

Town and Country Planning (Inquiries Procedure) (England)

Rules 2000

Appeal

Redevelopment of the Department Of Work And Pensions Docs Distribution Centre,
Manchester Road, Heywood, OL10 2PZ

On behalf of Trammell Crow

LOCAL PLANNING AUTHORITY APPLICATION REFERENCE: 22/01410/FUL

SECRETARY OF STATE'S REFERENCE: XXX

PLANNING INSPECTORATE'S REFERENCE: XXX

Kit Patrick BA(Hons) Dip La/CMLI

Landscape and Visual Impacts

March 2024

ANNEX 1

**LVIA Review correspondence between TPM Landscape and Rochdale Borough
Council (A4 colour document)**

**ANNEX 1: LVIA Review correspondence between TPM Landscape and Rochdale
Borough Council (A4 colour document)**

A compilation of the reviews and critiques of the TPM LVIA by Rochdale Council external landscape consultant, Ryder Landscape Consultants (RLC), and including the RLC review of the Barnes Walker critique of the TPM LVIA, and also correspondence (submitted and reviewed in meetings) between TPM Landscape, RLC and Rochdale Council.

The information is presented with the most recent correspondence relating to the Proposal prior to submission of the final information listed first.

- ANN 1.1 TPM Response to final Ryder comments on the LVIA: 4 July 2023**
- ANN 1.2 TPM Response to feedback received from Barnes Walker and Stuart
Ryder: 3 July 2023**
- ANN 1.3 TPM Response to Barnes Walker ‘Critique’ of TPM LVIA**
- ANN 1.4 TPM Response to Ryder Landscape Consultants ‘Review of Heyward
Stores Landscape and Visual Impact Assessment Information’**
- ANN 1.5 STUART RYDER’S REVIEW OF TPM LVIA RECEIVED 20 JUNE 2023, AND
INCORPORATING STUART RYDER’S RESPONSE TO THE BARNES
WALKER CRITIQUE OF THE TPM LVIA.**
- ANN 1.6 STUART RYDER’S REVIEW OF BARNES WALKER CRITIQUE OF TPM LVIA
RECEIVED 20 JUNE 2023**

Note: In all the following commentaries responses in RED are by TPM Landscape.

ANN 1.1 TPM RESPONSES TO FINAL RYDER COMMENTS ON THE LVIA: 4 JULY 2023

Response from Stuart Ryder to LPA, with further response by TPM following the meeting 4 July 2023, attended by Rochdale Council planning officers, Sturt Ryder, TPM Landscape and representatives of the client and design team.

If you are minded I would suggest that further information or confirmation of the following would aid the thoroughness of the study. None of the points are fundamental or substantive in nature and the LVA could still be used in its current form to allow you to determine the application.

- Finer grain of landscape receptors – trees on Site being one example and the Site another;
 - Further information will be provided.
 - Low
- Identification and assessment of an visual receptors beyond 1km – but likely to be minor visual effects given distance and precedent of other logistic buildings in the view;
 - Site revisited to extend the study area
 - 4 views taken
- Assessment of any cumulative effects if any exist;
 - Cumulative effects of the development will likely be less due to built form in between receptor and development site
- Fuller description of mitigation measures and the duration that they will take to achieve an effect;
 - Additional mitigation proposed. More mature trees planted to the top of the slope.
- Landscape benefits of the scheme to allow them to be taken into account in the planning balance.
 - There are existing gaps in vegetation along the site boundaries which provide views into the existing industrial estate. A considerable number of new trees are proposed to strengthen the vegetated character to the site boundaries.
 - New boundary treatments are proposed against the existing residential settlement to create a more uniformed appearance (currently varies in quality and condition).
 - Sustainable methods of drainage are incorporated into the layout through three separate basins.
 - Native planting (trees, hedgerows and shrub mixes) is proposed along with swathes of wildflower meadow that add to the
 - ecological value of the site.

These following responses were presented to Stuart Ryder at a meeting with Rochdale Council 4 July 2023.

**ANN 1.2 TPM RESPONSE TO FEEDBACK RECEIVED FROM BARNES WALKER
AND STUART RYDER 3 July 2023**

Stuart Ryder Review of TPM LVIA received 20 June 2023.

1.0 CONSISTENCY

It has been raised as part of the feedback received about our judgement for assessing the future housing associated with the South Heywood Masterplan as having a Medium-High Sensitivity. As explained previously, settlement that exists is assessed as High whereas future housing that is not fixed at this stage is assessed as Medium-High as in our professional judgement we consider there to be a difference between the two receptor types.

Following a review of the Landscape and Visual Assessment as part of the Landscape Chapter prepared by IBI Group on behalf of Russell's for the wider Outline South Heywood Masterplan in 2017 it is noted that residential receptors in that receptor are assigned as either Medium/Low or Medium Sensitivity.

- Banff Grove Residential – Medium/ Low Sensitivity

South Heywood

Chapter 8: Landscape and Visual

Viewpoint 2: View looking south from Banff Grove



- 8.95 This view represents **residential** views from properties on Banff Grove. Views are primarily focused on the public open space / amenity grass area located in the foreground of the photograph, Views in the mid distance are focused on the roof-scape of **residential** areas of Heywood and storage sheds / industrial units.
- 8.96 The condition of the view is as Low. Mixed land use is evident and has weekend the structure of the landscape within the view. There are frequent detracting features from roof lines and storage units.
- 8.97 The value of the view is seen as Low. The baseline is of low importance and rarity and there is low scenic quality to the view. The amenity grass land and tree planting is seen as the only redeeming feature within the view.
- 8.98 In terms of susceptibility of the visual receptor, this is deemed as Medium. Although the receptor is classed as residents of Banff Grove, rooms used during daylight hours are located on the ground floor of properties, and views from these rooms are screened by existing vegetation, located within front boundary treatments and public open space.
- 8.99 As per table 8.15 the sensitivity of the visual receptor is deemed as **Medium / Low** sensitivity.

- Gloucester Avenue Residential – Medium Sensitivity

Viewpoint 6: View looking south from Gloucester Avenue.



8.114 This view represents residents of Gloucester Avenue. Mature trees and shrubs can be seen within the foreground, with agricultural grazing land to the mid distance. Field boundaries are determined through mature tree and hedgerow lines and post and wire agricultural fencing. With the exception of Greenwood Hill Farm, the majority of views into the far distance are screened by mature tree lines.

8.115 The condition of the view is seen to be **Ordinary**. Agricultural land and mature field boundaries create a recognisable landscape structure, and there are minimal detracting features.

8.116 The value of the view is seen as **medium**. Land is undesignated, however is seen as having medium scenic quality for the residents of Gloucester Avenue.

8.117 Susceptibility of the visual receptor is deemed as medium, this is due to views from rooms used during daylight hours not having direct views on to the site. Rooms with direct views on to the site are only used during the evening hours.

8.118 As per table 8.15, the sensitivity of the visual receptor is deemed as Medium sensitivity. table 8.15, the sensitivity of the visual receptor is deemed as **Medium sensitivity**.

We are not challenging IBI's judgement as such, however, we have clearly assigned the residential receptors in our assessment to have a higher sensitivity (both existing and future) and therefore, reinforces our opinion that we have appropriately judged the level of sensitivity in our report.

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Secondly, as part of the South Heywood Masterplan, one large warehouse unit has approval next to the junction of Hareshill Road and Pilsworth Road. The scale and massing of this approved unit is of a similar scale (if not larger) than the one being proposed on the site. This development will sit near residential development as part of the wider masterplan. The location of the approved building differs from the outline masterplan, where two units were indicated. As far as we can tell on the council's website, there was no requirement for an LVIA for the new warehouse which is quite a bit larger than ours.

South Heywood Masterplan



Recent Planning Approval

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Overlay of approved layout on South Heywood Masterplan



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Overlay of approved layout on proposal site (for context of scale).



ANN 1.3 TPM RESPONSE TO FEEDBACK FROM BARNES WALKER

TPM have responded to the items listed by Barnes Walker following their review and additional comments received by Stuart Ryder. Barnes Walker and Stuart Ryders comments in the tables below are in blue. TPM response are noted in red.

No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
1	4.3 Landscape receptors	Site elements - That the Site elements have not been included in the original application, or updated LVA.	Strongly agree – this is noted in my response to Rev D of the LVA and would assist in understanding the full range of landscape effects.	TMP – to include site elements and Site as an entity in itself.
TPM Response: SITE ELEMENTS: Trees – There are considerable areas of tree planting across the site, including to the site boundaries and internal to the site. The trees on site are well established and provide a green edge to the development, as well as providing amenity value internal to the site layout. Landform – The landform appears to be relatively flat from outside of the site, however, there is approximately a 5m level change from the northeast of the site towards the southwest. Drainage – The site is drained through conventional drainage systems. Land Cover – The site comprises of large areas of hard standing associated with the internal road structure, car parking, service yards and warehouse footprints. There are areas of soft landscape throughout, including grassed verges, individual tree planting and areas of vegetation to the site boundaries. Enclosure – The existing site boundaries vary in quality and condition across the site. The boundary treatments consist of timber fencing, concrete post and mesh, and in places no fence treatment at all. Human Activity – The site is operational as an active industrial site with nine existing warehouse buildings and two further buildings at the entrance from Manchester Road. The site is frequently used and is evident by the use of HGVs on site and staff car parking. Tranquility – The site is in operational use, located next to a busy main road (Manchester Road) and the new link road, and less than 1km away from the M62 motorway. Openness – The site is well developed in its current condition with a series of warehouse buildings, proximity to the existing edge of settlement and established vegetation both to the site boundaries and internal to the site.				
2	4.6 to 4.8	Sensitivity of Site elements - Understating the landscape sensitivity of the Site as Low and it should be reviewed using TGN 1/21 – establishing landscape value outside of the National Landscapes in England.	Partly agree – I think TGN 1/21 would not assist greatly as that seeks to establish ‘valued landscape’ as per NPPF 174 a). The inclusion of site elements and the overall Site itself in the list of landscape receptors, along with a look-up table of how TPM combine landscape value and susceptibility would be more effective an establishing relative sensitivity of the receptors.	TMP - to include site elements and Site as an entity in itself and establish the landscape sensitivity for any additional receptor.
TPM Response: SITE SUSCEPTIBILITY: LOW Landscape Designation: Low (No landscape designation and relatively unimportant landscape) Landscape Resource/ Habitats: Medium (Vegetation across the site is valuable resource on site to contain the site and valuable for habitats, however, there is no public access and internal tree planting to the site is only relevant for users of the site.) Scale and Enclosure: Low (small scale landscape that is contained in its current context) Landform and Topography: Low (relatively flat landscape with no notable features) Settlement and Urban Landscapes: Low (located on the fringe of urban fringe with properties dated in 20th/ 21st century. Commercial and industrial buildings evident).				

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No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
Historical and Cultural Landscapes: Low (no recognized individual features or elements). - Remoteness and Tranquility: Low (proximity to road infrastructure including M62 and urban edge remove sense of remoteness and tranquility.) Visual and Sensory: Low (enclosed landscape with no visual link to the wider landscape). LANDSCAPE QUALITY: ORDINARY-POOR (locally recognized landscape with some features worth of retention, primarily being trees on site. However, the site boundaries are inconsistent and have scope to be improved.) LANDSCAPE VALUE: LOW (landscape without any particular significance with no access to the local community or public. A landscape that is not distinct or recognisable and does not add to the context of the wider area). LANDSCAPE SENSITIVITY: LOW-MEDIUM (landscape of low susceptibility whereby the proposals will only alter the landscape elements in a limited way i.e., removal of internal trees). MAGNITUDE OF CHANGE: LOW (The development will result in a slight change to the landscape character of the site with the nature of the change remaining as existing. It is noted there will be loss to existing trees internally to the site and change to the landform enable the development to be practical for use, however, the other site elements are largely unchanged.) LANDSCAPE EFFECTS: SLIGHT (as above the site is assessed to have a LOW-MEDIUM sensitivity and LOW magnitude of change. Therefore, applying these assessments to the table matrix (table vi) in TPM Methodology page 6, the landscape effect is assessed as Slight				
3	4.9 & 4.10	Tree loss – The quantum of trees removed from the Site is quoted and percentages calculated to show the scale of loss of and change to the character of the wider Site.	Strongly agree – this should be considered as an effect of the development and how it leads to a change in perception of the Site as a whole. This can be done by having trees as a separate landscape receptor.	TMP – to include site elements and Site as an entity in itself
TPM Response: It is acknowledged that tree removal will be required to facilitate the development, however, the tree loss is primarily internal to the site layout. There is some tree loss to the site boundaries, however, the majority of the existing vegetation that borders and encloses the site is to be retained as part of the development proposals.				
4	4.17	New residents of the Russell Homes scheme – VPs 11 & 12 are welcomed to help demonstrate the effect on new residential receptors VP12 is not considered at the correct distance of 10m to show close to effect.	Partly agree – VP12 is taken at a distance of 75m to the built form and is useful to understand the appearance of the current storage buildings at this distance, closer views may not be as useful to show the wider character from this location.	TMP – could photograph from 10m but winter conditions have now passed
TPM Response: This view shows the wider context of the proposed development from the link road. It is considered views of the development would be even less at 10m				
5	4.18	Understatement of visual sensitivity for prospective residential receptors – BW query why the new residents would only have a Medium-High	Partly agree – There is no explanation in the updated LVA as to why the new residents are given a Medium – High level of sensitivity and the existing residents (VP 9 & 10) a High level.	TMP – could explain their judgements as to visual value and susceptibility and tie back to a look-up table.

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No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
		level of sensitivity and not High		
TPM Response: The receptor for new residents does not currently exist and is based on the outline masterplan. We consider there to be a difference between settlement that exists and future residential that may not be delivered for a number of years hence the reduction to Medium-High.				
6	4.24	North western landscape buffer – pine trees provide limited screening and AIA notes will be partly removed for construction.	Partly agree – The photograph at Contextual Photo A and VP11 indicate that the pines now they are reaching maturity do not provide low level screening and require a good scrub understorey to form an effective visual barrier. The screening proposals are however clearly shown on the planting plans.	TMP – Ensure landscape proposal drawings are adequate in terms of width and planting mix.
TPM Response: The landscape buffer along this boundary is on average 15m wide. It is noted this reduces in places; however, it is also much wider along localized in the context of this boundary.				
7	4.24 Continued	North western landscape buffer – Section DD at the pinch-point does suggest a buffer that is only 5m wide and that the ground on the inside of the Site's boundary would be lowered requiring the removal of more trees.	Strongly agree – A 5m wide tree belt will not be effective at screening the large Unit 3 building beyond the boundary, particularly if the planting is all new if existing stock has to be felled for road levels. Initially I looked at Landscape Masterplan 101 Rev F that indicates a broader green swathe to north west boundary compared to Dwg 206 Rev A. However, on closer inspection the seem if the indicated existing vegetation on masterplan drawing is set outside of the redline boundary.	TMP – This is a narrow part of the buffer which will allow sight through it to acoustic wall and the building. Has purchase or placing Public Open Space on the west side of the boundary been explored with Russell Homes?
TPM Response: This is a very localized location on this site boundary. As mentioned previously, the buffer is on average circa 15m wide. There will be some loss to existing trees, however, they are a band of trees located internal to the layout and trees on the boundary line are to be retained. This boundary will be reinforced with new planting internally strengthen the buffer and visual screen.				
8	4.24 Continued	North western landscape buffer – questioning height and effectiveness of species chosen to screen building and wall.	Partly agree – The choice of tree species is not the quickest growing with holly and oak being slow to establish and thrive. The use of larger trees would add a greater screening presence but can go into stasis and not put the height or screening cover on that quicker growing smaller stock such as poplar or certain maples provide.	TMP – Through the detailed design process and planning conditions provide a quicker growing and more effective tree mix

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No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
TPM Response:				
TPM to review planting mix and amend to incorporate more quicker growing species.				
9	VP 11 – Visual Effects	VP11 Visual effects – considers that the Low magnitude of change assigned to new residents is an under assessment	Partly agree – Magnitude of change is just that change and if there are no residents yet to experience the change it is difficult to ascribe a magnitude to them. I have sympathy with the consideration that it will not be a ‘Low’ magnitude of change as the acoustic wall to the rear of this wooded area will create a dark solid, uniform height feature within the woodland. The ability to see the building will depend on how many trees from the rear of the woodland block are removed. Summer leaf cover will aid screening.	TMP – The effectiveness of this buffer area is key to the residential amenity experienced by residents. If houses were already built would the boundary treatment be any different?
TPM Response:				
The acoustic fence is dictated by the acoustic assessment carried out by others. The exact locations of properties cannot yet be fully defined and is a hypothetical receptor. It is acknowledged that there is a localized pinch point on this boundary, however, this increases considerably to the north and south up to 15m wide.				
10	4.23	Southern landscape buffer -recognise that Unit 3 has been pulled further into Site and suggests that it needs to be retreated further and reduced in height as well. The roadway set behind the bunded retaining wall will assist in screening HGV movements.	Partly agree – The southern boundary planting is hampered by the presence of the triangular SuDS basin. Some basins can actually be planted with damp tolerant trees species such as alder and willow but this basin appears quite deep which restricts such planting. Overall, its width does appear limited and the ability to create an adequate depth of planting to foil the view to the new buildings behind is doubted.	Creating space on Site for a wider southern planting boundary would require a reduction in building sizes. Alternatively, negotiation could be had with neighbouring land owners to sell a strip of land to allow planting.
TPM Response:				
The area directly to the south of the attenuation basin (offsite) is proposed as an area of green space in the outline masterplan. The landscape buffer to the west where the development would abut future housing is a circa 22m wide buffer set on a raised batter than reaches 7m in height above the site boundary line prior to the implementation of any mitigation planting.				
11	4.23	Southern Landscape buffer – proposes the bunded retaining wall continues along the whole of the southern boundary.	Partly agree – The SuDS basin does prevent the more effective screening solution from continuing down the southern boundary. As space is such a premium the SuDS basin could be removed and replaced with a crate system under the main staff car park.	
TPM Response:				

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No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
There is a requirement to deliver an attenuation basin in this location. The retention of existing trees was considered paramount along the boundary, therefore, there is not the space to incorporate the retaining wall further. As mentioned in item 10, the space directly to the south is earmarked for green space on the outline masterplan.				
12	4.23	Southern landscape buffer - overshadowing	Partly agree – planting of large screening tree varieties close to a property boundary can lead to direct overshadowing; Shade cast from the sun's transit will likely be less problematical as the buffer planting is to the north of the proposed housing.	
TPM Response: Proposed trees are located to the north of the properties so shading should not become an issue.				
13	VP12	Viewpoint 12 and greater visual effects	Partly agree – As expressed in my review of the LVA this visual effect after 15 years could be considered as remaining adverse in nature, The tree line is only partial and much of the stock is already mature. The gaps could be filled in by new planting but it would not have achieved a height approaching the current mature tree level. Nor will the current mature trees grow sufficiently to screen off the additional height of the proposed units. Care has to be taken to not judge the change in view against the current open field but it needs to be assessed against the sense of new residential development with the proposals set within the interior of a built-up area rather than on the edge of a green field location. Instead of contrast with an open field there would be a degree of contrast with residential settlement in terms of scale and building heights. The degree of separation from other large scale logistics buildings then becomes important so that it can be perceived as part of the greater collection of the Heyward Distribution Park or as a collection of 'outlier'	RBC – review the physical and visual linkages between this site and other large logistic buildings to consider if in spatial planning terms there is sufficient to link them together or whether it looks like the wrong building in the wrong place.

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No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
			units set within a residential area.	
14	Visualisations	Provision of accurate visualisations	Strongly agree – The proposals are of such a scale and contrast with existing residential areas that they merit the production of accurate visually verified images (VVI's) produced to recognisable guidelines to achieve Level 4 status in the Landscape Institutes TGN 6/19.	TMP / Gerald Eve to commission VVI's from a limited number of agreed viewpoints
TPM Response: Verified views would need to be taken from existing receptors identified in the report. Receptors assessed, aside from those that abut the site are considered to have a low or medium change in the existing view. Following the delivery of the South Heywood Masterplan, the visual effects are expected to be less. As the adjacent residential layout is not fixed, TPM contest that verifiable views can be taken from within that parcel of land, and therefore, resist this request.				
15	Green screen	Discussion of green screen to the acoustic barrier – querying 5m high system of instant hedge and stainless steel tope system for climbing plants or pre-grown 3m high system manufactured by Mobelaine.	Strongly agree – As landscape planting features both these systems are domestic in focus and I have not seen their use on a large site. There is a recognisable risk that the screen that is being proposed to screen the screen is itself visually intrusive. Both systems are anticipated to be establishment intensive and as previously discussed set anything on a mound perches them above the grounds natural water table. A maintenance and management plan is yet to be provided.	TMP – Re-think on how best to screen long lengths of acoustic barrier and whatever solution or solutions that is arrived at how they are going to be maintained along with the acoustic barrier they are seeking to disguise.
TPM Response: TPM to review proposals to see if alternative methods can be implemented to soften the acoustic fences.				

ANN 1.4 TPM RESPONSE TO RYDER LANDSCAPE CONSULTANTS ‘REVIEW OF HEYWOOD STORES LANDSCAPE AND VISUAL IMPACT ASSESSMENT’ INFORMATION’

TPM have made the following responses following the nature of observation/ feedback provided by Stuart Ryder. A series of actions are noted in response to each point raised. Stuart Ryders comments in the tables below are in **blue**. TPM response are noted in **red**.

Ref No	Report Ref	Nature of observation / feedback	TPM Comments
1		Lack of ZTV and limiting study area to 1km..	Visual envelope/ constraints plan to be included in the updated LVIA. The study area has been increased to incorporate other considered views from the east of Heywood and north of settlement to the south of the M62.
2	Section 5	Reproduction of published landscape character information but no testing of its applicability to Site.	Further narrative to be added to clarify TPM’s assessment on this.
3		The three local landscape character areas are predominately defined by land use or could be classed as landscape types in the area.	Section 6.1 and the following pages state elements that make up each Local Character Area. Further will be added to elaborate on these points.
4		Why is the FFL of the development so much higher than at the moment? No explanation given	This is due to the cut and fill balance required across the site to make the site layout viable. TPM will add a note to cross reference to architects and engineer plans for more information.
5	6.7	Mixing landscape and visual effects up.	Review narrative to clarify
6		Better description of the Site’s elements and overall characteristic would benefit landscape appraisal.	As covered above in response to BW comments
7		Are there are any landscape benefits to put into the planning balance?	There are existing gaps in vegetation along the site boundaries which provide views into the existing industrial estate. A considerable number of new trees are proposed to strengthen the vegetated character to the site boundaries. New boundary treatments are proposed against the existing residential settlement to create a more uniformed appearance (currently varies in quality and condition). Sustainable methods of drainage are incorporated into the layout through three separate basins. Native planting (trees, hedgerows and shrub mixes) is proposed along with swathes of wildflower meadow that add to the ecological value of the site.
8	6.9	Where are the definitions for notable or significant effects?	Notable is something that is readily noticeable or worthy of attention. Significant is something that is noteworthy/ important to be worthy of attention.

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Ref No	Report Ref	Nature of observation / feedback	TPM Comments
			The use of the words is not considered in the same context as they are in EIA terms with this being an LVA report.
9	Section 7	Why are some residential receptors classified as having a High Sensitivity and others Medium / High	Settlement that exists is given a high sensitivity. Future housing is assigned a Medium-High sensitivity as it does not yet exist, and exact positions are not fixed.
10	Section 7	Visual receptors are always people and not such things as paths or houses.	Agreed. We assess views in the context of the people that are in each location.
11		Direction of travel point is not fully explained, is one worse than the other?	Direction of travel towards the site dictates the likelihood of viewing the site. If travelling in the direction of the site, views will be higher than if views are at an oblique view to the direction of travel.
12	9.1	Landscape effects may not physically extend out of the Site but can influence the character of nearby land.	The existing site is industrial in use and will remain following the delivery of the development proposal. The intention is to retain the existing vegetation that characterises the site boundaries and reinforce with substantial mitigation. It is considered that this change would be no different to that expected as a result of the warehouse development that has approval and delivered as part of the South Heywood Masterplan. The landscape character is not expected to alter for the reasons set out above.
13	9.1	What empirical data backs up comments on existing scale and height?	We have used our professional judgement to make this statement as the scale and massing of the new development is not out of context with the wider industrial areas and the warehouses proposed on the South Heywood Masterplan.
14		Cumulative landscape and visual effects may aid the understanding of why the proposals at this scale are considered in keeping with existing landscape character, if there are none they need to be ruled out	NOTE: Post masterplan effects noted on page 43 of the LVA Cumulative landscape effects – the development site will transition from an industrial parcel of land on the edge of agricultural fields to one which is contained on all sides by residential development. Cumulative visual effects – wider views, particularly from the west will be less as development comes forward as part of the South Heywood Masterplan. Comments on each viewpoint are below (section 4).
15	VP2	Is this the actual publicly accessible footpath.	Yes
16	VP12	Is the front, long rectangle in wireframe the proposed acoustic barrier – labels picking out Unit Nos. and key features would assist	The rectangle is the acoustic barrier; however, this has now been replaced with the 1:3 raised batter that is to be

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Ref No	Report Ref	Nature of observation / feedback	TPM Comments
			landscaped to the whole extent. The wireframe will be amended to omit the acoustic fence as this is no longer required.

Other actions:

- TPM have revisited site to take photographs from other considered viewpoints beyond 1km of the site boundary including to the east of Heywood settlement and to the south of the M62 motorway and to the northern edge of settlement. The proposal site is not currently visible from these locations; however, it is noted that other existing industrial buildings and wind turbines are evident. If the increase in height and scale of the new buildings are visible from these views, they will be visible in the context of the existing industrial estate forming the backdrop to the views. This will further be the case on the delivery of the industrial buildings associated with the South Heywood Masterplan.
- Other mitigation measures including façade treatment, cut and fill analysis and lighting will be cross referenced back to the wider team consultants documents for consideration.

CUMULATIVE IMPACT OF THE SOUTH HEYWOOD MASTERPLAN ON VIEWS

View 1: Existing industrial buildings are evident in the existing view. It is noted there will be a low change to the view due to the increase in height of the development on site although the change is similar nature to what is existing. Following the delivery of the South Heywood Masterplan, users of the footpath will be surrounded by built form and therefore, the proposed development is considered to have a Negligible visual effect post-delivery of the masterplan.

View 2: Same comments as above.

View 3: Views of the proposal site are notable from this location; however, existing industrial buildings are already evident in the view. It is acknowledged that there will be a change to this view due to increase in scale and massing of the new buildings. As the wider outline masterplan comes forward, the new residential development will be visible. An area of public open space is proposed as part of the outline masterplan, and in the foreground of the view. It is anticipated that further tree planting will be delivered within that space which adds to the visual screen.

View 4: There are glimpsed views of the existing industrial buildings on site from this view. It is anticipated the change will result in the roof pitch of unit 3 being more visible. Following the delivery of the outline masterplan, newly built form associated with the residential parcel will restrict the view with an anticipated Negligible visual effect.

View 5: Same as view 4.

View 6: The proposed development is assessed to result in a medium change which is largely due to the loss of some trees to facilitate the development access. The existing industrial buildings are evident in the view at the existing site access only. The new building will result in an increase in height of building which will be perceivable but not notable to the casual observer. However, the receptor is assessed for vehicle users and therefore, is a transient view of the site. Therefore, it is concluded to be a slight-moderate effect. The outline masterplan will result in some residential development opposite the site entrance, however, the retention of most existing trees along the Manchester Road elevation means the new development is largely screened.

View 7: Public footbridge crossing over the M62. The development is not visible from this location. However, the industrial buildings being delivered as part of the South Heywood masterplan will be evident on the horizon line from this location.

View 8: There are localised gaps along this footpath route, however, the majority of the footpath is bordered by high hedgerows which limits extensive views. There are glimpsed views of the existing industrial buildings on site, with industrial buildings on Heywood Distribution Park more prominent in the view. The development will result in the

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increase in scale and massing on height, however, this is a very localised opening along the footpath so will not be readily perceived by the casual observer. The view of the development post delivery of the outline masterplan will be even less due to new industrial buildings and residential development between the receptor location and proposal site.

View 9: The wider outline masterplan will not impact on the views from these properties.

View 10: The wider outline masterplan will not impact on the views from these properties.

View 11: This view is taken within the parcel of agricultural land to the north west of the proposal site and to be representative of future housing associated with the wider outline masterplan. Views of the proposed development will be restricted to glimpsed views through the understory of the existing trees. Views will be less during the summer months when the understory is in full leaf. The increase in scale and massing of the development may be perceptible, however, the view will be filtered by the understory. The proposed mitigation incorporates a strong landscape buffer along the site boundary and on average is approximately 15m wide. It is acknowledged that there is a localised pinch point at 5m wide where the acoustic fence may be more visible, however, there will be new planting to soften this impact and the buffer increase in both a north east and south western direction.

View 12: This view is taken from the south west of the proposal site and is representative of views from future housing that abut the site. The view is taken further back than 10m to give a better understanding of the wider elevation along this edge. It is noted that there will be a large change to the view due the increase in scale and massing on site, however, the nature of the change remains as industrial. A landscape buffer of circa 22m wide is proposed along this boundary and combines native shrub planting along with layers of new tree planting. These proposals are also set on a raised batter that reaches a height of 7m above the site boundary level prior to the implementation of any planting. As part of the original proposals, trees proposed ranged from 3.5m up to 6m high at day one when planted, however, TPM propose to amend the proposals to show more mature trees (40-45cm girth and 8m high) as a linear band to the top of the batter to provide a more immediate screen. It is worth noting that the species proposed will grow considerably over future years and reach heights much greater than 6 to 8 metres high.

NEXT STEPS

- Add in further description on site elements that define the site character (beyond land use).
- Clarify in the report how we reach the conclusion of a low landscape sensitivity for the site (as set out above).
- Provide further mitigation proposals.
 - Add in a constraint plan
 - Provide other considered viewpoints.
 - Add in further tree planting where possible.
 - Increase tree sizes to the top of the landscape batter to the south western boundary
 - Review planting mixes to ensure quicker growing species are included in the mix.
 - Add in commentary on cumulative impacts in the context of the South Heywood Masterplan.

TPM COMMENTS: 21-12-2022

How we responded to the South Heywood Masterplan in LVIA

- The retention of existing trees to the site boundaries were viewed as integral as part of the development of the site layout.
- We can provide an Addendum to the LVIA to include an assessment for the potential of housing in the adjacent land. The outline masterplan is schematic in its form, with location of dwellings and road infrastructure not fully defined. The assessment would be representative from a certain point within the adjacent land rather than an exact plot location.
- In terms of mitigation, there is a nett improvement of trees (196 trees are to be removed/ 223 trees are proposed) with considerable areas of whip tree planting across the scheme.
- We have assessed the nature of the change for adjacent residential receptors located on Bader Drive and White House Close. It is considered that the nature of the potential visual impact for future housing to be similar as the proposal site already contains a series of industrial buildings.

The following comments in red are a response to specific points.

Visual Impact Mitigation

We have concerns that there is significant adverse visual impact that has not been properly mitigated for, or appropriately assessed (i.e. LVIA). The LVIA is currently being critiqued by specialist landscape consultants. They have identified concerns around the extent of tree loss, the lack of assessment of this, and the failure to consider the impact of approved housing that abuts the site. This will also set out precedents set locally for the more appropriate use of earth landscape bunds which can be planted with trees. These require little maintenance, yet provide a stronger green and acoustic buffer, compared to a green wall.

TPM response: The majority of trees to the north west, south west, southern and eastern (interface with Manchester Road) boundaries are to be retained as part of the development proposals, however, there is unavoidable loss of trees to accommodate the required levels across the site to support the development. Earth bunds were considered during the design process, however, due to the desired plateau levels and potential conflict with root protection zones it was concluded that there was not the space to incorporate the bunds with the retention of boundary vegetation considered paramount.

The LVIA fails to consider the effect of the proposed development upon the existing landscape features and landscape character of the site and immediate setting. The site has a well treed character and the existing trees add value, increasing the sensitivity of the landscape. The LVIA understates the landscape sensitivity and does not take into account that there would be large scale tree removal.

TPM response: It is a site comprising of existing industrial buildings, road infrastructure and parking, which is considered to have a low landscape sensitivity. The proposal does not alter the industrial use of the site, and therefore, we believe the landscape character is correctly assessed.

Whilst existing trees are part of the existing industrial site, it is not publicly accessible and with limited extension to the wider visual amenity. The trees provide value in softening the existing built form and for

the users of the site. We consider there is sufficient space to achieve a similar character as part of the mitigation proposals.

The larger building footprint, service yards and parking would significantly reduce the areas of green space and proposed planting would not compensate for that lost. The loss of the trees internally to the site, would in turn, reduce the existing levels of screening provided by the trees and change the perceptual quality of the landscape and the built form therein. There would be significant adverse landscape effects as a result of the proposed development, which the LVIA does not identify.

TPM response: Tree removal is primarily focused internal to the site layout. We acknowledge the trees have some amenity value for the site, however, they are not highly visible when viewed externally. The development layout looks to retain as many boundary trees as possible, whilst acknowledging there will be unavoidable localised tree removal due to the proposed site level changes. Where gaps appear in the boundary planting, the proposal incorporates considerable areas of native shrub, scrub and tree planting to mitigate for the loss of trees on site. It is noted that there will be a loss of 196 trees as a result of development, however, 223 individual trees (combination of sizes) are proposed along with areas of whip tree planting, planning for both long and short term.

The approved South Heywood Masterplan proposes to locate new residential properties adjacent to the north-western and south-western boundaries of the Heywood Stores Site – 10m boundary. The LVIA fails to consider these views.

As previously discussed, an addendum to the LVIA can be provided to assess the potential housing receptors in the land adjacent to the site. This would be a representative potential view as the outline plan is in schematic form.

The existing vegetation to the north western boundary is retained where possible and strengthened with native shrub planting, whip and tree planting.

Viewpoint 5 is taken from the adjacent field to the north western boundary. It is acknowledged that the new built form may be visible above the tree line. The development would be at its most visible from the furthest point in the adjacent field. Views of the development closer to the north western boundary will be less due to the retention of existing vegetation along the boundary and strengthening through mitigation planting. The extent of landscaping to the north western boundary is circa 17metres at its widest and 7metres at its narrowest (localised pinch point).

The landscape proposals would not adequately mitigate the adverse effects upon the landscape features and visual amenity of the future residents. The landscape buffers around the perimeter are not wide enough to accommodate a sufficient width of tree planting to filter views of the built form. There is insufficient space for tree planting to compensate for the significant tree losses which the proposed development will require.

TPM response: The closest building to the north western boundary is approximately 11m away and is earmarked for demolition as part of the proposals. The new building (unit 3) will be located approximately 42m away from the north western boundary. It is acknowledged, that the development will be higher than the existing building with the service yard located between, however, the majority of the existing boundary vegetation will be retained and enhanced with new scrub and tree planting, which as stated above is 7m wide at its narrowest, increasing up 17 metres. We feel this is perfectly adequate but in the widest area there may be scope to add in some bunding following an internal review.

The majority of trees are retained to the south western boundary with views of the industrial buildings evident in the existing views. An 11m planted buffer, comprising of native scrub with whip planting, mature trees, and 'green screen' are proposed to soften the impact of views where gaps appear in the existing trees.

Kit Patrick Proof of Evidence

ANNEX 1: LVIA Review Correspondence

Information about the Green Walls is lacking and there are concerns about the establishment and maintenance of the walls. Overall, it is considered that they are not appropriate in this instance, not a robust solution and would be prone to failure.

TPM response: The intention is not to be a formal green wall seen in urban settings and more of a naturalistic approach through green screens, instant hedging and climbers. The additional layers created by native scrub and tree planting as well as retained trees will further soften this elevation. An elevation/ section can be provided for the approach to this area if required.

Given the importance of visual impact, Russells believe Trammel Crow should provide scientifically verified photographic CGI view from the 10m off-set of the site boundary (at the rear of the approved housing) to show the difference between existing views and proposed photographic CGI views. Russells would be happy to provide access to the site for you to undertake this work, and suggest that only views with gaps in boundary trees/vegetation, and where the new largest building is closest to the approved residential, should be used, to provide a proper sense of scale, massing and impact.

TPM response: It is up to the LPA to decide the level of assisting visual information. We suggested a series of viewpoint locations to the LPA on 15th June 2022. The viewpoints were agreed with the LPA as confirmed by James Gibbs on 26th June 2022. No verified views were requested at that time. As mentioned, we can provide an addendum to the LVIA to incorporate an assessment of the potential receptors that may come forward as part of the Outline Masterplan to respond to this specific comment.

Russells are finalising a sketch up model of the existing site/buildings in situ of the proposed buildings. The uplift in scale and massing is stark, and this is before the proposed increased level changes have been included. Overall, Russells has compiled strong evidence to illustrate this adverse visual impact, which amounts so to over development.

**ANN 1.5 STUART RYDER'S REVIEW OF TPM LVIA RECEIVED 20 JUNE 2023, AND
INCORPORATING STUART RYDER'S RESPONSE TO THE BARNES
WALKER CRITIQUE OF THE TPM LVIA.**

Review of Heyward Stores Landscape and Visual Impact Assessment Information

Background

Ryder Landscape Consultants (RLC) were instructed by Rochdale Borough Council (RBC) Planning and Development Team to independently assess submitted landscape and visual assessments in support of and objecting to proposals to redevelopment Heyward Stores into three logistic warehouses.

Submitted assessments

There are two documents to consider, the Application LVA and the subsequent critique of it conducted on behalf of the Russell Homes. The two written documents that this note focusses upon are:

Landscape & Visual Impact Appraisal (LVIA), prepared BY Landscape Architects TPM Landscape Ltd for Gerald Eve originally dated October 2022 but with a Revision D from May 2023 being the current, updated version addressing initial concerns raised by Russell Homes; and

Review note prepared by Planning Consultants Avison Young that draws upon landscape review material prepared by Landscape Architects – Barnes Walker, the Avison Young note is dated 26th April 2023, the Barnes Walker material is held at Appendix 2 of the note.

Instruction

The following matters were requested by RBC;

- 1 Review of LVIA and supporting plans
 - Confirming in your objective view whether TPMs assessment is accurate and representative of the proposals impacts (accounting for the landscaping shown on the submitted plans)

- Your view on the information being suitable and proportionate for the context of the application
- 2 Review of Russell Homes objection supported by Barnes Walker
- Confirming whether the critical comments with regards to how the LVIA has been undertaken are in your view valid and require any further actions

Methodology

The Landscape Institute's Technical Guidance Note 2/20 - Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs) has been used to assess the May 2023 Revision D version of the Application LVIA.

Reading the critique prepared by Barnes Walker after reviewing the Application LVIA has allowed me to define whether the remarks are valid or not.

Site was attended on Wednesday 14th March to assess the accuracy of the stated effects by both parties.

Author

Stuart Ryder, Director of Ryder Landscape Consultants conducted this review of submitted materials. He has over thirty years' experience as a Practicing Landscape Architect and appears as an Expert Witness.

Application LVIA review

The TGN 2/20 note proposes three steps are followed before arriving at Conclusions on the accuracy and reliability of the submitted LVIA/LVA. They are;

- 1. Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;**
- 2. Checking the baseline, content and findings of the assessment;**
- 3. Checking the presentation of the assessment findings.**

What's in a name?

The submitted document is called a Landscape and Visual Impact Appraisal, or LVIA for short.

This is not the same as a Landscape and Visual Impact Assessment, also typically shortened to LVIA, which is part of an Environmental Impact Assessment (EIA).

It is easier to refer to non-EIA landscape studies as Landscape and Visual Appraisals or LVA's. I consider that the application report is a LVA as it is not informing an EIA process.

Methodology Review

The TPM Methodology is set out in Appendix 2 of the LVIA and consists of a series of tables for both landscape and visual considerations. The TGN 2/20 suggests seven review questions as reproduced below as a) to g) to assess the methodology.

a) Does the scope of the assessment meet the requirements set out in the Scoping Opinion and/or as defined in the LVIA or LVA and if substantively different, are the reasons clearly set out and explained?

We can immediately discount the need to cross reference a Scoping Opinion as this is not a development that is subject to an EIA. There is no discussion of any particular focus or instruction for the appraisal.

b) What consultations have been carried out and have responses been acted upon?

There is no reference to agreeing methodology and representative viewpoints with Rochdale Borough Council (RBC) prior to the production of the study. This is considered good practice as defined in GLVIA3, however it is recognised that at times such engagement with Local Authority Landscape Officers is not achievable if they are not in post.

However, there has been consultation with the landscape representatives of Russell Homes that prompted modifications in the appraisal as reported in Rev D of the document. This included moving two representative viewpoints (VP 9 & 10) and two additional viewpoints (VPs 11 & 12) from the proposed housing area.

c) Has the scope and methodology of the assessment been formally agreed with the determining authority? If not, why not?

Formal agreement to the scope and methodology of the assessment is not recorded as agreed with the RBC as the determining authority. This review can retrospectively identify any substantive issues with the process but ideally these matters are confirmed before the study commences.

d) As part of the methodology, has the terminology been clearly defined, have the criteria to form judgements including thresholds been clearly defined and have any deviation from good practice guidance (such as GLVIA3) been clearly explained?

The methodology as presented in Appendix 2 has a fulsome array of tables covering the principal elements of landscape and visual assessment work. In these tables terminology has been clearly defined but not necessarily all the thresholds on which judgements are based. For example there is no 'look-up' table to define the sensitivity of

receptors and how the assessor's judgements of susceptibility and value are combined to arrive at the overall judgement of sensitivity.

It does not stray from the guidance or appear contradictory to it but at times I found it difficult to follow the reasoning process of the methodology to arrive at the end judgement of effects.

e) Does the assessment demonstrate a clear understanding and provide a separate consideration of landscape and visual effects?

The study does separate landscape and visual effects but at times does mix up visual matters when considering landscape effects – one example of this is at §6.7 Para 1. Overall, the landscape and visual information and assessment are treated as separate, but interlinked topics.

f) Does the assessment demonstrate comprehensive identification of receptors and if all likely effects?

I consider there to be a shortfall of receptors identified for landscape receptors and possibly for visual receptors.

At §2.2 the study sets down how elements, characteristics and character all have the potential to be landscape receptors. However, there are no elements identified in the landscape receptors list such as the boundary trees to the site. There is inclusion of relevant landscape character information but this is mostly set as lists of published data from the original studies rather than stating what characteristics are applicable at the Site and in its context. It is therefore difficult to assess what specific characteristics should be considered as individual landscape receptors if any at all. Likewise, the Site as an entity in itself is not individually assessed.

One matter that was positive to see is the identification of bespoke local landscape character areas was undertaken to allow an assessment of effects on individual areas. However, the areas identified related back to landscape types based primarily on land use rather than defining finer grain character areas and explaining what collection of characteristics they had to give them their individual character.

With regard to visual receptors I would expect to see Zone of Theoretical Visibility (ZTV) mapping to aid the selection of viewpoints for a proposed development of this scale. The 1km visual envelope is considered too small with higher ground set to the east where publicly accessible views may be evident. Equally there may be no views at all but without considering them it cannot be decided whether they should be included or dismissed as visual receptors.

g) Does the assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?

Landscape effects are described at §6.6 to §6.9 whilst visual effects are discussed at §7.5 to §7.7, both these sections of text include descriptions of proposed mitigation measures and summary tables.

I would have anticipated lengthier sections to describe the landscape effects and why the proposed mitigation measures would reduce the identified adverse impacts. The approach for landscape is systematic in terms of looking at National and Regional character areas first before moving onto the identified local landscape character areas.

There is no discussion of cumulative landscape effects with the other consented logistics and industrial development in the area. There is reference to the precedence existing distribution buildings have and their positions are marked on some of the viewpoint photographs.

The description of visual effects on the viewpoint photography sheets contained in Appendix 1 is clear and helpful to the reader. Likewise the supplementing of VP's 9 to 12 with wireframe representation of the units also helps to clarify the extent of visual change.

Baseline, contents and findings of the assessment

a) What is the reviewer's opinion of the scope, content and appropriateness (detail, geographic extent) of both the landscape and the visual baseline studies which form the basis for the assessment of effects (supported by appropriate graphic such as ZTVs etc. as appropriate)

The landscape baseline has already been discussed above at Methodology f) and the correct character areas have been used and further local landscape character areas described. I consider the Site should be described as an entity and the individual landscape elements defined. Likewise, a better description of the Site's immediate context, sometimes referred to as the 'host landscape' would aid the understanding of immediate landscape character that would be affected by the adjacent development.

Revision D of the study recognises that the adjacent area to the Site to the south and west is going to be subject to fundamental change with the delivery of the South Heyward Masterplan

The description of the buildings themselves is generally lacking with critical information such as why it is to be set at a higher level than the current site not explained or expanded upon.

There is no ZTV mapping and a 1km extent of study area to me appears tight and more akin to residential development rather than large scale buildings.

b) Has the value of landscape and visual resources been appropriately addressed (including but not necessarily limited to) considerations of local, regional and national designations, rarity, tranquility, wild land and valued landscape.

The fact that there are no national or local landscape designations has been identified. Rarity of the landscape resource has not been addressed but this is not an issue here as neither the existing Site or the contextual host landscapes are rare in landscape terms. The perceptual landscape qualities of tranquility and wildness is identified as lacking which I agree with. There is no judgement of whether it is a valued landscape (as defined by NPPF 174 a) but this is a moot point as it is not.

Value of landscape features is briefly summarised at §6.5 as part of the buildup process for defining global sensitivity for the three local landscape character areas.

Value and quality of views is summarised as part of the discussion of individual representative viewpoints in Appendix 1.

c) Have the criteria to inform levels of sensitivity (both landscape and visual) and magnitude of change been clearly and objectively defined, avoiding scales which may distort reported results?

It is easier to see how levels of sensitivity have been defined for visual receptors than the more global approach taken to landscape receptors. As noted above at Methodology d) there is no 'look-up' table in Appendix 2 to define the sensitivity of receptors and how the assessor's judgements of susceptibility and value are combined to arrive at the overall judgement of sensitivity. Such a table is useful for consistency purposes and to allow comparison between different receptors.

d) How well is the cross-over with other topics such as heritage or ecology, addressed?

Generally, it is lacking in detail with only passing references to ecology (ecological value of the SuDS basins) and no apparent reference to heritage assets or time-depth to the landscape. It could be that there is no, or very limited heritage interest nearby but this can be stated. Likewise, if there is an identified ecological benefit resulting from the proposals this can be stated and the source material from which the judgement is gained.

e) Is there evidence of an iterative assessment design process?

There is no evidence of how the findings of the study has influenced the design of the proposals. Likewise, there is missing operational information given the LVIA about hours of use, lighting heights and levels, types of activity, why there is a need for acoustic fencing, FFL of the new buildings, architectural treatment, circulation of staff and visitors and features such as emergency access. These factors are important to help understand what operational effects would occur during the operation of the

development and how the detailed landscape mitigation proposals have responded to each.

f) Is it clear how the methodology was applied in the assessment, e.g. consistent process, use of terms, clarity in reaching judgments and transparency of decision-making?

It is clear with the visual receptors from the 12 No, representative viewpoints how the methodology has been applied and the judgements presented can be seen and understood. It is less clear for the landscape receptors as even with the use of local landscape character areas there is amalgamation which makes it difficult to understand the effects on finer grain characteristics, or individual elements.

The further complication is the anticipated change to the host landscape with the development of the South Heyward Masterplan which does not have specific final detail of what proposals are exactly where around the Site. Reasonable assumptions appear to have been made by assessing landscape and visual effects against the current undeveloped baseline and then again with the foreseeable development in place.

g) How appropriate are the viewpoints that have been used?

I consider the viewpoints to be generally appropriate with the following caveats;

Longer range views to the east may exist that lie beyond the 1km study limit and to be fully comprehensive it would be better to rule these in or out of the study. It is anticipated that there will not be any large scale effects from this distance and the possible ability to see other logistic buildings will influence the sense of change in the view.

It is correct to include VP's 11 & 12 in the study in anticipation of residential receptors experiencing the views from this area. Typically, non-publicly accessible views would not be included in a LVA study but as they will become public views they should be considered to make the study more robust.

h) How appropriate is the proposed mitigation, both measures incorporated into the scheme design and those identified to mitigate further the effects of the scheme, and mechanisms for delivering the mitigation?

The mitigation sections of both the landscape (\$6.8) and visual assessment (\$7.7) and also largely repeated as Section 8 are quite short. They do not establish the mitigation principles, what adverse landscape and visual effects they are seeking to address and how they will be delivered, established and maintained. Nor is there any reference to landscape enhancements.

However, as this is Full planning application there is a suite of eight detailed landscape drawings that show the proposals around the Site which allow an understanding of how and where screen planting is proposed.

The seven bullets of Section 8 have been reproduced below in RLC Table 1 with my assessment as to their potential effectiveness;

Proposed mitigation measure from Section 8	Comments on likely effectiveness
Retain the existing woodland and linear wooded belts that surround the proposal site currently. Replace and strengthen any lost trees with new woodland planting to retain the green infrastructure around the site. Use the landscaping of the site to enhance the biodiversity where possible;	It is a sensible and straightforward piece of mitigation to retain the existing screen trees that were planted to screen the existing buildings. However in the study where this is stated it is caveated with the term 'where possible' which leaves open the need to fell trees. New stock will obviously take time to establish to be as effective as the current planting. The new buildings will appear above the retained tree line in some views.
Incorporate new SUD's basins to support site drainage and a new ecological pond to provide new habitats and enhance the sites biodiversity value;	The enhancement to the Site's bio-diversity will depend on depth and form of the SuDS basin which judging from contours on the planting plan for that area appears deep and uniform in slide slopes. The SuDS basin will have no benefits to how the scheme is perceived from the outside as it is an internal feature to the development.
Ensure that good provision is made within the layout for green space, buffer planting and wildflower meadow areas;	The term 'good provision' is quite vague in terms of scale, or function that the green space is expected to perform. If the green space is expected to provide layers of internal screening within the development this should be stated and its effectiveness commented upon. Internal spaces as indicated will have limited effect on external screening of the proposals.
Incorporate new tree and shrub planting to strengthen landscape buffers and soften the built form;	This mitigation suggestion is the same as the first point. The shrub planting is critical to screen lower level views under mature tree canopies.
Incorporate architectural form trees within the visitors car park to add further layers of softening of the buildings whilst making an attractive setting;	This type of car park tree planting is one of the hardest to establish even with appropriate sub-surface detailing as indicated within the proposal plans. Car parking trees unless set in soft landscape areas are prone to physical impact, poor water infiltration, scorch in summer and poor micro-climate in winter. The car park design appears to have considered tree planting as an after thought rather than as integral and important part of the layout.
Acoustic barriers to be sensitively designed using green screens to soften the visual impact of the screens whilst functioning effectively for the nearby residential properties.	It is not established why the acoustic barriers are required and what they will look like. Their various heights are given but no imagery as to their appearance. It is presumed that their presence in the view is an adverse effect which is why a green screen is required in front of them. However, the form of the green screen is not fully defined.
Incorporate bunding/ batter to the south western boundary with new landscaping comprising trees and native scrub to provide screening in addition to	The proposed 1:3 bunding / batter is not a naturalistic landscape feature and will appear as artificial landform until planting upon it cloaks the

Proposed mitigation measure from Section 8	Comments on likely effectiveness
the existing retained vegetation. The landscape buffer will be wide enough to provide a dense buffer and give sufficient space for the tree species to establish successfully.	uncharacteristic land form and it is read as a bank of trees and scrub. However the difficulty of establishing woodland stock on raised embankments effectively perched above the groundwater table should not be under-estimated.

The above mitigation measures could be controlled through Planning Conditions. There are however a number of topics not addressed within the mitigation measures including;

- Minimizing of adverse effects of night-time illumination on the surrounding area;
- Building cladding options in terms of type and colour and how they could reduce the appearance of the buildings scale;
- Modifying building levels;
- Speed limits on Site to reduce engine and road noise;
- Confirmation of no use of aural bird scarers;
- Commitment to soft landscape establishment and maintenance works including ongoing re-planting of failed stock;
- Treatment of ancillary details such as site security fencing, gatehouses and visible services.

These points may be covered in other submitted application material.

i) What is the reviewer's opinion of the consistency and objectivity in application of the criteria and thresholds set out in the methodology for assessing the sensitivity of receptors, the magnitude of changes arising from the project, the degree/nature of effects, and the approach to judging the significance of the effects identified, in the case of EIA projects?

There appears to be consistency and objectivity in the application of the criteria set out in the methodology to assess the sensitivity of receptors and I can understand the professional judgements that have been arrived at for the varying landscape and visual receptors.

With regard to the magnitude of changes I consider that the assessments raised at Year 1 are appropriate and consistently applied, however the magnitude of change at Year 15 less so particularly for VP's 9 to 12.

Existing mid distance views to the west and south will effectively be screened out by the new development of the South Heyward Masterplan area. The following specific comments apply;

VP3 – Why is this view affected by the South Heyward Masterplan proposals, is there building between the visual receptor and the proposals?

VP9 & VP10 - Moderate-Substantial adverse reducing to Slight-Moderate neutral following establishment of mitigation is the descriptor of the visual effect. This suggests that there will be a lessening by two grades on the visual effect (Moderate-Substantial to Slight-Moderate) and the type of effect changes from Adverse to Neutral i.e. from a detracting change to one that is keeping the visual appearance of the area. I consider there may be a lessening of effects over time from Moderate-Substantial to Moderate but the type of effect would remain as Adverse.

VP11- Slight-Moderate adverse reducing to Slight neutral following the establishment of mitigation measures is the assessed visual effect. The tree screen here appears relatively full and in looking at the proposal drawings is to be retained. However, there will be the sense of much larger built form beyond the trees, particularly in winter views such as this. I consider the effect in 15 years, when compared against the current baseline where there is very little/ no built form influence to remain adverse in nature.

VP 12 - Moderate-Substantial adverse reducing to Slight-Moderate neutral following the establishment of mitigation measures. Again, the inclusion of more built form in terms of visible extent and height is considered an Adverse effect and would not change to Neutral as the baseline it would be judged against would be residential housing and there would be a contrast in scale and form.

The definition of 'significance' of effect is not applicable as this is not an EIA project. However the term 'notable or significant' effects is used at §6.9 in connection with landscape effects. There is no apparent definition as to what is a notable or significant landscape effect in Appendix 2 – Methodology Tables 7 or 14.

j) What is the opinion on the volume, relevance and completeness of the information provided about the development or project including, where relevant, detail about various development stages such as construction, operation, decommissioning, restoration, etc?

As already highlighted there is a lack of information about the development and its operation, nor is there a forwarding reference to other submitted documents such as the Design and Access Statement that may provide such detail. For example the provision of an access bridge into the proposed Unit 3 is not discussed at all.

k) Does the document clearly identify landscape and visual effects which need to be considered in the assessment?

This point relates more to EIA projects where the findings of the LVIA are carried forward to the Environmental Statement that reports on the EIA process and findings.

l) Have levels of effect been clearly defined and, the case of LVIA, have thresholds for significance been clearly defined and have cumulative landscape and visual effects been addressed?

The threshold for significance is not required as this is not a LVIA informing an EIA. However, the cumulative landscape and visual effects is an applicable point with them not explicitly considered by the application LVA. Existing logistic facilities would be considered as part of the landscape and visual baseline whereas proposed buildings, or

those under construction should be considered as part of a cumulative assessment. Guidance on cumulative assessment is provided by the Landscape Institute and explains the two types of cumulative effects on being able to see the two or more developments from the one location or sequentially.

Checking the presentation of the findings

a) Does the LVIA/ LVA display transparency, objectivity and clarity of thinking, appropriate and proportionate communication of all aspects of the assessment of landscape and visual effects, including cumulative effects.

There is more transparency and better presentation of visual effects than landscape effects within the LVA. The lack of finer grain establishment of landscape elements and missing description of the development do not assist in understanding the effects on the landscape character of the Site and the immediate contextual landscape.

b) Have the findings of the assessment been clearly set out and are they readily understood?

The findings of the landscape and visual assessments are summarised in Tables 1 & 2 respectively, with the descriptors given in each of the viewpoints contained in Appendix A easier to follow than discussion of landscape receptors.

c) Has there been clear and comprehensive communication of the assessment, in text, tables and illustrations?

There has been the use of text, tables and illustrations throughout the document and it is clear and legible. It could have been more comprehensive with regards to landscape receptors and boundary details. It did not need to repeat lots of the landscape character information baseline that could have been appendicised.

d) Are the graphics and/or visualisations effective in communicating the characteristics of the receiving landscape and visual effects of the proposals at agreed representative viewpoints?

Generally, the graphics are informative and assist the reader. Some may have been better scaled up to A3 and set within an Appendix.

The wireframe information is useful to assess how much of the buildings will be visible in certain of the views. It is however noted that they are not visually verifiable which reduces the amount of trust that can be placed on their accuracy.

e) Are the graphics and/or visualisations fit for purpose and compliant with other relevant guidance and standards?

Yes, and with the confirmation that the wireframe modelling is not to a visually verifiable standard then it does not comply with Level 3 photo-representation. Most of the viewpoint photography in Appendix 1 would be classed as a Level 1 photo-

representation. They would benefit from identification of landscape elements to aid the reader who is not as familiar with the Site as the landscape practitioner is.

f) is there a clear and concise summation of the effects of the proposals?

Section 9 titled Summary and Conclusion provides a summary of landscape and visual effects. It is clear and concise but may benefit from linking to other parts of the study and summarizing how the key parts of the LVA process has been taken forward in the development of the proposals.

Report the Review

The TGN 2/20 document recommends that a short report is prepared under the nine headings used below;

1. Confirmation of the brief issued to the reviewer setting out the scope of the review.

The brief was two-fold with Stuart Ryder of Ryder Landscape Consultants appointed to:

- Review the adequacy of the submitted application LVA prepared by TPM on behalf of Gerald Eve, dated March 2023 and associated supporting drawings and
- Consider the critique of the same LVA prepared by Barnes Walkers on behalf of Russell Homes to establish which, if any, of the points that it raises have legitimacy.

2. A summary of how the review was undertaken.

The review was undertaken following the questions laid down in the The Landscape Institute's Technical Guidance Note 2/20 - Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs) has been used to assess the May 2023 Revision D version of the Application LVIA.

This included reviewing the LVA document, considering the plans and photography it included and doing the same for the Barnes Walkers critique.

3. A summary of findings of the review of the assessment methodology;

The review of the TMP methodology found that:

- The methodology process was not for an EIA which is acceptable as the project is not deemed to breach EIA thresholds;
- There was no reported liaison between TPM and Rochdale Borough Council prior to the study being produced;
- There has however been subsequent liaison and updating of the study in response to comments raised by Barnes Walker acting on behalf of Russell Homes who are developers of residential plots in the South Heyward Masterplan to the south and west of the Application Site;
- Terminology and ratings are clearly defined in Appendix 2 in multiple tables, but what is less clearly defined is the process used to arrive at the judgements as presented;
- The study clearly considers landscape and visual matters as two separate topics as recommended in the Guidelines for Landscape and Visual Impact Assessments – Third Edition (GLVIA3);
- The study is more comprehensive and clearer with regards to visual matters than it is with regards to landscape effects. There is considered to be a finer grain of landscape elements

that could be included and possibly more visual receptors if the study area is expanded beyond 1km.

- Generally, there is clarity and transparency in its reasoning but greater detail on landscape effects could be provided.

4. A summary of findings of the review of the scope of the assessment:

- That there is considered to be more landscape receptors such as the Site itself and the elements such as trees on Site that should be assessed. There may be more visual receptors that exist beyond the 1km study area.
- The value of identified landscape and visual receptors are discussed but not whether the Site or its landscape context are 'valued landscape' as per NPPF 174 a), in my opinion neither are.
- The constituent parts that assessors use to determine receptor sensitivity are there but would benefit from a clear sensitivity look-up table that combines value and susceptibility judgements. Such a table will help demonstrate consistency of sensitivity definition and allow others to repeat the process.
- There is a general lack of cross-over with other topics such as ecology and heritage.
- There is no evidence or statement of the LVA being part of an iterative design process where findings from the LVA have been used to modify the proposals.
- There is a greater level of clarity with regards to the representative viewpoints used to illustrate visual receptors than landscape receptors.
- The representative viewpoints are considered appropriate but there may be more from over 1km away.
- There is a lack of description as to the form and operation of the development.
- Mitigation measures are perhaps over simplified and only address planting and no other elements of the proposals such as cladding, lighting and finished floor levels.
- Generally there is a consistent approach across the study but I disagree that some of the visual effects at 15 years would be neutral in type but would be adverse in nature.
- There is no consideration of any cumulative effects or ruling them out if they do not occur.

5. A summary of findings of the review of the actual assessment of effects

The actual assessment of effects is considered to be reasonable with the exception of the type of effect identified at viewpoints 9 to 12 where the type of visual change after 15 years is considered to remain an Adverse effect instead of a Neutral one.

6. A summary of findings of the presentation of the assessment

The presentation of information is considered better for the visual receptors and the discussion of the representative viewpoints is good and clear. The landscape receptors are less well described and presented but still understandable. Some of the landscape character information could be placed in an Appendix and the applicable parts to the Site drawn out.

7. A summary statement by the reviewer in respect of appropriateness, quality, comprehensiveness, compliance and conformity with relevant guidance and regulations;

I consider the LVA to be appropriate and of sufficient quality to allow the landscape and visual effects of the proposed logistic buildings to be reported upon. It could be more comprehensive with regards to considering a finer grain of landscape receptors and in describing the mitigation proposals more thoroughly. I consider that it does comply with GLVIA3.

8. Recommendations for further information to be sought (if necessary); 4

If you are minded I would suggest that further information or confirmation of the following would aid the thoroughness of the study. None of the points are fundamental or substantive in nature and the LVA could still be used in its current form to allow you to determine the application.

- Finer grain of landscape receptors – trees on Site being one example and the Site another;
- Identification and assessment of an visual receptors beyond 1km – but likely to be minor visual effects given distance and precedent of other logistic buildings in the view;
- Assessment of any cumulative effects if any exist;
- Fuller description of mitigation measures and the duration that they will take to achieve an effect;
- Landscape benefits of the scheme to allow them to be taken into account in the planning balance.

9. Overall conclusions on the adequacy of the assessment and whether it is sufficient to support making an informed planning decision.

The LVIA provides an adequate assessment of landscape and visual effects and it should be considered as sufficient to support RBC making an informed planning decision. The five additional items listed in Section 8 would further aid the Planning Officer's understanding of effects and any members of the public, or adjacent landowners who are concerned about the scheme's landscape and visual effects.

The following table has been presented as a way of capturing feedback when the LVA was being read and reviewed. It deploys a simple coding to the reference number to highlight which issues are Major – Red, Moderate – Orange or Minor – yellow to aid the understanding of the level of concern regarding each point. You will note that there are few red boxes and most are orange or yellow.

Ref No	Report Ref	Nature of observation / feedback
1		Lack of ZTV and limiting study area to 1km..

Kit Patrick Proof of Evidence
ANNEX 1: LVIA Review Correspondence

Ref No	Report Ref	Nature of observation / feedback
2	Section 5	Reproduction of published landscape character information but no testing of its applicability to Site.
3		The three local landscape character areas are predominately defined by land use or could be classed as landscape types in the area.
4		Why is the FFL of the development so much higher than at the moment? No explanation given
5	6.7	Mixing landscape and visual effects up.
6		Better description of the Site's elements and overall characteristic would benefit landscape appraisal.
7		Are there are any landscape benefits to put into the planning balance?
8	6.9	Where are the definitions for notable or significant effects?
9	Section 7	Why are some residential receptors classified as having a High Sensitivity and others Medium / High
10	Section 7	Visual receptors are always people and not such things as paths or houses.
11		Direction of travel point is not fully explained, is one worse than the other?
12	9.1	Landscape effects may not physically extend out of the Site but can influence the character of nearby land.
13	9.1	What empirical data backs up comments on existing scale and height?
14		Cumulative landscape and visual effects may aid the understanding of why the proposals at this scale are considered in keeping with existing landscape character, if there are none they need to be ruled out
15	VP2	Is this the actual publicly accessible footpath.
16	VP12	Is the front, long rectangle in wireframe the proposed acoustic barrier – labels picking out Unit Nos. and key features would assist

ANN 1.6 STUART RYDER'S REVIEW OF BARNES WALKER CRITIQUE OF TPM LVIA
RECEIVED 20 JUNE 2023

Review of Barnes Walker critique of the TPM Landscape and Visual Appraisal

Purpose of note

To decide which if any of the remarks and issues raised by Barnes Walker acting on behalf of Russell Homes carry merit and need to be considered in the planning balance.

Methodology

The Barnes Walker critique table and notes were read after completing the review of Rev D of the TMP application LVA so they did not colour or influence my own independent reading of the LVIA.

Format

A table overleaf presents this 'critique of a critique' and is shorter than the LVA review note. It concentrates on the points raised in the Barnes Walker table of comments. After summarizing the individual point of criticism, I pass remarks of my own as to whether it is a genuine concern or fault of the LVA and state whether I:

- Strongly agree with the criticism;
- Agree in part with the criticism;
- Disagree and think the LVA is correct; or consider there is
- No validity to claim.

If I think there are further actions or points to put to the Applicants, I have placed these in an end column titled – Actions if any.



Review of comments made by Barnes Walker on the TMP application LVA for Hayward Stores redevelopment.

No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
1	4.3 Landscape receptors	Site elements - That the Site elements have not been included in the original application, or updated LVA.	Strongly agree – this is noted in my response to Rev D of the LVA and would assist in understanding the full range of landscape effects.	TMP – to include site elements and Site as an entity in itself
2	4.6 to 4.8	Sensitivity of Site elements - Understating the landscape sensitivity of the Site as Low and it should be reviewed using TGN 1/21 – establishing landscape value outside of the National Landscapes in England.	Partly agree – I think TGN 1/21 would not assist greatly as that seeks to establish ‘valued landscape’ as per NPPF 174 a). The inclusion of site elements and the overall Site itself in the list of landscape receptors, along with a look-up table of how TPM combine landscape value and susceptibility would be more effective an establishing relative sensitivity of the receptors.	TMP - to include site elements and Site as an entity in itself and establish the landscape sensitivity for any additional receptor.
3	4.9 & 4.10	Tree loss – The quantum of trees removed from the Site is quoted and percentages calculated to show the scale of loss of and change to the character of the wider Site.	Strongly agree – this should be considered as an effect of the development and how it leads to a change in perception of the Site as a whole. This can be done by having trees as a separate landscape receptor.	TMP – to include site elements and Site as an entity in itself
4	4.17	New residents of the Russell Homes scheme	Partly agree – VP12 is taken at a distance of	TMP – could photograph



No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
		– VPs 11 & 12 are welcomed to help demonstrate the effect on new residential receptors VP12 is not considered at the correct distance of 10m to show close to effect.	75m to the built form and is useful to understand the appearance of the current storage buildings at this distance, closer views may not be as useful to show the wider character from this location.	from 10m but winter conditions have now passed
5	4.18	Understatement of visual sensitivity for prospective residential receptors – BW query why the new residents would only have a Medium-High level of sensitivity and not High	Partly agree – There is no explanation in the updated LVA as to why the new residents are given a Medium – High level of sensitivity and the existing residents (VP 9 & 10) a High level.	TMP – could explain their judgements as to visual value and susceptibility and tie back to a look-up table.
6	4.24	North western landscape buffer – pine trees provide limited screening and AIA notes will be partly removed for construction.	Partly agree – The photograph at Contextual Photo A and VP11 indicate that the pines now they are reaching maturity do not provide low level screening and require a good scrub understorey to form an effective visual barrier. The screening proposals are however clearly shown on the planting plans.	TMP – Ensure landscape proposal drawings are adequate in terms of width and planting mix.
7	4.24 Continued	North western landscape buffer – Section DD at the pinch-point does suggest a buffer that is only 5m wide and that the ground on the inside of the Site's boundary would be lowered requiring the removal of more trees.	Strongly agree – A 5m wide tree belt will not be effective at screening the large Unit 3 building beyond the boundary, particularly if the planting is all new if existing stock has to be felled for road levels. Initially I looked at	TMP – This is a narrow part of the buffer which will allow sight through it to acoustic wall and the building. Has purchase or placing Public Open Space on



No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
			Landscape Masterplan 101 Rev F that indicates a broader green swathe to north west boundary compared to Dwg 206 Rev A. However, on closer inspection the seem if the indicated existing vegetation on masterplan drawing is set outside of the redline boundary.	the west side of the boundary been explored with Russell Homes?
8	4.24 Continued	North western landscape buffer – questioning height and effectiveness of species chosen to screen building and wall.	Partly agree – The choice of tree species is not the quickest growing with holly and oak being slow to establish and thrive. The use of larger trees would add a greater screening presence but can go into stasis and not put the height or screening cover on that quicker growing smaller stock such as poplar or certain maples provide.	TMP – Through the detailed design process and planning conditions provide a quicker growing and more effective tree mix
9	VP 11 – Visual Effects	VP11 Visual effects – considers that the Low magnitude of change assigned to new residents is an under assessment	Partly agree – Magnitude of change is just that change and if there are no residents yet to experience the change it is difficult to ascribe a magnitude to them. I have sympathy with the consideration that it will not be a ‘Low’ magnitude of change as the acoustic wall to the rear of this wooded area will create a dark solid, uniform height feature within the woodland.	TMP – The effectiveness of this buffer area is key to the residential amenity experienced by residents. If houses were already built would the boundary treatment be any different?



No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
			The ability to see the building will depend on how many trees from the rear of the woodland block are removed. Summer leaf cover will aid screening.	
10	4.23	Southern landscape buffer -recognise that Unit 3 has been pulled further into Site and suggests that it needs to be retreated further and reduced in height as well. The roadway set behind the bunded retaining wall will assist in screening HGV movements.	Partly agree – The southern boundary planting is hampered by the presence of the triangular SuDS basin. Some basins can actually be planted with damp tolerant trees species such as alder and willow but this basin appears quite deep which restricts such planting. Overall, its width does appear limited and the ability to create an adequate depth of planting to foil the view to the new buildings behind is doubted.	Creating space on Site for a wider southern planting boundary would require a reduction in building sizes. Alternatively, negotiation could be had with neighbouring land owners to sell a strip of land to allow planting.
11	4.23	Southern Landscape buffer – proposes the bunded retaining wall continues along the whole of the southern boundary.	Partly agree – The SuDS basin does prevent the more effective screening solution from continuing down the southern boundary. As space is such a premium the SuDS basin could be removed and replaced with a crate system under the main staff car park.	
12	4.23	Southern landscape buffer - overshadowing	Partly agree – planting of large screening tree varieties close to a property boundary can	



No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
			lead to direct overshadowing; Shade cast from the sun's transit will likely be less problematical as the buffer planting is to the north of the proposed housing.	
13	VP12	Viewpoint 12 and greater visual effects	Partly agree – As expressed in my review of the LVA this visual effect after 15 years could be considered as remaining adverse in nature, The tree line is only partial and much of the stock is already mature. The gaps could be filled in by new planting but it would not have achieved a height approaching the current mature tree level. Nor will the current mature trees grow sufficiently to screen off the additional height of the proposed units. Care has to be taken to not judge the change in view against the current open field but it needs to be assessed against the sense of new residential development with the proposals set within the interior of a built-up area rather than on the edge of a green field location. Instead of contrast with an open field there would	RBC – review the physical and visual linkages between this site and other large logistic buildings to consider if in spatial planning terms there is sufficient to link them together or whether it looks like the wrong building in the wrong place.



No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
			be a degree of contrast with residential settlement in terms of scale and building heights. The degree of separation from other large scale logistics buildings then becomes important so that it can be perceived as part of the greater collection of the Heyward Distribution Park or as a collection of 'outlier' units set within a residential area.	
14	Visualisations	Provision of accurate visualisations	Strongly agree – The proposals are of such a scale and contrast with existing residential areas that they merit the production of accurate visually verified images (VVI's) produced to recognisable guidelines to achieve Level 4 status in the Landscape Institutes TGN 6/19.	TMP / Gerald Eve to commission VVI's from a limited number of agreed viewpoints
15	Green screen	Discussion of green screen to the acoustic barrier – querying 5m high system of instant hedge and stainless steel tope system for climbing plants or pre-grown 3m high system manufactured by Mobelaine.	Strongly agree – As landscape planting features both these systems are domestic in focus and I have not seen their use on a large site. There is a recognisable risk that the screen that is being proposed to screen the screen is itself visually intrusive. Both systems are anticipated to be establishment	TMP – Re-think on how best to screen long lengths of acoustic barrier and whatever solution or solutions that is arrived at how they are going to be maintained along with the acoustic barrier they are



No.	TMP Ref	Summary of Barnes Walker critical comment	SR Response to comment	Possible Actions (if any)
			intensive and as previously discussed set anything on a mound perches them above the grounds natural water table. A maintenance and management plan is yet to be provided.	seeking to disguise.

In summary

Even though in my review I identified two categories – ‘Disagree and think the LVA is correct’ and there is ‘No validity to claim’ I found myself not using them

The concerns expressed by Barnes Walker are largely fair and raise a number of similar points to those that I raised in my independent review of Rev D of the application LVA. They are at times solely interested in the effects on the consented housing areas but this is understandable. I found there to be assertions about harm to the amenity of new residents that are not as helpful to understand the effects of the proposals than the simpler analysis of detail.

As an exercise it is a little abstract at times to consider effects for visual receptors who are not yet there and provision of a masterplan layout may assist in defining the likely landscape and visual effects with greater clarity.