

Ref Application: LCC/2022/0048

**PROPOSAL:** PROPOSED CRICKET FACILITY COMPRISING 2NO. CRICKET OVALS AND ASSOCIATED PAVILION BUILDING AND SPECTATOR SEATING, COVERED CRICKET NETS, ACCESS, PARKING, LANDSCAPING AND ASSOCIATED WORKS (INCLUDING TEMPORARY EVENT OVERLAY FACILITIES ON TICKETED MATCH DAYS), REALIGNMENT OF PUBLIC RIGHT OF WAY REF 9-12-FP 1, 7-4-FP 6 AND PUBLIC RIGHT OF WAY REF 9-12-FP 2, 7-4-FP5

**LOCATION:** LAND AT WOODCOCK ESTATE, STANIFIELD LANE, FARINGTON  
**Grid Ref:** E354744, N424731

Planning Officer: Jonathan Haine

LANDSCAPE COMMENTS

Date: 18.11.22

1.0 Site Character:

- 1.1 The proposed development site is an area characterised by generally flat and open topography, comprising agricultural pasture and with boundaries or demarcated generally into field areas by drainage ditches and hedgerows, with hedgerow trees. Fields are generally semi-regular rectangular and maintain a generally small-medium scale (Historical mapping indicating similar land use pattern since mid 1800's, potentially earlier).
- 1.2 Several semi-isolated or small clusters of residential properties are scattered around the peripheral boundaries or are immediately adjacent to the development site. These include property numbers 1-8 Fowler Avenue, 1-6 Woodcock Estate and Shirdley Cottage. Other properties are located at further distances along Fowler Lane, Old School Lane and Stoney Lane.
- 1.3 Two PRow cross through the site, one along, close to the immediate northern boundary (with access from the A582), the other crosses the site from SW, through the centre of the site, eastwards (through the Shirdley Cottage access) linking to Stanifield Lane. Footpath users would experience open and distant views of field areas, hedgerows and trees.
- 1.4 The busy A582 Farington Road is situated close to the northern boundary of the site (field area partially intervening). It is screened by mature vegetation. Stanifield Lane (A5083), forms a partial boundary to the immediate east of the site, characterised by hedgerows with further agricultural areas currently beyond eastwards. South of the site (beyond a further field area), Fowler Lane provides access from Stanifield Lane to further properties to the south west of the development site. The lane has a quiet ambience as it no longer provides through access, being terminated by the A582. An underpass provides a well used access for cycle users and pedestrians. Generally lanes have hedgerows marking boundaries, often with trees some unlit and generally have limited use of kerbs.
- 1.5 Fowler Avenue forms a very narrow access road between Farington Road and Fowler Lane. It provides access to the 8 properties along its length and forms the western boundary of the proposed development site. It is unlit and has no kerbs.

The descriptions above form the predominant characterising features of the proposed development site and immediate area.

## 2.0 Planning Context

2.1 Generally the planning documents and policies referred to in the submission (Planning Statement 1) are relevant, namely;

- National Planning Policy Framework (NPPF) (2021)
- Central Lancs Core Strategy (July 2012)
- South Ribble Local Plan (2012-2026) (July 2015)

2.2 There is reference to the NPPF and specifically with regards to Green Belt, within which the proposed development site sits; paragraphs 137, 148, 149 & 150 are noted as specifically relevant. These question whether the proposed development is 'inappropriate' in the Green Belt. Inappropriate given the reference to permissible 'outdoor sport' and whether the development constitutes 'very special circumstances'.

2.3 The question arises from this guidance as to whether openness is retained (as part of its required 'Green Belt' function) and whether proposals allow no material change of use of land.

2.4 Central Lancashire Core Strategy:

2.4.1 The Core Strategy Policy 17 is specifically important related to the design of new buildings (in this instance the proposed pavilion and associated infrastructure within the proposed development);

2.4.2 Core Strategy Policy 19 relates to the proposed development site acting as an 'Area of Separation and Major Open Space', which specifically includes this area (*(d) Bamber Bridge and Lostock Hall*), to help maintain openness in areas where there are relatively small amounts of open countryside between settlements.)'

2.4.3 Core Strategy 21 Landscape Character Areas (LCA's) requires new development to be well integrated into existing settlement patterns; appropriate to the landscape character type and designation within which it is situated; It will be detailed below (Section 2.7.2) how the proposed development deviates from landscape character;

2.4.4 Core Strategy Policy 24 : Sport and Recreation : seeks to ensure that everyone has the opportunity to access good sport, physical activity and recreation facilities including through the identification of sites for major new facilities where providers have evidence of need;

2.4.5 Core Strategy Policy 25: (Community Facilities) seeks to ensure that local communities have sufficient provision of community facilities which act as a focus of community activity; The relevance of this in relation to the specific site proposed development is commented upon below Section 2.6.2.

## 2.5 South Ribble Local Plan

Relevant policies (for Landscape) include ;

2.5.1 Policy C4 Cuerden Strategic Site: The designation of this land for development has particular relevance on the pressure it places on immediately adjacent areas, particularly with regards to retention of character; (this is discussed further below See 2.7.8); specifically the Green Belt of the Proposed Development Site.

- 2.5.2 Policy G1 (Green Belt) seeks to resist development in the Green Belt, unless there are *Very Special Circumstances* and with noted exceptions which includes 'b) *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt ....*'  
The issue of openness will be discussed below (See Sections 2.7.2, 2.7.4, 2.7.6, 2.7.12, 3.2, 3.10, 5.7, 8.17.1 & 9.10.7);
- 2.5.3 Policy G5 (Areas of Separation) (this reiterates 2.4.2 above); '*aimed at preventing built-up areas from merging into each other and protecting the land within from inappropriate development*';
- 2.5.4 Policy G13(Trees, Woodlands and Hedgerows); ) *states that permission will not be granted where proposals adversely affect trees, woodland and hedgerows which are protected by a Tree Preservation Order (TPO). There is also a presumption in favour of the retention and enhancement of existing trees, woodland and hedgerows. In cases where there is an unavoidable loss of trees on a site, replacement trees will be required at a range of two new trees for every one tree lost.*'

Attention is drawn to the AIA (Arboricultural Impact Assessment) as will be detailed below; and comments on General Arrangement, Soft Landscape Proposals Drawings also detailed below; Attention is also drawn to the Green Belt status and it is queried whether as Green Belt 'should' have limited development whether this policy should be adjusted to reflect the more important status of the land use/ designation?

- 2.5.5 Policy G17 (Design Criteria for New Development); *requires proposals to incorporate high-quality design which inter alia protects local character and distinctiveness; neighbouring amenity; highway and pedestrian safety; and local landscape features.*

It is demonstrated below in reference to the proposed layout and design how the proposed development does not fulfil this policy;

## 2.6 Playing Pitch Strategy 2018

- 2.6.1 The Planning Statement document details that there is a shortage of cricket provision in the South Ribble area and argues that this very reason justifies its location in this particular area on Green Belt as would satisfy this requirement and constitute the 'Very Special Circumstances';
- 2.6.2 It should therefore be queried whether the proposal would meet this local need/ shortage? Personal experience has witnessed whereby local clubs do not want local schoolchildren or clubs playing on their grounds (for fear of damage.. preventing usage by the club itself-perhaps in this instance the more regional, elite cricket users). I would recommend that should this proposal progress this usage by local groups, schools, clubs should be clearly evidenced or be a specific fulfilment requirement and should not be limited for instance to a new set of shirts or online training; the usage by local clubs and schools should be guaranteed;

## 2.7 Green Belt Policy ; Openness and Inappropriate;

- 2.7.1 It is accepted that Green Belt policy permits '*the Provision of Appropriate Facilities for Outdoor Sport*', which therefore raises the question of what is appropriate; this should be taken in consideration of what constitutes appropriate, in all the features and characteristics that are appropriate to the particular Green Belt area.
- 2.7.2 The characteristics of the Green Belt area are described in Section 1.0. The changes to the existing landscape character are as noted below;

- The proposed development does not utilise a rectangular field land pattern; it proposes an introduced circular land use pattern which differs significantly from that existing;
- it removes hedgerows and trees within the central area of the site; these are not replaced in a similar pattern and therefore landscape context and character is destroyed;
- it proposes a % of ornamental trees which are out of keeping with the natural landscape (purple leaved trees) and the composition of tree mixes which do not reflect the existing landscape pattern;
- proposals do not sufficiently compensate for the loss of TPO trees;
- It creates mounds around the site which change the relatively flat topography (landscape character) and prevent openness;
- it proposes a large scale development out of character with the current scale of the landscape;
- it locates and positions built form against the very grain and pattern of the landscape character, that of isolated buildings or very small clusters of development; a triangular built form is not in keeping with the vernacular;
- it imposes very large (5m high) close board fencing which significantly effects the openness, both in terms of the landscape itself and particularly for directly adjacent residents; adjacent 2.4m high fencing is proposed-neither characteristic of an open landscape;
- it introduces hard road/ other surfaces, lighting, signage, cars, traffic and such urban elements into green rural areas;
- changes to PRow (as detailed and queried below Sections 3.9, 3.9.1-3.9.3, 5.5, 8.16.1 & 9.13);

2.7.3 It should be noted that the proposed development is not a temporary use, which enables the easy restoration of land form and pattern, the changes imposed would be permanent and irretrievable;

2.7.4 There is disagreement with the statement in 5.23 of Planning Statement Part 1; *'The pavilion building and practice nets have both been designed to nestle into the landscape, in order to minimise visual impact. The concentration of these elements along the western boundary where there are existing buildings of a scattered nature, also enables them to be read in the same landscape context'*.

It is reiterated from 2.7.2 the location and form of the proposed pavilion and indeed the 5m high practice nets on the western boundary, directly adjacent to a number of residents not only contradicts the traditional pattern of buildings within the existing landscape character, but it also imposes the most significant effects on these residents and the landscape pattern; they reduce openness for adjacent users and the landscape generally;

2.7.5 Figure 5.1 and 5.2 of Planning Statement 1 aim to illustrate how the green and open landscape has been retained. Note that these illustrations are at a sufficient distance, scale and orientation not to illustrate detail, they use artistic licence to present a desired image. It can however be clearly seen between the two images how the landscape pattern is changed from an irregular rectangular field pattern marked by hedgerows and trees to a circular landform emphasised by peripheral planting and mounding and hard areas with presence of cars;

2.7.6 It is when appraising the landform from an aerial perspective that one is able to particularly assess the benefit of Green Belt and indeed the Designation of 'Area of Separation' which also exists to the proposed development site and to understand the specific purpose of Green Belt policy to “ *prevent urban sprawl by keeping land permanently open ...*”;

2.7.7 There are significant changes proposed to immediately adjacent areas (Central Lancashire Masterplan/ Cuerden Strategic Site), whereby the immediate eastern area to the site is designated for development. Equally there already exists significant development to the south and south west. This then provides a picture of how little Green Belt and Area of Separation actually remains within the particular site and immediate surroundings in question.

2.7.8 Having experience of writing and assessment of various Landscape Character Assessments, which have involved studying historical landscape patterns over time, certain aspects have become evident;

- that the erosion of green and open areas often begins with the use of the area for sport ( often viewed as a soft usage which it is assumed doesn't change appearance too much). Over time however, further applications are made to increase the built footprint, or land is sold off to fund improvements to pitches;
- each time an adjacent or an area is released from its original landscape pattern it weakens the remnant areas of Green Belt (and in this case also the Area of Separation), as the collective landscape pattern is so weakened that it becomes incoherent and inconsistent. It consequently places additional pressures on the remnant piecemeal field areas for further development.

Therefore it is important not to simply assess the site in question but also to relate it to its adjacent areas and consider how the area will function as Green Belt and Area of Separation as a result of this development (i.e the site itself cannot be assessed in isolation). In this case I do not consider that it would be feasible for the remaining areas to function effectively as Green Belt or Area of Separation, due to the small scale, remnant nature and the many surrounding pressures for further development.

2.7.9 With regards to the LVIA and comments therein please see in reference to Section 8 below;

2.7.10 With regards to alternative sites I would query why some are even worth documenting, e.g. I could not envisage such a sports complex being feasible on a forestry site on a hillside (Chorley Nab)?! Ideally a brownfield or other site without the classifications contained would be more suitable for such a development.

2.7.11 With regards to need please read in conjunction with 2.6.2 above; also it could be queried whether the sports complex should be able (should have sufficient financial support), to enable to compete with sufficient land prices to be viable and other options be assessed in other locations, (Otherwise this provides an argument or justification for any form of development in the Green Belt). I do not consider the lack of funding justifies development in Green Belt and Area of Separation.

2.7.12 I would disagree with 5.68 (Planning Statement 1), which states;

*'The proposed pavilion building is considered to be of significant architectural merit, with its form and position taking cues from the landscape'*

A triangular built form makes no reference to any such vernacular pattern within the existing built environment or landscape, its positioning directly adjacent traditional style houses/ isolated clusters does not add to the cluster but strongly contrasts and negatively affects their location, setting and context (including openness) in the existing landscape;

### 3.0 Design (Section 6 Planning Statement)

- 3.1 Comment on 6.16 reiterates the point made in (2.7.12) above. It is considered the siting and form of the pavilion, with associated practice nets and 5m high fencing is completely misplaced and demonstrates a lack of understanding of the landscape character and existing site context. It is strongly disagreed that the pavilion and associated infrastructure would:  
*'blend into the rhythm of scattered properties'*.
- 3.2 The effect of sinking the building into the landscape results in extensive mounding around the site. This is proposed in an effort to use excavated material and reduce costs by removal off site. The extensive mounding removes Openness. The form of mounding is out of character with the existing landscape pattern. This is reinforced by planting which follows a new form and layout.
- 3.3 The reference to Landscape Character fails to intrinsically describe and detail the existing landscape character....how does it justify its scoring of qualities e.g. 'good' condition and 'good' value as set out in 6.19? This isn't cross referenced? Neither the LVIA nor the Planning Statement demonstrate an understanding of the sites features.
- 3.4 In reference to 6.20 it is noted in section 8.0 below how the LVIA fails to detail many of the effects and fails to set these out in a recognised manner or follow stated best practice guidance.
- 3.5 I would disagree with the statement in 6.21. This fails to recognise the effect that developing one area within the Green Belt/ Area of Separation will have on its surrounding area as detailed in 2.7.8 above.
- 3.6 6.21 also states; *'The new tree planting and a vegetation strategy are to be considered for long term replacement and reinforcement of existing green infrastructure networks, which will ensure that the longevity and vigour of vegetation is maintained on Site.'*
- 3.6.1 This is hardly feasible when many of the species on site proposed for removal are long living oak species, being replaced predominantly with small canopy short lived species, some ornamental species, which provide a fraction of the ecological value as that of an oak tree.  
A better understanding and reflection of the local character in proposals would have demonstrated a more convincing Landscape Proposal and site design.
- 3.7 Section 6.32 makes reference to the loss of TPO (Tree Preservation Order) trees, 19 trees in total (including tree groups), many of which are the oak trees noted in 3.6.1. I would question whether there are the equivalent of 6 trees to 1 tree lost. Whips and feathers (@1m high transplants), do not constitute equivalent replacements for e.g. a 100 year old oak tree. Suggest the ratio would need to be reassessed.
- 3.7.1 It is usual when in the case a mature TPO tree is removed that it is replaced with a similar species and size, i.e. a semi mature species min 25-30cms girth. A minimum 19: No. of these are therefore required as acceptable replacements.
- 3.8 Flood Risk: Sinking the site will result in lower levels than the natural topography, therefore surface water here would be expected to be 'moved' (is there sufficient gradient) to attenuation areas?
- 3.8.1 It is noted that drainage ditches are proposed in some locations (e.g. western boundary), close to the boundary with adjacent properties. It should be ensured that no flooding results to properties as a result, or to nearby Fowler Avenue and it would

need to be ensured that ditches are not created in the RPA's (Root Protection Areas) of adjacent residents' trees or boundary hedgerows.

- 3.8.2 It is noted that there is a significant proposed planting of Alder species,( a known water lover). It is queried whether this is to support surface water drainage? Root systems can however be extensive, therefore preferably should not be planted in the vicinity of properties or built features and use of root protection required where this is the case.
- 3.9 Section 6.51-53 references the existing and proposed PRow, noting how it improves the location of the footpath through Sherdley Cottage. It fails to note how the diverted footpath is located directly behind No's 3 and 4 Woodcock Estate, thereby worsening their privacy from the previous situation;
- 3.9.1 There is concern that some diverted sections (to the south of the site) may be through wet and boggy conditions (identified by existing presence of footbridge over drain). It should be ensured that any proposed surfaces to diverted footpaths are not overly wet. Some groundworks/ surfacing would therefore be necessary to prevent this occurrence;
- 3.9.2 Reference is made to diversions not being considerably further than the existing route, however it is important to note that the existing routes are not necessarily used as a route from A to B, but also as a recreational route, allowing walking in a pleasant environment. They are for well being, exercise and exercise of pets; any diversion should be at least equal to what exists at present;
- 3.9.3 Does the 'event management' mean that PRow will not be useable during event days? If so how much does this equate to? (in terms of how many days etc. local people would not be able to use public footpaths?);
- 3.10 Noise: With reference to 6.68 the fact that a 5m high acoustic fence is required at all means that there is something wrong with the design. Nearby residents are significantly affected, rather position the nets elsewhere where this would not be a requirement. Note the fencing is a visual intrusion in the 'open' landscape, both on the landscape character itself and on the views by local residents and users.
- 3.10.1 Clause 6.69 should include any noise restrictions to adjacent residents as a result of pavilion hospitality events. Ideally the building should be positioned further away, where this would not be necessary.
- 4.0 Arboricultural Impact Assessment (AIA):
- 4.1 As noted in 3.7 size of any replanted tree is important in terms of replacement and a 1m high whip/ feathered transplant does not compensate for one mature tree, less so a TPO tree; and potentially less so in Green Belt;
- 4.2 Noted that permissions to remove trees from emergency access not yet granted. This assurance should form part of the application?
- 4.3 It is apparent that many of the trees to be removed are early mature/ mature oak trees of a reasonable/ good quality. Any Landscape Proposal should seek to mitigate these tree losses sufficiently (see sections 2.7.2, 3.6.1, 3.7, 3.7.1 above and 5.4, 5.9, 5.11,5.12,5.13, 6.1, 6.2, 6.3, 6.4.2, 7.3, 7.4, 7.4.1 & 8.17.1 below).

5.0 Planning Statement 2

General Arrangement: UG 1016 LAN GA DRW 01 Rev P20

- 5.1 Many comments have already been noted, i.e; Sections 2.7.2 , 2.7.4 and many points noted in section 3.0 above. In addition to these are;
- 5.2 Access track (road) to and around the built development would need surfacing with a chipping surface to make less visually dominant, such as buff surface chipping dressing;
- 5.3 Details of 'temporary event structure' required, many of these are positioned close to residences;
- 5.4 Tree sizes proposed are too small generally. 19 semi mature trees would be required (see comments above) in addition to a variety of larger specimens at 16-18cms, large feathered specimens etc. tbc;
- 5.5 Diverted footpath between proposed native woodland planting mix (on periphery) needs to ensure sufficient space to avoid close intimidating areas. There is a need for 10-15m open area between planted areas. This would mean the planting would need to relocate/ be sufficiently extended to accommodate this;
- 5.6 In many instances very thin slithers of woodland planting would appear better (in character with existing landscape), if these were proposed as small blocks, rather than peripheral slithers. It may also be useful to ensure residential properties do not experience completely foreshortened views, rather filtered are preferable;
- 5.7 Reiterate the issue regarding artificial mounding, removes openness and changes landscape character;
- 5.8 Hedgerows and hedgerow trees within car parking areas could help reflect landscape character;
- 5.9 Avenue style tree planting is not representative of native or natural style planting (north of proposals), demonstrates lack of appreciation of landscape character;
- 5.10 Built form and nets would be better positioned away from residents, namely north east of northern pitch;
- 5.11 Drawing doesn't clearly identify existing trees to be retained, (i.e. canopies)...need to assess any impacts on RPA's, which also should be indicated;
- 5.12 With regards to 5.11 need to assess any effects on any vegetation on eastern side of Fowler Avenue, around property No. 6 Fowler Avenue to ensure that proposed ditch is not located within RPA's.
- 5.13 More trees required on eastern boundary generally (boundary with Stanifield Lane) Needs the appearance of hedgerow with trees;
- 5.14 Self binding gravel will not be sufficiently robust for footpaths as indicated. Resin bound would be more appropriate to heavily used areas.
- 5.15 Any slopes should be 1:3 maximum (some are indicated > than this @ 1:2 which are too engineered and create difficulties in maintenance);
- 5.16 Need to ensure that no drainage overspill (from ditch etc.) onto Fowler Avenue;



5.17 General Arrangement does not illustrate location of higher lighting columns, only bollard lighting. This should either be cross referenced or included;

5.17.1 With reference to the Lighting Plan this appears to replicate column lighting with bollard lighting positions? With reference to the former it appears most significant visual effects would be from residents along Fowler Avenue. Given these receptors are not documented (within the LVIA), the document therefore omits to correctly inform on visual effects of the proposed development and is therefore misrepresenting the degree of visual effects.

## 6.0 Soft Landscape Drawings

*Comments apply as detailed in all above sections; and*

6.1 There is a predominance of planting of Alnus and Populus tremula, particularly on the western boundary. Both species like water. Is the reasoning behind their usage due to expected wet conditions? Comments as regards surface water drainage as documented above; ( Note: Populus tremula is really a shrub not a tree and cannot be counted as such).

6.2 Most of the trees proposed are light canopy short-lived species and very small specimens (8cms/ 10-12cms etc.). These are not representative of some of the most important species being removed, i.e. mature oak species of which the majority are TPO. Note regards any replacements as above (Clause 4.1-4.3 and clauses referenced therein as relevant) Much greater % of long lived, larger specimens (ranging from 14-16cms, to 16-18 and 25-30cms required); poor that this not come across in Landscape Proposals as again demonstrates lack of understanding of the site;

6.3 Several proposed tree species are purple leaved and/ or ornamental type varieties, which are not at all appropriate for a rural setting. This also demonstrates lack of appreciation, understanding and representation of the rural/ landscape character. Species not permissible would include Acer platanoides 'Crimson King', Liquidamber styraciflua, Prunus serrula, Acer Griseum; Use of native species preferred;

6.4 The use of Viburnum opulus in native shrub mixes demonstrates lack of knowledge on current virus associated with this species. Omit from the mix. Equally use of Viburnum tinus should ensure it is a disease free variety, otherwise omit/ substitute;

6.4.1 The native shrub mix must include min 20% Crataegus monogyna and also include Prunus spinosa and Acer campestre; it is queried why such a large % of Rhamnus spp. When this is not common in native shrub mixes of the area?

6.4.2 Crataegus monogyna and Acer campestre are naturally a sub canopy layer(generally shrub) to main woodland climax trees. Preferable not to provide these as specimen trees but within the woodland mix (understorey mix) Cornus sanguinea will need to be planted on edges;

6.4.3 No mention of soil depths/ type (subsoil/ topsoil) and nature of reuse of soils, necessary performs to BS;

6.5 Any substitution species to be agreed with LCC LA ;

6.6 The Native Woodland Planting (as keyed in on General Arrangement and Soft Landscape Drawings) is not specified in the Plant Schedules. Clarification required;

- 6.7 Are rabbit guards/ deer fencing to be specified, if so should be stated; how are these to be managed?
- 7.0 Landscape Management Plan
- 7.1 Needs a condition that Landscape Management commitment in perpetuity; also ref 6.1.3;
- 7.2 State that all maintenance operations to be carried out by suitably qualified landscape contractors and personnel;
- 7.3 ref 5.1.3 existing Mature trees on boundaries to be retained (not 'wherever possible') and a statement that any trees lost will be replaced with similar species with 25-30cms semi mature tree specimen; see also 7.2.7
- 7.4 Notes ref to pollarding/ coppicing trees but further detail not provided, needs to be specific and quantified (need to assess how many/ where); the result of this again is that there is very little longer living mature tree species;
- 7.4.1 Ref 7.2.7 need to ensure that mature trees would not be included within programme for thinning/ coppicing;
- 7.5 To ensure no future problems with roots/ hard surfaces ensure root protection in proposals as/ if necessary. This will not be deemed a reason for tree removal;
- 7.6 Ref 7.3 Needs to detail design intentions of planting;
- 7.7 No specific reference to Himalayan balsam removal-specific management guidance required; see Gov.uk website for guidance;
- 7.8 Not usual for 2 cuts/ year in yr 2 onwards (ref 7.7.3), as will be cutting flowers before they have a chance to set seed? Usually once/ yr Sept-October;
- 7.9 Appendix 9.2;
- i) weeding noted as 2 x year Year 1, however in text this noted as 8 no. ?
  - ii) usually firming up when required (on monthly visits & after heavy winds); specific treatment required for Himalayan balsam;
  - iii) Any dead/ dying mature tree to be replaced with semi mature specimen min. 25-30cms;
  - iv) Any mature trees which subject to built works within or close to canopy spread to have proprietary sugar solution treatment applied to root system, carried out by sufficiently qualified arboriculturalist. Method/ type to be approved;
  - v) Table doesn't specifically detail pollarding/ coppicing as described in text? Clarification required;
  - vi) Suggest surfaces to infiltration-attenuation areas to receive scarification/ spiking every year from Yr 2 onwards; debris should be removed annually;
  - iv) paved area maintenance should include for making good/ replacement of damaged/ sunken/ broken units/ sections/ kerbs etc.;
  - vii) Fencing & furniture should include making good, removal and replacement of any damaged components/ elements as required-fenceline treatment?
  - viii) Graffiti removal?
- Ecological requirements; damaged bird and bat boxes?
- ix) assumes species rich grassland created on subsoil? Methodology required/ detail tbc;

- 8.0 LVIA
- 8.1 It is usual and good practice to take visual assessments both in summer and winter. Only summer views have been undertaken, which is misleading in the assessment and not truly representative of effects;
- 8.1.1 The Methodology (1st para. P51 ) presents confusing information. It looks as if documentation lifted straight from another assessment?
- 8.2 Figure 3.1 Landscape Character. It is usual to represent the categorisation for the separate Landscape Character documents. It is confusing how this has been illustrated and would hazard that not presented correctly;
- 8.3 Figure 3.4 : usual to have direction of photographs. Not usual to annotate as 'Site Context', more usual as Viewpoints (as follow on);
- 8.3.1 No grid references, location, angle of view or distances quoted in the Viewpoints;
- 8.3.2 No categorisation of what type of Visualisation as documented in methodology (Visual Representation of Development Proposals Landscape Institute 2019);
- 8.4 Not acceptable that no Viewpoints from PRoW to north of site , or from Residential Properties directly adjacent to the site; these are fundamental to the assessment of visual effects to those nearest to the site and which would be expected to have greatest visual effects (see also 8.5.1).
- 8.4.1 The LVIA document is not acceptable on this basis as not being an accurate true portrayal of effects from those significant and representative viewpoints/ receptors;
- 8.4.2 Visual guidance recommends detailing receptors by proximity, however with residential properties these vary considerably and the true reflection should demonstrate the effects on specific receptors which are adjoining the site with some differentiation as to aspect and proximity to the proposed built development;
- 8.5 What is the difference between context and assessment photographs? Not usual to categorise in this manner. Usually there are Viewpoints and Photomontages, with the two sets of photographs (where montages proposed/ agreed) following immediately after the existing site photograph to allow easy comparison. It is usual to focus on views which may be significant visual effects. Here there is a larger selection of views from more distant locations, where it would be expected that effects are less and not significant.
- 8.5.1 Viewpoints (whether they Context or Assessment) need to include receptors on Fowler Avenue. In terms of assessment residential receptors in these locations would score 'high' due to their proximity and the effect of the proposed development on their view. The LVIA fails to document this so omits this effect within its scoring regime.
- 8.6 It is usual to describe the view and its effects, not to simply list in a Table. The Table should accompany text in an Appendix. The terminology using 'visible' is not standard or an accepted methodology. Again it is usual to present angle of view, distance from the site, grid reference etc. on the Viewpoint. Good practice to have small map attached to the Viewpoint and table at bottom of Viewpoint with all information which can easily and clearly assessed.
- 8.7 It is usual to have a topographic Figure to illustrate topography. This is not included; No ZTV (Zone of Theoretical Visibility) pretty standard figures as part of a LVIA;

- 8.8 The actual site description is very poor, it doesn't document the type of trees which populate the area, i.e. the mature oak trees and the fact that many of these are classed as TPO's. It isn't usual to describe ecology, (there is a separate document for this) hedgerows and description thereof should be within landscape; with regards to built features it doesn't pick up the historic pattern of isolated clusters of development, built materials, traditional form or otherwise;
- 8.8.1 Green Belt and Area of Separation should be detailed within Planning Policy (not Landscape Character);
- 8.9 There is no reference on p16 to how the classification of good has been achieved. This needs to cross reference to the Methodology. The methodology should be clearly stated or cross referenced at the front of the document;
- 8.10 Section 5 barely describes the proposed development? A cross reference to Section 9.0 might be useful. It is unusual to have two such categories.
- 8.11 It is unclear how the terminology of 'Wireframe'(Section 6) in the document reflects the recommended guidance (Visual Representation of Development Proposals, as noted above). The guidance recommends various 'Types' and states that the type should be stated. Neither is the type stated nor does the 'wireframe' fit to any of the detailed Types. From my experience the wireframes as presented do not reflect usual wireframes. Also these are based on previous Viewpoints and as already noted these are not acceptable. They might be photowires or AVR's, assessment is impossible without some clear understanding of what is being presented. Equally as noted it is usual to present an existing situation and then present the proposal on the same photo, for ease of comparison.

I would suggest that standard photomontages (Type 3) should be prepared at agreed locations to correctly identify proposed visual effects;

- 8.12 Tables are not usual method of detailing Effects, these usually an Appendix. The scoring is not correct in that needs to state whether adverse, beneficial etc. there is no cross reference to methodology etc.
- 8.13 Landscape Effects on Green Belt (no Effects stated for Area of Separation Designation ?);  
Disagree with scoring and do not consider there is sufficient weighting of in particular the effects of the loss of the landscape features and the role the Green Belt plays in this location particularly in the context of the surrounding areas, which have many pressures for built development;
- 8.13.1 N.B. Once the Green Belt is lost to development the presence of Green Belt and its rural features is irretrievable; this is not reflected in the scoring.
- 8.14 Effects should include those effects (i) during Construction, (ii) at Yr 1 (on completion of implementation) and (iii) at Yr 10/ 15 (as agreed); this is standard good practice which has not been detailed within the LVIA. This would then present a correct understanding of change over time and therefore enables assessment of residual effects.

Residual effects of development over time cannot be correctly estimated without this and the assessment is therefore not correct or complete.

- 8.15 Landscape Effects fails to consider the effects on the existing built environment (the surrounding isolated farm building/ small cluster of houses) and pattern, it doesn't

detail the built environment and details only fences, therefore missing part of the character of the landscape; and also no correct scoring or assessment;

- 8.15.1 There is disagreement and rejection of the scoring to Landscape Effects generally, due to the manner in which documented and the fact that that the site is seen in isolation without consideration of the larger effects within its Green Belt and Area of Separation role within the area;
- 8.16 Visual effects are also rejected, namely as they do not consider or include the receptors that would have most significant visual effects, namely residents on Fowler Avenue;
- 8.16.1 Only 1 footpath is considered and this only from one direction, where it has 360 degree effects. This is missed from the visual baseline (Table); the footpath to the north should also be included;
- 8.16.2 Same comment as 8.12 and 8.14
- 8.17 Section 9.00 should really come before Section 7 and 8 and its format does not follow the LVIA process. This reads more like an extract from the Design and Access Statement.
- 8.17.1 It has been demonstrated in the many points raised and noted above that many of the issues claimed, could be qualified and queried. Statements in the Landscape Strategy, with regards to Landscape Proposals are noted and commented upon below ...as follows;

- *The existing boundaries of the site, and how these can be retained, enhanced, or replaced, to ensure suitable protection around the site perimeter;*

What is proposed on the western boundary existing hedge? As far as can see it has not been reinforced or enhanced. Boundaries are not there 'to protect' (the site), but to act as boundaries; their role within the Planning and Landscape context is to create and maintain landscape character within an agricultural or rural environment;

- *The vegetation and biodiversity of the existing site area, and how this can be protected and enhanced, while mitigating against potential disturbances;*

As noted not sure how the proposed short lived, small growing, often ornamental tree species can replicate, enhance and certainly don't protect the many mature oak trees, many with TPO's which would require removal; What exactly is a 'potential disturbance'?

- *The drainage and water management across the proposed site area, and solutions to improve this within the development;*

Drainage ditches are an effective and sufficient water management system for the existing agricultural usage.

- *The existing character of the landscape, and how the proposed landscape of the development can complement and reflect this;*

The proposed landscape changes from an irregular, rural, flat, open and agricultural landscape into a large scale development, which by the mounding irretrievably changes the openness as does the positioning of built form and 5m high close boarded practice nets

- *The topography of the existing site, and how this may be altered to provide practical and experiential benefits.*

Purely from a development point of view.

- 8.18 The document does not detail Cumulative landscape and visual effects of the proposed development. The LVIA is not an approved document without this. The LVIA is a very poorly presented document and is an incomplete assessment.
- 8.19 Section10: Conclusions. Here (in the conclusion!!) the document references the Methodology for the first time (standard good practice is to have this at the front of the document).
- 8.19.1 Here the document references and makes conclusions of receptors such as residents, which haven't been detailed in the assessment; clearly not acceptable;
- 8.19.2 The document conclusions references effects for the first time, not a round up of what is proven within the document e.g. effects of the nets- these have not been sufficiently assessed, either in landscape or visual terms;
- 8.19.3 It is usual to reference the number and scale of landscape and visual effects. This is neither carried out/ included but would be worthless in this instance, with such a flawed document;
- 8.19.4 Still no reference to receptors from Fowler Avenue; unacceptable;
- 8.20 For the many reasons as stated the LVIA document cannot be accepted as a viable document with this Planning Submission, it is therefore rejected;
- 9.0 Design & Access Statement
- 9.1 It is usual to agree Viewpoints with Landscape Architects. This has not happened;
- 9.2 Aerial views are at a sufficient distance not to illustrate detail; they omit illustrating the effects of 5m bunding and the proximity of this on adjacent residents;
- 9.3 Aerial views of the existing situation clearly illustrate the landscape pattern, regular field pattern, pasture, marked by hedgerows and hedgerow trees. It can be clearly seen how this is threatened by nearby development. This should then emphasise its very importance, in terms of Green Belt and Area of Separation.
- 9.4 Reiterate past comments on built form not being in keeping with vernacular style or context of small clusters. Again reiterate this is misplaced and demonstrates a lack of understanding of landscape character, context and pattern.
- 9.5 Site character (p3) continuously omits to mention residential properties along Fowler Avenue. This is fundamental to the assessment and application, by selectively choosing what to illustrate and include it weakens the documentation provided, it is not therefore a transparent and honest assessment;
- 9.5.1 p3 Site Character mentions underpass to Fowler lane over Railway. This is incorrect, Fowler lane passes over the railway but is an underpass under the A582.
- 9.5.2 p3 omits to detail Fowler Avenue and properties. Notes (16) small scale entrance, but even this is omitted from the Figure. Poor documentation;

- 9.6 From the historical pattern as indicated (only goes back so far) it is clearly seen that the field pattern has stayed the same since the 1800's.
- 9.7 p11 (Vehicular roads) Needs to note that Fowler Lane is a 'broken' route (road is stopped up under the A582). This creates a quieter character to the lane, it becomes more used as a footpath and cyclist route beyond the residential properties.
- 9.8 Part 3 p 8 Site Planning Principles; it is clear to see from the figure (Site Arrangement) how the scale and proposed built form strongly contrasts with the surrounding and adjacent form and scale of traditional style properties. This is further compounded by the scale and extent and position of the practice nets, bin stores and associated fencing;
- 9.9 Drawings seem to imply that there is significant screening between the practice nets and the adjacent properties (along Fowler Avenue). This is not the case. The buffer between the structures proposed is completely insufficient, (see Part 4 p7 Roof Level Axonometric View), which clearly shows the minimal western boundary adjacent practice nets. Practice nets would be better positioned to the northeast, firstly to enable a greater extent of buffer and secondly as a lesser effect on those most sensitive visual receptors. The type and form of netting could possibly then be reduced to improve openness. It is queried why a green roof to the built form has not been proposed to increase biodiversity and improve the visual outlook for adjacent residents?
- 9.10 The relationship of vertical to horizontal scale of cross sections is such a contrast that it presents distorted visual effects;
- 9.10.2 Equally the presentation of lots of green trees on an image distorts the actual impression of e.g. a few short lived small canopied trees; terminology is architectural jargon 'landscape bowl' (area adjacent Fowler Avenue) is merely a short steep slope with a few trees (as noted above);
- 9.10.3 The effects of the scale and height of the 5m fencing is not sufficiently illustrated;
- 9.10.4 All the sections use artistic licence to wash over the detail;
- 9.10.5 Photo examples illustrate green roofs, however these have not been proposed, misleading images; ditto soft timber finishes, when scale of timber use minimal compared to use of aluminium panels proposed;
- 9.10.6 View over balancing pond (Part 5), also misleading. Much of the time this will remain empty or very scarcely filled and will appear very rough.  
(it would be interesting to know the species of plant portrayed in the foreground of the image....it is not a familiar native species, presents a tropical appearance);
- 9.10.7 Part 5 p23 view within the car park: this clearly illustrates how openness is removed by the mounds in an effort to reduce the visual effects of substantial large car parking areas;
- 9.11 Part 6 p4 (108) Comments on material selection has been made elsewhere above. Whether the geogrid system would work (i.e. remain green), depends on how frequently it is used. Too much usage and the grass will be unable to sustain growth. Equally much of the time the geogrid is on a stone base, which will result in very little available soil/ moisture during dry months. How is this to be avoided? This system is far better suited to an overflow occasional usage;
- 9.12 Part 6 p12 : Boundary Sections; no sections through practice net areas; no annotation of scales to determine distance and height;

9.13 Part 7: PRow: Previous comment re: flooding/ wet areas-build up and surface as/ if necessary. Provision of styles to replace existing as/ if necessary; MUST be mown and maintained; possible use of geogrid system and stone to help with wear;

9.13.1 See previous comments re: worse proximity for residents at Woodcock Estate; also re: planting and diverted footpath through planted areas. Extend planting, ensure wide open unthreatening stretch to walk through; issues re: access/ how many match days will the footpath not be available? worse health and wellbeing experience walking through confined area rather than open field;  
Aim for min 15-20m width of area to accommodate footpath at all times as mitigation;

9.13.2 Need to avoid visual clutter of extensive signage. Any detail should be approved;

### **Summary:**

Many of the Planning Submission documents are repetitive in substance, therefore main issues as noted in all sections above are summarised below;

- Site Character comprises generally a flat, low-lying irregular rectangular field pattern, pastoral land use, field boundaries marked by native hedgerows and hedgerow trees, sometimes ditches. Built development is restricted to small clusters of traditional brick style properties or isolated farmsteads. Two PRow cross the site area. The site presently sits within areas of adjacent countryside; there are characterising country/ rural lanes (without kerbs or lighting), adjacent and close by. The busy A582 lies adjacent and close to the site to the north, whilst Stanifield Lane is immediately east of the site.
- Both NPPF, LCC and SRLP document the site area is within Green Belt and is classed as an 'Area of Separation', the purpose being to separate and differentiate between existing and proposed areas of adjacent development and to 'prevent the spread of urban sprawl and maintain openness'.
- Planning documents require that proposed development accords with Landscape Character, maintains Green belt characteristics, whilst clear and precise demonstration of Very Special Circumstances are an essential requirement for approval of development in the Green Belt;
- It is queried whether the proposed development constitutes 'appropriate' development of the Green Belt. Appropriate relates to those characteristics demonstrated by the Green Belt. Section 2.7.2 of the comments above documents and lists the many ways in which the proposed development is not appropriate and will not retain openness in the Green Belt.  
Appropriate therefore relates to the proposed scale, form and potential 'openness' proposed outdoor sports facility;
- The local need is stated as a specific reason for development being suitable in this specific location and thus the justification of need. Decision makers should be very certain that local need (i.e. which should include regular and their required usage of the 'community' pitch area) is sufficient and this is not lip service to peripheral add-ons to the community such as quoted provision of t shirts or online learning;
- The proposed development would result in irreversible change to Landscape Character and the Green Belt. It is not considered that the current Green Belt could continue to exist following this development;



- It is considered that the Pavilion Building and Practice Nets, with associated fencing are not in keeping with Landscape Character and that their location and scale have the greatest effects (both visually and to the landscape);
- Submission documents often present images that are open to artistic licence, by their use and positioning of vegetation, distance, scale of view and orientation, to present as best an image as possible for the proposed development; thus create a misleading impression; nevertheless it can clearly be seen that the existing landscape pattern will be significantly changed;
- It is noted how eroding rural areas (even for permitted sports usage), will over time, through further applications ultimately change landscape character and are a next stage in the urban development process;
- It is noted (and contradicts submission documents), by stating that the site area cannot be read/ seen in isolation. By its very Green Belt status its importance is weighted by its proximity to adjacent/ proposed development;
- Development of the Green Belt generally (and in this location), would create piecemeal and remnant areas of Green Belt, which would be further subject to intense development pressures;
- It is considered that the proposed development should be supported with sufficient financial funding to enable the development to be assessed in other potential and more appropriate areas. Cheaper land values experienced by Green Belt areas does not justify development in the Green Belt, (as is given as a reason for development in this specific area). Otherwise any development could plead this argument;
- The siting of the pavilion and practice nets are not considered 'appropriate' in the landscape; neither in terms of scale, or built form, nor location adjacent to residential properties;
- It is considered that the significant areas of mounding would affect the existing openness of the landscape;
- The Landscape Proposals (with the significant numbers of comments), demonstrates a lack of understanding or representation of existing landscape character. Were options presented to LCC Landscape Architects at an early stage important characteristics could have been better integrated; (ref 2.7.2 comments/ issues in section 3 generally);
- Various concerns are raised regarding the diverted PRow (through the body of the site);
- Many comments are raised regarding the specifics of the Landscape Proposals (all sections of the document above apply);
- The LVIA is noted as very poor, partly due to significant incorrect/ poor format, most significantly due to lack of inclusion/ omission of most significant receptors and partly due to several other omissions. It does therefore not follow standard guidance. It is rejected as a submission document;
- The Design & Access Statement: Comments with regards to other document submissions as noted in comments above all apply to the Design & Access Statement.

There are further comments on detailing and again the presentation of the document is used to create a beneficial artistic impression.

## Recommendations:

It is recommended that the Planning Application is refused on the following grounds;

1. **The poor/ lack of understanding and integration of existing landscape character, which therefore make this application inappropriate, fundamentally;**  
**-the location, scale and form of pavilion, practice nets and associated fencing so close to the western boundary and adjacent receptors;**

**Note the principle of retention of openness cannot apply or be retained in the format as submitted;**

**Failure therefore to fulfil Policy 21, 17,19 of the Core Strategy and failure with NPPF regarding Green Belt requirements.**

2. **The many other landscape issues as noted within all sections of comments above, relating to mounding/ openness/ trees/ species/ detailing;**
3. **There is a rejection of the LVIA document; this is therefore not recommended as to be applicable as a submitted document for the Planning Application; due to the points as raised and noted.**
4. **It is considered that the Green Belt (and Area of Separation) would not be able to continue to exist in any meaningful manner in this specific location, were the proposed development to be granted;**
5. **'Very Special Circumstances' and fulfillment of 'need' in this specific area have not been demonstrated. Commercial land values should not determine the appropriateness of development in the Green Belt.**

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