

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

Issued by email to: x-alison.gough@warrington.gov.uk

Dear Ms Gough

Date 5th December 2021

Six56, Warrington - warehouse development (On Line
Application Reference PP-07744484)

Ramboll previously undertook a technical review of the Landscape and Visual Impact Assessment (LVIA) and associated materials submitted with Application PP-07744484 (Ref. our letter date August 2019) and provided a commentary on the robustness of the Landscape and visual Impact Assessment (LVIA) submitted by the Applicant, along with recommendations for additional information to aid the determination of the application by Warrington Borough Council (WBC). These recommendations dealt with both necessary supplementary information in respect of the outline planning application as well as requirements for inclusion in any future detailed application. This included:

- An assessment of likely landscape and visual effects arising from proposed external and internal lighting and details of any mitigation or design approaches that are to be incorporated into detailed designs.
- An assessment of potential effects on the visual amenity of properties in the vicinity that utilises the 'Lavender test' as its basis.
- A detailed landscape appraisal drawing showing a detailed landscape character map within the study area (i.e. more detailed than national or local character assessments) showing the pattern of key characteristic elements (hedgerow, tree lines, field boundaries, infrastructure and built forms etc) with analytical annotations.
- Production of a retention plan indicating what elements are to be retained and which are to be removed.

Ramboll
5th Floor
7 Castle Street
Edinburgh
EH2 3AH
United Kingdom

T +44 131 297 2650
<https://uk.ramboll.com/environment-and-health>

- For those viewpoints/visualisations where intervening summer tree canopies or hedgerows restricted (but don't obscure) views of the proposed development, the inclusion of outlines for the proposed development buildings in photographs from key viewpoints to indicate its size and position during winter months.
- 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.

WBC have subsequently received supplementary information in the form of addenda to the original Environmental Statement as well as revised proposals, and a letter from Mr Simon Tugby of Layer Studio (Ref. 2021LYR133-XX-XX-LTR-L-0001) dated the 18th November 2021 in which he responds to the commentary in Annex 1: Summary of Key Issues and Recommendations in Ramboll's letter of advice to WBC of June 2021. What follows is a brief update to our previous commentary, taking into account the additional information provided by the applicant and Mr Tugby's responses.

Comments on the LVIA

Mr Tugby argues that the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) are intended as guidance, rather than mandatory standards. However, the guidance is intended to ensure consistency, transparency and rigour, and to reflect advances in assessment approach. Moreover, Ramboll would have been remiss if they failed to highlight deviations from current professional practice, especially as such deviations have formed part of the basis for objectors challenges to a number of previous planning decisions. It is also the case that, whilst some concerns remain about materials submitted by the Applicant, there is a degree of consensus about the extent of significant landscape and visual effects.

Green Belt and Planning Allocations

In respect of Mr Tugby's point in respect of the Green Belt status of the site, and its allocation in WBC's draft Garden Suburb Development Framework and 2021 LDP as Employment land, it should be noted that an allocation is not the same as approval of a specific development. It is possible for a development to be consistent with a strategic allocation/landuse whilst being unacceptable in environmental policy terms. Much is dependent upon the layout and design of the specific proposals.

Design and Mitigation

The revised proposals depicted in the revised Heights Parameters Plan Drawing No. 16-194 P115 Rev H represent only modest changes to the application scheme. Moreover, proposed perimeter landscaping and attenuation bunding are not expected to be particularly efficacious in overcoming the anticipated significant landscape and visual effects. A point acknowledged by Mr Tugby's. It is also the case that such measures, in of themselves, are likely to have an impact and to cause a significant effect on the character and visual amenity of the local countryside, including the amenity of neighbouring residential receptors by foreshortening what are open views across the countryside and establishing anomalous landforms.

Information Requirements - Detailed Application

Ramboll's previous letter of advice contained recommendations for further information in the event of a detailed planning application being lodged in order to assist WBC in determining such an application. This information was to be required through planning conditions. Mr Tugby has questioned the necessity of a number of these items of information, but WBC should satisfy themselves as to whether the information that has been provided to date is sufficient to enable them to determine the application.

Based on the Applicants latest proposals and the information provided by the Applicant to date, it is recommended that WBC require the following information, as a minimum, in the course of the detailed application or as a condition to be discharged prior to commencement of construction works at the site:

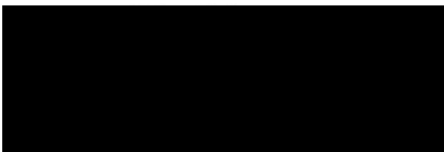
- A plan showing the anticipated layout of the site during construction works, including any temporary compounds and haul routes, soil and construction material storage areas, as well as details of phased construction and any temporary or permanent mitigation measures, in order to minimise impacts on the fabric of the landscape and protect visual amenity.
- Production of a Retention Plan indicating what elements are to be retained during both the construction and post construction phases of the proposed development, and what is to be removed, along with any measures for the protection of existing landscape features, to minimise impacts on the fabric of the landscape and protect visual amenity.
- Detailed layout drawings showing finished levels, hard and soft landscaping (including any SUDs and drainage features) and containing planting schedules, an outline specification for landscaping and maintenance in order to ensure rapid and effective establishment of the landscape setting of the development. These proposals should also indicate any phased development with known timescales incorporated.

In the event that WBC are minded to approve the detailed application, provision should be made for the Applicant to submit 'as built' drawings and for a WBC officer to monitor compliance during both the construction and operation of the site, and the establishment of proposed mitigation measures.

Conclusions

Notwithstanding the disagreement concerning Ramboll's appraisal of the Applicants submissions, a degree of consensus does exist in respect of the incidence of significant landscape and visual effects. Similarly, there is agreement in respect of the lack of efficacy associated with the recent changes to the proposals. With this in mind, it is therefore a matter for WBC to determine the application based on information before them based on the relevant contemporaneous policy and legislation. I trust that the foregoing analysis and preceding letters of advice provide sufficient guidance to assist WBC in this regard.

Yours sincerely



Robert Bainsfair
Senior Managing Consultant – Landscape Architecture
1702709 - Edinburgh

D +44 (131) 2972678
+44 7850 215 921 rbainsfair@ramboll.com