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Preston
PR1 0LD

VIA EMAIL

31730/A5/SS/PN
23 December 2022

Dear Jonathan,

**LAND AT WOODCOCK ESTATE, STANIFIELD LANE, FARINGTON
APPLICATION REF: LCC/22/0048**

Further to our recent discussions regarding the above application, we write to formally respond to your detailed comments (attached to your email dated 11 November 2022) and those provided by statutory consultees.

As part of our response, we propose a series of amendments to the scheme, the details of which are summarised below:

- Alterations to the proposed new access off Stanifield Lane and the realignment of the internal road in response to feedback from LCC Highways and to allow for the retention of the existing mature oak trees (T60 and T61) and as much of the existing hedgerow (H58) as possible.
- Realignment of the secondary emergency access route to allow for the retention of the existing mature oak trees (T60 and T61). It is proposed that this route will be surfaced using crushed stone surfacing.
- The provision of a secondary access into the overflow car park (surfaced using crushed stone surfacing) as requested by LCC Highways, for use on occasions when the drop-off/pick-up area may be congested.
- A continuation of the self-binding gravel surface along the diverted Public Right of Way (PROW) (Ref: 9-12-FP 2).
- Repositioning of the proposed post and rail fence in the south-eastern corner along the diverted PROW (Ref: 9-12-FP 2).

- Proposed re-location of the northbound bus stop on Stanifield Lane alongside the creation of a dedicated half width layby and a footpath providing a direct link to the diverted PROW (Ref: 9-12-FP 2) to the south.
- Proposed new southbound bus stop on Stanifield Lane with splitter island to facilitate safe crossing for pedestrians.
- Incorporation of a signalised pedestrian crossing on Stanifield Lane.
- The provision of a shelter serving the drop-off/pick-up area.
- Adjustment to the proposed kissing gates to allow for cycle and wheelchair access.
- Extension to the wickets within the two ovals to provide increased outdoor practice provision.

As a result of the proposed amendments it has been necessary to adjust the red line of the site area to accommodate the realignment of the secondary emergency access and the relocated northbound bus stop on Stanifield Lane.

Furthermore, in order to clarify that we are not proposing any changes to PROW Ref: 7-4-FP 6, we would also duly request that the description of development is amended as follows (i.e. to remove reference to PROW Ref: 7-4-FP 6):

'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 and public right of way Ref 9-12- FP 2, 7-4- FP 5'

In order to reflect the above changes, we submit herewith an updated submission comprising the following documentation:

	Document	Date/Ref	Author	Status
1.	Covering Letter	23 December 2022	BWNS	Supplementary Information
2.	Architectural Drawings	Please refer to Appendix 1	BDP	Please refer to Appendix 1
3.	Landscape Drawings	Please refer to Appendix 1	Urban Green	Please refer to Appendix 1
4.	Arboricultural Impact Assessment	December 2022	Urban Green	Substitute Document
5.	Biodiversity Net Gain Report	December 2022	Urban Green	Substitute Document
6.	Biodiversity Enhancement Management Plan	December 2022	Urban Green	Substitute Document
7.	Landscape Management & Maintenance Plan	December 2022	Urban Green	Substitute Document
8.	Highways Technical Note - Response to National Highways	09 December 2022	WSP	Supplementary Information
9.	Highways Technical Note - Response to LCC Highways	21 December 2022	WSP	Supplementary Information

Management of the Site

Use of the Pavilion

Lancashire Cricket (LC) have confirmed that the priority uses of the pavilion building will be for cricket-related activity and community use which will collectively take the majority of the pavilion's annual capacity. Outside of this, the building will be available for private hire to support a contribution to overheads. To this end we propose a series of conditions which would enable some private function use of the pavilion whilst also being cognisant of the need to protect the amenity of neighbouring residents. The following conditions are proposed which we would welcome further dialogue with you on:

- 1. The use of the pavilion building for non-cricket related or community private hire events shall not take place on any more than 50 days in any calendar year. A record of days of use shall be kept and retained for inspection on request by the Local Planning Authority at any reasonable time.*
- 2. Prior to the first use of the pavilion building hereby approved, a Noise Management Plan setting out management responsibilities for functions expected to operate within the building post 2300 hours, shall be submitted in writing to the Local Planning Authority for approval. This should include measures relating to the following:*
 - Maximum occupancy (excluding staff)*
 - The opening of windows*
 - Smoking Zone*
 - The use of sound limiting devices*
 - Exiting the building post 2300 hours*
 - Closing the building post 2300 hours*
 - Use of pavilion car park post 2300 hours*

The Noise Management Plan shall be implemented as approved and maintained thereafter unless otherwise agreed with the Local Planning Authority.

Ticketed Match Day Management

No permanent security fencing is proposed around the site boundary which is intentional to try and maintain the Site's openness and to limit the extent of urbanising features. On ticketed match days, a combination of temporary barriers, heras fencing, and stewards would be used for perimeter control. This will prevent spectators from accessing the Site other than via the designated 'Gates' located off Stanifield Lane. A Stewarding Plan showing the exact position of stewards will form part of the Event Day Management Plan (EDMP) for all ticketed events (see paragraph 1.9.7 of the example EDMP).

Green Belt Issues

Notwithstanding our position that the proposal constitutes appropriate development within the Green Belt, we have in any event put forward a number of Very Special Circumstances which, when viewed collectively, are considered to clearly outweigh any harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal.

Review of Alternative Sites

As set out within the Planning Statement (July 2022) (paragraphs 5.58-5.60) LC needed to work with a development partner in order to deliver the scale of facility required of a second, permanent home

for the Club. Of critical importance to the Development Agreement between LC and LCC was the fact that LCC would take the development forward on its own land, which was a fundamental prerequisite to maximise the viability of the scheme. On the basis that no proposal would come forward unless it was on land already within LCC's ownership, there is no practicable reason to consider alternative sites outside LCC's ownership for the purposes of the alternative site assessment.

Need

Addressing the deficiency of cricket pitch provision identified by the Central Lancashire Playing Pitch Strategy (PPS) forms only one part of the needs case for the scheme which also extends to the needs of LC themselves, the needs of underprovided groups (including women, girls and disability cricket) as well as a wider community need in the local area. Whilst operating at a national and regional level, LC are committed to developing the game at all levels and the provision of the 'community pitch' is in itself geared towards community use being its primary purposes. Whilst the Proposed Development will not necessarily fully address the site-specific requirements of local clubs identified within the PPS, it will nevertheless provide a substantial contribution towards cricket provision within Central Lancashire and South Ribble specifically.

Use of Outgrounds

LC's current use of outgrounds is not a sustainable approach moving forwards and the facilities available are not readily (and permanently) suitable to LC's requirements. Furthermore, the outgrounds do not provide for the additional nets or wicket capacity for elite training or for playing nor is there scope to expand their availability for more matches and training days.

LVIA

We note the comments from the Landscape Officer (dated 18 November 2022) which raises a number of matters including many which relate to other points discussed within this letter. A detailed response to the points raised under Section 8.0 (LVIA) are included in **Appendix 2**.

Site Layout

T60 and T61

As noted above, we have reconsidered the layout of the proposed access and internal road alignment to enable the retention of the mature oak trees (T60 and T61) and as much as possible of the existing hedgerow (H58). This followed detailed discussions with LCC (Highways) which suggested minor adjustments to the access arrangement which has, in turn, facilitated the changes to the internal layout.

The Siting of the Pavilion

The siting of the pavilion, pitches and practice nets has very carefully taken into consideration a whole range of factors, all of which are described in detail within the submitted Design and Access Statement (DAS). It is also worth noting that the pavilion is over 60m from the nearest residential property – more than half the length of a professional football pitch. The practice nets are c.20-30m away, and aided by the strategic use of the topography, neither of which are taller than a typical domestic property.

We believe the analysis and detailed narrative within the DAS demonstrates conclusively that the pavilion and associated facilities are in the right position for the following fundamental reasons:

1. Reducing the scale and mass of built structures through working with the natural topography and changes of level, maintaining an appropriate domestic scale.
2. Maintaining the characteristic sense of openness across the whole site by keeping built form near to the site perimeter and other built forms, away from the centre of the site.
3. Optimising the orientation and positioning critical to the pavilion building's primary function – the viewing of cricket.
4. Working with the site topography to provide essential level accessibility for everyone to all functions at both levels of the building.
5. Operational adjacency required between the pavilion and related functions to protect the building's users, and specifically young and less physically able people.
6. Creating the necessary space in the east of the Site critical to facilitate match day safety and cricket event overlay, safe access and egress to visiting spectators.
7. Facilitating safe level access for grounds and facility maintenance to both pitches, whilst safely segregating this from public arrival, player, and spectator areas.
8. Concealing plant and facilities equipment sensitively within the pavilion building footprint at the lower ground level, only made possible through optimising use of the natural topography to the west of the site.
9. Segregating cricket and public functions arrival, allowing the ground to function efficiently and safely day to day, and scale up for occasional larger events.
10. Creating a compact, safe and secure environment, particularly for young and less physically able people.

All of these benefits are only possible in this part of the Site, and are critical to the successful functionality of the facilities. Good design of the pavilion building to position social space away from neighbouring properties, provide a protected entrance lobby and mechanical ventilation systems ensures that the noise within can be appropriately managed and contained. Similarly, containment of the practice area structure within the lower levels in this part of the Site provides visual containment of the activity, and as demonstrated within the submitted Noise Assessment, contains noise intrusion such that undue disturbance would not be caused to neighbouring properties.

The proposed car parking is also neatly contained in between the pavilion and practice nets, screening it both visually and acoustically. It is worth noting that this relatively small number of parking spaces are only for staff and team members. The much larger visitor car parking area is located a significant distance away within a green landscape bunded enclosure.

Screen Mounding adjacent to Fowler Avenue

From Fowler Avenue, the entire space from property boundary to the rear of the pitch bowl is landscaped and planted. The natural height of the spectator bowl relative to the level of the property boundary means that additional mounding is not required here as the rear of the bowl already does the job of creating landscaped separation from spectators on the opposite side of the bowl. Spectators will only face inwards towards the pitch, and landscaped planting to the outer slope is designed to naturally protect / screen the property boundary. Further details are illustrated on page 112 of the DAS. We have also prepared a Contour Plan for information purposes which will be provided under separate cover.

Relationship between the Nets and the Pavilion

We have spoken with the England and Wales Cricket Board (ECB) and they have reiterated a number of fundamental requirements which necessitate the siting of the pavilion building and practice nets in the arrangement submitted. These include reasons of safeguarding, disability access (particularly important given the Site's designation as a location for regional disability cricket), security at major

matches and use of ancillary facilities. The ECB would also wish to draw attention to the guidance set out in their original letter dated 22 July 2022, on minimising any impact on neighbours and the fact that many practice facilities operates in much closer proximity to residents without cause for concern (and fewer constraints).

The north and south elevations on the Practice Nets – Elevations drawing (Ref: 210002-BDP-Z2-XX-DR-A-001001 Rev P08) have been extend to show Fowler Avenue and to better illustrate the level differences, landscape treatment and distances to the boundary to the west of the nets area.

The small area of car parking adjacent to the pavilion is critical to the day-to-day functionality of the building, including providing good accessibility for less able visitors. The car parking is also neatly contained in between the pavilion and practice nets, screening it both visually and acoustically. As noted above, this relatively small number of parking spaces are only for staff and team members – the much larger visitor car parking area is located to the east within a green landscape bunded enclosure.

The vehicular route adjacent to the pavilion is also critical to the grounds and facility maintenance operation, with grounds vehicles sharing this route from the garage with the lower ground level of the pavilion and the two pitches.

Secondary Emergency Access

At the request of LCC (Highways) we have allowed for a secondary emergency access to connect to the A582 to the north which would be utilised in the exceptional circumstance where the primary emergency access off Stanifield Lane may be inaccessible. The revised Landscape General Arrangement Plan (Ref: UG_1016_LAN_GA-DRW_01 Rev P32) shows this as being surfaced using crushed stone surfacing. This has been discussed and agreed with LCC (Highways).

Footpath Diversion north of Sherdley Cottage

The route of the PROW as currently proposed would perform a dual purpose in terms of re-providing the PROW as well as serving the overflow car park (when in use). To move the route south would bring the path in close proximity to the ditch which runs along the north of the access road to Sherdley Cottage. There are pockets of surface water flood risk associated with the ditch which we were advised to avoid (or otherwise ensure the path is suitably drained) by the LCC PROW team. Linked to the wet conditions here, the landscape GA drawing proposes an area of semi aquatic planting which contributes towards the overall Bio-diversity Net Gain (BNG) to be secured on the site and it would be considered regrettable to diminish this in order to accommodate the PROW . Taking these factors into consideration it was considered preferable to realign the PROW to the north of the perimeter bund. The proposed gap in the bund which is necessitated by this decision is not considered to give rise to any unacceptable impacts nor is it considered undesirable from an operational perspective. A partial loss of hedgerow in this location is also compensated for as part of the proposed new landscaping.

Design of the Nets Structure

The nets will utilise a curtain system which is a hanging system with no structure for balls to impact. It is more complex and expensive to construct than a standard frame system but is deemed essential for this Site given its importance for performance cricket and having regard to neighbouring amenity.

The fence and nets have been designed with an interstitial buffer space in between them to provide access for maintenance and space to allow the net to contain cricket ball impact (without striking the fence).

Landscaping

The banking around the proposed ovals will be created by lowering the ground in these locations and so the banks themselves will not be raised above the existing ground level. By contrast it is proposed to build up bunds around the site perimeter with the objective of enclosing activity within the Site and providing a natural boundary treatment. The outer bunds will be planted with a mixture of species rich grassland and wildflower mix which will provide a distinct contrast to the amenity grass areas specifically designated for spectators.

The Plant Schedule is shown on drawing Ref: UG_1016_LAN_SL_DRW_04 Rev P11 which was provided with the original submission but has in any event been updated and re-provided as part of this submission (Rev P13).

Energy/Water

It is proposed to use Air Source Heat Pumps for heating and hot water generation, the position of which is shown on the Proposed Site Plan (Ref: 210002-BDP-ZZ-XX-DR-A-000002 Rev P13) and also shown as screened on the West Elevation (Ref: WDK-BDP-Z1-X-DR-A-(0-)-0013 Rev P08).

Photovoltaic Panels (PVs)

Taking into consideration the visual sensitivity of the Site it was considered inappropriate to locate PV panels at roof level on the pavilion, which would be much more visually prominent than the natural stone ballasted roof proposed. Roof mounted PVs would also necessitate many additional safety measures to afford access for cleaning, maintenance, and replacement such as guardings, upstands and balustrades which would further add to the height of the building which, in our view, would provide a negative visual impact.

Rain Water Harvesting

Rain water harvested from the roof of the pavilion would be insignificant compared to the volume of water demand for pitch irrigation. However, a sustainable solution to pitch irrigation is proposed involving a natural ground water source. This solution is tried and tested (a similar system is in place at Old Trafford cricket ground) and does not have any mains water demand – thereby conserving the precious main water supply.

Archaeology

The Archaeological Evaluations requested by the County Archaeologist have now been completed and a report setting out the results will be provided early in the New Year.

Lighting

The lighting proposals are indicative only at this stage and we would expect a condition requiring details including the exact position, type and direction of lighting to be agreed.

We can confirm that there will be no use of floodlights. The reference in the EMF to lighting relates to temporary low level lighting which may (or may not) be required for safety or operational purposes whilst closing down the site post-match.

Drainage/Flooding

As you know, we met with the LLFA on 14 November 2022 and we subsequently provided additional information directly to the LLFA on 18 November 2022. We are not aware of any further response having been provided by the LLFA further to this.

Sport England Response

We understand that the pre-commencement condition requested by Sport England is a standard approach. LC have appointed the ECB's recommended pitch and fine turf specialist to design the playing surfaces and on this basis, the ECB are comfortable that there would be no issue in securing the quality playing surface sought.

Transport Issues

We have separately provided a response to National Highways (via email dated 12 December 2022). However, for completeness the WSP Technical Note dated 09 December 2022 is re-provided alongside a separate WSP Technical Note (dated 21 December 2022) which responds to the comments raised by LCC Highways. As part of the latter we have made changes to the access design alongside the incorporation of additional infrastructure aimed at enhancing the attractiveness of accessing the Site via sustainable modes of travel.

Arboricultural Survey

To confirm, no trees within the site are of veteran or ancient value.

Issues raised by Local Residents

It is noted that a number of the issues raised by local residents are consistent with the matters summarised above. However, as requested, we have given specification consideration to the proposed alternative layout put forward by residents of Fowler Avenue which sites the pavilion to the east of the site and set out our response below.

Locating the pavilion to the east of the site is the worst possible location for a number of reasons. These reasons are highlighted within explanatory diagrams within the DAS. It is also of critical importance to consider the solution in three dimension, not just on plan, and to understand that the open spaces to the east of the Site are also of critical importance to the successful operation of the cricket ground.

The reasons why the east location was rejected early in the design process include the following:

- 1. Topography – the western site utilised the natural topography to minimise the visual impact of the Pavilion, reducing its apparent height, whilst providing level access at both levels of the building. The eastern location is at the site's natural high point, nullifying the potential split-level arrangement and doubling the effective height of the building as a result.*
- 2. Height and Massing – Creating a taller building in the east location would create a worse neighbouring relationship to residents to the east than is possible in the west by virtue of working with the natural site topography.*

3. *Vertical Circulation* – The measures required in this location resulting from the lack of level change in the topography would also increase the footprint of the building, creating a larger and less efficient plan form, and a bigger intervention within the open nature of the site.
4. *Orientation* – The east is the worst possible location for the Pavilion with views into the afternoon sun of the cricket hampered by glare, compromising the primary function of the facility.
5. *Accessibility* – The split-level proposal in the west of the site promotes excellent accessibility for users at both levels of the building, including disability cricketers and visitors. This would be lost in the east location, removing the ability of the upper storey from offering level access.
6. *User Group Security* – The split-level approach possible in the west of the site creates natural segregation of building functions, including natural separation of grounds maintenance from the players and public levels at upper ground level. This is not possible at a single level in the east, compromising natural safety and separation of building users and functions.
7. *Match Day Safety* – The open space provided in the north east of the site is critical to facilitate space for people movement, orientation, amenities, ticketing, security and emergency evacuation of the facilities. The alternative eastern location of Pavilion and nets cuts the site in half at the critical ingress and egress point, compromising safe operation as a match day venue. In this alternate scenario, the only way this obstacle could be overcome to provide the requisite space to facilitate match day visitors would be to displace the large visitor car park to the west of the site – however this would entail significantly greater transport infrastructure through the site, and create a significantly greater disturbance to residents.
8. *Venue Maintenance* – The split-level of the west Pavilion location affords level access for grounds maintenance vehicles from the lower ground level. The site to the east is significantly high than the pitch level, and therefore it would not be practically possible to locate the grounds operation here. Furthermore, positioning the grounds vehicles at this point of the site would create unavoidable cross overs with public circulation routes, and lack the safe segregation from public arrival offered in the west of the site. This would potentially pose an ongoing operational, health and safety risk.
9. *Characteristic Openness* – The Pavilion and nets location in the west utilises the natural topography to reduce the physical height and visibility of development. In addition, by locating the mass along the perimeter (rather than the middle) of the site, the overall green, open character is maximised. The alternate location in the east would have a much greater impact at the site high point, in addition to creating built structure right in the middle of the green open space to the north of the site, effectively splitting it into two halves. This would in our view have a significant negative impact upon the green open character of the overall site.
10. *Surveillance and Safeguarding* – The close functional adjacency of Pavilion, practice nets and operations to the rear of the Pavilion is critical to safe and secure operation of the venue, particularly for younger age groups. The proposed location to the west creates a naturally protective space around these functions, which aids safeguarding, natural surveillance and security. In contrast, the alternate location to the east with the nets displaced further north does not offer this same close adjacency, with the nets located towards the main visitor car park and access road. This increases the risk and reduces security for building users, in particular younger players and visitors.

For all of the reasons outlined above, it is our considered opinion that the proposed alternate east location suggested here is sub-optimal to the point where it would simply not be practically possible.

We trust this is helpful. However, if you require anything further, please do not hesitate to contact either myself or Paul Newton at this office.

Yours Sincerely

Susie Stephen

SUSIE STEPHEN
Associate Director

APPENDIX 1 – DRAWING SCHEDULE

ARCHITECTURAL DRAWINGS

Drawing Title	Drawing Reference	Submission Rev.	Substitute Rev.
Existing Site Location Plan	WDK-BDP-ZZ-XX-DR-A-(0-)-0000	P06	P08
Proposed Site Location Plan	WDK-BDP-ZZ-XX-DR-A-(0-)-0001	P10	P12
Proposed Site Plan	WDK-BDP-ZZ-XX-DR-A-(0-)-0002	P11	P13
Red Line Site Plan	WDK-BDP-ZZ-XX-DR-A-(0-)-0006	P02	P04
Proposed Site Sections	WDK-BDP-ZZ-XX-DR-A-(0-)-0010	P06	-
Existing Site Sections	WDK-BDP-ZZ-XX-DR-A-(0-)-0011	P02	-
Lower Ground Floor Plan	WDK-BDP-Z1-XX-DR-A-(0-)-0001	P08	-
Axonometric Lower Ground	WDK-BDP-Z1-XX-DR-A-(0-)-0006	P05	-
Upper Ground Floor Plan	WDK-BDP-Z1-XX-DR-A-(0-)-0000	P09	-
Axonometric Upper Ground	WDK-BDP-Z1-XX-DR-A-(0-)-0005	P05	-
Roof Plan	WDK-BDP-Z1-XX-DR-A-(0-)-0002	P08	-
Axonometric Roof	WDK-BDP-Z1-XX-DR-A-(0-)-0007	P05	-
North Elevation	WDK-BDP-Z1-XX-DR-A-(0-)-0010	P07	-
East Elevation	WDK-BDP-Z1-XX-DR-A-(0-)-0011	P07	-
South Elevation	WDK-BDP-Z1-XX-DR-A-(0-)-0012	P07	-
West Elevation	WDK-BDP-Z1-XX-DR-A-(0-)-0013	P08	-
Building Section – Long	WDK-BDP-Z1-XX-DR-A-(0-)-0015	P06	-
Building Section – Function Space	WDK-BDP-Z1-XX-DR-A-(0-)-0016	P05	-
Building Section – Dressing Room	WDK-BDP-Z1-XX-DR-A-(0-)-0017	P05	-
Detail Axonometric	WDK-BDP-Z1-XX-DR-A-(0-)-0020	P02	-
Practice Nets – Plans	WDK-BDP-Z2-XX-DR-A-(0-)-1000	P05	P08
Practice Nets – Elevations	WDK-BDP-Z2-XX-DR-A-(0-)-1001	P05	P08
Practice Nets – Sections	WDK-BDP-Z2-XX-DR-A-(0-)-1002	P05	P08

LANDSCAPE DRAWINGS

Drawing Title	Drawing Reference	Submission Rev.	Substitute Rev.
General Arrangement	UG_1016_LAN_GA_DRW_01	P20	P32
Soft Landscape 1/3	UG_1016_LAN_SL_DRW_02	P05	P09
Soft Landscape 2/3	UG_1016_LAN_SL_DRW_03	P05	P09
Soft Landscape 3/3	UG_1016_LAN_SL_DRW_04	P11	P13
Boundary Treatment Plan	UG_1016_LAN_BT_DRW_05	P08	P11
Public Rights of Way Diversion Plan	UG_1016_LAN_PROW_DRW_11	P09	P12
Lighting Proposals Plan	UG_1016_LAN_LP_DRW_13	P04	P07
Landscape Details Native Hedgerow	UG_1016_LAN_LD_DRW_08	-	P01
Landscape Supporting Notes	UG_1016_LAN_LSN_DRW_12	-	P01

APPENDIX 2 – LVIA RESPONSE

Para No.	Landscape Officer Comment	Urban Green Response
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;	The presentation of summer and winter views is considered best practise but not essential in LVIA. By far the majority of application programs do not allow for the production of seasonal views. This is not mandatory within Guidance for Landscape and Visual Impact assessment Third Edition (GLVIA3).
8.1.1	The Methodology (1st para. P51) presents confusing information. It looks as if documentation lifted straight from another assessment?	This is Urban Green's standard LVIA methodology in accordance with GLVIA 3. The section relating to winter views should have been altered / omitted in this instance.
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;	Figure 3.1 clearly indicates the Lancashire Landscape Character Types LCT as presented in 'A Landscape Strategy for Lancashire: Landscape Character Assessment' document – the text on P13 goes on to describe the further subdivision of this LCT into the Landscape Character Area LCA.
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);	GLVIA 3 is not prescriptive on the presentation of viewpoints. The photography presented in Figure 3.4 are Internal Site Context Photographs which are included to assist the reader in getting an understanding of the existing site and its surroundings. This is standard industry wide practise and is included in all Urban Green LVA/LVIA/TVA/TVIAs.
8.3.1	No grid references, location, angle of view or distances quoted in the Viewpoints;	The locations and directions of the Internal Site Context Photographs are mapped and included within the commentary.
8.3.2	No categorisation of what type of Visualisation as documented in methodology (Visual Representation of Development Proposals Landscape Institute 2019);	The indicative wireframes views presented are clearly labelled as such and that they are not to be considered as verified views.
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	Viewpoint 7 although not directly from the PRoW is representative of the open views across the site from a number of receptors from this direction which are described in the Visual Baseline on P23 and assessed on P42 as major/moderate.

Para No.	Landscape Officer Comment	Urban Green Response
	expected to have greatest visual effects (see also 8.5.1).	Fowler Avenue is a private road and therefore not readily accessible. Viewpoint 1 is a representative view for the residents of dwellings on this road and arguably should have been assessed as such. The residents of dwellings on Fowler Avenue are described within the visual baseline on P23 and within the conclusion. Viewpoint 2 considers nearby residents on Fowler Lane.
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;	These receptors have not been omitted from the assessment as described above
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;	This is considered in the assessment.
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.	As stated above it is standard industry practise to include internal site photography with the LVIA as part of the site description (as presented in the LVIA and all UG landscape planning documents) and then separately to assess representative Viewpoints from outside of the Site.
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.	As above - Fowler Avenue is a private road and therefore not readily accessible. Viewpoint 1 is a representative view for the residents of dwellings on this road and arguably should have been assessed as such. The residents of dwellings on Fowler Avenue are described within the visual baseline on P23 and within the

Para No.	Landscape Officer Comment	Urban Green Response
		conclusion. Moderate effects ascribed to nearby residents on Fowler Lane.
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.	Viewpoint locations are clearly mapped in Figure 4.1 and described within Table 4.1 and within the commentary for each Viewpoint as per Urban Green methodology and sufficient for the reader to return to the same location as detailed within GLVIA3. GLVIA3 is not prescriptive regarding the term 'visible'.
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;	Agree topographical figure not produced in this instance but the landform in the area is relatively flat.
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;	Site description is as per our UG methodology, vegetation description perhaps could have been more detailed however this information would have been presented in the AIA
8.8.1	Green Belt and Area of Separation should be detailed within Planning Policy (not Landscape Character);	They are included within the Planning policy and Landscape Baseline
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;	Commentary of how the rating is ascribed is described on P16. Methodology is listed in the Contents – perhaps this could have been presented and cross referenced more clearly for the reader.
8.10	Section 5 barely describes the proposed development? A cross reference to Section 9.0	Agree to a degree – perhaps the assessment would have benefitted from the information

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	might be useful. It is unusual to have two such categories.	within Section 9.0 being included within Section 5.0
8.11	<p>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.</p> <p>I would suggest that standard photomontages (Type 3) should be prepared at agreed locations to correctly identify proposed visual effects;</p>	The photomontages as presented are indicative wireframes views only and are clearly labelled as such. They are intended to aid and inform the reader but are not to the accuracy standards ascribed to a Verified View.
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.	Tables are UGs normal approach to presenting effects and are generally favoured by local authorities. LVIA methodology clearly presented in the Appendix. Cross referencing to the Appendix could have assisted the reader but the information is clearly presented within the document. Addition of Adverse or Beneficial would have made the assessment clearer, however, I believe that all the effects are considered to be adverse.
8.13	<p>Landscape Effects on Green Belt (no Effects stated for Area of Separation Designation?);</p> <p>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</p>	Effects on the green belt are assessed to be moderate and the assessment is proportionate in this instance.

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	<p>the context of the surrounding areas, which have many pressures for built development;</p> <p>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.</p>	
8.14	<p>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.</p> <p>Residual effects of development over time cannot be correctly estimated without this and the assessment is therefore not correct or complete.</p>	<p>Description above relates more closely to an LVIA as presented within an ES chapter rather than a standalone document. This is not detailed within our methodology against which the findings of the LVIA should be judged – the effects judgements within the assessment are valid as judged against the methodology included.</p>
8.15	<p>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;</p>	<p>This is considered within the landscape character assessment.</p>
8.15.1	<p>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;</p>	<p>Considered both within the contextual landscape character assessment and the assessment site character elements – as per standard practise.</p>
8.16	<p>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.</p>	<p>As above re: access and inclusion of Fowler Avenue.</p>
8.16.1	<p>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.</p>	<p>As above re: assessment of user of the footpath network</p>

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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.	Agree this would have been helpful to relocate to Section 5.0.
8.17.1	<p>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;</p> <ul style="list-style-type: none"> • 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; 	These points are detailed within the landscape scheme and DAS.

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	<ul style="list-style-type: none"> • 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.	Cumulative effects of committed developments were not requested by the local authority and would normally be considered as part of an ES chapter. The LVIA is an approved document with or without this and should be judged against its own methodology.
8.19	Section 10: 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).	Methodology clearly presented within the document – additional cross referencing may have assisted the reader in this instance.
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;	Effects are previously presented.
8.19.2-3	The document conclusions references effects for the first time, not a roundup 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;	The LVIA is in line with its methodology which is in accordance with GLVIA3 and against which it should be judged.

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	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;	Stated within the visual baseline as early as P23.