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Our ref: 109204
Your ref: 3/2013/0854



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BY EMAIL ONLY

Dear Mr Macholc
Cc Stephen Kilmartin

Planning consultation: Erection of replacement dwelling
Location: Sawley Lodge, Sawley

Thank you for your consultation on the above which was received by Natural England on 09 January 2014.

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.

Previous comments

We have previously only supplied general comments in relation to this proposal on issues relevant to our statutory purpose, in particular protected landscapes and protected species. This is because the nature of the proposal – a replacement dwelling - would ordinarily not meet the risk-based criteria we use for providing bespoke comments.

However, we are now aware that this proposal is for a substantial dwelling and does raise significant landscape and ecological issues. We have therefore reviewed the submitted documents and offer the following advice in relation to our statutory purposes.

Protected landscapes

This development is proposed within the Forest Of Bowland Area of Outstanding Natural Beauty which is a statutory protected landscape.

Based on the submitted information to date we cannot reach a view on the significance of landscape and visual impacts from this proposal. The main reasons for this are set out below.

- The submitted landscape assessment has outlined the existing local landscape setting only, but not then assessed the significance of landscape change that will occur if the proposal was permitted.

Considering the scale of the proposed building, and given its location in a highly valued and protected landscape, we consider it essential that a comprehensive landscape assessment is undertaken so that your Authority can fully understand the significance of impacts from the scheme. This assessment should be in accordance with the latest guidance from the Landscape Institute (Guidelines for Landscape and Visual Impact Assessment – 3rd Edition).

- Reference is made to The Ribble Way, a long-distance footpath, which follows the current drive leading to Sawley Lodge. However, we are not clear how alterations to the drive and construction of the dwelling might impact on users of this footpath and their perceptions of the landscape character of the area. We would have expected this to be explored in the assessment.
- A 2 kilometre study area was used to identify a series of viewpoints but we are not clear why this size of study area was considered appropriate. How tall is the building and what is its Zone of Theoretical Visibility (ZTV)? **No ZTV maps have been provided therefore we cannot be certain that the proposal will not be visible from further afield, nor that the chosen viewpoints are the most suitable.**
- The assessment states that it is beyond its scope to consider the visual impact on private receptors. We are not clear why this is considered appropriate and advise that it is best practice to identify viewpoints that represent a range of visual receptors including someone living/working in the area; someone visiting the area for the purposes of enjoyment; and someone passing through on foot or by car.

Given that different types of viewers have different responses to change, depending upon their circumstances, it is important to select viewpoints that represent the range of receptors expected within the study area.

- We are not clear why Figure 12 shows an incomplete image of the 2km study area, rather than centrally locating the proposed site so that the whole of the study area is shown. Are there viewpoints located further east that are not shown on the map?
- **The visual impact assessment methodology has not been described and no information provided on the individual judgements reached for each viewpoints, in order to support the overall conclusion of no significant visual impacts from this proposal.** For example, what sensitivity rating was assigned to each viewpoint, what was the magnitude of change at these locations and how significant was the visual effect considered to be as a result of the proposal being built?
- The photo viewpoints do not illustrate the current view and the future view separately for comparison purposes.

We are aware that the AONB has provided detailed comments on the submitted documents and recommend that you address their concerns. The AONB partnership has detailed knowledge of the location and wider landscape setting of this development and consequently their advice should be given considerable weight when determining this application. They will also be able to advise as to whether the development accords with the aims and policies set out in the AONB management plan.

Protected species

Our current approach is not to provide bespoke comments on protected species issues where our published [Standing Advice](#) on protected species is available for you to use.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

We note, however, that you have specifically asked for our view on the ecological advice provided by Lancashire County Council in their letter dated 6 January 2014. We fully support their comments and recommend that full consideration is given to them prior to determining this application.

In particular, they have highlighted:

- possible damage to a Biological Heritage Site and loss of ancient woodland through tree felling activity prior to obtaining planning permission;
- loss of habitat for nesting birds and roosting bats;
- inadequate survey work to establish use of the existing buildings by bats;
- a lack of assessment of impacts for other Protected and Priority species;
- no submitted desk-based assessment drawing on species records from Lancashire Environment Records Network; and
- no Phase 1 habitat survey of the site.

Their advice is comprehensive, raises significant concerns and highlights that the currently submitted information does not meet the standards outlined in our standing advice.

For any queries relating to the specific advice in this letter only please contact me on the number below. 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

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