

FARINGTON CRICKET FACILITY
APPLICATION REF: LCC/2022/0048

RESPONSE TO LANDSCAPE COMMENTS DATED 18 NOVEMBER 2022

Para	Comment	Response
2.6.1- 2.6.2	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'; It should therefore be queried whether the proposal would meet this local need/ shortage?	It is not considered appropriate for the Landscape Officer to comment on the acceptability or otherwise of the Very Special Circumstances case as this is a matter for the decision maker.
2.7.2	- 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	This appears to have been written from the perspective that any and all change is unacceptable. Where there may be harm, there may also be benefits which outweigh such harm and this should form part of the planning balance which is a matter for the decision maker. - The circular arrangement of the proposed cricket fields is linked to their sporting function. It should be noted however, that the definition and shape of these areas is grass sports field to grass perimeter spectator area and as such will be a subtle/blended framing of these shapes and will not be as strongly defined as the neighbouring rectilinear hedgerows. It should also be noted that the existing boundary hedgerow to the wider site edge will be retained and enhanced to strengthen this character when viewed from outside the Site. - There are a total of 250 proposed trees within the scheme, the majority of which are native and reflective of those found in the local area. These are further supplemented by over 8,300m² of native woodland mix consisting of native whips and feathers that will establish overtime to provide biodiversity and landscape character befitting of the site context. The proposed ornamental trees are only located in areas that provide a sense of arrival to the new development and will assist in adding a greater range of seasonal and habitat interest to the Site. These species and their locations will not detract from the surrounding areas of woodland and hedgerows. - Regarding the sense of openness, we disagree with this point – the existing site's sense of openness is fragmented by the field patterns, which make navigating the public right

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	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);	of way difficult. The proposed development actually create a significantly greater sense of openness across the central part of the site with the flowing topography of the pitches and bowls and a new network of footpaths opening up the large central part of the site. The proposed landscape bunds and mounds have been developed to provide a variety of functions around the Site including providing visual screening to the car park, to assisting with the movement of visitors, and shaping of the cricket spectator areas. These bunds will also repurpose and utilise site found material and avoid the need to export off site. Their height and massing will be mostly screened by the retained mature hedgerows around the perimeter of the Site and as such will not be detract from the surrounding visual topography. • The scale of development has been very closely controlled such that through careful design the footprint of the Pavilion building (c.1,050m²), is less than 1% of the overall site area (c.136,750m²). Furthermore, this small built form is positioned as a new addition to the collection of existing buildings along the site's western edge, maintaining the characteristic sense of green openness. • The location and position of the 5m high close board fence will be at a lower level than the adjacent Fowler Avenue and will be screened and softened by the established mature hedgerow along this road, along with further softening created by introduced tree, shrub and woodland planting. • The hard surfacing has been kept to an absolute minimum with the vast majority of the parking areas consisting of reinforced grass areas. The footpath network is mostly a self-bound gravel surfacing that can be found along footpaths in the local area, and will use locally sourced crushed stone. Similar to the surfacing, the lighting strategy is responsive to the setting and will consist of a limited number of column lights along the main vehicle route to the pavilion along with low level bollard lighting along the main footpath - these will all be turned off when not in use, and have been specified to limit light spillage. The details of the signage strategy have yet to be developed, but we will be seeking to implement only where necessary and to a design in keeping with the character of the Site. Additional signage is likely to be required during event days, but this will only be temporary. • The proposed changes to the PROW have been the subject to extensive discussions with the PROW team and have been deemed acceptable from a technical perspective.
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	For the purposes of a comprehensive assessment of all potential alternatives having regard to the site search criteria set out within the Planning Statement.

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	contained would be more suitable for such a development.	
2.7.12	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;	We strongly believe that the Pavilion building is a positive addition to the collection of built forms along with western edge of the proposed site. The plan form of the Pavilion is triangular to create a simple and highly effective architectural solution to addressing the building's primary function – welcoming visitors and viewing the two playing areas to the north and south – whilst providing level access to staff and team access from the west. However, because of the way the building is sculpted within the topography of the proposals, it is never seen from above, and therefore the shape in plan is not the primary consideration in judging the new building's relationship with the closest adjacent built forms; properties that are located over 60 metres away. Of far greater importance to the context is the scale, mass, materiality and articulation of the building form within the proposed elevations. Setting the building down within the site topography diminishes its scale commensurately with the surrounding domestic built forms. The roof gently slopes to a low-point to the west elevation, minimising its height relative to these properties. Careful selection of natural materials – stone gabions, timber cladding, bronze eaves and stone ballasted roof – allows the building to sit comfortably within the landscape setting. The material articulation of the lower ground level and upper ground levels further breaks down the structure into simple, single storey elements – a natural stone plinth, with a timber single storey above. When considered in the context of the changes of level, existing and proposed landscape features which create its setting, we believe the Pavilion building treads lightly, sensitively and appropriately within its surroundings, This sensitive approach to the design of the Pavilion building is described and illustrated in detail within the Design and Access Statement (DAS).
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.	Please refer to response at 2.7.12 above.

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3.6-3.6.1-	6.21 also states; <i>'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.'</i> 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.	The scheme has been designed to achieve a positive % gain across all biodiversity net gain areas with the entire site encompassing a mosaic of habitat typologies that will be managed over time to establish a rich and diverse ecologically attractive landscape.
3.7-3.7.1	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. 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.	The scheme will incorporate 250 new trees which equates to a 13:1 replacement ratio. Further to discussions with LCC, alterations to the proposed planting mix have been amended to incorporate additional oak trees (including 29No. Quercus robur and 23No. Quercus petraea). Please refer to amended Soft Landscape drawings Ref: • UG_1016_LAN-SL-DRW_02 Rev P10; • UG_1016_LAN-SL-DRW_03 Rev P10; and • UG_1016_LAN-SL-DRW_04 Rev P14. The proposed Planting Schedule is shown on drawing Ref: UG_1016_LAN-SL-DRW_04 Rev P14.
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?	Pushing the pitches into the topography is a key design strategy in creating natural enclosure and shelter around the environment for cricketing activity, a natural spectator viewing bowl, whilst minimising the visual impact of the proposals from the site periphery. The areas that are shown to be reduced below existing ground levels are predominantly located in the cricket pitches and to the west of the pavilion. The pitches will have sufficient drainage across the area in the form of filter/collector drains designed by a pitch specialist, which are to be directed to the attenuation pond via the mains surface water drainage network. The same drainage regime is also proposed for the practice nets. In the car park area we have proposed

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		permeable paving which will pick up runoff from the hardstanding areas in this area, again directing flows to the attenuation pond. Due to the extensive earthworks we have also included filter drains across the site to account for the change in levels and to ensure any runoff generated from the site is directed to the attenuation pond so that there is no increase in the risk of flooding off site.
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.	To clarify, these are not drainage ditches, they are shallow depressions that would contain a differing mix of grassland species to benefit biodiversity potential. Notwithstanding this, these have subsequently been relocated to southeast corner of the site away from neighbouring properties.
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;	It is not uncommon for PROWs to be located in proximity to a residential boundaries. The noted benefit in relation to Sherdley Cottage is that the PROW will be diverted around the property as opposed to through it which is the current (official) arrangement.
3.9.2	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?);	No. At no time will the PROW be physically obstructed. On ticketed match days stewards will be positioned around parts of the PROW to prevent unauthorised access into the Site via the PROW.
3.10- 3.10.1	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. 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.	Please refer to our response dated 23 December 2022.

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4.2	Noted that permissions to remove trees from emergency access not yet granted. This assurance should form part of the application?	Assuming this refers to the proposed secondary emergency access route, we can confirm that based on the amended proposals (submitted on 23 December 2022) that the creation of this route does not result in the removal of any trees.
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	Where possible, the existing trees have been retained and will form part of the strengthened landscaped perimeter of the Site. Please also refer to response at 3.7 above.
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;	The access road route will only be visible to those using it. All perimeter hedgerows in and around the access will be retained and enhanced with further soft landscaped features added to visually screen the access road from neighbouring sites.
5.3	Details of 'temporary event structure' required, many of these are positioned close to residences;	Please refer to the submitted Event Overlay plan (Ref: 210002-BDP-Z1-XX-DR-A-(SK)-1001 Rev P03).
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;	The PROW grass footpath routes through these areas pass through areas of woodland mix planting which will consist of native tree whips and feathers which will be approximately 1m in height at time of planting. These spaces will be managed over time to establish the planting as it grows and thinned out accordingly to create a variety of densities to support habitat creation and biodiversity interest. The area either side of the footpath will be maintained as an open and clear route for pedestrian users (minimum 3m width) which is in keeping with existing PROW footpath routes in the area.
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;	There are a variety of widths to the woodland planting mix which over time will be managed to created openings, glades, filtered views, and a hierarchy of species varieties subject to the function and adjacencies of these spaces. This will be developed and managed over time to ensure that the evolving woodland is suitable and responsive to the neighbouring properties and viewpoints.
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;	The AIA (December 2022) clearly shows trees to be retained on drawing Ref: UG_1016_ARB_TRP_01 Rev 05. The RPAs of these trees are also shown on drawing Ref: UG_1016_ARB_TCP_01 Rev 00.
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.	This feature has since been relocated. It should also be noted (as per 3.8.1 above) that this was not a drainage ditch, it was a shallow depression that would contain a differing mix of grassland species to benefit biodiversity potential.

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5.14	Self-binding gravel will not be sufficiently robust for footpaths as indicated. Resin bound would be more appropriate to heavily used areas.	The heaviest usage of these footpath routes will be during event days which are limited in number during the year and will take place during the drier cricketing season. Additional routes are provided along grass paths which may be supplemented by temporary matting (as required) to the most trafficked spaces to ensure robustness during these occasions.
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);	Across the whole site all slopes have been designed to a maximum slope of 1:3. Viewing slopes to pitch bowls have been designed to provide good sightlines for spectators, and are much shallower. Only one area in the whole site has required a steeper 1:2 slope – it occurs on the south western extent of the community pitch cricket mound and will be engineered to be stable. This element of the scheme will incorporate shrub planting (as shown on drawing Ref: UG_1016_LAN_GA_DRW_01 Rev P32) which will help stabilise the gradient as the roots establish. The planting mixes have been selected to be robust and lower the demand on maintenance use. In addition, in areas where an even steeper slope would have been required, natural stone gabion retaining walls have been provided to resolve this issue.
5.17	General Arrangement does not illustrate location of higher lighting columns, only bollard lighting. This should either be cross referenced or included;	The proposed lighting types are shown on drawing UG_1016_LAN_LP_DRW_13 Rev P07. However, 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.
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.	As per 5.17 above, 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.
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).	These species are specified as a 10-12cm girth standard tree (as commonly available at many UK nurseries) it is not a shrub. This is a hardy variety of tree and can cope with a range of soil types, ground conditions and exposures. Subject to ground conditions following the earthworks exercise across the site, there may be certain species that are interchanged across the site to suit their characteristics and suitability for certain conditions, such as waterlogging tolerance. This will not affect the total number of proposed trees, nor the varieties thereof. If deemed necessary, control over this can be secured via condition.
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	There are a total of 250 proposed trees within the scheme, the majority of which are native and reflective of those found in the local area. These are further supplemented by over 8300m ² of native woodland mix consisting of native whips and feathers that will establish overtime to provide biodiversity and landscape character befitting of the site context. The

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	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;	ornamental trees are only located in areas that provide a sense of arrival to the new development and will assist in adding a greater range of seasonal and habitat interest to the site. These species and their locations will not detract from the surrounding areas of woodland and hedgerows.
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;	This is a commonly used and nursery stocked hardy shrub which is an attractive variety for pollinators. At the time of sourcing all of the trees and shrub plants we will liaise with the nursery suppliers as to availability and any known issues at this point in time with the specified species/cultivars.
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?	The Planting Schedule (as shown on drawing Ref: UG_1016_LAN-SL-DRW_04 Rev P14) has been amended to include 20% Crataegus monogyna and 10% Prunus spinosa. 5No Acer campestre trees are also proposed.
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;	The usage and location of these trees is mostly in the vicinity of proposed shrub and woodland mix areas to provide height and variety. Cornus sanguinea is included in several of the proposed shrub mixes to provide this function.
6.4.3	No mention of soil depths/ type (subsoil/ topsoil) and nature of reuse of soils, necessary performs to BS;	All shrub planting beds will be a minimum of 450mm topsoil. Grass and seeded areas will be minimum 150mm topsoil (with the exception of wildflower seed which will be sown on prepared subsoil). Please refer to drawing Ref: UG_1016_LAN_LSN_DRW_12 Rev P01 for tree pit depths and details.
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;	This has been amended on drawing Ref: UG_1016_LAN_SL_DRW_04 Rev P14.
6.7	Are rabbit guards/deer fencing to be specified, if so should be stated; how are these to be managed?	All new woodland mix, hedge and shrub planting areas will incorporate 750mm high rabbit mesh fencing around the perimeter of these areas to enable establishment of plants.
7.0	Landscape Management Plan	Please refer to the updated Landscape Management Plan (December 2022) Rev P06 which has been prepared in response to the detailed comments under this section.
8.0	LVIA	Please refer to our response dated 23 December 2022.
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	There are number of different questions here, which we will address individually:

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	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?	<i>Practice Nets Screening</i> - The proposed practice nets are carefully screened and contained in a number of different ways to create an appropriate setting for play, and to ensure that neighbouring receptors are not unduly affected by the activity within, as follows: 1. Utilising the site topography to significantly reduce the relative height of the net structures (c.2m lower) from adjacent properties and Fowler Avenue. 2. Visually and acoustically containing the activities within a natural timber fence enclosure. 3. Retaining existing tall mature hedgerows and planting along the western Fowler Avenue boundary. 4. Supplementing the existing landscape with a number of new trees and landscape planting along with western boundary in between the existing hedgerow and the slope to the natural timber boundary fence. The combination of all of these measures means that the net area is very well hidden away from external visibility. Further details of these features can be found within Urban Green's landscape proposals, along with reference to earlier responses describing the site layout. We have also refreshed and updated the following drawings to help illustrate the proposed practice nets, retained existing and proposed landscape features and the relationship with the surrounding more clearly; • <i>Practice Nets Elevations (Ref: 210002-BDP-Z2-XX-DR-A-001001 Rev P08)</i> – sections extended to illustrate landscape screening and relationship with site boundary. • <i>Landscape Boundary Sections (Urban Green)</i> – new sections added to illustrate retained existing and proposed landscape features, including boundary relationships with Fowler Avenue and properties north and south of the practice area. • <i>Pavilion Roof Axonometric View (Ref: 210002-BDP-Z1-02-DR-A-000007 Rev P07)</i> – extents increased to illustrate landscape screening and relationship with site boundary. <i>Practice Nets Position</i> - Please refer to our response dated 23 December 2022 and the ECB letter dated 13 January 2023. <i>Pavilion Roof</i> - The design intent for the Pavilion building is described and illustrated in detail within the Design and Access Statement (DAS). The proposed stone ballasted roof of the pavilion is intended to provide a natural stone surface finish in keeping with the surroundings. A green roof was considered, but rejected, during the early design stages on the basis that it would create an onerous maintenance regime at roof level which would require additional safety measures to afford more frequent access, and subsequently add to the height of the Pavilion building. In addition, we were able to meet and exceed the proposed biodiversity

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		project goals (a minimum 10% Biodiversity Net Gain) in our proposals for landscape design across the wider site.
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;	The geogrid system has been successfully utilised on a range of sites and will appear as green grass if maintained appropriately – an example scheme being the southern area of Winckley Square Gardens in Preston. This area will be most heavily used during event days which are limited to the drier cricket season months and to a limited number of days a year, providing plenty of time for the grass to be maintained and recover from any heavy traffic. Temporary track mats may be brought in (as required) to provide further protection to any excessively used areas during these event days and to provide vehicular access to food and beverage areas, as shown indicatively on the Event Overlay Plan (Ref: 210002-BDP-Z1-XX-DR-A-(SK)-1001 Rev P03).
9.12	Part 6 p12 : Boundary Sections; no sections through practice net areas; no annotation of scales to determine distance and height;	These have been prepared, as listed under 9.9 above.
9.13.2	Need to avoid visual clutter of extensive signage. Any detail should be approved;	We have no issue in accepting a condition which requires such details to be submitted for approval and implementation 'prior to first use'.
Summary	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;	In line with NPPF paragraph 148, it is a matter for the decision maker to determine whether Very Special Circumstances exist to clearly outweigh the harm resulting from the proposal.
Summary	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;	The NPPF is clear that the provision of appropriate facilities for outdoor sport is acceptable within the Green Belt. As above, it is a matter for the decision maker to apply the relevant NPPF policy tests to proposals affecting the Green Belt (which in this case is also the approach to be taken to proposals affecting Areas of Separation – as directed by SRLP Policy G5).
Summary	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.	Please refer to our response dated 23 December 2022.