


**LANCASHIRE CENTRAL
RESPONSE TO LANDSCAPING COMMENTS**


Design Code

Comment	Response
<p>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.</p>	<p>The Design Code is not required to demonstrate a design evolution, which is the role of the Design and Access Statement which has been submitted as part of the application. In any event, the bulk of design evolution process has largely been completed via the adopted 2015 Masterplan. Policy C4 requires the general arrangement and layout to be in conformity with the Masterplan.</p> <p>The Design Code is not required to provide an exhaustive list of development parameters or design restrictions for the Site. This should be avoided as a degree of flexibility is needed to ensure that a deliverable and sustainable scheme can be developed.</p> <p>The role of the Design Code is to supplement the parameter plans with an additional layer of control on specific design issues. The Design Code submitted contains the restrictions which the Applicant deem appropriate to this scheme.</p>
<p>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.</p>	<p>The Application Site, although greenfield in character, is allocated for development within the development plan. Green Belt Policy (via both the NPPF and the Development Plan) does not require development proposals to consider potential visible impacts upon nearby green belt land.</p>
<p>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</p>	<p>The visuals provided within the Design Code document were largely presented for illustrative purposes only, essentially forming extracts from the Design and Access Statement and other technical reports</p>

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<p>what the features are. A scale bar should also have been provided on all of the plans.</p>	<p>(such as the Landscape and Visual Impact Assessment) where further technical detail is available to view.</p> <p>Following the closure of the consultation process, and in discussion with the Planning Officer, the Design Code was amended in February 2023. These amendments aim to streamline the Design Code, omit any information which may be duplicated elsewhere, and to remove reference to the Development Framework Plan (a drawing showing an illustrative scheme of development).</p>
<p>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.</p>	<p>This point is noted and has been addressed by the February 2023 Design Code. The Design Code should also be read in conjunction with the Planning Statement, which sets out the full planning policy context and justification for the Proposed Development.</p>
<p>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.</p>	<p>The Strategic Green Infrastructure Network, which forms a detailed part of the current application, is expected to meet the majority of landscaping improvements and ecological management so that there is sufficient flexibility within Development Zones to meet market restrictions.</p> <p>Additional restrictions or assessment considerations could be inserted into the Design Code albeit we do not consider that any additional coding restrictions are required.</p>
<p>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)</p>	<p>The planning application is submitted in outline form with the maximum quantum and height of development clearly defined by the Parameter Plans. These drawings provide the broad limitations on building scale and massing.</p> <p>The Design Code does not seek to provide any further restrictions or coding requirements on the detailed design of the Development Plots as this detail will be subject to reserve matters approval (at the appropriate time).</p>


Comment	Response
<ul style="list-style-type: none"> • building scale and massing. • building vernacular • lighting • types of hard surfaces materials and their locations • street furniture • planting types • fencing types • visual elements such as vista's, focal points • public art requirements • enhancing biodiversity 	
<p>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"</p>	<p>Again, the Design Code is a technical document which is intended to contain any detailed design expectations which may be necessary to deliver an appropriate quality of development.</p> <p>The potential impact of development upon landscape character, and the assessment of such impact, is outlined within separate documents, namely the Landscape Chapter of the Environmental Statement (the ES), and the associated Landscape and Visual Impact Assessment (LVIA).</p> <p>We do not agree that the Proposed Development's approach to landscaping is 'inwardly focused'. Instead, we believe much of the assessment towards landscape impact has already been addressed through the allocation of the site and the development of the 2015 Masterplan – something which is now well established.</p> <p>With such development principles in place, much of the focus of this application is on landscaping within the Site. The assessment of longer-distance impacts is still provided through the ES.</p> <p>The landscape character of the site is addressed within the Landscape Chapter of the ES and the presence of existing features which contribute to landscape character, such as ditches, hedgerows, trees and woodland belts noted. Many of these features are incorporated within the detailed landscape proposals associated with the western boundaries of the site, which are to be determined as part of the application.</p>

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	<p>The existing PROW network is largely retained and is proposed to be enhanced with a new east to west connection parallel to the M65 to allow connection from the site and areas to the west, with the Cuerden Valley Park beyond the eastern boundary of the application site.</p> <p>We consider the policy requirement to assess landscape impact has been met and appropriate action taken to mitigate any impacts to acceptable levels.</p>
<p>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.</p>	<p>It is not the role of the Design Code to consider such matters. Such considerations are dealt with via the Preliminary Ecological Assessment and associated surveys, together with the Biodiversity Net Gain Assessment. It is anticipated that appropriately worded conditions will be used to ensure that such considerations form a key consideration through each part of the design and planning permission process, and that appropriate forms of mitigation are provided.</p>
<p>Character Areas - Mixed Use Zone A</p> <p>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":</p>  <p>This generic form of highway landscaping can be found in industrial estates and retail 'parks' throughout Lancashire.</p>	<p>We do not agree that there is a need to screen views of the development from the main access road. The Cuerden Strategic Site (the CSS) is a key employment allocation within the Local Plan, positioned at a strategic gateway point and accessed via a purpose-built motorway junction. The landscape strategy aims to deliver a development which clearly functions as a business park, which would be set within well-landscaped grounds. The formal landscaping along the link road achieves this goal.</p>

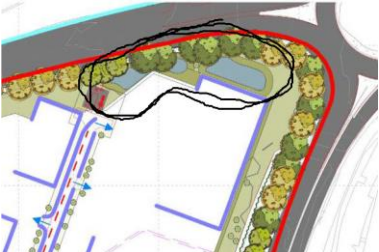

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<p>The location of the car parks that serve the large buildings near the main roundabout in the screenshot above and below is a concern:</p>  <p>This type of layout effectively places a huge 'core' of car parking (bounded by the black line above) right 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.</p>	<p>Whilst these comments are noted they relate to the layout of the Illustrative Development Framework and parts of the Site which the Applicant is only seeking outline planning permission for at this stage. Clarification on this point has been made via the February 2023 revision to the Design Code, which uses the Parameter Plans as a base map, and omit reference to the illustrative layout. As such these comments should carry no weight in the determination of this application.</p> <p>Notwithstanding this point, it is considered appropriate to place car parking and functional servicing areas in these locations, as they will be located behind the strategic landscaping which runs alongside the link road. The aim of the landscaping should be to enhance the setting and character of the business park, not to screen it from view. Every effort will be made through the design process to provide clear and legible approaches to each building, and to ensure that the landscaping enhances these linkages.</p>
<p>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,</p>	<p>As a strategic employment site a key requirement of the layout is that large development areas are provided to achieve the optimum use of the land. The access arrangements must respond accordingly.</p>

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<p>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.</p>	<p>It is true that some of the pedestrian and cycle routes are built alongside the road vehicle network, but this is a normal design approach and one which follows the route requirements of those using it. This approach avoids the potential for pedestrians to walk along vehicle-only routes, and provides employees and visitors with direct access to the Development Zones.</p> <p>The Proposed Development does aim to provide an alternative route away from the road network, via the Strategic Green Infrastructure network. An appropriate balance has therefore been struck.</p>
<p>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.</p>	<p>Whilst these comments are noted they relate to the layout of the Illustrative Development Framework and parts of the Site which the Applicant is only seeking outline planning permission for at this stage. Clarification on this point has been made via the February 2023 revision to the Design Code, which uses the Parameter Plans as a base map, and omit reference to the illustrative layout. As such these comments should carry no weight in the determination of this application.</p> <p>Notwithstanding this point, the Applicant disagrees with these comments as it is not always necessary or appropriate to position buildings directly on the street frontage, and setting large buildings away from the pavement can help to provide a sense of approach / place which can be emphasised by appropriate landscaping within the Development Zone (a Reserved Matter).</p>
<p>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.</p>	<p>This point is noted but it is not considered that any site-specific design coding is required to ensure that this point is considered through the Reserved Matters process. The inclusion of such broad considerations would duplicate the tests set out at Policy G17 of the Local Plan and are not therefore considered necessary.</p>
<p>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</p>	<p>The development parameters allow for buildings of up to 20 metres which would represent the maximum scale of development and the 'worst-case' scenario for several points of assessment. Chapter 7 of</p>

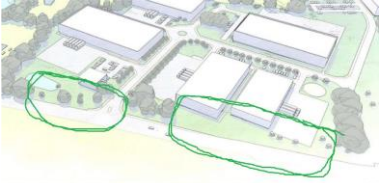
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<p>support this chosen maximum building height. A height of 20m combined with the mass and block like form of some of the proposed units is of concern as they could be too large for the local landscape scale.</p>	<p>the ES, and the associated LVIA, consider the impacts of such development. It is not considered necessary to repeat such assessments within the Design Code.</p> <p>Notwithstanding this point, the detailed design of each building will be assessed as part of each Reserved Matters application, and will be assessed against the relevant policies of the Development Plan.</p> <p>The height parameters for DZ.A, at up to 20 metres, are considered to be appropriate. The Landscape and Visual Impact Assessment (LVIA) identifies two key views of DZ.A, and refers to them as Viewpoints 14 and 15. The view the officer refers to is VP14. The LVIA concludes that the development, when viewed from this location, would result in a major-adverse impact which would then be reduced to a moderate-major adverse impact at a 15 year post-construction point of assessment. Such impacts are, on balance, considered to be acceptable given the strategic and allocated nature of the CSS.</p>
<p>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.</p>	<p>The CSS is predominantly a greenfield site which includes only a small number of existing buildings. The location of the CSS, combined with the existing and proposed landscaping along Lostock Lane and Stanifield Lane limit the visual links between the Proposed Development and the adjacent urban area, which is predominantly residential in nature.</p> <p>Given this context, there is not considered to be any significant need for the development to utilise similar architectural features or materials. The local vernacular is considered to have limited influence on the design of the Proposed Development.</p> <p>In addition to this, the CSS is intended to boost the local economy and to attract inward investment into the area. It is therefore considered appropriate to invite innovation and contemporary design.</p>
<p>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.</p>	<p>Such comments are noted but are not relevant to the current application, as they relate to the potential impacts of construction within the Development Zones. Approval for the detailed design of development in these areas will be subject to separate Reserved Matters applications. Any potential arboricultural impacts will be assessed at this stage. The layout of the current application (the access road and green infrastructure) does not prejudice the integrity</p>

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<p>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:</p>  <p>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.</p>	<p>of these trees and provides sufficient flexibility within the Development Zone to avoid such impacts.</p>
<p>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?</p>	<p>The Strategic Green Infrastructure does not propose to remove a significant number of trees along the southern boundary of the site. The perceived gaps in the landscape buffer are the result of the red line boundary of the Site, and the limited number of trees within the Application Site. Trees outside the site will be retained and will continue to provide screening.</p>

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<p>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.</p>	<p>The development parameters allow for buildings of up to 25 metres which would represent the maximum scale of development and the 'worst-case' scenario for several points of assessment. Chapter 7 of the ES, and the associated LVIA, consider the impacts of such development. It is not considered necessary to repeat such assessments within the Design Code.</p> <p>Notwithstanding this point, the detailed design of each building will be assessed as part of a Reserved Matters application, and will be assessed against the relevant policies of the Development Plan.</p> <p>[The height parameters for DZ.B, at up to 25 metres, are considered to be appropriate. The Landscape and Visual Impact Assessment (LVIA) identifies four key views of DZ.A, and refers to them as Viewpoints 1, 2, 3 and 4. The most significant of these are VP1 and 2, both of which are reduced to a moderate-adverse impact at a 15 year post-construction point of assessment. Such impacts are, on balance, considered to be acceptable given the strategic and allocated nature of the CSS.</p> <p>We do not agree that the presence of such structures would be 'incompatible' with the local landscape, given that the Site is allocated and is intended to become an urban area over time.</p>
<p>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.</p>	<p>Such comments are noted, however the landscaping in this particular area does not form part of the application and will be dealt with via a Reserved Matters submission.</p>
<p>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</p>	<p>Such comments are noted, however the layout and design of development in this area does not form part of the application and will be dealt with via a Reserved Matters submission.</p>

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<p>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.</p>	
<p>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.</p>	<p>Such comments are noted, however the layout and design of development in this area does not form part of the application and will be dealt with via a Reserved Matters submission.</p>
<p>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)</p>  <p>The above pond proposals contradict those on some of the other applicant's plans, e.g.</p>  <p>Illustrative Site Opportunities Plan Only 1 pond is shown within the area outlined in black.</p>	<p>Such comments are noted however the area in question does not form part of the Strategic Green Infrastructure applied for at this stage and is therefore reserved for future consideration The number and location of such attenuation ponds will be subject to consideration at a later date once the detail scheme is fixed.</p> <p>The issue of consistency of the plans within the Design Code has been addressed through the February 2023 amendment, which replaces the Illustrative Development Framework and uses the Parameter Plans as a base.</p>

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<p>"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.</p>	<p>The landscaping proposed in this area is shown on the detailed landscaping plans produced by Smeeden Foreman, namely drawing SF 3236 LL06 Rev K.</p>
<p>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.</p>	<p>The proposed development aims to provide a net gain for Biodiversity. The precise measures are set out in the Biodiversity Net Gain Report provided as part of this application and will be secured by way of a condition.</p>
<p>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.</p>	<p>The development parameters allow for buildings of up to 22.15 metres which would represent the maximum scale of development and the 'worst-case' scenario for several points of assessment. Chapter 7 of the ES, and the associated LVIA, consider the impacts of such development. It is not considered necessary to repeat such assessments within the Design Code.</p> <p>Notwithstanding this point, the detailed design of each building will be assessed as part of future Reserved Matters submissions and will be assessed against the relevant policies of the Development Plan.</p> <p>The height parameters for DZ.C, at up to 21.15 metres, are considered to be appropriate. The Landscape and Visual Impact Assessment (LVIA) identifies four key views of DZ.C, and refers to them as Viewpoints 11,12 and 15. The most significant of these is VP12, which would be reduced to a moderate-major neutral impact at a 15 year post-construction point of assessment. Such impacts are, on balance, considered to be acceptable given the strategic and allocated nature of the CSS.</p>

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<p>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.</p>	<p>As previously noted, the CSS is visually separate from the local building vernacular and there is little need to reference it explicitly. Instead, a coherent architectural response will be provided to the surrounding landscaped areas.</p> <p>The precise palette of materials is a reserved for future consideration Matter, but given the context of the Site and the strategic aims of the CSS to attract inward investment, the use of contemporary materials and architectural features is considered to be appropriate.</p>
<p>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:</p> 	<p>The CGI referred to is an illustrative image which was intended to demonstrate the potential scale of development. It is not a full or complete rendering of the proposals. This CGI was removed as part of the February 2023 amendments to the Design Code.</p> <p>Reference should instead be made to the detailed landscaping drawings, namely drawing reference SF 3236 LL07 Rev H.</p>
<p>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.</p>	<p>This is a subjective assessment of a CGI which has been presented for illustrative purposes only. No measurements are shown on the image and so it is not possible to assess relative heights. This CGI was removed as part of the February 2023 amendments to the Design Code.</p>
<p>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.</p>	<p>Whilst these comments are noted the precise location of any buildings within this area is a reserved for future consideration.</p>
<p>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:</p>	<p>Whilst these comments are noted the precise location of any buildings within this area is reserved for future consideration.</p>

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<ul style="list-style-type: none"> • new structures located within root protection areas of existing trees. • absence of the connecting boulevard concept proposed for other zones. • 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. • very little mitigation planting or other landscape features for the buildings within the site. • 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). • no mitigation proposed to the south of Unit 5. • little connectivity between habitats. 	
<p>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.</p>	<p>The development parameters allow for buildings of up to 24.7 metres which would represent the maximum scale of development and the 'worst-case' scenario for several points of assessment. Chapter 7 of the ES, and the associated LVIA, consider the impacts of such development. It is not considered necessary to repeat such assessments within the Design Code.</p> <p>Notwithstanding this point, the detailed design of each building will be assessed as part of future Reserved Matters applications and will be assessed against the relevant policies of the Development Plan.</p> <p>The height parameters for DZ.D, at up to 24.7 metres, are considered to be appropriate. The Landscape and Visual Impact Assessment (LVIA) identifies five key views of DZ.D, and refers to them as Viewpoints 6, 7, 8, 9, and 10. The most significant of these is VP8, which would result in a moderate adverse impact. Such impacts are, on balance, considered to be acceptable given the strategic and allocated nature of the CSS.</p>
<p>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,</p>	<p>This section is intended to acknowledge that the development will be visible from Stanifield Lane and that the architectural treatment of the buildings will form a key consideration, alongside the strategic landscaping.</p>

Comment	Response
<p>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.</p>	<p>Notwithstanding this point, the detailed appearance of the buildings is a reserved for future consideration and does not form part of this application.</p>
<p>Character Areas – Residential Zone E Section a. Street Types (hierarchy, footpaths, bridleways, cycleways) requires the following:</p> <p>"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."</p> <p>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.</p> <p>"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.</p>	<p>The replacement hedgerow forms a detailed aspect of the design which is difficult to convey via the Illustrative Development Framework or the Parameter Plan (which is now used as a base map). Reference should instead be made to the detailed landscaping plans, namely SF 3236 LL07 Rev H. This shows the replacement hedgerow.</p> <p>The design requirement to provide an avenue which runs through the development would take place within Development Zone E and is therefore reserved for future consideration.</p> <p>The height parameters for DZ.E, at up to 13.7 metres, are considered to be appropriate. The Landscape and Visual Impact Assessment (LVIA) identifies three key views of DZ.E, and refers to them as Viewpoints 9, 10 and 13. The most significant of these is VP13, which would be reduced to a moderate-major adverse impact at a 15 year post-construction point of assessment. Such impacts are, on balance, considered to be acceptable given the strategic and allocated nature of the CSS.</p>
<p>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.</p>	<p>Such comments are noted however the detailed layout of Development Zone E is reserved for future consideration. The layout will need to balance many considerations including Policy G10 and the need for some form of recreation space. Such considerations will dictate the final quantum of development.</p>

Comment	Response
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.	
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.	Such comments are noted however the final statement covers this requirement, explaining that the Applicant's should seek clarification as to the BEEAM or equivalent standards applicable at the time of future Reserved Matters applications. Alternatively, planning conditions can be used to set the minimum requirements of the future phases of development.

Environmental Statement, Landscape and Visual Impact Assessment

Comment	Response
Various comments	Addressed via submission made 10/02/2022.

Parameter Plan 1 – Development Zones, Land Use, Quantum and Building Heights

Comment	Response
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?	The Strategic Green Infrastructure performs a variety of functions, not just the provision of visual and physical separation. The distance between Zone D and the nearby dwellings is considered to be appropriate, particularly when taking into account the height restrictions included within this area.
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	The height parameters for DZ.B, at up to 25 metres, are considered to be appropriate. The Landscape and Visual Impact Assessment (LVIA) identifies four key views of DZ.A, and refers to them as Viewpoints 1, 2, 3 and 4. The most significant of these are VP1 and 2, both of which are reduced to a moderate-adverse impact at a 15 year post-construction point of assessment. Such impacts are, on

Comment	Response
<p>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.</p>	<p>balance, considered to be acceptable given the strategic and allocated nature of the CSS.</p>
<p>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.</p>	<p>The height parameters for DZ.C, at up to 21.15 metres, are considered to be appropriate. The Landscape and Visual Impact Assessment (LVIA) identifies four key views of DZ.C, and refers to them as Viewpoints 11,12 and 15. The most significant of these is VP12, which would be reduced to a moderate-major neutral impact at a 15 year post-construction point of assessment. Such impacts are, on balance, considered to be acceptable given the strategic and allocated nature of the CSS.</p>
<p>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.</p>	<p>The proximity of the development to, and potential impact upon, nearby residential dwellings is a consideration which has been taken into account and we believe is acceptable. The Applicant's analysis of the heights is that there will be no adverse impact upon the neighbouring dwellings.</p>

Parameter Plan 3 – Strategic Landscape

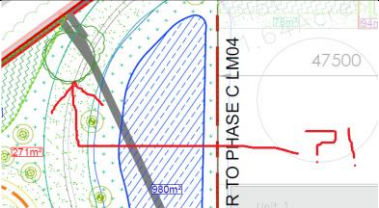
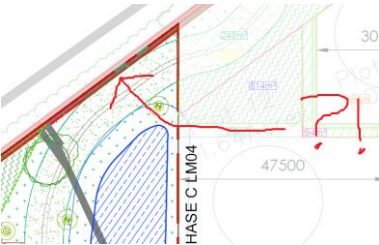
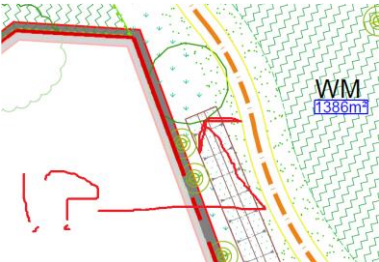

Comment	Response
<p>This plan is of little use as it has no key for the proposed strategic landscaping. As a minimum this parameters plan should provide clear</p>	<p>Parameter Plan 3 is intended to provide an illustrative overview of the proposed strategic landscaping. The drawing is particularly important</p>


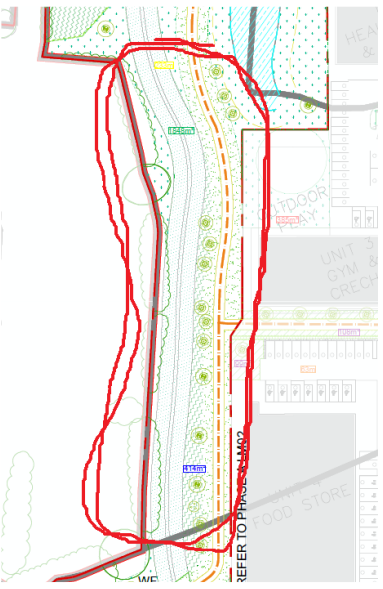
Comment	Response
<p>detailed information on the following elements of the 'strategic' landscape where they are proposed: (Please note, this list is not meant to be all inclusive)</p> <ul style="list-style-type: none"> • Different habitat types, e.g. woodland, scrub, hedgerows, species rich grassland, 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 	<p>given the significant size, and complex layout of the site. Parameter Plan 3 is intended primarily to confirm the extent of the landscaping which forms part of this current application, and to confirm which areas would be subject to future consideration at Reserved Matters stage.</p> <p>Full detail of the Strategic Landscaping can be found within the landscaping plans, namely LL04 Rev E, LL05 Rev E, LL06 Rev E and LL07 Rev E, and LL09 Rev A.</p> <p>LL01 has been withdrawn as it is replaced by LL08 Rev C.</p>
<p>In addition to the above the following information should be provided: (Please note, this list is not meant to be all inclusive)</p> <ul style="list-style-type: none"> • 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 	<p>The drawing has been amended to include the omitted key as requested. The application includes detailed landscape proposals associated with new highway access to the site, boundary treatments, and an extensive area of landscape on the western edge of the application site with associated SuDs features, all of which is submitted for approval. Arboricultural, ecological and PRow information has been submitted as part of the application.</p>
<p>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</p>	<p>Recent submissions have drawn a better distinction between detailed landscaping plans (for approval) and illustrative plans (for reference).</p>

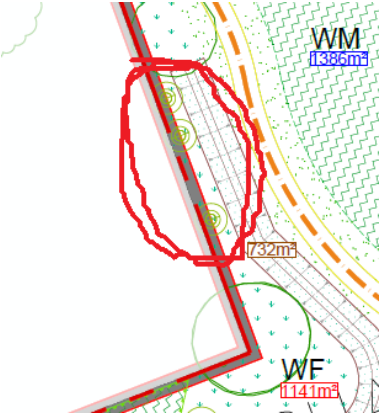
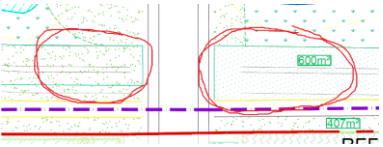
Comment	Response
<p>included in the current planning application and which are supposed to be determined later by way of reserved matters. The applicant should have separated the site's landscape structure/green infrastructure, i.e. the areas beyond the individual plots the design of which can be fixed at this stage, and made these the basis of the current planning application.</p>	

Landscape Proposals – Green Infrastructure A

Comment	Response
<p>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:</p> <p>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.</p> <p>The electricity pylons/cable runs and OS data for areas adjacent to the site are not shown.</p> <p>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.</p>	<p>This was an issue with the original document upload. Detailed proposals have been provided across a suite of drawings, namely</p> <ul style="list-style-type: none"> • SF 3236 LL04 Rev J Zone A • SF 3236 LL05 Rev J Zone B • SF 3236 LL06 Rev K Zone C • SF 3236 LL07 Rev H Zone D • SF 3236 LL09 Rev E Zone E • SF 3236 LL08 Rev H Green Infrastructure <p>The vegetation for retention and for removal is shown within the submitted arboricultural information. The above drawings are intended to show the proposed development only. The duplication of such information is unnecessary.</p> <p>Additional OS Data can be added to the drawings, though it is not deemed to be necessary as such information is readily available from other plans.</p> <p>The different hatch patterns are used for attenuation ponds and for below ground storage.</p>
<p>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.</p> <p>Tree directly in the path of a proposed SUD (swale?):</p>	<p>The tree protection fence would be positioned 2m from base of hedge to allow retention.</p> <p>The tree in the line of SuDs feature is a drawing error which shows an existing tree which is scheduled for removal. The loss is mitigated</p>

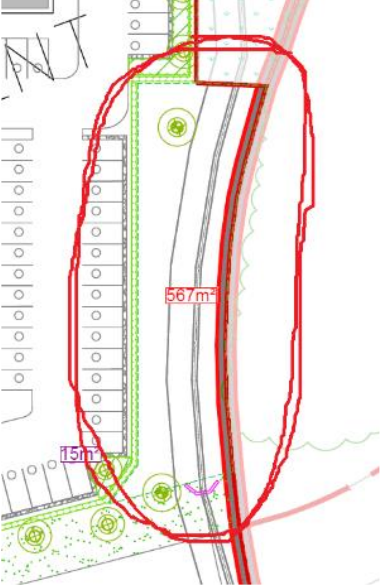
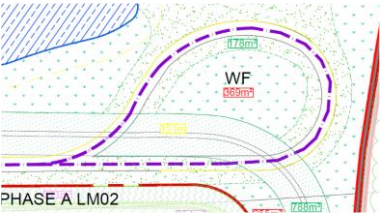

Comment	Response
 <p>SUD within hedgerow root protection area (RPA):</p>	<p>through the planting of replacement trees in the area, and the public benefits of the SUD design.</p>
 <p>Excavation within tree RPA:</p>	<p>The most up-to-date drawings (Rev E) show the excavation adjusted to be outside of the RPA of this tree.</p>
 <p>Proposed planting within RPA of plants within private land:</p>	<p>The proposed planting within the RPA of the off-site tree has been omitted in the most up-to-date drawings (Rev E)</p>
	

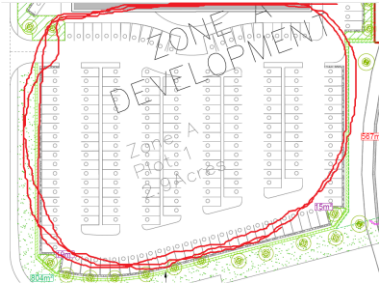

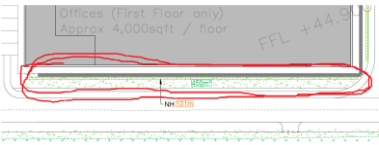
Comment	Response
<p>Existing residences should have been shown on the drawing so that those directly affected by the scheme proposals could see what mitigation measures are proposed for their property.</p>	<p>Additional OS Data can be added to the drawings, though it is not deemed to be necessary as such information is readily available from other plans.</p>
<p>No screen planting apart from one tree is proposed for the rear of Unit 4:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>
<p>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:</p> 	<p>Whilst there is potential for some very minor incursions into the RPA of adjacent trees, this would not prevent the retention of these trees.</p>
<p>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</p>	<p>The neighbouring land comprises an area of rough ground behind a farmstead and compatible with proposals.</p>

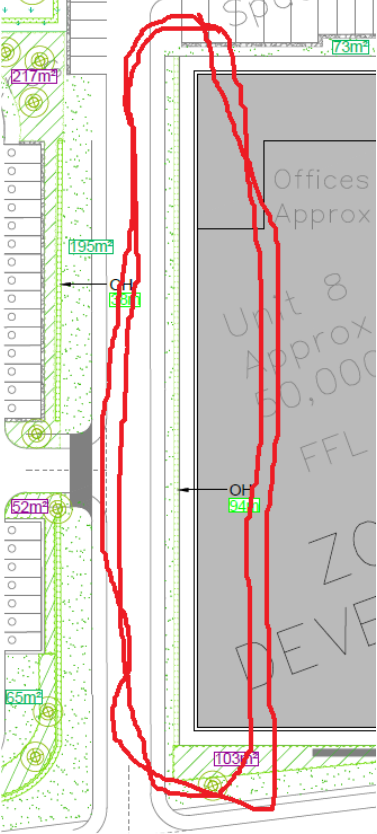
Comment	Response
<p>could be damaged by canopy branches and/or expansion of the root plate.</p> 	
<p>Even though only one is shown in the drawing key, as can be seen in the areas highlighted in red below, two different hatches have been used for the SUD's:</p> 	<p>Corrected in current drawing SF 3236 LL04 Rev J.</p>



Landscape Proposals – Phase A

Comment	Response
<p>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.</p>	<p>Details regarding the proposed removal of Trees are contained within the Arboricultural Survey Report (Rev D). Additional information regarding the ecological impacts are contained within Chapter 12 of the Environmental Statement and its appendices, and within the Biodiversity Net Gain Calculation Report.</p>
<p>The area within the red outline below has no hatching. Why?</p>	<p>This was a drawing error. The hatching is now shown on Zone A SF 3236 LL04 Rev J.</p>

Comment	Response
	
<p>It is difficult to see what the purpose of this short circular length of path is for:</p> 	<p>This area is intended to provide break-out and amenity space for site users, particularly the employees of the neighbouring Development Zones.</p>
<p>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:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>

Comment	Response
<p>There are no proposals to break up this large car park area into more human scale/non-industrial estate like areas:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>
<p>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:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>
<p>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:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>

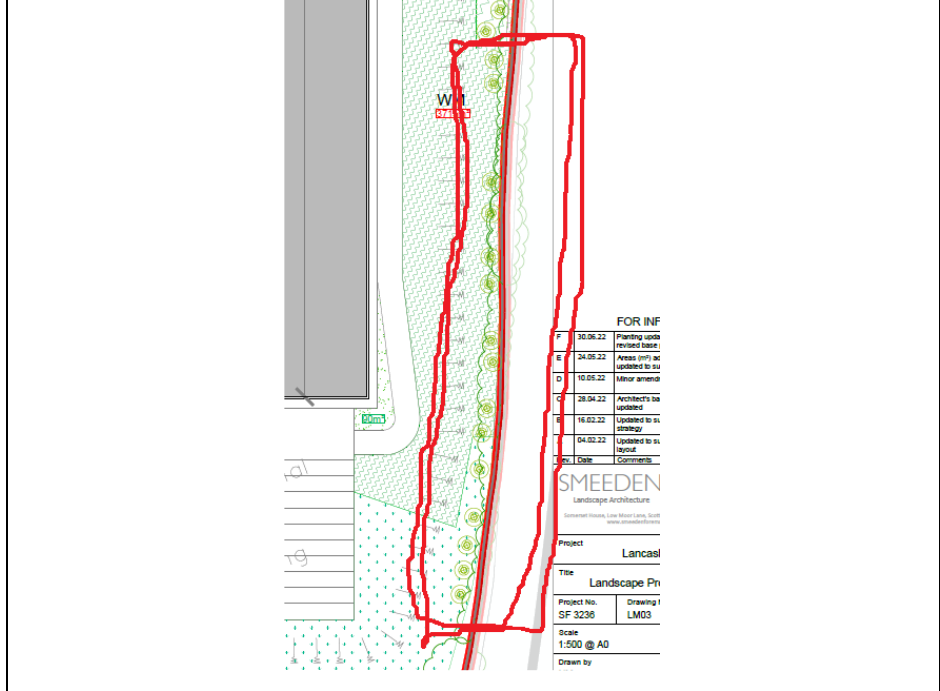
Comment	Response
	
<p>The landscape structure generally is very sparse within the area where Unit's 8 and 9 would be located being mainly comprised of small-scale 'infilling' of left-over areas between the buildings, car parks and other infrastructure with limited tree planting and grass. In addition, the 'boulevard' concept for the access roads is absent from this area. In the screenshot below, there are no significant belts of planting ('green infrastructure') to mitigate the visual effects of the large buildings, car parks and service areas:</p>	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>

Comment	Response
	
<p>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):</p> 	<p>The footway on the southern side of the road is omitted to provide greater room to construct the road without impacting on trees.</p>

Landscape Proposals – Phase B

Comment	Response
<p>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.</p>	<p>Details regarding the proposed removal of Trees are contained within the Arboricultural Survey Report (Rev D). Additional information regarding the ecological impacts are contained within Chapter 12 of the Environmental Statement and its appendices, and within the Biodiversity Net Gain Calculation Report.</p>
<p>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.</p>	<p>There is extensive woodland and scrub planting on the motorway embankments which will become more substantial in time and provide further screening.</p>
<p>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:</p>	<p>These trees are planted to the rear of proposed and existing hedgerows and will not have an adverse impact upon Wigan Road.</p>



Comment **Response**






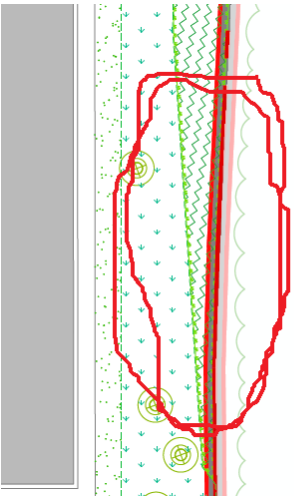

Preserving the row of trees along the southern boundary and integrating them into the proposals should be one of the applicant's key landscape priorities as these trees could provide substantial mitigation of the new building's visual effects and maintain some habitat connectivity through the site. In 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:




These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.

Comment	Response
	
<p>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:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>
<p>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.</p>	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>


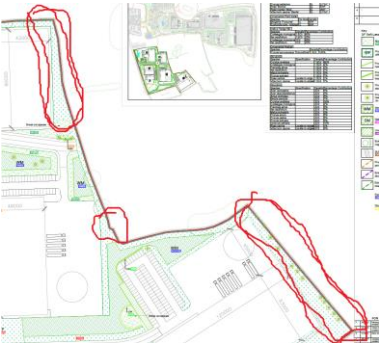
Comment	Response
<p>Vegetation intended for removal and root protection areas of trees/shrubs/hedges to be retained must be shown on the drawing. Without this vital information, the scheme's full impacts on existing vegetation and the requirements for mitigation/compensation (including biodiversity net gain calculations) cannot be determined.</p>	<p>Details regarding the proposed removal of Trees are contained within the Arboricultural Survey Report (Rev D). Additional information regarding the ecological impacts are contained within Chapter 12 of the Environmental Statement and its appendices, and within the Biodiversity Net Gain Calculation Report.]</p>
<p>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.:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p> <p>In any event, a substantial hedgerow exists on the site boundary. Further opportunities for planting would be considered as part of the landscape associated with the development of these sites.</p>
<p>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:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p> <p>This arrangement has ecological value and avoids planting the woodland over the top of a surface water drainage route</p>
<p>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:</p>	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>

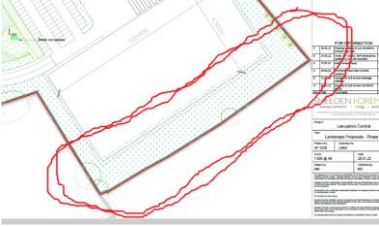
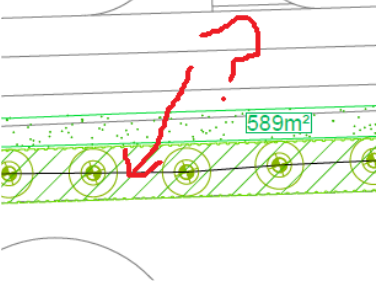
Comment	Response
	<p>There is existing vegetation on the edge of the site taller than any larger nursery stock that might be introduced into this area.</p>
<p>The area outlined in red below is far too narrow for 'woodland' planting or creation:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>
<p>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:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>


Comment	Response
<p>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:</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>
<p>Also of concern in the screenshot above is the lack of space around much of the western pond for maintenance.</p>	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>



Landscape Proposals – Phase D

Comment	Response
<p>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.</p>	<p>Details regarding the proposed removal of Trees are contained within the Arboricultural Survey Report (Rev D). Additional information regarding the ecological impacts are contained within Chapter 12 of the Environmental Statement and its appendices, and within the Biodiversity Net Gain Calculation Report.</p>
<p>Unlike the other landscape proposals drawings, the building units do not have the grey hatching and building unit number.</p>	<p>Noted, but not critical to assessment of the landscaping proposals.</p>
<p>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</p>	<p>There are 15 trees shown on the northern boundary and a belt of woodland planting.</p> <p>There are 12 trees shown on the eastern boundary in addition to the retained hedgerows. This boundary abuts agricultural fields and areas of minerals extraction.</p>

Comment	Response
<p>large northern building and associated service area from the adjoining residential area:</p> 	<p>The southern boundary abuts agricultural fields and there is a well treed hedgerow retained over the majority of the boundary and proposals for an additional 5 trees.</p>
<p>Along much of the eastern site boundary little or, inexplicably, no tree and shrub mitigation planting are proposed (areas within the red lines below). Although some scattered tree planting is proposed towards the southern end of the site, the overall landscape in the areas below would be one of open expanses of grassland devoid of any vertical screening elements. This would likely maximise the potential effects of the proposed large industrial buildings in views from PRoW's to the east and south</p> 	<p>There are 12 trees shown on the eastern boundary in addition to the retained hedgerows. This boundary abuts agricultural fields and areas of minerals extraction.</p>
<p>As with other zones, the scope for providing effective mitigation of the proposed building's effects on views from the surrounds is limited greatly by the site layout, building scale and development density which do not leave sufficient space along some of the site's boundaries for it.</p>	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>
<p>As can be seen below, the applicant has no proposals for any tree/shrub/hedge mitigation planting for the southern boundary – just open areas of grassland which would likely maximise the potential effects of the proposed large industrial buildings in views from PRoW's to the east and south:</p>	<p>This a boundary against an active sand / gravel pit and no additional screening is considered to be required.</p>

Comment	Response
	
<p>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:</p> 	<p>The black line links trees of the same species.</p>
<p>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:</p>	<p>Woodland belts include larger scale trees, and this planting is anticipated to be implemented prior to any detailed application for built form in this area and so should be addressed at that stage.</p>



Comment	Response
	
<p>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:</p>	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>

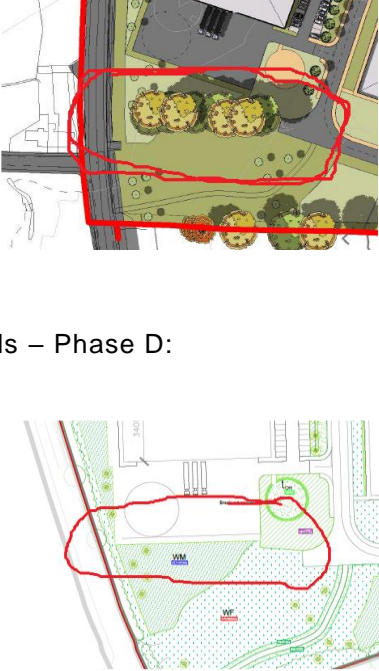
Comment	Response
	
<p>The proposed locations of most of the breakout spaces are far from ideal as they would be located close to large service areas/car parks and access roads with all their attendant noise, air pollutants and poor visual amenity, e.g.</p> 	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>

Landscape Proposals – Phase E

Comment	Response
<p>There are no mitigation/enhancement proposals for this phase. No explanation as to why this is the case appears to have been provided.</p>	<p>These comments relate to the illustrative part of the drawings. The layout and landscaping proposals within this area is reserved for future consideration and would be subject to a separate application.</p>

Illustrative Development Framework Plan

Comment	Response
<p>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.</p> <p>Northern boundary of Phase D Illustrative Development Framework Plan: A line of trees along the boundary</p>  <p>Landscape Proposals – Phase D: One tree proposed</p>  <p>Near southern boundary of Phase D Illustrative Development Framework Plan:</p>	<p>A Key has been added to drawing as requested.</p> <p>There are no proposals for work to highway land outside the red line boundary.</p> <p>The Illustrative Development Framework Plan is provided for reference only.</p>

Comment	Response
 <p>A line of trees</p> <p>Landscape Proposals – Phase D: No line of trees</p>	

Planning Statement

Comment	Response
<p>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</p>	<p>The initial site clearance works were carried out in a timely manner to enable the development approved via the 2017 permission to proceed. Unforeseen circumstances, namely the withdrawal of the main retail tenant IKEA halted the works. Further delays were introduced as a revised scheme needed to be prepared. The Applicant had little/no control over such matters.</p> <p>The revised application aims to deliver an improvement to the landscaping on the site, and uses the pre-2017 site conditions as a baseline, not the site in its current cleared state. The application includes the strategic green infrastructure as a detailed phase of development and will aim to deliver this as part of the initial phase of on-site infrastructure works, which will be implemented before proposals for the individual Development Zones are implemented. The</p>

Comment	Response
that the site's 'net loss' state would be maintained for an unacceptably long period of 20 – 30 years.	Applicant is therefore aiming to keep the temporary landscaping impacts of the project to a minimum.
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.	The more recently submitted versions of the drawings already address this point by providing better distinction between detailed and illustrative elements of the landscaping design.
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.	This statement represents the Applicant's view at the time of the application and was based on several rounds of formal pre-application discussions. It is inevitable for a scheme of this scale that some further clarification will be needed to complete the assessment process.
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?	Table 3.2 is intended to set out the maximum development parameters and land uses to inform other aspects of the assessment, such as spatial planning matters and retail impact assessments. Landscaping and ecological considerations are sufficiently covered by other documents.