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Your ref: 3/2012/0942



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Dear Ms Westwood

Planning consultation: 1040 Residential dwellings

Location: Land at Higher Standen Farm and Part Littlemoor Farm, Clitheroe

Thank you for your consultation on the above dated 17 September 2013 which was received by Natural England on 17 September 2013.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2011**

Designated Landscapes – Forest of Bowland Area of Outstanding Natural Beauty (AONB)
This application is within the setting of Forest of Bowland Area of Outstanding Natural Beauty (AONB).

This application is a distance of 1.1 km from the Forest of Bowland Area of Outstanding Natural Beauty (AONB). In our previous responses, references 68558 and 83676 Natural England highlighted the weakness of the Landscape and Visual Impact Assessment (LVIA) in that it does not adequately assess the potential impacts of the development on the AONB, particularly in terms of viewpoints from Pendle Hill. We also considered that the Forest of Bowland AONB is not shown on the relevant plans and maps showing the visual influence of the proposal. One further weakness Natural England highlighted was that the LVIA does not provide enough visual illustrations to provide detail to assess the significance of the impact on the AONB from the proposed development.

Natural England has now been in receipt of the Regulation 22 supplement of the Environmental Impact Assessment. This has highlighted two new viewpoints within the LVIA. We note the additional viewpoint from Pendleton Moor. Natural England still does not believe that this one additional viewpoint within the Forest of Bowland depicts the proposed development within the setting of the AONB. Natural England continue to advise that further viewpoints need to be selected, particularly from PROWs within Pendle Hill and high elevations, which are well used for recreational users.

Natural England is aware that your Local Authority has been in consultation with the Principal

AONB Officer at Lancashire County Council, who has advised that the LVIA and additional information provided has adequately addressed weaknesses identified earlier regarding photomontages and an additional viewpoint on PRoW on Pendle Hill. However it is not apparent to Natural England how the AONB's concerns have been overcome, in particular further clarity on how the design/layout and landscaping of the scheme will be sufficient to 'mitigate the impact on the views'. We note the planning application is at Outline stage, however your LPA need to be confident that such mitigation is achievable otherwise the principle of development would come under doubt, in Natural England's opinion.

Natural England wish to gain further understanding on how design/landscape/layout will mitigate effects to ensure certainty on the principle of development in this location. May we also highlight the relationship with the Core Strategy and outstanding concerns with respect to the same site, which is included in the emerging Plan. We have only recently been alerted to additional information on the LVIA (email to Kate Wheeler on 19 Sept) and we have not yet received confirmation as to whether the LVIA will be used to update the Sustainability Appraisal findings. We have advised (email to LPA on 20 Sept) that an update is required as the current SA highlights (page 20) that more direction is required to '**maximise benefits and minimise adverse effects**' and '**More details should be provided in terms of sustainable design principles for the strategic site.**' This reinforces the point that more justification on mitigation is required if the LPA are to rely on this to avoid an effect.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Sally Maguire on 03000602110. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Sally Maguire
Land Use Operations Crewe