landscape character is absent from the entire design code and no reference is made to the requirements of Lancashire County Council's Landscape Strategy. This perhaps explains why the design principles are primarily inward looking being focused – in landscape terms – on the needs of the development site rather than how it sits within the wider landscape, responds to local landscape character, and enhances interconnectivity of features. Reference is made to tree and woodland planting to integrate the built form within the landscape and the development site's green infrastructure promoting "*strong recreational*" links, but as no reference is made to key features of the area's landscape character, it is not clear whether these basic design requirements could maintain/enhance the area's landscape character or compensate for that which would be lost due to the proposed development. Neither is it clear whether the design code requires use of landscape mitigation features within the site that would be appropriate for the surrounding landscape character. Landscape character should have been an important thread throughout many of the code's design principles ensuring that this key policy test of the NPPF

(Policy 130 c) is met, *"policies and decisions should ensure that developments are... sympathetic to local character... including the surrounding built environment and landscape setting"*

- Section **3.4 Green Infrastructure & Ecology** advocates that the development site's Green Infrastructure *"should aid in promoting strong recreational and wildlife links with the surrounding area"* but it is not clear how the requirements of the Environment Act 2021 will be met. It should also be noted that the code does not have any aspirations regarding biodiversity net gain.
- **Character Areas - Mixed Use Zone A**
In section **4.2 Mixed Use Infrastructure (Zone A)** the design code confirms that the principal access and gateway entrance to the development is linked to the site by *"an attractive landscaped link road connects with a new internal roundabout that acts as a focal distribution point."* As can be seen in this extract from the **Illustrative Site Plan of Zone A** below, the link road is a simple highway landscape comprised of relatively narrow grass verges interplanted with trees. These landscape elements would do little to mitigate the visual effects of the nearby large car parks on views from the *"attractive landscaped link road"*:



This generic form of highway landscaping can be found in industrial estates and retail 'parks' throughout Lancashire.

- The location of the car parks that serve the large buildings near the main roundabout in the screenshot above and below is a concern:



This type of layout effectively places a huge 'core' of car parking (bounded by the black line above) right at the centre of Zone A making it the dominant design/visual feature. Locating them to the front of the buildings they serve and around the roundabout and connecting roads would provide those arriving via the site's main gateway off the M65 with views in all directions of large areas of bitmac surfacing/vehicles which is at odds with the design code's stated aim of *"providing a strong and dynamic gateway entrance to the site."* Unfortunately, and as explained above, since the design code fails to provide information on the applicant's options appraisal, area use selection criteria, building location, etc. the thinking behind locating car parks in front of buildings close to link roads rather than behind as is the case for service yards is not known. Whatever the reason(s), it has to be said that the proposed location of the main car parks is sub-optimal in landscape and visual terms and is really more suited to an industrial area where visual receptor sensitivity is much lower and functional requirements are different.

- Section **4.2 Mixed Use Infrastructure (Zone A)** confirms that *"safety for pedestrians, cyclist and all other users of the site have been paramount in determining road locations and routes, new footpath, and cycle way routes."* This is questionable as the **Illustrative Well-Being and Accessibility Plan** shows that many of the proposed paths/cycleways would be next to busy roads used by high noise/pollution emission vehicles such as diesel engined trucks.

- The applicant proposes to arrange the contemporary buildings *"to display active frontages that present themselves to the new estate spine road"* (**b. Block Principles (access, frontages, car parking, refuse/servicing)**) but their impact would as highlighted above, be diminished by their setting dominated by large car parks.
- According to section **c. Plot Form (plot size, width, adaptability, building envelopes)**, *"buildings will be of an appropriate scale and massing relative to their individual specific use."* A building's scale and massing should not be determined solely by its specific use as there are numerous other environmental factors which should be considered including effects on views, avoidance of an overbearing effect, impacts on landscape character, proximity of valued features and places, the local building vernacular, etc., etc.
- Of concern in **e. Building Types and Uses / Density and Building Height** is the reference to buildings heights which *"may range... up to 20m."* No assessment of landscape scale has been provided to support this chosen maximum building height. A height of 20m combined with the mass and block like form of some of the proposed units is of concern as they could be too large for the local landscape scale.
- Amongst other things, section **f. Building Materials and Features (architectural detailing/principles)** states that new buildings *"should be high quality, contemporary and incorporate sustainable materials and technologies where possible or appropriate."* The problem with this requirement is there is no reference to reflecting elements of the local building vernacular/character. Why? This failure to consider local vernacular is very evident from the *homogenous* buildings depicted in the **Illustrative Imagery of Mixed-Used Architecture** which are typical of those found in retail parks across the country. To avoid this homogenising effect and maintain local distinctiveness, the design code should have been more prescriptive with specific requirements relating to local building vernacular.
- **Character Areas - Employment Zone B**
The **Illustrative Employment Area Plan** within section **4.3 Employment, Business & Leisure Area (Zone B / Zone C / Zone D)** shows proposed large buildings close to the east - west running 'spine' of existing trees. Works required to build these structures and the substantial change to the surrounding environment, e.g. microclimate and hydrology, would undoubtedly have adverse effects on these trees. Construction works undertaken within these tree's root protection areas would likely adversely affect their health and long term viability. The large building footprints shown in Area B are a concern as their large scale may not be appropriate for the local landscape character – no evidence/rationale for this large development scale is provided in the design code and the design process appears not to have been informed by an analysis of the local landscape scale. Because the building footprints are so large – and it is reasonable to assume that their height could be up to 25m – they would dwarf the small amounts of greenspace provided around them. This is very evident in this screenshot from the **Illustrative Site Plan of Zone B** which is characterised by large

buildings separated by large car parks/service areas bounded by narrow grass verges with limited tree planting:



This disproportionate building and parking area size/density leaves insufficient space for creating any meaningful public realm. In addition, as some of the trees along the southern boundary would be removed (they are not shown above) the visual impacts of the large 'warehouse' type structures would be maximised in views from the south. Due to the lack of space along the northern boundary, any planting within the landscape strip would have only a very limited mitigating effect on views of the site from the north.

- **Section d. Boundary Treatment/Landscaping / Drainage Open Spaces and Heritage Assets** recognises the importance of the substantial landscape belt with existing mature trees which would provide a screen to the service yards and buildings but proposes to remove sections of it opening up views of the site from the south. Why?
- **Section e. Building Types and Uses / Density and Building Height** confirms *"This zone looks to establish building heights up to 25m high."* A 25m height for buildings of the size proposed would likely be inappropriate for the local landscape due to the disproportionate contrast in scale with existing structures, incompatibility with the existing landscape scale and greater visibility especially in views from the south, west and east.
- **Character Areas - Employment Zone C**
Section **a. Street Types (hierarchy, footpaths, bridleways, cycleways)** confirms that *"The zone benefits from the access road running through its*

centre to form a boulevard of connectivity." The **Indicative Access Diagram** with this text shows that the 'boulevard' concept has been poorly developed with some sections of it being typical highway standard tree free minimalistic grass verges.

- In **Illustrative Site Plan of Zone C** large parking and servicing areas are proposed to the front of the buildings (as per Zone A and to a lesser extent Zone B). As with these other zones, this approach ensures that the main core of the site is dominated by large car parks/service areas and their associated dark grey macadam surfacing, clutter, stored waste materials, etc. and minimalistic landscape mitigation. Making large parking/service areas one of the main visible elements of the scheme's landscape is not conducive to the creation of a high quality locally distinctive public realm. A reversal of this approach, i.e. locating the proposed buildings much closer to large boulevards with car parking/servicing to the rear would provide opportunities for creating distinctive streetscapes.
- The existing vegetation along the boundary with Lostock Road would be incorporated into a landscape buffer. Unfortunately, the applicant's drawings provide conflicting information on what would be adjacent to this landscape buffer.
- **Indicative Access Diagram**
3 ponds are clearly visible within the area outlined in black.
(Please note, the ponds need to be located away from the root protection areas of existing boundary vegetation)



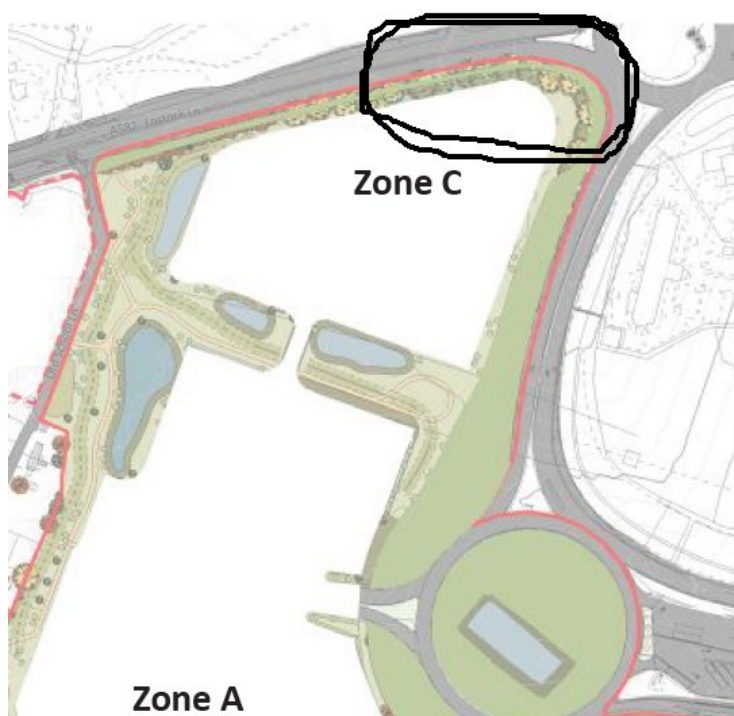
The above pond proposals contradict those on some of the other applicant's plans, e.g.

Illustrative Site Opportunities Plan

Only 1 pond is shown within the area outlined in black.

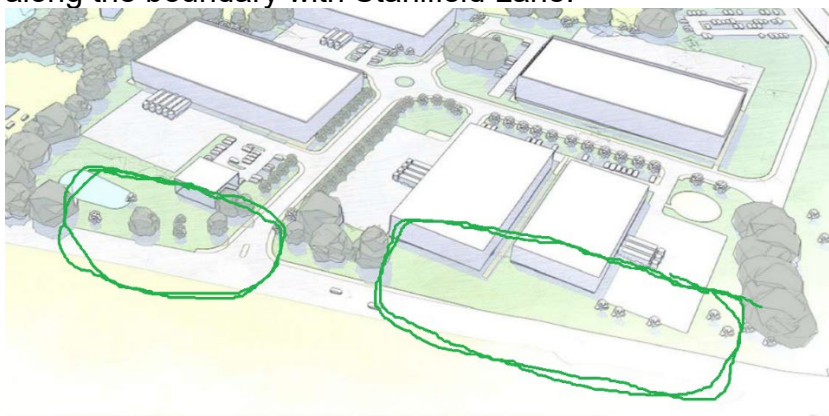


Untitled plan from **Design and Access Statement**
No ponds shown in area outlined in black



- "Substantial landscaping" (ref **b. Block Principles (access, frontages, car parking, refuse/ servicing)**) is proposed to separate the two character areas/zones A and C but no specific, detailed parameters have been provided for it. The proposed landscape buffer along the boundary with Lostock Lane is not wide enough for the amount of mitigation planting required unless of course the applicant intends to allow views of the proposed buildings from this road. There is no indication in the text as to which option the applicant prefers.

- According to section **d. Boundary Treatment/Landscaping / Drainage Open Spaces and Heritage Assets** an aspiration of Zone C is *"to act as a wildlife haven for a variety of native animal and plant species which are further enhanced by the insertion of a number of new ponds that enhanced biodiversity."* In the absence of any specific, detailed parameters for the biodiversity proposals it is not clear how the applicant expects this aspiration to be achieved. Whilst new ponds are proposed it should be borne in mind that as most of these would be attenuation ponds and hence contaminated with toxic hydrocarbons, they could not form part of the applicant's biodiversity proposals.
- A maximum building height of up to 22.15m is stated in section **e. Building Types and Uses / Density and Building Height** but as with the other zones no assessment as to whether this substantial height is appropriate for the landscape scale has been provided. The inadequate separation distance between the proposed buildings and surrounds and, the local landscape's small to medium scale would greatly increase the likelihood of a 22.15m building height having adverse landscape and visual impacts. The new industrial buildings could become dominant features in views from Green Belt land to the west.
- Section **f. Building Materials, Features and Design Principles** requires materials chosen to *"provide a coherent architectural response to the site and its surrounding context."* However, from the fashionably modern palette of materials provided it seems unlikely that the proposed building facades and features will make little or no reference to the local building vernacular. In addition, no key features of the local vernacular have been identified to guide future developers.
- **Character Areas - Employment Zone D**
As can be seen in the areas outlined in green below in this screenshot from the **Illustrative 3D Aerial Perspective** little mitigation planting is proposed along the boundary with Stanifield Lane:



- The building heights in this illustration also appear smaller than they would be in reality, especially those closest to Stanifield Lane. In addition, all of the building heights appear to be the same which is unlikely to be the case. Under representing vertical scale of development proposals in images which depict them should always be avoided to ensure transparency.

- The separation distance between Units 2 and 3 and Stanifield Lane is insufficient leaving little space for mitigation planting – essential as the new buildings could be as high as 24.7m. It should also be noted that more space for boundary mitigation planting could have been provided if the applicant had aligned some of the buildings parallel to Stanifield Lane.
- Aside from weaknesses relating to mitigation planting, alignment and location of the buildings, the proposed site layout shown in **Illustrative Site Plan of Zone D** also displays the following:
 - a) new structures located within root protection areas of existing trees.
 - b) absence of the connecting boulevard concept proposed for other zones.
 - c) insufficient segregation of pedestrians/cyclists from the roads – the proposed access track to the south for example only occupies a short length and would be terminated at one of the main access roads.
 - d) very little mitigation planting or other landscape features for the buildings within the site.
 - e) large building service areas located close to Stanifield Lane (as highlighted above minimal space is provided for mitigating their visual effects on Green Belt land to the west).
 - f) no mitigation proposed to the south of Unit 5.
 - g) little connectivity between habitats.
- Section **e. Building Types and Uses / Density and Building Height** states with regard to building heights, *"The Southern Employment Area should aim for buildings up to 24.7m high."* This is a considerable height – Zone D is adjacent to Green Belt land which has a small/medium landscape scale – for which no explanation or justification is provided.
- Section **f. Building Materials, Features and Design Principles** sets out a requirement for the *"architectural aesthetic along Stanifield Lane"* which *"should reflect the lower scale of development that runs parallel to the existing highway."* With a proposed building height of 24.7m, this cannot be achieved. In addition, the required building materials *"palette of contemporary cladding systems comprising a range of materials as metal cladding systems, ceramic rainscreens and timber cladding combined with glazed curtain walling"* is unlikely to reflect the building vernacular along Stanifield Lane or the wider landscape. Collectively these requirements and the inadequacy of mitigation boundary planting would likely ensure that the proposed buildings would have significant adverse landscape and visual impacts on Stanifield Lane and the Green Belt land to the west.
- **Character Areas – Residential Zone E**
 Section **a. Street Types (hierarchy, footpaths, bridleways, cycleways)** requires the following:
 - a) *"The landscape to the site entrance should be designed to be open with clear sight lines with a replacement hedge line and hedgerow trees to provide a green frontage to the street scene."*

No replacement hedgerow is shown on the **Illustrative Site Plan of Zone E** and it appears that all of the native western boundary hedgerow would be removed. Some trees are proposed along the Stanifield Lane boundary including some directly under the overhead power lines (I strongly advise against this) but overall, the mitigating effect of this vegetation would be minor ensuring that Zone E would have an open aspect along this boundary maximising the new housing's visual impacts on views from Green Belt land to the west.

b) *"The Avenue should run through the development"*

As can be seen from the **Illustrative Site Plan of Zone E** this proposed feature would be an avenue in name only. In landscape terms, a single line of trees as proposed does not form an avenue.

- **Section d. Boundary Treatment/Landscaping / Drainage Open Spaces and Heritage Assets** stipulates the requirement for the north side of the site to provide *"the opportunity for a large area of public open space."* As proposed, most of the proposed public open space would be filled with an attenuation pond significantly impacting on the usability of the 'space.' Furthermore, an attenuation pond is a hazardous feature that residents would likely wish to avoid meaning that Zone E effectively provides no areas for play, recreation, etc. beyond private gardens. This despite a stated requirement that *"the public open space within the Development will incorporate the provision of play facilities for younger children"* but as can be clearly seen on the **Illustrative Site Plan of Zone E** there is literally nowhere for it.
- **Section d. Boundary Treatment/Landscaping / Drainage Open Spaces and Heritage Assets** also stipulates that *"A network of green links is required to help knit the development into the wider area."* This is a commendable requirement, but the design of the housing layout leaves no room for any green links along the Old School Lane boundary. This means that a consequence of the proposed development for the existing residents on Old School Lane is that they would lose their views over open land to the west and have them replaced with views of housing devoid of any mitigation measures – an unacceptable outcome. The proposed *"network of green links"* is also required to *"create a linear park along the line of the existing hedgerow that runs from Stanifield Lane to Old School Lane."* This is a grand aspiration but in reality, the lack of space, loss of hedgerow and damage to retained hedgerow caused by works within root protection areas combined with very limited opportunities for tree planting would effectively create nothing more than a row of trees, gappy hedgerow and grass verges – hardly something which could be classed as a *"linear park."*
- **4.5 Environmental Standards (BREEAM and Energy Efficiency)**
Most notable in this section is the absence of anything substantial regarding biodiversity and landscape character – both key considerations in national planning policy and in the case of the former, the subject of legislation.

1. b) Environmental Statement, Landscape and Visual Impact Assessment (LVIA)

- It is not clear from the LVIA what form of the proposed development has been used as the baseline for determining likely landscape and visual impacts. The design code for example sets out varying requirements for building heights "up to" specified maximums. As in visual terms a 25m high large building has the potential to have visual effects over a much wider area than a 10m high building, the applicant's LVIA should have clarified what building heights, massing, lighting, etc., etc. were assumed for undertaking the assessment. Another important consideration is the fact that the application site would be developed over quite a long timeline during which the extent of likely landscape and visual effects would change quite significantly. It is not unreasonable for example to assume that a phase involving the construction of the large industrial buildings would produce significantly greater landscape and visual impacts than those arising from road construction. This likely variation in landscape change has not been adequately considered in the LVIA as the description and assessment of landscape and visual effects seems to focus on the development being built in one go rather than the reality of phasing which would see building works potentially being undertaken over 20 – 30 years. It may be that uncertainty about the site's future building phases meant that this was the only approach that the LVIA team could have taken. Whatever the reason(s), the applicant should have provided an explanation of the limitations of the LVIA at the outset to ensure transparency.
- The section which looks at **Legislative Context Statutory and non-statutory landscape-related designations and classifications** makes no reference to historic designed landscapes listed on the National Register of Parks and Gardens or those identified by Lancashire County Council's Historic Design Landscapes in Lancashire project. A review of publicly available data shows that the northern boundary of the application site is very close to Lostock Hall historic designed rural estate landscape.
- Para. 7.38 states that *"The Site is not located within the Green Belt"* which is correct but attention should have been drawn to the fact that the site is adjacent to Green Belt land giving potential for impacts on the visual amenity of the designated area.
- Para's 7.45 – 7.48 provide information on the study area for the LVIA and cumulative landscape assessment. Reference is made to the following in these para's but some matters relating to them have not been resolved satisfactorily:
 - a) *"The study area is defined as the Zone of Theoretical Visibility (ZTV)"*
This is not in line with good practice as ZTV analysis is a tool used to help identify and define a study area. For the purposes of LVIA, good practice deems a study area to be the area where development proposals are most likely to have landscape and visual effects of **moderate and above** significance which are materially important when determining a planning application. The appropriate study area radius from a development site is

determined by desktop/field work, ZTV analysis and professional judgement. In the case of the Cuerden Strategic Site, using the whole of a ZTV area for the LVIA's study area is unnecessary and would generate a substantial amount of assessment work including repeated identification of materially insignificant impacts of negligible – slight significance. The absence of any ZTV mapping in the application documents makes it impossible to determine the extent of the area assessed by the applicant and, of course, whether the area covered was sufficient. As large structures of up to 25m in height are proposed, ZTV mapping should have been submitted with the application – it is a key tool for informing the determining authority's assessment of the development proposal's likely landscape and visual impacts.

b) *"The assessment of visual effects considers the visual amenity of the Site and the surrounding area and identifies potentially sensitive visual receptors and the approximate visibility of the development."*

For the sake of clarity, especially for lay people reading the LVIA, this sentence should also have confirmed that the impact of changes to the views of sensitive receptors and mitigation of effects would also be considered by the LVIA.

c) *"The study area is defined by the boundary of the Landscape Character Type 5 'Undulating Lowland Farmland', Landscape Character Area 5k 'Cuerden-Euxton'"*

It is not clear why this is the case and it contradicts this in a) above, *"The study area is defined as the Zone of Theoretical Visibility (ZTV)."* A study area is determined by a range of factors which collectively ensure that its boundary will almost never be precisely aligned with a local landscape character type or area boundary. Study area boundaries are usually based on a specified radius from the development site boundaries or some key feature(s) within it. In addition, the criteria used to determine study areas and landscape character type/area boundaries are, not surprisingly, completely different. To further complicate matters reference is made to **Appendix 7.4 (Cumulative Sites)** which supports the applicant's brief discussion of the landscape assessment study area but the three identified *"Cumulative sites"* all lie beyond the boundary of this study area (defined by the Undulating Lowland Farmland Landscape Character Type). No sites *within* the applicant's cumulative landscape assessment study area are shown on **Appendix 7.4 (Cumulative Sites)**.

- Para. 7.49 confirms that *"Cumulative visual effects are considered within the viewpoint photographs."* No explanation of why the visual assessment has been conducted this way has been provided. Why, for example, was a study area not used and why was the cumulative landscape assessment not undertaken with reference to viewpoint photographs? The methodology needs to be consistent for both assessments to ensure transparency.
- The applicant does refer to published landscape character assessments and has attempted to provide a very fine grain of character assessment through the identification of his/her own site-specific landscape character areas which

are shown in **Appendix 7.7**. This is an appropriate approach but the execution of it is not without problems, especially:

a) character area boundaries

Despite the applicant maintaining that the character area boundaries "*broadly correspond to the three red line boundary areas*" the reality is that they **exactly** correspond to the boundaries. Having reviewed the landscape of the site and surrounds it is very clear that some key features of the landscape character within the three site boundaries can be found beyond them. This means of course that the boundaries of the three site specific character areas are not correct – their character is not confined solely to the application site. What the applicant should have done is identify geographically discreet landscape character areas within, and where determined by their actual boundaries, beyond the application site.

b) Key features of the site-specific landscape character areas

The descriptions of the site-specific landscape character types are inadequate as few of their defining natural and man-influenced key features have been identified. Most of the focus is on listing landscape elements which the applicant considers to be "*detractors*" and whether there are trees covered by a TPO. The latter is of little use for character assessment anyway as it is simply a designation and as such is not visible. Character assessment is primarily concerned with features that can be seen rather than designations made on paper. The unfortunate outcome of these problems is that the actual character of the three character areas identified by the applicant cannot be determined negating the point of the whole exercise.

c) Landscape character areas

It is not clear why the applicant has identified site specific character areas and not types. Landscape character areas are discrete geographical areas of a particular landscape type with a broadly consistent character. Their classification is identified by a local place name, e.g. Cuerden-Euxton Landscape Character Area or Upper Hodder Valley Landscape Character Area (source: ***A Landscape Strategy for Lancashire***, Lancashire County Council, 2000). The applicant's landscape character areas are simply identified by a number which is not really in accordance with good practice and, it suggests that the applicant does not consider them to be discreet geographical areas.

- Para. **7.79 Viewpoint selection** confirms that "*The ZTV has identified viewpoint locations, which represent the views of the main visual receptors considered likely to experience views of the Development.*" This is slightly misleading as ZTV mapping is simply one of a number of tools used to *inform* the selection of viewpoints. ZTV mapping alone does not identify viewpoint locations.
- According to para. 7.81 "*Site work was undertaken in February 2022, when the majority of deciduous trees and shrubs had shed their leaves.*" Site work should also have been undertaken sometime during summer to, amongst

other things, facilitate an evaluation of the likely extent of mitigation that existing vegetation could provide.

- As can be seen from **Table 7.1: Representative Viewpoints Location**, the applicant has considered the effects of the proposed development on just 15 visual receptor locations which is simply not enough. Good practice for visual impact assessment requires consideration of likely effects of development proposals on all of the visual receptors within the LVIA's study area. The findings of this assessment are usually presented in tabular form enabling the determining authority to appraise the full extent of likely visual impacts. It is not clear from the information provided whether the applicant's chosen 15 viewpoints are the product of a scoping out exercise and, if that is the case, which other viewpoints have been considered and the reasons why they were not taken forward for full assessment. The applicant does confirm in para 7.80 that the selected viewpoint locations have been chosen to *"best represent potential receptors to which the assessment refers"* but this seems unlikely as no viewpoints have been selected to represent likely impacts on views from PRow's 6, 7, 8 and 12. In addition, other problems are evident in the following viewpoint photographs, some of which could have been addressed through more careful microsighting:
 - Viewpoint 3 – no visibility of the site
 - Viewpoint 4 – no visibility of the site due to foreground vegetation
 - Viewpoint 5 – almost no visibility of the site due to vegetation. Much of what should be visible is obscured by foreground vegetation
 - Viewpoint 6 – almost no visibility of the site due to vegetation. Much of what should be visible is obscured by foreground vegetation. Site is not visible in the supporting context panorama due to the relatively narrow field of view/lens focal length and the view of an enclosed footpath corridor says very little about the landscape context.
 - Viewpoint 10 – no visibility of the site due to vegetation. Fencing in the foreground obscures distant features.
 - Viewpoint 11 - almost no visibility of the site due to foreground vegetation
 - Viewpoint 12 - almost no visibility of the site due to foreground vegetation. Duplicates viewpoint 11. Site is not visible in the supporting context panorama due to the relatively narrow field of view/lens focal length. These limitations mean the image is of limited value for understanding the landscape context.
 - Viewpoint 13 – limited visibility of the site due to foreground vegetation
- In more general terms, the following should be noted about the submitted viewpoint photographs:
 - The lighting conditions at the time many of them were taken was poor. The base photographs should have been taken in bright sunlight with a clear blue sky.
 - Contextual panorama's have only been provided for some of the viewpoints. Why?
 - No camera/image metadata provided.

- The descriptions provided in the **Existing view description/ key receptors** column of **Table 7.1: Representative Viewpoints Location** do not provide enough information on the features of the site which make up the view, their visibility, and their extent within the view.
- No coordinates have been provided for the viewpoint locations.
- The proportion of viewpoints from roadside locations – where receptor visual sensitivity is low – is too high

It is important to flag up these detailed viewpoint issues as the applicant has – incorrectly – used them solely to determine the likely visual effects of the proposed development. And, it should be borne in mind that as so many of the selected viewpoints either have little or no visibility of the site, the proposed developments likely visual impacts on them will invariably be of negligible – minor significance resulting in an 'underscoring' of the overall effects.

- The lists of likely landscape and visual effects stated in para's 7.82 and 7.83 should have included the following:

Construction Phase Landscape and Visual Effects

- Noise
- Loss of landscape tranquillity
- Storage of materials

Operational Phase Landscape and Visual Effects

- Loss of landscape character
- Loss of landscape tranquillity
- Increased lighting and noise
- Loss of views
- Loss of landscape amenity
- Impacts on the visual amenity of Green Belt land
- Impacts on the setting and character of the Old School House Grade II listed building

- The construction phase mitigation measures discussed in para. 7.84 lack detail. For example, regarding tree protection the text states *"Existing trees, hedges and ditches would be retained and protected in accordance with good practice"* but no further details of what this would entail are provided. In addition, there is no mention of the following:
 - Temporary lighting controls
 - Soil protection
 - Advance planting and temporary screening bunds (the construction works will generate a considerable amount of surplus topsoil)
- Para 7.85 confirms that *"From a landscape and visual perspective, landscape mitigation included within the Development is shown at Appendix 7.9."* Unfortunately, **Appendix 7.9 Proposed Landscape Mitigation** has no key greatly diminishing its use as a tool for providing details of the applicant's proposals. Evaluation of the landscape mitigation proposals is also hindered by the failure to provide in para. 7.85 any rationale for them, i.e. design concept(s), landscape element functionality, etc.

- Of concern within para 7.88 is the following, *"The assessment of residual landscape effects is based upon the Site and its immediate setting."* No explanation is provided as to why the assessment is confined to just the limited area of the site and immediate setting and not the whole of the LVIA study area as required by good practice.
- Para **7.90 Landscape value** correctly confirms, *"The Site (including LCA1, LCA2 and LCA3) is not included within any landscape designations"* but fails to mention that much of the land adjacent to the application site lies within Green Belt and close to an important non-registered historic designed landscape. These should have been highlighted and considered as the impacts of development proposals on the visual amenity of Green Belt and the setting and character of heritage assets are material considerations when determining planning applications.
- The judgements made on the landscape susceptibility of local landscape character areas LCA1 and LCA2 appear to be in conflict with the applicant's methodology provided in **Appendix 7.1**. The applicant considers these character areas to have a moderate level of susceptibility which according to the methodology in **Appendix 7.1** means they have *"some ability to accommodate the proposed change without changing the overall character, or individual elements."* The development proposals involve completely changing LCA1 and LCA2's character which is predominantly open pasture with scattered trees and hedgerows to one characterised by large modern industrial/service buildings, housing and associated infrastructure. Such a change would according to the applicant's methodology indicate a **high** level of landscape susceptibility since *"The proposal would change the overall character"*. Applying the applicant's own methodology shows that *all three* of the local landscape character areas have a high landscape susceptibility to the development proposed. With the susceptibility values raised to high this has implications for the values subsequently attributed to two LCA's for landscape sensitivity.
- The judgements made on the proposed development's overall landscape effects during construction for LCA's 1 and 2 would also be affected by the incorrect judgement made on landscape susceptibility discussed above. As the proposals would involve the complete loss of most of the site's rural features and their replacement with large modern industrial units, housing, etc. the overall effects on LCA's 1 – 3 during construction would likely be moderate/major significance.
- The assessment of cumulative landscape effects in para 7.133 lacks transparency as numerous structures which the proposed new development could be seen in combination with have not been considered by the assessor and no explanation for this rationale has been provided. Only three *"cumulative sites"* have been assessed but due to a dearth of information it is difficult to see how from just these developments the applicant can conclude *"that landscape effects from the proposed development in combination with other committed developments would be no change neutral."* Insufficient evidence has been provided to support that claim.

- The sensitivity of visual receptors on public rights of way in the assessment of residual visual effects section deems them to have a medium level of sensitivity. It is widely recognised in LVIA that PRow users are among those receptors with the highest level of visual sensitivity, especially where views from them are an important component of the landscape amenity provided as would be the case for example for users of Footpath 7.
- The applicant considers in para 7.147 for Viewpoint 1 that despite *"existing planting and proposed landscape mitigation would support assimilation of the Development into the view"* this would only *"reduce the level of effect to moderate adverse."* This dichotomy – why would a development assimilated into the landscape have moderate adverse visual effects(?) – is also predicted to occur for other viewpoints too. The problem with this outcome is that it signals the failure of the proposed mitigation to reduce impacts to a level below moderate adverse. One of the main aims of landscape mitigation is to reduce the level of effects on views to *below* moderate adverse, i.e. to a level which is not materially significant. The applicant should design landscape mitigation which achieves this, and if it is not possible, explain why in the LVIA.
- The conclusion reached in Para **7.316 Cumulative Visual Effects** lacks transparency as only three other buildings/developments were used in the analysis. The assessment should have considered the proposed development's likely effects in combination with all existing, in planning and approved development. The reality of the Cuerden development site proposals is that from numerous viewpoints the new buildings will be seen in combination with existing buildings and the effects of this must be considered within the LVIA.
- In the summary of landscape effects (para's 7.319 – 7.324) the applicant has concentrated solely on the three landscape character areas within the application site – LCA1, 2 and 3. Whilst these areas do need to be included, the assessment should have looked at the effects of the proposed development on the character of the wider landscape.
- The problems with the summary of the visual effects are more fundamental in that only 15 'representative' viewpoints have been considered. As stated above, this is simply not enough to determine the overall visual effects of the development proposals. The residents of Woodcock Estate for example may well feel very aggrieved that the applicant has not assessed the likely impacts of the proposed development on views from their properties. There are 'representative' viewpoints to the north and south provided by the applicant but expecting residents of Woodcock Estate – in all probability lay people regarding LVIA – to extrapolate from the applicant's assessment and place those findings in the context of views from their own properties is unreasonable. Assessing likely visual effects of development proposals is something you would expect any residents to undertake but this can only be a meaningful exercise if it is informed by the work of the applicant's landscape professionals. It is not necessary for an LVIA to provide photographs for every visual receptor but good practice does require assessment of all receptors

within the applicant's study area. Usually, the findings of this work are presented in tables detailing, amongst other things, predicted Impacts, magnitude of Impact, significance of visual effect (with/without mitigation), magnitude of impact and significance of residual visual effect. On schemes of the size proposed in a location like the Cuerden site, which is near a town's urban fringe, it is not unusual to see tables with assessment of effects on the views of over 100 receptors.

Summary

For the reasons outlined above, it is recommended that little reliance is placed on the applicant's LVIA as a tool for assisting with determining the Cuerden Strategic Site. The applicant should formally withdraw the LVIA and resubmit a version which addresses the weaknesses and omissions discussed above.

1. c) Parameters Plan 1 - Dev. Zones, Land Use, Quantum & Building Heights

- **Zone A**
The applicant proposes to step-down building heights along the western boundary with Old School Lane from 20m to 15m presumably to reduce the impacts of the new buildings on nearby residences. Similarly in Zone D another step-down building zone is proposed presumably to reduce impacts on the future housing development off Stanifield Lane but in this location the maximum height is 18.6m as opposed to 15m in Zone A. Also, the separation distance between the buildings and the proposed housing is approximately three times narrower than that for proposed for Zone A. Both these inconsistencies beg the question, why?
- **Zone B**
A maximum building height of 25m is proposed for Zone B. In landscape and visual terms, this is too large a scale for the buildings fronting the southern and western boundaries. The proposed separation distances between Zone B and the southern/eastern boundaries would not leave sufficient space for effective mitigation of likely visual effects. Also, some of the applicant's drawings do not show all of the existing boundary trees (therefore intended for removal?). Their removal would exacerbate the visual impacts of 25m high industrial buildings especially for example in views from PRow 7. The inadequate separation distance could result in the 25m high buildings appearing as dominating (overbearing?) features in views from Wigan Road. To combat these significant visual issues, either the separation distances between buildings and boundaries need to be increased, or building heights need to 'step-down' towards zone boundaries – a transition zone like that proposed for Zone A.
- **Zone C**
The maximum building height proposed for this zone is 22.15m. Of concern is the inadequate separation distance between the northern boundary of the zone and Lostock Lane. 22.15m high large buildings located as close as 10m from this road would significantly change the local landscape character from a tree/hedge lined road near open countryside to a much more enclosed corridor flanked by large industrial buildings. The big difference in landscape

scale between the large industrial buildings and the flat expanse of highway would serve to emphasize their presence in the landscape and risk them having an overbearing effect. As recommended for Zone B, a building height step-down transition zone should be provided or the separation distance between building and the Lostock Lane boundary is significantly widened.

- Zone D
As with Zone A, the applicant proposes to step down the maximum building height from 24.7m to 18.6m within Zone D. However, this lower height of 18.6m is still too high along the northern boundary as insufficient separation distance is proposed between the development zone and the consented development off Stanifield Lane (REF: 07/2021/00973/REM). As such there is the possibility that the new industrial buildings in Zone D could have an overbearing effect on this new residential development.

1. d) Landscape Proposals Drawings

The applicant has submitted the following drawings illustrating his/her strategic and detailed landscape/green infrastructure proposals:

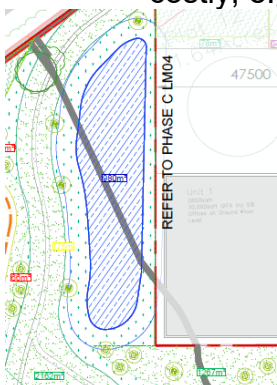
Parameters Plan 3 - Strategic Landscape

- This plan is of little use as it has no key for the proposed strategic landscaping. *As a minimum* this parameters plan should provide clear detailed information on the following elements of the 'strategic' landscape where they are proposed:
(*Please note, this list is not meant to be all inclusive*)
 - Different habitat types, e.g. woodland, scrub, hedgerows, species rich grassland, amenity grassland, wetland
 - Area to be retained and managed for biodiversity
 - Ornamental planting, e.g. trees, shrubs, bulbs
 - Ponds – attenuation and habitat
 - Ecology mitigation measures, e.g. wildlife barriers, habitat piles, hibernacula
 - PRoW closures and diversions
 - Footways, trails, tracks and access points
- In addition to the above the following information should be provided:
(*Please note, this list is not meant to be all inclusive*)
 - Existing vegetation, e.g. woodland, trees, hedgerows, scrub, grassland to be retained and removed
 - Root protection areas of existing woodland, trees, hedgerows, scrub
 - PRoW's
 - Existing ponds
- The drawing text for states that "*Full details of the Strategic Landscaping proposals are shown on the separate plans produced by Smeeden Foreman*" and "*The additional landscaping which is to be provided within Development Zones A, B, C, D and E is to be determined by plot layout and is therefore a reserved matter. Details of this additional landscaping is to be provided by way of separate reserved matters application(s).*" The problem with the latter

statement is that Smeeden Foreman have provided additional plot specific landscaping details for Development Zones A, B, C and D with this application. **Landscape Proposals - Green Infrastructure A** and the **Landscape Proposals - Phase A – D** drawings all provide detailed planting plans covering most of the site. The only exception to this is Phase E for which no green infrastructure/planting information whatsoever has been provided. If the landscaping for specific plots is to be dealt with by way of separate reserved matters why submit most of it now? In addition, with all of the landscaping proposals being provided on **Landscape Proposals – Phase A – D** drawings, it is not possible to determine which elements of these schemes are actually included in the current planning application and which are supposed to be determined later by way of reserved matters. The applicant should have separated the site's landscape structure/green infrastructure, i.e. the areas beyond the individual plots the design of which can be fixed at this stage, and made these the basis of the current planning application.

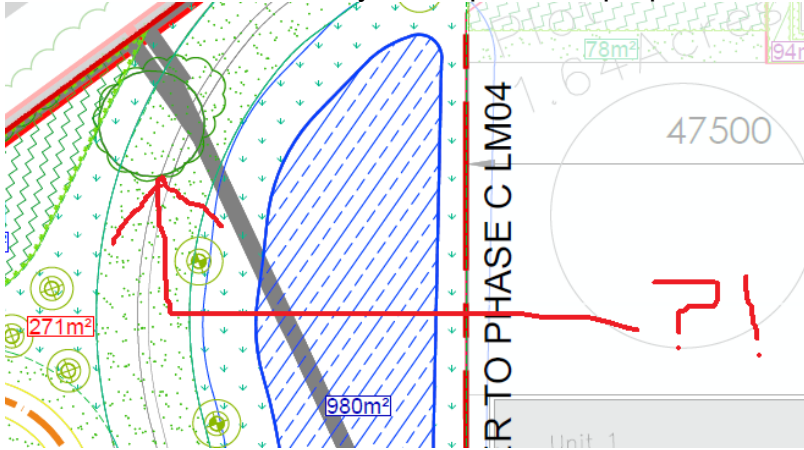
b) **Landscape Proposals - Green Infrastructure A**

- The "A" in the drawing title suggests that this is one of a series covering the whole of the site's green infrastructure, but a review of the applicant's documentation shows it is in fact the only one. No explanation has been provided as to why this is the case and why the rest of the site's green infrastructure has not been included in this drawing. Aside from this issue, the green infrastructure drawing has the following weaknesses:
 - Vegetation intended for removal and root protection areas of trees/shrubs/hedges to be retained must be shown on the drawing. Without this vital information, the scheme's full impacts on existing vegetation and the requirements for mitigation/compensation (including biodiversity net gain calculations) cannot be determined.
 - The electricity pylons/cable runs and OS data for areas adjacent to the site are not shown.
 - Two different hatches have been used for ponds, but it is not clear what they are supposed to represent as neither of them are shown in the drawing key. The location of some of the ponds is questionable as they would be very close to the proposed buildings/car parks/service areas making amongst other things maintenance difficult and unnecessarily costly, e.g.

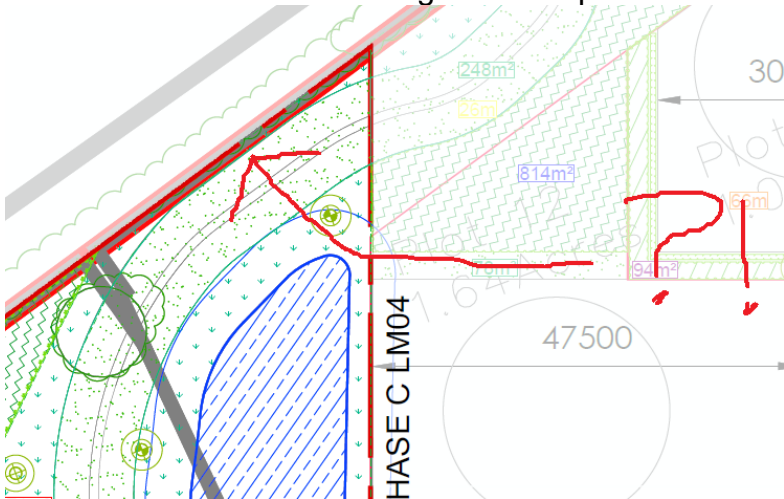


- As can be seen in the examples below (*note, not an exhaustive list*), excavation and other works are proposed within the root protection areas of existing trees and hedgerows intended for retention.

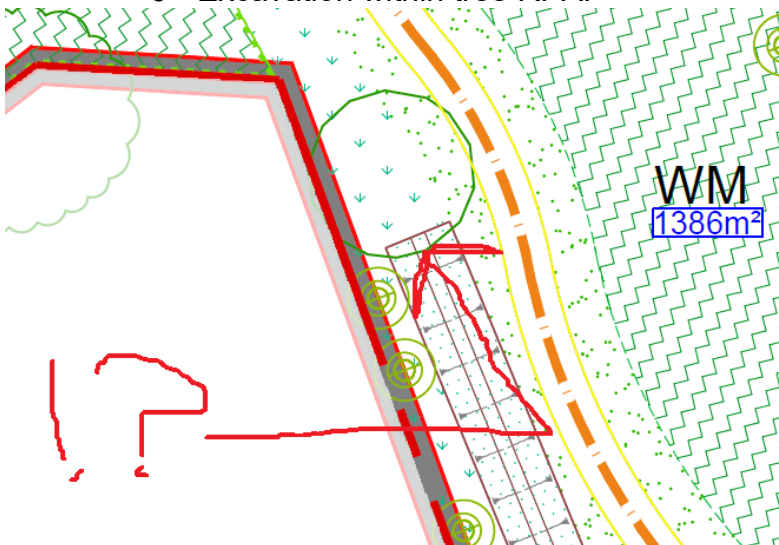
- Tree directly in the path of a proposed SUD (swale?):



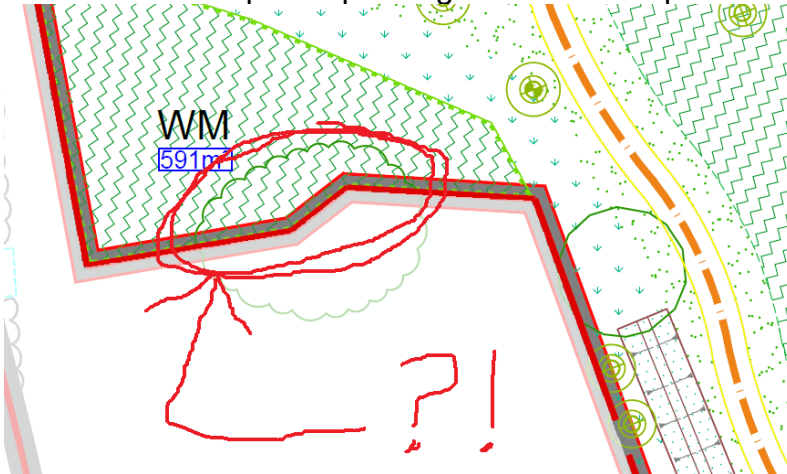
- SUD within hedgerow root protection area (RPA):



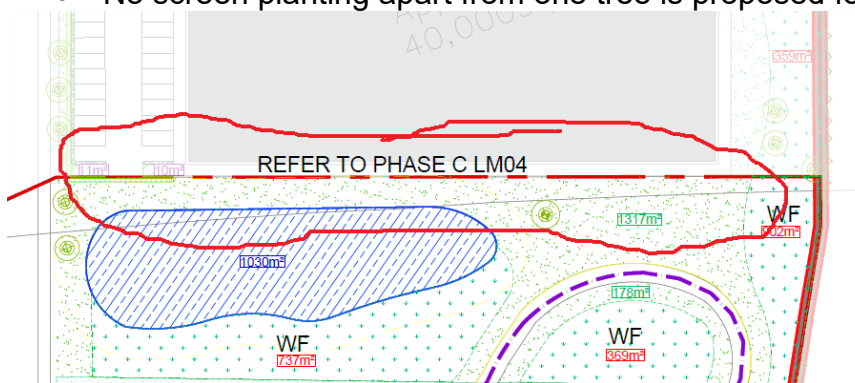
- Excavation within tree RPA:



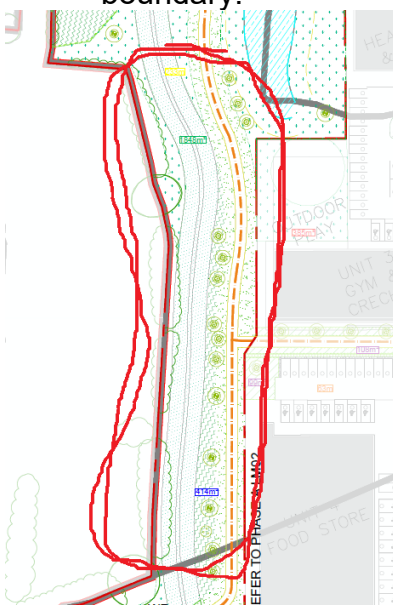
- Proposed planting within RPA of plants within private land:



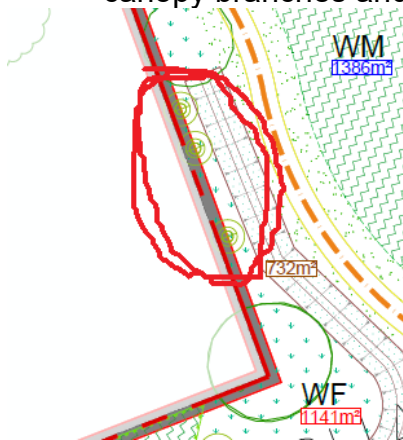
- Existing residences should have been shown on the drawing so that those directly affected by the scheme proposals could see what mitigation measures are proposed for their property.
- No screen planting apart from one tree is proposed for the rear of Unit 4:



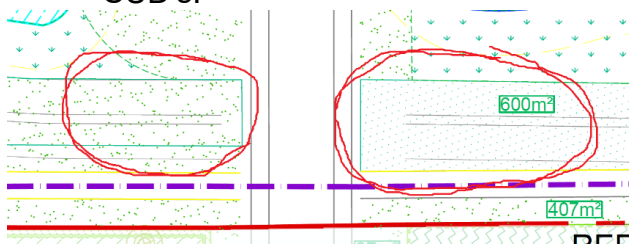
- The proposed location of the SUD (excavated within the RPA's of existing planting) leaves little room for screen planting along part of the western boundary:



- As the trees in the highlighted area below would be planted directly on the site boundary, their canopies at maturity would overhang adjacent land. In addition, as the trees matured any boundary fencing could be damaged by canopy branches and/or expansion of the root plate.

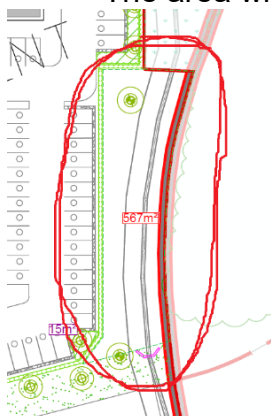


- Even though only one is shown in the drawing key, as can be seen in the areas highlighted in red below, two different hatches have been used for the SUD's:

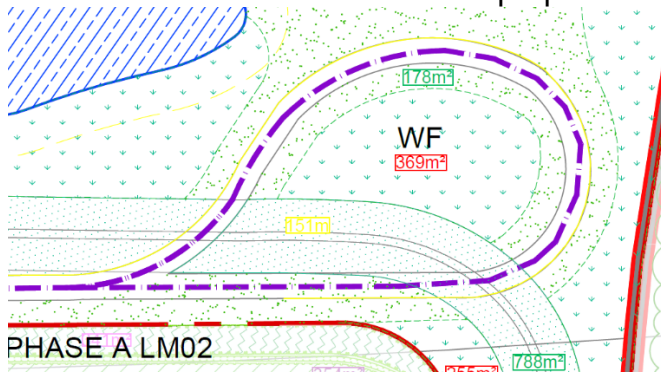


c) Landscape Proposals - Phase A

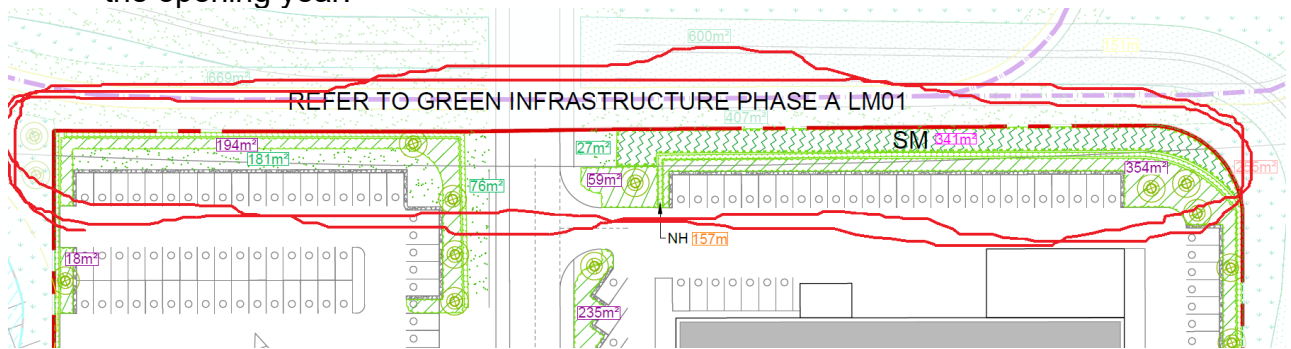
- As with the **Parameters Plan 3 - Strategic Landscape**, the Phase A drawing shows various works proposed within tree and hedge RPA's.
- Vegetation intended for removal and root protection areas of trees/shrubs/hedges to be retained **must** be shown on the drawing. Without this vital information, the scheme's full impacts on existing vegetation and the requirements for mitigation/compensation (including biodiversity net gain calculations) cannot be determined.
- The area within the red outline below has no hatching. Why?



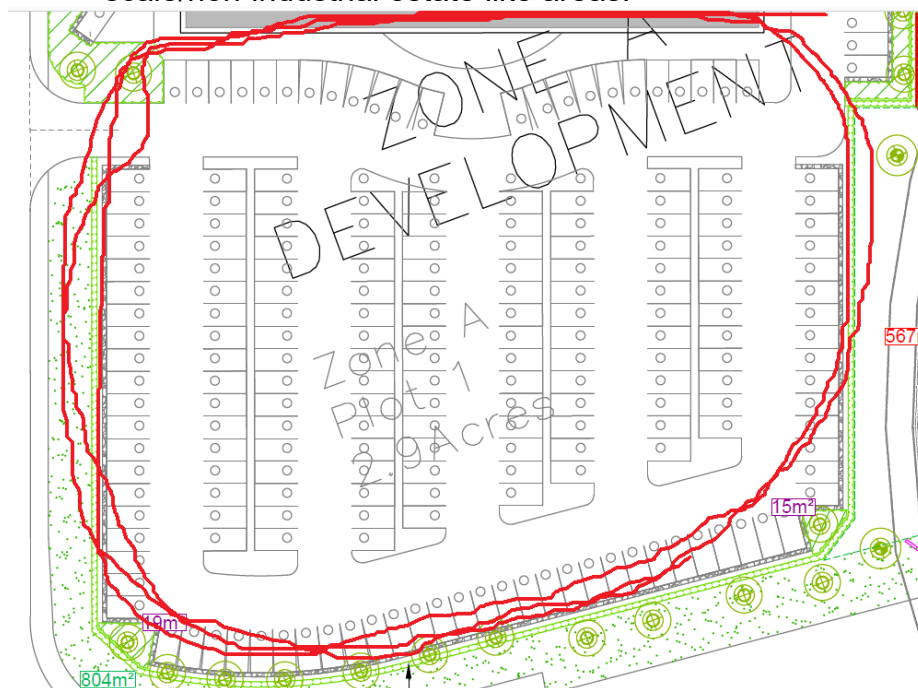
- It is difficult to see what the purpose of this short circular length of path is for:



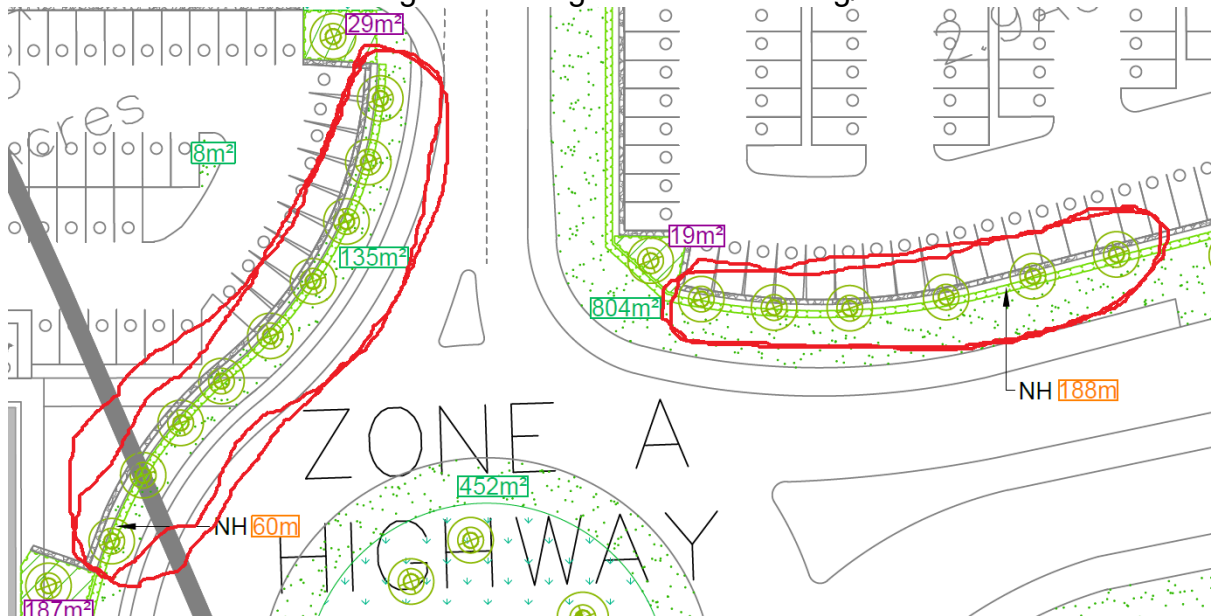
- Heavy standard and extra heavy standard trees are required along the boundaries within the red outline to provide more effective minimisation of the adjacent car park's impacts and nearby buildings on views from the path in the opening year:



- There are no proposals to break up this large car park area into more human scale/non-industrial estate like areas:

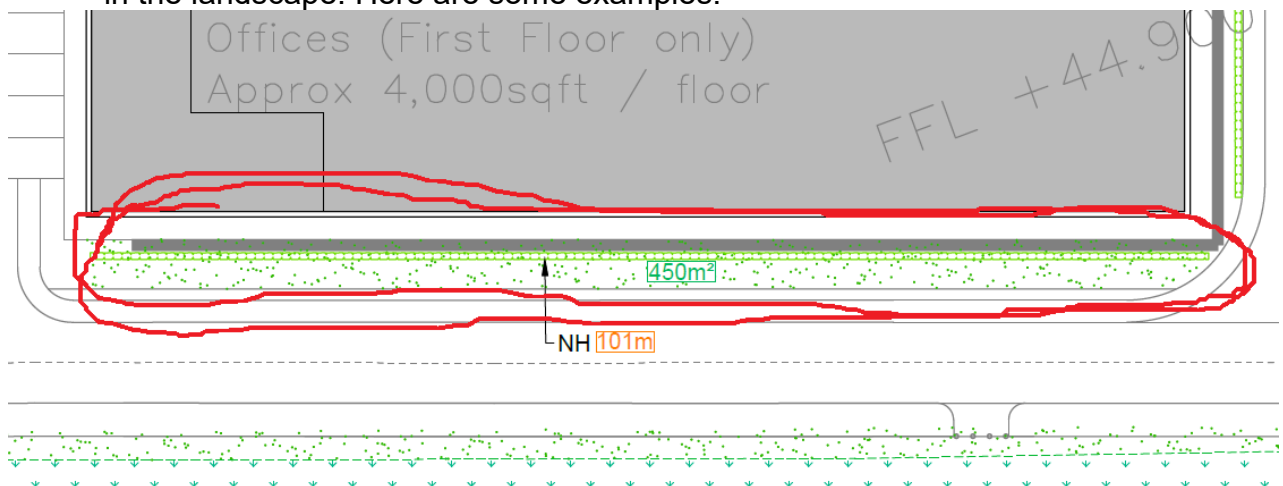


- To ensure that trees do not cause future problems arising from being planted too close to structures, it is essential that the requirements of BS5837 are used to guide the choice of locations for proposed tree planting. As can be seen from the screenshots below, the proposed tree locations are far too close to car parks. As the trees matured this could lead to problems arising from branch overhang and damage to road surfacing/kerbs:

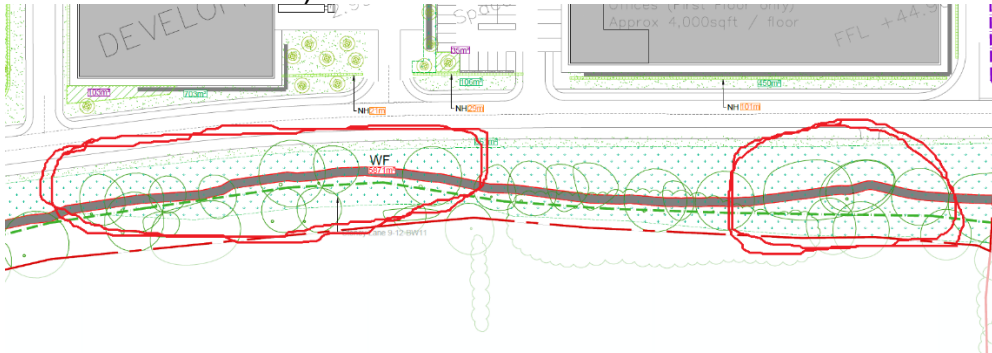


(Please note: the above are not the only locations where here trees are proposed too close to structures)

- Generally, the proposed mitigation planting around the larger structures is inadequate. In many cases the proposed ornamental hedges would be dwarfed by the large industrial structures exacerbating their discordant scale in the landscape. Here are some examples:

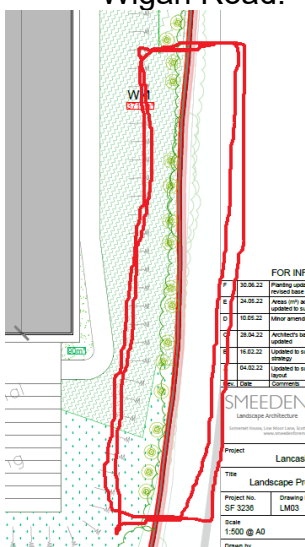


- The location of the proposed road would mean construction works being undertaken within the RPA's of the following along Stoney Lane (see areas outlined in red):



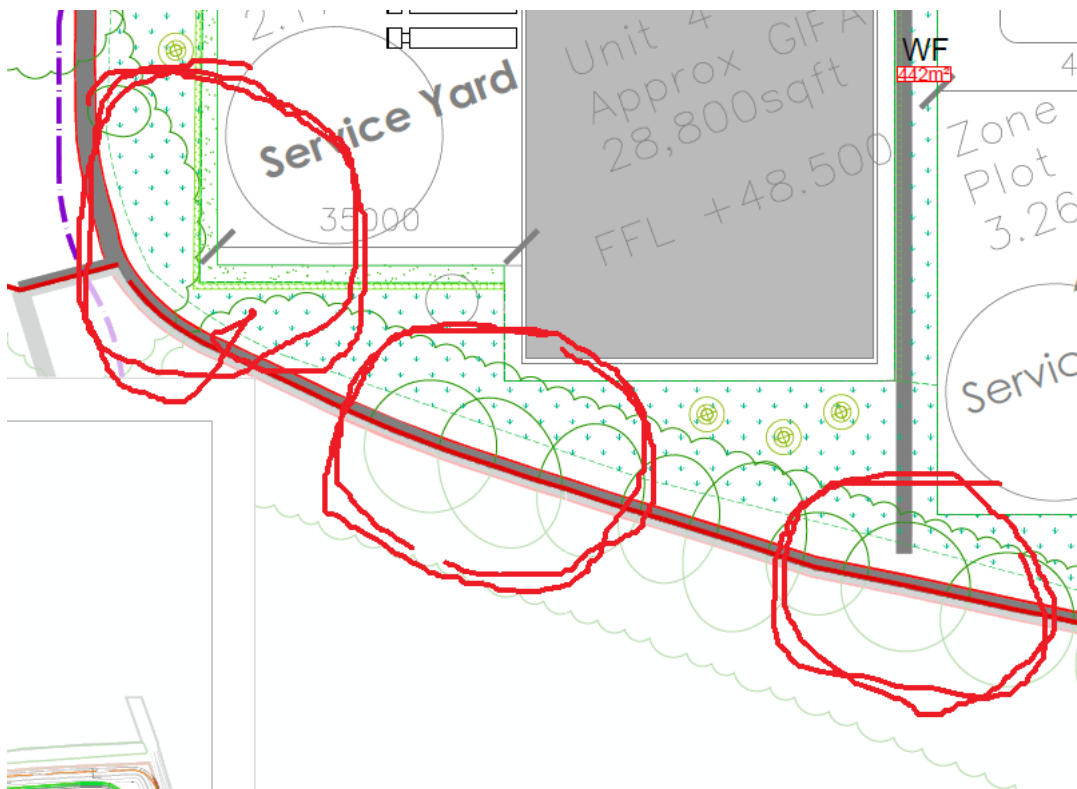
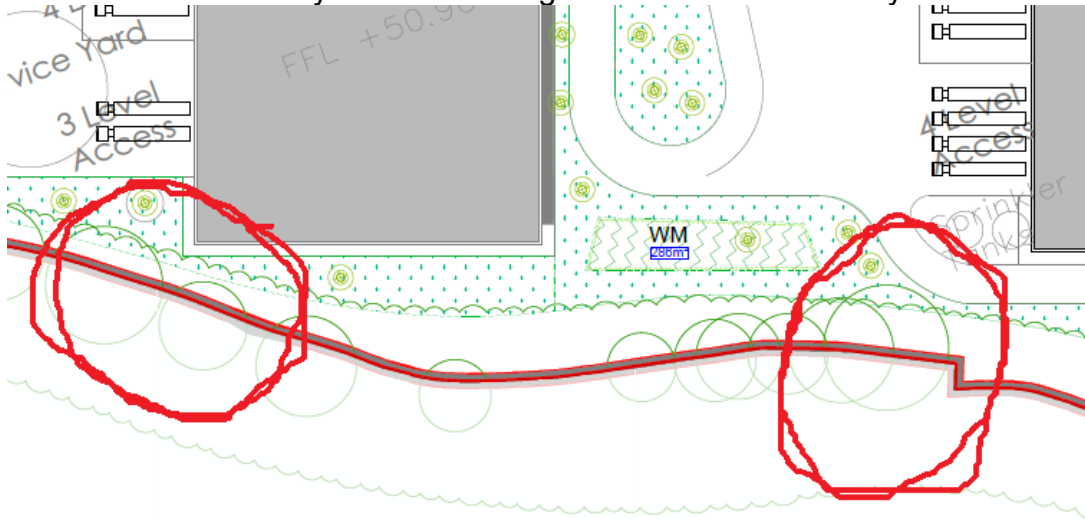
d) Landscape Proposals - Phase B

- As with the **Parameters Plan 3 - Strategic Landscape**, the Phase B drawing shows various works proposed within tree and hedge RPA's.
- Vegetation intended for removal and root protection areas of trees/shrubs/hedges to be retained **must** be shown on the drawing. Without this vital information, the scheme's full impacts on existing vegetation and the requirements for mitigation/compensation (including biodiversity net gain calculations) cannot be determined.
- Apart from grassland no other form of mitigation planting is proposed for the northern site boundary. As the site is visible from the adjacent elevated motorway, some tree and shrub planting should be provided along this boundary.
- Tree and woodland planting are proposed along the Wigan Road frontage which includes heavy standard trees, presumably to provide immediate mitigating effect during the opening year. As can be seen in the screenshot below, some of these heavy standard trees would be planted far too close to Wigan Road:



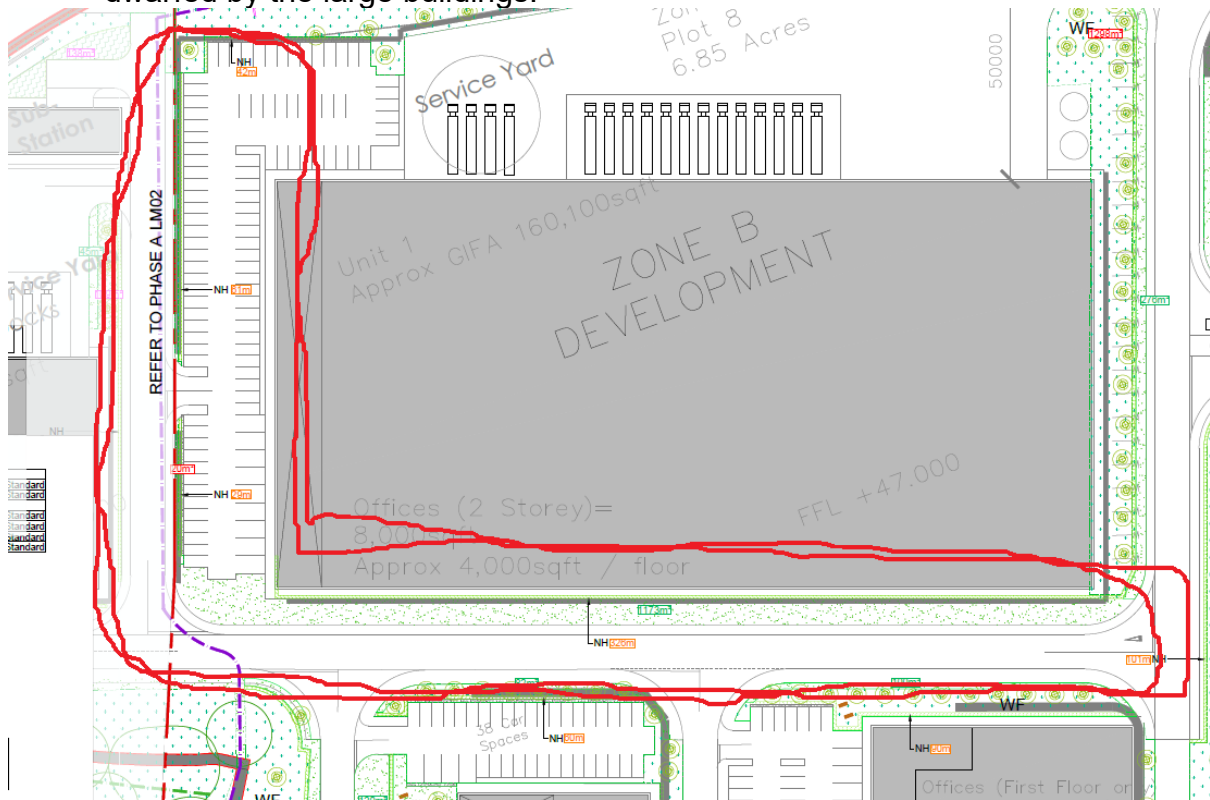
- Preserving the row of trees along the southern boundary and integrating them into the proposals should be one of the applicant's key landscape priorities as

these trees could provide substantial mitigation of the new building's visual effects and maintain some habitat connectivity through the site. In developing the layout of the site, the applicant appears not to have considered the impacts of the building/road/service area construction would have on these southern boundary trees. These screenshots show – within the areas bounded by a red line – a range of works proposed within existing tree RPA's that would likely affect their long-term health and viability:



- As discussed for Phase/Zone A, the scale of some of the proposed industrial buildings and the density of the development greatly limit opportunities for designing a landscape structure suitable for creating an attractive public realm that also benefits biodiversity to the same extent as that proposed for

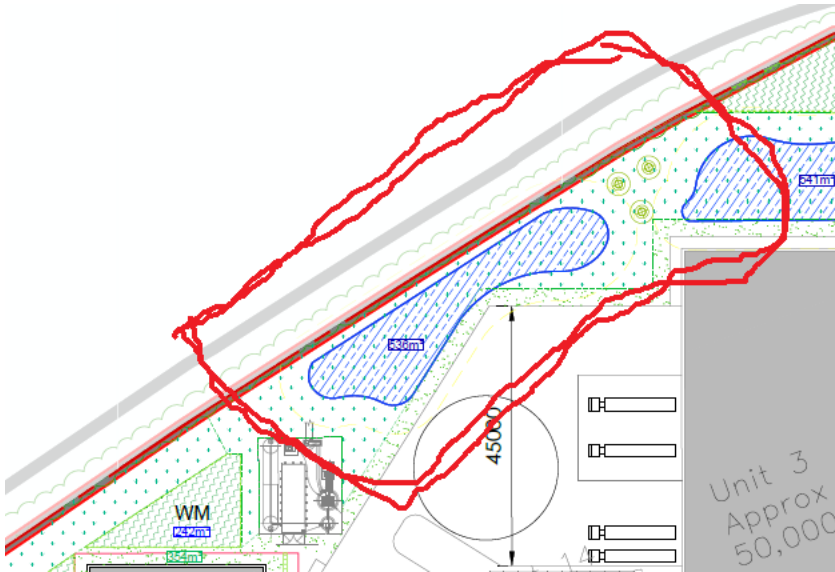
Phase/Zone A. The area that Unit's 1, 3 and 4 would be located within for example have very limited mitigation planting largely confined to areas left over after space has been allocated for buildings, roads, car parks, etc. The outcome – narrow grassed highway verges, no tree planting and ornamental hedgerows as shown below – would have little mitigating effect and be dwarfed by the large buildings:



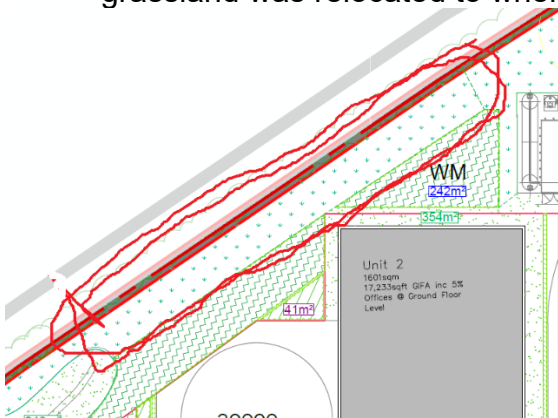
- For those employed within the buildings there are no immediate outdoor opportunities for recreation. Unlike other phases/zones and despite the presence of established trees along the southern boundary, no real green infrastructure is proposed. In fact, unless substantially revised, the development proposals would actually result in **a loss** of many of the southern boundary trees.

e) Landscape Proposals - Phase C

- As with the **Parameters Plan 3 - Strategic Landscape**, the Phase C drawing shows various works proposed within tree and hedge RPA's.
- Vegetation intended for removal and root protection areas of trees/shrubs/hedges to be retained **must** be shown on the drawing. Without this vital information, the scheme's full impacts on existing vegetation and the requirements for mitigation/compensation (including biodiversity net gain calculations) cannot be determined.
- Two of the proposed ponds in the area bounded by the red line in the screenshot below would take up much needed space for mitigation planting along the northern boundary.:



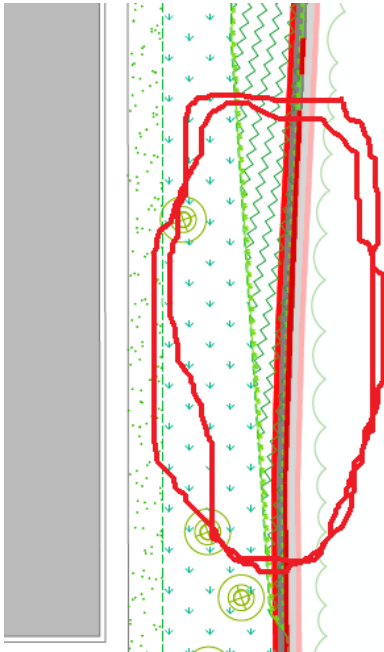
- The grassed area sandwiched between existing hedgerow and proposed 'woodland' serves no purpose. The woodland planting would provide more effective mitigation if it was located adjacent to the site boundary and the grassland was relocated to where the woodland is shown below:



- Unlike most of the proposed planting areas within the scheme, the two important areas of screen planting highlighted by the red outlines below would have no heavy standard or extra heavy standard trees. These trees are crucial for providing immediate impact in the opening year:



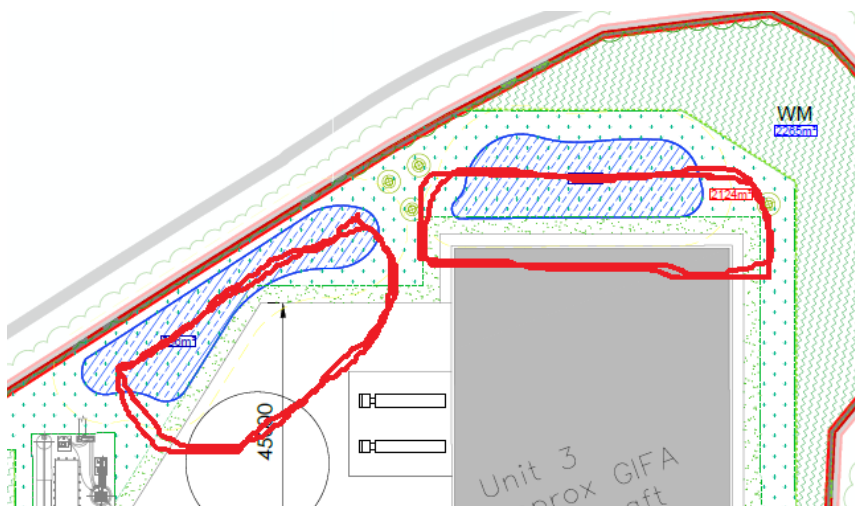
- The area outlined in red below is far too narrow for 'woodland' planting or creation:



- The landscaped areas along the frontage of these access roads are too narrow for planting to achieve any meaningful mitigating effect. They also fail to maintain the applicant's 'boulevard' concept for the main access roads:



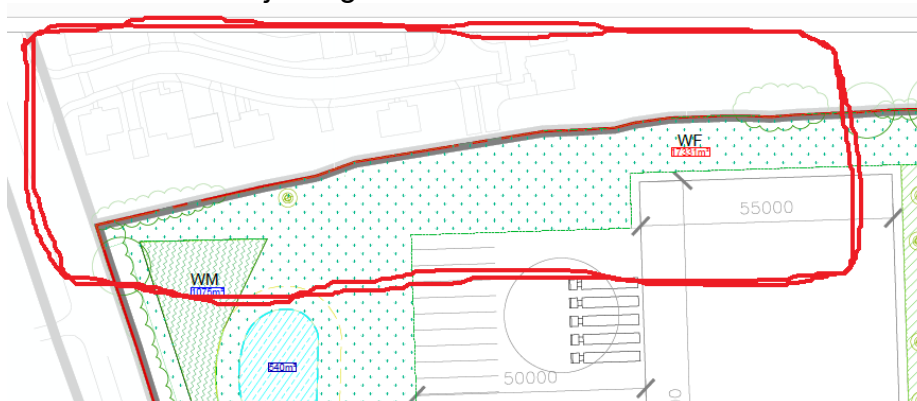
- An inadequate separation distance has been provided between the two ponds and adjacent structures (see the area's bounded by red lines in the screenshot below). Maintaining the northern end of Unit 3 could be compromised by the limited space between it and the nearby pond. If these ponds are intended to be beneficial for biodiversity, then some form of buffer should be provided between them and nearby service areas and buildings:



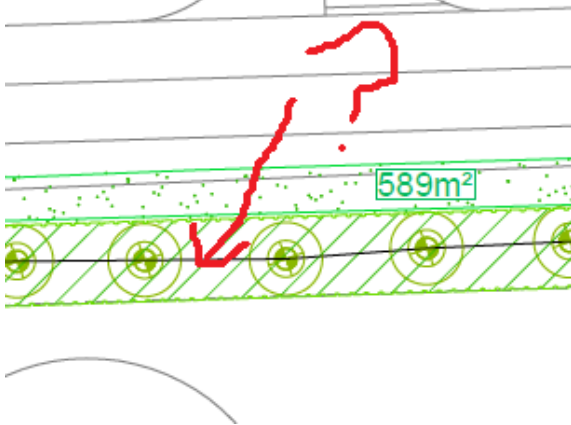
Also of concern in the screenshot above is the lack of space around much of the western pond for maintenance.

f) Landscape Proposals - Phase D

- As with the **Parameters Plan 3 - Strategic Landscape**, the Phase D drawing shows various works proposed within tree and hedge RPA's.
- Vegetation intended for removal and root protection areas of trees/shrubs/hedges to be retained **must** be shown on the drawing. Without this vital information, the scheme's full impacts on existing vegetation and the requirements for mitigation/compensation (including biodiversity net gain calculations) cannot be determined.
- Unlike the other landscape proposals drawings, the building units do not have the grey hatching and building unit number.
- Of concern are the inadequate mitigation planting proposals along the northern, eastern and – in part – southern boundaries. Along the northern boundary only grassland and *one* tree are proposed. As the land beyond this is to be developed for housing, mitigation of the effects of the proposed large industrial buildings on views from the residential area is essential. As can be seen in the screenshot below, the applicant's proposals would result in clear unfiltered views of the large northern building and associated service area from the adjoining residential area:

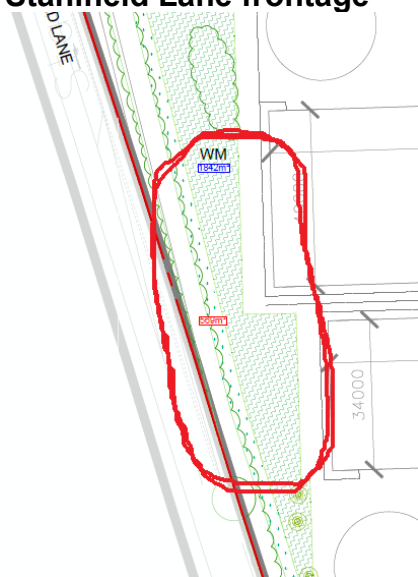


- A black line has been drawn between some of the proposed trees but as it is not shown in the key or used on the other phase drawings it is not clear what it is meant to be showing:



- Substantial belts of woodland are proposed to mitigate effects and assimilate the scheme into the local landscape, but at critical locations no planting of heavy or extra heavy standard trees are proposed. In the example locations below, larger trees are essential to achieve an immediate impact in the opening year:

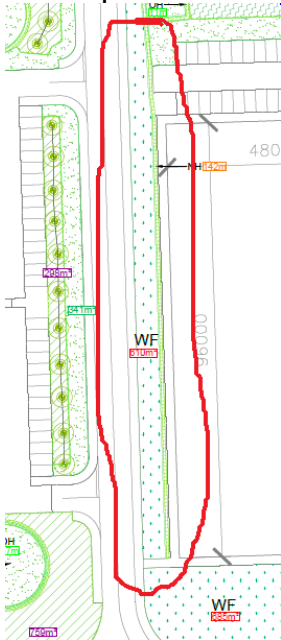
Stanifield Lane frontage



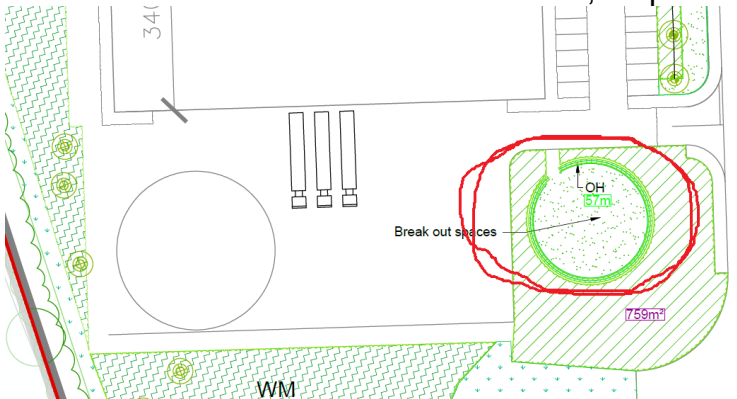
Eastern boundary



- The location of the proposed large building leaves no space in the area highlighted below for any effective mitigation planting. The proposed ornamental hedge which would be dwarfed by the adjacent large industrial building would do little other than highlight the inadequacy of the mitigation provided:



- The proposed locations of most of the breakout spaces are far from ideal as they would be located close to large service areas/car parks and access roads with all their attendant noise, air pollutants and poor visual amenity, e.g.



g) Landscape Proposals – Phase E

- There are no mitigation/enhancement proposals for this phase. No explanation as to why this is the case appears to have been provided.

h) Illustrative Development Framework Plan

- The value and usability of this drawing is diminished by the absence of a key.
- The existing M65 motorway roundabout lies within the planning application boundary but no landscape and ecology mitigation/enhancement proposals have been provided for it. The roundabout is adjacent to Zone's A and B but

as can be seen on drawings LM02 Rev G and LM03 Rev F, it has not been included in either of them.

- There are a number of inconsistencies between the **Illustrative Development Framework Plan** and the **Landscape Proposals – Phase A – D** drawings concerning the proposed landscape mitigation, e.g.

Northern boundary of Phase D

Illustrative Development Framework Plan:

A line of trees along the boundary



Landscape Proposals – Phase D:

One tree proposed



Near southern boundary of Phase D

Illustrative Development Framework Plan:

A line of trees



Landscape Proposals – Phase D: No line of trees



The applicant needs to clarify which drawing takes precedence over which regarding accurately illustrating the development proposals.

1. e) Lancashire Central Planning Statement July 2022

Para 2.11 confirms that with regard to extant planning permission LPA Ref: 07/2017/0211/ORM *"some site preparation works has commenced, the permission has not yet been implemented."* Whilst some of that approval's precommencement conditions have been discharged and work is ongoing to enable discharge of the outstanding conditions of note is the fact that the **net loss** of landscape features and biodiversity arising from the initial construction works has not been addressed in the unacceptably long 4 years+ period since they were undertaken. For this latest planning application, planning permission is being sought for a maximum period of 10 years for submission and approval of all the reserved matters applications. Add to this the lengthy construction periods required for building the kind of large structures now proposed and the time it takes for mitigation planting to have a significant beneficial effect it seems likely that the site's 'net loss' state would be maintained for an unacceptably long period of 20 – 30 years.

Para 3.4 confirms *"The application is submitted in outline with all matters reserved save for access from the public highway and the strategic green infrastructure running between the various development zones"*, but this seems at odds with the level of detail provided on the various landscape drawings reviewed above.

Whilst para 3.5 claims that *"the application provides sufficient certainty to enable the decision maker to fully assess the Proposed Development"* this review of the applicant's documents shows that with regard to landscape and visual matters, this is simply not the case; much work still needs to be done so that the full significance of likely effects can be determined.

Table 3.2: Land Uses Per Zone is useful but it fails to provide any minimum requirements/targets for green infrastructure/public open space/biodiversity net gain. Why?

Para 3.29 confirms that "*Existing trees and hedgerows will be retained*" but as there is a dearth of and at times conflicting information generally in the applicant's documentation concerning tree losses, it is difficult to see what target in percentage terms was set for them. Given the generally scattered distribution of trees across the application site, there seems few if any obstacles to ensuring that no trees would have to be removed to facilitate development. No evidence has been provided which demonstrates that the tree and hedgerow losses are unavoidable.

1. f) Design and Access Statement Lancashire Central Rev P5

Regarding landscape and visual matters arising from the planning application, the **Design and Access Statement** does not add anything new or significant to the body of information – in fact there is some repetition of content between the two documents – already provided in the **Design Code**. As this latter document has already been commented on earlier in this document, no comments are provided on the **Design and Access Statement**.

1. g) Information provided to illustrate the scheme proposals

All of the applicant's information graphically illustrating the proposals is in drawing plan format only and as noted above, many of these drawings are of very little use as there are inconsistencies between them and they have no keys to explain what the various existing/proposed features are (which is contrary to good practice). With the limitations imposed by these drawings, the full extent of the proposed development's likely landscape and visual impacts cannot be determined, nor can the adequacy of the proposed mitigation and habitat creation works be fully assessed.

Given the large scale and relative heights of the proposed buildings it is essential that the applicant submits site cross sections and visualisations produced in accordance with Highland Council's latest Visualisation Standards for Wind Energy Developments. Visualisations are particularly useful for members of the local community many of whom will not be familiar with reviewing site plans and the challenges of trying to translate 2D images into a visualised reality which accurately depicts the proposed building's vertical scale and mass.

The applicant should agree viewpoint locations for these visualisations with the determining authority.

2. Determining the Application

As has been demonstrated in the comments above, both the applicant's supporting documentation (Design Code, Environmental Statement - Landscape and Visual Impact Assessment, Parameters Plans, landscape proposals drawings) and the scheme proposals have several significant weaknesses and omissions.

These matters need to be addressed to the satisfaction of the planning authority before the Cuerden site planning application can be determined.

Aside from the documentation submitted in support of the planning application there are several other problems which need to be addressed before this planning application can be determined.

One of the most serious issues with the application relates to strategic landscaping as the applicant seems unsure about what exactly he/she is applying permission for. This is supposed to be a planning application for permission to create strategic green infrastructure/landscaping but detailed landscape design drawings for plots which may not actually be developed as shown have also been submitted – it seems very premature to do such a level of work for development plots that have not been let/sold/designed/approved. Add this to the fact that these detailed design drawings are laden with problems in landscape and visual terms it seems appropriate to recommend that the applicant be requested to formally withdraw his/her landscape proposals drawings. In doing this determining the Cuerden Strategic Site planning application can focus on the site's green infrastructure/landscape/landscape strategy/landscape structure, secure in the knowledge that if approved this would be implemented in the form detailed in the planning application.

For the avoidance of any doubt or confusion, it should be noted that a landscape strategy – the key landscape element of this planning application – or as it is more commonly referred to, a landscape structure, is the main vegetative/landform based framework within which future development plots/parcels would nest within. With the Cuerden site this landscape structure would include specific proposals for the site's boundaries, main access roads, 'gateways,' biodiversity mitigation/compensation, SUDS and the external multifunction spaces (often branded as green infrastructure) which connect the various development land parcels and facilitate safe movement through the site for pedestrians, horse riders and cyclists. These are the areas/spaces which would remain unaffected by what was subsequently developed within the individual plots/land parcels. By necessity, this landscape structure would be implemented as soon as possible after gaining approval through for example, advance planting to make the most of the time available for plant establishment and growth – essential for early mitigation of the development's likely significant landscape and visual impacts.

All this makes the **Parameters Plan 3- Strategic Landscape** drawing especially important as it is the go-to source for details of the landscape structure that is one of the main elements of the planning application. Unfortunately, as outlined on page 21 above, the drawing has numerous weaknesses and omissions which need to be addressed before it too could be used to inform a determination of the planning application.

Turning to the actual details of the submitted proposed landscape structure, the following need to be addressed before the planning application can be determined:

a) Main structural landscape 'spine'

The dedicated road free interconnected spaces adjacent to the western boundary of Zone's C and A – the applicant's 'green infrastructure' – would provide good functionality, landscape amenity and habitat connectivity between most of the development zones. However, to the east of Zone A this vital 'spine' of interconnected spaces would completely break down being replaced by narrow

grassed highway verges, scattered trees, ornamental hedges and boundary planting. Had the proposed western 'green infrastructure' been extended and built on the field boundary trees shown in the aerial photograph below, new spaces providing access, landscape amenity and enhanced habitat connectivity could have been provided right up to Wigan Road and Cuerden Valley Park beyond. In addition, there would be scope within these spaces for providing more effective mitigation planting along the southern boundary of Zone B than that proposed. The fact that the applicant's proposals for this area would actually involve the avoidable *removal* of some of the boundary trees and no creation of separate interconnected spaces wastes the opportunities existing landscape features provide for creating extensive green infrastructure *throughout* the site:



b) Site boundary mitigation

Given the substantial height and mass of many of the proposed industrial buildings and the rural context of many of the viewpoints to the west of the site a key factor in successfully assimilating the Cuerden development into the receiving landscape is extensive mitigation planting along all of the site boundaries. As highlighted above, the applicant's proposals for the site's boundaries are generally inadequate either due to nothing being proposed at all or the planting of insufficient quantities of trees and shrubs to achieve the required effect. This places a greater reliance on the mitigation provided by existing trees and hedgerows within the site. Unfortunately, as there are numerous works likely to be undertaken within the root protection areas of many trees and hedgerows threatening their long-term health and viability, this approach is unlikely to achieve as much mitigation as it should do.

c) Existing trees and hedgerows

It is not clear the extent to which the applicant has assessed the site and surrounds existing trees and hedgerows and their suitability/feasibility for retention/incorporation within the proposed scheme. No tree survey has been provided – a glaring omission – and no root protection areas are shown on any of the drawings which suggests that no detailed assessment of the effects of the development's construction works has been carried out. Without this vital assessment work which helps determine how many trees and hedgerows the proposed works will directly affect and how many losses would be unavoidable, the applicant cannot accurately determine habitat losses/gains and carry out the necessary biodiversity metric calculations.

Until an accurate tree survey and assessment of the implications of the proposals on existing trees and hedgerows has been provided and, the applicant can demonstrate that the scheme design was informed by this information, the Cuerden site planning application should not be determined.

For all the reasons outlined above a full assessment of the Cuerden Strategic Site's likely landscape and visual impacts cannot be completed. The applicant's documentation submitted in support of his/her planning application is a key evidence base required by the determining authority to inform decisions made on the acceptability of the Cuerden Strategic Site's in landscape planning terms.

It is therefore strongly recommended that the applicant address in full to the satisfaction of the local planning authority all the issues, weaknesses, problems, etc. outlined above so that the Cuerden Strategic Site planning application can be fully assessed and judgements made on its likely acceptability in landscape planning terms.

Steven Brereton
22nd November 2022

APPENDIX 2 – SMEEDEN FOREMAN COVERING LETTER

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
SUSTAINABLE VALUE

INFRASTRUCTURE & ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS

This product is printed
on stock and in a process
that conforms to the PEFC
standards for sustainably
managed forests.

REVIEW OF CHAPTER 7

- 1.1 This document has been prepared in response to the comments of Lancashire County Council officer Steven Brerton, Landscape Team, South Ribble District, dated 22 November 2022, on landscape and visual issues relating to Application No LCC/2022/0044 Cuerden Strategic Site, East of Stanifield Lane, North of Clayton Farm, West of Wigan Road, Lostock Hall. The consultee response is noted and the response shown as bullet points
- 1.2 Assessment of effects upon the visual amenity of the surrounding Green Belt not considered
- The application site is not within Green Belt.
 - The LV Chapter does not assess effects on visual amenity of adjacent Green Belt
 - Green Belt considerations only feature within the LV Chapter as part of judgements of the value of views
- 1.3 Clear definition of the proposed development parameters not given. Clarification required on building heights, massing and lighting assessed
- The LV Chapter (7.3) has been amended to reference the Parameters plan and to list the building height parameters by zone. The amended section also lists the landscape Green Infrastructure drawings.
- 1.4 Assessment required of phasing over extended delivery period over 20-30 years
- The LV Chapter has been amended to include a more detailed list of potential effects and to reference Table 5.1 of the ES and repeat the indicative phasing calendar.
- 1.5 Baseline omits identification of historic parks and gardens
- The nearest nationally Registered Parks and Gardens are outside the study area
 - The site of Lostock Hall to the north of the roundabout junction of Lostock Lane and Watkin lane is not designated
- 1.6 Definition of study area unsound
- The LVIA has been clarified to reflect the process by which the study area was defined which was by reference to the published landscape character zones, and by site work and desk study.
- 1.7 Methodology for assessment of cumulative effects inconsistent/unclear

- The approach to the cumulative assessment is elaborated in the sections on landscape impacts and on visual impacts.
- 1.8 The introduction to the assessment should set out more clearly for the lay person what the assessment does, including the assessment of effects
- The introduction sets out the purpose of LVIAs and this has been reviewed against the text introducing the Guidelines for Landscape and Visual Assessment to ensure consistency.
- 1.9 Fine grain site-specific assessment and summary takes in only the site extents and does not include all the character areas which extend beyond the site. The descriptions are inadequate and focus upon detracting features
- The LVIA baseline includes a review of wider landscape character areas and was undertaken in the context of the understanding of the allocation of the site and previous planning approvals for development.
- 1.10 Viewpoint selection refers to use of the ZTV to identify viewpoints which should be based upon a range of factors
- The Chapter has been revised to describe the assessment being undertaken following site investigation and utilising viewpoint for the previous successful planning application.
- 1.11 Summer visual assessment omitted
- Summer visual assessment is not included in the LVIA, although winter assessment represents the worst-case scenario in terms of visual effects
- 1.12 15 representative viewpoints are not enough to cover all visual receptors in the study area, especially as 7 of the 15 viewpoints show little site visibility and the majority are from road (lower sensitivity) whereas viewpoints are missing from PRow 6, 7, 8 and 12 and from Woodcock Estate
- 15 viewpoints is a reasonable number for proposals of this scale and nature
 - The viewpoint locations are broadly representative, and include those used for the previous successful planning application.
- 1.13 Tabular form, as normally presented, would enable appraisal of the full extents of visual effects
- Anticipated visual effects are set out in the main body of the LVIA as narrative and the appended table of effects does allow a concise overview of the visual effects

- 1.14 Comments on Photographs: Poor lighting conditions for photography, contextual panoramas only supplied for some viewpoints and no metadata provided (or viewpoint co-ordinates)
- The photographs are taken in overcast conditions but visibility is not affected - the requirement for blue skies is impractical and unnecessarily onerous
 - Contextual panoramas are provided only for some photographs where this aids the understanding of the assessment photograph.
 - A location plans showing the location for each photograph is included in Appendix Part 2. Figure 7.10.
- 1.15 Poor description of the visibility of the site and the features of the site which make up the view
- The visibility and features of the site are included as part of the description of each of the viewpoints.
- 1.16 High proportion of limited intervisibility viewpoints biases overall effects
- Please see previous comments on viewpoint selection.
- 1.17 Omission of some landscape and visual effects during construction and operational phases
- The LVIA paragraphs are not intended to be exhaustive but to represent the main likely effects
- 1.18 Lack of detail regarding construction phase mitigation
- Construction phase mitigation is described briefly and in general terms
- 1.19 Lack of key on Proposed Landscape Mitigation plan
- Plan has been updated and a key provided.
- 1.20 Lack of rationale for landscape mitigation proposals
- The Chapter has been amended to include more information on landscape mitigation proposals 7.86 to 7.88.
- 1.21 Omission of assessment of effects on adjacent Green Belt and non-registered historic designated landscape
- Effects on these receptors are omitted
 - Character of heritage assets is properly within the scope of heritage assessments rather than LVIA.

- Effects on adjacent Green Belt have not been considered as the application site is not within Green Belt.

1.22 Inadequate judgements of value and susceptibility of LCA1 and LCA2 and therefore the level of significance of effects

Adverse effects on these receptors are judged to be moderate and therefore significant from a landscape perspective increasing the value may increase the effects but as they are already significant from a landscape perspective this would not alter the overall conclusions of the LVIA

1.23 Inadequate judgements of sensitivity of pedestrians on PRow

- Half of the receptors on PRow are judged appropriately for sensitivity according to the methodology
- The sensitivity of one of the receptors on PRow (Viewpoint 4) have been amended.

1.24 Proposed landscape mitigation is not judged to sufficiently reduce adverse effects

- The effectiveness of the mitigation is limited at the year 15 point of assessment as planting will only be sufficient to reduce the impacts of ground level detail and 'clutter' as the buildings will remain higher than the proposed trees.

1.25 All receptors within the study area should have been assessed, potentially including over 100 visual receptors

- The requirement for assessment of all receptors is impractical and unnecessarily onerous
- LVIAs are required to be proportionate and representative