

File Ref: LYR133-XX-XX-LTR-L-0001
Recipient: Gavin.Winter@spawforths.co.uk

c/o Gavin Winter

FAO: Alison Gough
Development Management
Economic Regeneration, Growth and Environment Directorate
New Town House,
Buttermarket Street
Warrington
WA1 2NH



MANCHESTER	NEWCASTLE
The Barn	The Studio
One Hollin Lane	Low Shilford House
Styal	Stocksfield
Cheshire	Northumberland
SK9 4JH	NE43 7HW

W	layer.studio
T	01625 523 157
E	manchester or newcastle@layer.studio

**REFERENCE: Six56, Warrington - warehouse development (On
Line Application Reference PP-07744484) - Addendum to Environmental
Statement**

18th November 2021

Dear Ms Gough

We write in response to the letter from Ramboll of 1st June 2021 with respect to their review on behalf of Warrington Borough Council of the Landscape and Visual Impact Assessment (LVIA), submitted to support the Six56 Warehouse Development Planning Application No. PP-07744484.

We have reviewed the covering letter and Annex 1 and respond with text within a table, alongside the relevant extracted text from the Ramboll letter. Due to the covering letter summarising issues raised in their Annex 1, the extracted text refers to the latter.

Yours Sincerely,

Simon Tugby
Director
Layer.studio

Comment / Response Table.

Ramboll Comment	Layer Response
<p>The LVIA whilst broadly consistent with the current professional guidance contained in the 2017 Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) is considered to deviate from this guidance in a number of key aspects and to have a number of important omissions and incorrect approaches. The matters of most importance and relevance are identified below, along with recommendations for additional/supplementary information.</p>	<p>We do not consider that the LVIA submitted deviates from GLVIA3 in a number of key aspects or that it has a number of important omissions and incorrect approaches. Indeed, the comments below do not, in our view, provide sufficient justification and are dealt with below. GLVIA3 is not prescriptive which is one of the major differences from the earlier GLVIA2.</p>
<p>Whilst welcoming some additional information, the addendum does not address susceptibility and underplays the value and importance of the site and other such landscapes in respect of its 'strategic' role and position within Warrington's Green Belt, a key aspect of which is its open rural character. As in the original LVIA, the addendum overstates the screening effects of intervening vegetation and the influence of neighbouring developments, suggesting that this, in some way, lessens the sensitivity of the site.</p>	<p>At the time of writing the LVIA, WBC's Garden Suburb Development Framework proposed that the site was zoned for Employment. The author's comments predate the issuing of the Draft Local Plan in October 2021 which also rezones the areas of the site currently within Green Belt, for Employment. In our view, whilst not adopted, the Plan clearly suggests that the view of WBC in terms of striking a balance between Green Belt and future development, is that the latter is of greater 'strategic' importance. The "Green Belt Site Selection – Implications of Green Belt Release" (August 2021) document considers the implications on the Green Belt of releasing the draft employment allocation from the Green Belt.</p> <p>The Assessment concludes that the release of the wider employment site would result in some encroachment into the countryside but that it would not represent unrestricted sprawl; would have no impact on preventing neighbouring towns from merging; and have no impact on historic towns. It is concluded that the site is reasonably well contained and that removal of the draft allocation area "will not harm the overall function and integrity of the Warrington Green Belt".</p> <p>These conclusions relate to the whole draft allocation of which the Application Site forms part; and that the Application site has a "moderate" impact on the Green Belt as opposed to other parcels that have a "strong" overall contribution to the Green Belt.</p> <p>With respect to sensitivity, this is dealt with more fully below but existing development, in this case the existing industrial park to the west of the site, obviously has an influence and it is the case that landscape sensitivity is assessed in terms of its sensitivity to the particular development under consideration rather than in a landscape planning sense.</p>

<p>Both the LVIA and subsequent addendum contains only limited analysis of the landscape and visual baseline in general, including lighting and night character and amenity, and does not, therefore, provide a transparent basis for discussion of design and mitigation.</p>	<p>This is a generalised statement which, as we have explained above, we do not agree with. The issue of night-time lighting effects, however, has been addressed although this was not within the original scope agreed with WBC. The updated Lighting Assessment submitted with the ES Second Addendum provides a baseline study during the daytime and night-time to assess the likely impact of the existing external lighting on residential buildings and ecology in the area immediately surrounding the site. The updated document provides an assessment of the likely residual effects of construction and operational lighting and includes night-time visuals of how the operational lighting would appear. Whilst the proposals are only in outline and not yet subject to detailed design, the Lighting Assessment recommends a number of mitigation measures which, if incorporated into detailed design stages, will comply with ILS. Guidance on the reduction of obtrusive light will also be investigated and mitigated as part of the detailed design stage.</p>
<p>The revised proposals illustrated in Drawing 133-LYR-XX-XX-DWG-L-1000 represent minimal changes to the original application scheme. Mitigation proposals rely substantially on what are fairly meagre peripheral landscape features, including screen bunds and tree and shrub planting to soften or screen the development from neighbouring receptor locations. Neither of which would be especially efficacious. No substantive changes to the layout of the proposed development or reductions in the scale, mass or volume of the proposed buildings at the site is proposed. This is regrettable given that the LVIA and addendum cited these buildings as some of the key dominant features of the proposals.</p>	<p>Following the previous Ramboll response, the Applicant has given consideration to the comments and concerns pertaining to the scale and massing of proposed buildings and has agreed to reduce some of the building heights outlined in the building zones illustrated on the Building Heights Parameters Plan, which are the highest and most dominant features of the proposals. A revised Heights Parameters Plan Drawing No. 16-194 P115 Rev H reduces the maximum building height in Zone B2 from 43.5m to ridge (40m clear internal height) to 30m to ridge (26.5m clear internal height), which relates to Plot 4 of the Illustrative Masterplan and Zone D1 and D2 from 24.5m to ridge (21m clear internal height) to 22m to ridge (18.5m clear internal height), which relates to Plots 2 and 3 of the Illustrative Masterplan. Detailed landscape proposals will seek to provide a dense woodland planting matrix along the northern boundary to help soften visible built form over time alongside appropriate cladding material with non-reflective and soft graded natural tone colours.</p> <p>Notwithstanding the positive visual benefits of reducing these building heights, when assessing this against the methodology applied in the LVIA Addendum, the significance of effects reported remains the same.</p>
<p>Both the LVIA and subsequent addendum incorrectly ascribe a Medium sensitivity to the character of the site and adjoining landscape, which is characterised by an essentially rural outlook that is typified by a gently undulating landform, medium scale agricultural fields, and</p>	<p>We do not agree with the comment made with respect to sensitivity. The sensitivity of the receiving landscape combines judgements as to their susceptibility to the type of change or development proposed and the value attached to the landscape. As has already been referred</p>

<p>medium scale views bounded by interlocking treed skylines. Given the dominance of rural elements and the limited amount of built development within it, the scale and form of the landscape, and importance of intervisibility across the landscape towards the lo horizontal skylines the landscape is considered to have a high susceptibility to the type and scale of development proposed.</p> <p>The reliance of the LVIA and addendum on justifying the proposed development on the basis of the existing buildings within the business estate west of the site is unconvincing. The industrial estate and adjoining farmland are separate and distinct. It is also the case that the existing industrial buildings are not of the scale or form of the buildings proposed at the site.</p>	<p>to, the draft Local Plan shows this area as zoned for Employment and it is important to note that Green Belt is not a landscape designation but a planning one. These factors have been taken into consideration when assessing value. With regards to susceptibility to the type of change envisaged by the development, this has also been assessed as being medium due to the change that has occurred within the local character area as well as recognising the presence of an adjacent industrial park and the close presence of major infrastructure (motorways). In any event, the author's later comment accepts that we have assessed that the proposed development will result in some significant and adverse effects.</p>
<p>The LVIA provides no assessment of the effect of external lighting of the proposed development on the character and amenity of the study area. The justification given in paragraph 4.9 of the LVIA incorrectly scopes this matter out on the basis of a Light Spill Assessment (Doc Ref 1015524-RPT-LG-002) which is primarily a matter of intrusive light or light pollution as opposed to landscape or visual effects, an assertion revisited in the addendum, which makes reference to Doc Ref 1015524-RPT-LG-0023 which also does not address effects on landscape character or visual amenity. Whilst the detail of constructional or operational lighting may not be known in detail at this stage, further analysis of potential effects is none-the-less expected as this aspect of the proposed development would undoubtedly potential significant adverse effects on the character and amenity of what is a largely dark landscape. It is therefore recommended that a detailed assessment of the effect of construction and operational lighting is requested at the detailed application stage.</p>	<p>As already discussed in this response, the Updated Lighting Assessment considers the likely residual effects of construction and operational lighting and makes recommendations to mitigate lighting, which can be incorporated into proposals at the detailed design stage. It is also acknowledged in the Ramboll's response, that this can be considered and required at detailed referred matters stage if required.</p>
<p>Whilst the LVIA addresses potential significant effects on the amenity of residential receptors in the vicinity it does not address whether such effects would be 'overbearing' or 'overwhelming' and therefore render any property an unattractive (but not necessarily uninhabitable) place to live. This threshold has been established over numerous appeals and public inquiries throughout the UK and is often referred to as the Lavender test and which formed the basis of the Landscape Institutes guidance of the assessment of residential visual amenity</p>	<p>The RVAA was submitted as an appendix to the last LVIA in the First ES Addendum and was undertaken in accordance with guidance issued by the LI.</p>
<p>The illustration of likely operational effects in the visualisations in Appendix 4.3 of the addendum are considered to underplay effects, partly due to:</p>	<p>The visualisation consultant MSE, have updated the viewpoint visualisations previously undertaken to reflect the proposed reductions to some of the building heights. These visualisations conform with the latest Landscape Institute</p>

<ul style="list-style-type: none"> the use of photographic images showing summer conditions when intervening vegetation is in leaf and would afford the greatest degree of screening; the use of an unnatural wide-angle presentation which reduces the perceived scale of the development in images; the use of photographic locations for photomontages that are often subject to clutter or partial obstruction, thereby understating the visibility and prominence of the development, such as in the case of Viewpoint 2a; and misrepresentation of the efficacy of proposed screen planting, often being shown to entirely obscure the proposed development once mature (as in Viewpoint 7). 	<p>guidance, LI TGN 06/19 (90 degree on A1 wide sheet). The previous panoramas prepared by MSE were also produced to conform with what was the current LI Advice Note 01/11 i.e., 50 cm viewing distance of cylindrical panorama (94 degree on A1 sheet), guidance which has been superseded. Either way, the only technique of capturing such a wide development is as they have been undertaken. For information, it is worth noting that the principal of MSE, Mike Spence, sits on the LI panel which prepared the new guidance. A technical methodology for the photography and visualisation work is provided with the documents submitted with this Addendum.</p> <p>With respect to the baseline photography, general photography has been provided in the Appendices Figures, but these are not to either the new or old guidance as they do form the basis for preparing visualisations, but are for general record in supporting the baseline description and recording the location of viewpoints which have been the subject of detailed site assessment. The author should note that the visualisations provide a baseline view for comparison in full accordance with the latest guidance as referred to above.</p> <p>All viewpoint locations were previously agreed with WBC prior to their inclusion in the LVIA and subsequent addendums</p>
<p>Changes in the design of the proposed development since the original application have been insufficient to mitigate potential effects and no opportunity appears to have been taken to reduce the quantum of development or the scale and mass of proposed buildings which would be key impact generators.</p> <p>There remain a number of important omissions in information, but it is suggested that these are dealt with during any detailed application for the proposed development, as discussed below.</p>	<p>Following the previous Ramboll response, the Applicant has given consideration to the comments and concerns pertaining to the scale and massing of proposed buildings and has agreed to reduce some of the building heights outlined in the building zones illustrated on the Building Heights Parameters Plan, which are the highest and most dominant features of the proposals, which we consider will have visual benefits and reduce any impact these taller buildings would have from longer range views from the north and south. The updated Building Heights Parameters Plan is submitted with the Second ES Addendum, which includes an update of the LVIA to reflect this update.</p>
<p>The following information is considered an important requirement in order to assist WBC in determining such an application. It is anticipated that these could be required through planning conditions:</p> <ol style="list-style-type: none"> Detailed landscape appraisal. Lighting Assessment RVAA Retention Plan Construction Works 	<p>Notwithstanding the parameters, which should already provide the council with control to mitigate environmental impacts, we can agree on the further controls recommended where appropriate and as follows. Where necessary we have queried where we believe further detail may not be necessary.</p> <p><i>1. Detailed Landscape Appraisal</i></p>

<p>6. Detailed hard and soft landscape drawings 7. Sections 8. Photo-real photomontages (extract below)</p> <p>Photo-real photomontages of the proposed development immediately after completion of the proposed development, and a second suite of visualisations showing the proposed development six years after completion of the construction of the development, with proposed perimeter planting shown at a suitable level of maturity. The images should illustrate proposed building facades roof lines, openings and the appearance of external spaces.</p> <p>Photomontages for selected viewpoints showing the appearance of the proposed development after dark as an aid to the assessment of lighting impacts on the character and amenity of the area.</p> <p>The adoption, in visualisations, of partial transparency for proposed mitigation planting to better reflect the filtering of views, as opposed to the dense screening currently shown.</p>	<p>We question why this is required and note that Annex 1 suggests that this may be the subject of a condition. In our view it would be unusual and indeed unnecessary to undertake such a study for a proposed development of this scale and nature. The LVIA provides a detailed assessment of the landscape and visual effects associated with the development and we do not believe this appraisal would provide significant added benefit. Viewpoint locations have been agreed with WBC, which, together with a detailed site appraisal has formed the basis for assessing visibility and the influence and effect upon, existing landscape features. Reference has also been included in the LVIA to the Arup Green Belt Assessment (2016) undertaken on behalf of WBC and the "Green Belt Assessment – Garden Suburb Options" (April 2021) and the "Green Belt Site Selection – Implications of Green Belt Release" (August 2021) documents.</p> <p>Notwithstanding this, if the Council still deem it necessary to control through condition an appropriately worded condition can be agreed.</p> <p><i>2. Lighting Assessment</i></p> <p>We refer to the updated Lighting Assessment and agree that mitigation measures emanating from a detailed lighting strategy can be controlled by planning condition.</p> <p><i>3. RVAA</i></p> <p>The RVAA was submitted as an appendix to the last LVIA in the First ES Addendum and was undertaken in accordance with guidance issued by the LI. We await comments.</p> <p><i>4. Retention Plan</i> <i>5. Construction Works</i> <i>6. Detailed hard and soft landscape drawings</i> <i>7. Sections:</i></p> <p>All the above are agreed to and accepted but please note that with respect to trees to be retained, these are shown on the Landscape Masterplan submitted (Ref: 133-LYR-XX-XX-DWG-L-100 R7).</p> <p><i>8. Photomontages</i></p> <p>We question the value of visualisations at 6 years following completion which will not have allowed the proposed landscape mitigation to have sufficiently matured. Notwithstanding this, if the Council still deem it necessary an appropriately worded condition can be agreed.</p>

Conclusion

We consider that the above provides an appropriate response to the Ramboll last response to the First Addendum to the ES dated 1st June 2021. Where necessary, we have set out our justification for the approach we have taken in the LVIA in assessing the landscape character and visual impacts of the proposals and where we maintain our position.

Where appropriate, we have outlined the additional work which we have undertaken to respond to some concerns raised. In particular, the design team's amendments to the proposed building heights to reduce some of the more prominent maximum building heights. This is assessed through a second Addendum LVIA with supporting visualisations.

In summary, we consider that with regards to our responses (above) the planning decision can now be controlled through approval of the parameters and additional planning conditions above, which Ramboll accept can be used to provide the necessary control and detail at reserved matter stage, given the application currently under consideration is only seeking outline planning permission.