

Tritax Symmetry (Hinckley) Limited

## **HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE**

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### **The Hinckley National Rail Freight Interchange Development Consent Order**

Project reference TR050007

### **Applicant's Comments on Local Impact Reports [Appendix A – Applicant's Response to LUC Design Review]**

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**24 October 2023**

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Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009  
Regulation 5(2)(q)

**Response to the Landscape Design Review**  
**Prepared by LUC in respect of Hinckley National Rail Freight Interchange (HNRFI)**  
**October 2023 v.5**

**Introductory Remarks**

1. The purpose of the Review is stated as being to:
  - i) help inform BDC and HBBC’s judgement with respect to the quality of the landscape design; and
  - ii) establish if the Applicant’s scheme can be deemed ‘*good design*’ in relation to national and local planning policy.
2. The appraisal undertaken by LUC is structured to respond to the ten characteristics of a ‘well designed place’ as set out in the National Design Guide.
3. It is considered unfortunate to the Applicant that the Councils did not provide this Landscape Review in response to the informal stages of consultation and, notably, in response to the statutory consultation. The issue of design has not been raised during many informal Working Group meetings with the LAS until following the recent appointment of LUC by the Councils. The Applicant has hence not been able to respond to such comments in the submission of the application for a DCO.

**The principles of planning policy and guidance**

4. Any statement of planning policy and guidance, whether national or local planning policy, are to be interpreted objectively in accordance with the language used – read, as always, in its proper context (*Tesco v Dundee City Council* (Respondents) (Scotland) March 2021).
5. It is not disputed that the provision of the National Design Guide may be a matter which the Secretary of State considers both important and relevant to the decision on HNRFI (Section 104 Planning Act 2008). The Design Code (Document Ref 13.1 – V4) has been prepared in conjunction with the Design & Access Statement. The role of the Design Code is to establish a series of design guidelines for HNRFI which will assist in ‘*shaping the development of the site.*’ This underlying purpose is achieved by:
  - Providing clear design guidance on the character and quality of development;
  - Providing coding which both the local planning authority and developers can use to ensure a consistent level of quality is achieved over the entire development;
  - Ensuring consistency and co-ordination between the various parts of the development;
  - Providing clear guidance for assessing response to site tenders and guidance for assisting in determination of the detailed planning application.

6. Landscape Vision for HNRFI is set out at paragraph 1.4 of the Design Code comprising:

*'The combination of the proposed architecture, built form vernacular and structural landscaping that respects and enhances existing vegetation and works with the scale of the built form will create a development with strong identity.*

*Key to achieving this will be the realisation of a high-quality environmental setting and public realm organised around strong design principles.*

*In combination, the architecture and the landscaping of the site will create a safe and welcoming environment for new employment facilities.*

*The development has been designed to respond to the arboriculture, ecological, landscape, visual, hydrological, and topographical constraints of the site, and where possible, retain and enhance the existing green infrastructure as part of the development proposal.*

*The proposed landscape will provide a fully landscaped setting which enhances the local landscape character, generates opportunities for ecological diversity, as well as reduces the potential impacts of the proposal on the landscape, as well as on arboriculture and ecology.'*

7. As the primary basis for decision-taking on HNRFI, the criteria for 'good design' are provided at paragraphs 4.28 – 4.35 of the NPS-NN. Further guidance on 'scale and design' is provided at paragraphs 4.88 – 4.89.
8. In the context of HNRFI, it is fundamental to acknowledge that a DCO is sought for HNRFI pursuant to the principles of a Parameters Plan – which defines broad land use principles for the provision of a SRFI, in accordance with the principles of the Rochdale Envelope.
9. As it 'says on the tin', a Parameters Plan does not establish the details of the individual components of HNRFI, including buildings; road design; landscaping and infrastructure. Rather, the Parameters Plan establishes broad principles for the development, including the identification of development zones; the location of the rail port; arrangements for buildings to be rail served and provision for structural landscaping.
10. The details of HNFRI will come forward pursuant to the proposed Requirements – notably Requirement 4 'Detailed Design Approval'. The detailed provision for landscaping will be made not only in the context of the provision for structural landscaping (identified on the Parameters Plan), but also as a component of highway design and the development of phases and individual buildings.
11. An Illustrative Masterplan has been prepared to accompany the DCO application. This represents a possible pattern of buildings which satisfies the Parameters Plan. It is probable that detailed building design will be made pursuant to bespoke occupier requirements. In

consequence, the layout – including provision for landscaping – will be influenced by the particular building space requirements of potential occupiers.

12. It is considered unreasonable to have expected the Applicant to ‘drill down’ at the DCO stage of development management to the level of detail which appears to be suggested by LUC.
13. It is considered to be a fair and balanced comment to acknowledge that the NDG is, essentially, focussed upon the residential environment. None of the illustrations in the NDG relate to industrial or logistics developments. In consequence, the ‘ten characteristics’ of a well-designed place should be applied proportionately to the particular form of NSIP development.
14. The NPS-NN states at paragraph 4.29:

*‘Visual appearance should be a key factor in considering the design of new infrastructure, as well as functionality, fitness for purpose, sustainability and cost’*

15. The Draft National Planning Policy Statement for National Networks March 2023 (eNPS) similarly recognises this relationship and states at paragraph 4.26 (the preceding paragraph to the reference to the NDG) that:

*‘In light of the above, scheme design will be a material consideration in decision making. The Secretary of State needs to be satisfied that national networks infrastructure projects are sustainable, having regard to appropriate industry good design guidance, and the applicant has considered, as far as possible, **both functionality** (including fitness for purpose and sustainability) and **aesthetics** (including the scheme’s contribution to the quality of the area in which it would be located).’* (Emphasis added)

16. The Design Review does not refer to the word ‘functionality’ which is a fundamental consideration in the context of a SRFI which comprises a rail port, with features that will have a significant visual presence – such as shipping containers, and very large-scale warehouses to function as national or regional distribution centres.
17. The NPS-NN acknowledges these built form characteristics at paragraph 4.30, stating:

*‘It is acknowledged however that, given the nature of much national infrastructure development, particularly SRFIs, there may be a limit on the extent to which it can contribute to the enhancement of the quality of the area.’*

18. The statutory definition of a SRFI requiring a land area of at least 60 hectares (Section 26 Planning Act 2008) will necessarily have a significant impact upon the location where it is to be located – with opportunities for viable locations to be brought forward by developers recognised to be ‘limited’ (NPS-NN paragraph 2.56).

19. The Local Authorities have agreed (Statement of Common Ground on Planning Matters that a location for a SRFI cannot be accommodated within the existing urban areas. In consequence of the ‘*transport links and location requirements*’, the NPS acknowledges that ‘*it may be that countryside locations are required for SRFIs*’. (NPS-NN paragraph 2.56)
  
20. In accommodating a SRFI within a countryside location, the built form will necessarily – by reason of scale and design – be quite distinct to the pattern of development in nearby villages, and the scale and design of typical residential development (say, 2 storey brick and tile/slate dwellings). None of these design characteristics can be replicated within a SRFI.
  
21. The approach to ‘good design’ is set out at paragraph 4.31 of the NPS-NN, namely:
 

*‘A good design should meet the principal objectives of the scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts. It should also mitigate any existing adverse impacts wherever possible, for example, in relation to safety or the environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account capital cost, economics and environmental impacts.’*
  
22. The Parameters Plan (and the Illustrative Masterplan) has been prepared by architects with extensive experience in the functionality of modern logistics development. A J Architects have been assisted in the preparation of the Parameters Plan with the expertise of a range of specialist consultants for technical and environmental design considerations.
  
23. It is submitted that the Design and Access Statement ‘Design Code’ and Parameters Plan have had regard to the principles described in the National Design Guide proportionate to the decision taking for this DCO application.
  
24. TSH has responded to the comments within the LUC Landscape Design Review, August 2023, v3, and the Design Code, Reference 13.1-V4 has been updated accordingly to reflect the comments made either with new / additional information, or direction to where the point had already been addressed.
  
25. The following table identifies the comments made and the location where the point has been addressed. With the focus of the Design Review being on the quality of landscape design, the following representations are made. This is presented in a tabular format for ease of cross-referencing.

**Table 1**

LUC Landscape Design Review Section / Page Reference	Commentary	Updated Design Code Reference or note.
1.2 Core Documents, Pg6/7	<p>The preparation of the Design Code in conjunction with the Design and Access Statement set out its purpose at paragraph 1.2. The underlying purpose of the Design Code is to ensure design clarity of HNRFI and to enable swift delivery of development through the detailed planning process. The preparation of the Design Code had regard to best planning practice in the consideration of the components of good design. In so doing the Design Guide had regard to the 10 characteristics of well designed places, proportionately to the required functionality of a SRFI, as a national network.</p> <p>TSH has now updated the Design Code to reference the same documents that LUC has used to make their assessment, being the National Design Guide (NDG); the National Policy Statement for National Networks (NPS-NN), and the National Model Design Code (NMDC), Parts 1 and 2.</p>	1.3, pg 4
2.0 Appraisal of the Proposal, Pg 9	TSH acknowledges that the 10 defining characteristics set out in the NDG can be an appropriate method by which to appraise and inform both the parameters plan and the Design Code, but it must also be recognised that it, and the other documents referenced, don't specifically address the requirements of an SRFI.	1.3, pg 4
2.1 Context, Pgs 10 and 11	<p>In the appraisal of the context of the site, LUC have omitted to reference the two major pieces of national infrastructure in the existing railway line and M69 / J2 interchange. TSH has made specific reference to these elements, as they are two of the prime requisites for determining whether an SRFI has been located appropriately.</p> <p>The NPS-NN acknowledges that sometimes it is not possible to locate an SRFI within an existing urban context and development within the countryside may be required.</p> <p>TSH confirm that the parameters plan was developed in the same evolutionary manner as the illustrative masterplan, part of the same Statutory Consultation process and developed alongside it and notes to confirm same have been added into sections 3.1 and</p>	<p>2.1,2.2.1,2.2.2 Pgs 6 and 7</p> <p>3.1 pg 11 and 4.1 pg 13</p>

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	<p>4.1 of the Design Code. THS confirm that the Parameters Plan was developed in the same evolutionary manner as the Illustrative Masterplan, and formed part of the material used in the informal and formal stages of consultation. Accordingly, notes have been added to Section 3.1 and 4.1 of the Design Code.</p>	
<p>2.2 Identity, Pgs 12 and 13</p>	<p>The characteristic defining notes taken from the NDG, NPS-NN and NMDC focus on communities and neighbourhoods, which, if extracted and taken literally would be difficult, if not impossible to achieve as part of an SRFI. The NPS-NN recognises this and sets out how SRFI's should be reviewed differently from residential or smaller scale mixed use developments.</p> <p>Similarly, extracting the comment from the NMDC document stating that 'all new buildings should take into account the architectural character and materials of the surrounding area' doesn't recognise the style, form and requirements of an SRFI and associated buildings, and that these don't confirm to a local vernacular.</p> <p>There is acknowledgement that TSH has created an identity for the scheme within the Design Code, but in stating that it is foreign to the landscape does not recognise the identity that an SRFI requires. The identity of an SRFI is determined by the rail infrastructure; the buildings and associated infrastructure that serve it and the compelling national need. Its purpose is then to create a sense of place within which, people want to work whilst respecting the existing surrounding uses and context as far as possible.</p> <p>This has been made clear and set out within the Design Code.</p> <p>With regard to the heritage comment, it is not possible to recreate a rural aesthetic within the main HNRFI site, however TSH will provide for the planting of native tree species and hedgerows within the park. Outside of the main HNRFI site, EDP have recognised the character of the existing landscape and the</p>	<p>4.1, pg 13 and 11.1 pg 26</p>

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	extension to Burbage Common and publicly accessible spaces respond in this manner.	
2.3 Built Form, Pg 14	<p>The extracts from the NDG note the criteria for well-designed places, and each of the three bullet points are already addressed within the design for HNRFI, albeit the overall scale of the Proposed Development needs to be recognised, as calling for a development to be walkable, which it is, is also relative and sometime alternative means of movement may be more appropriate.</p> <p>The design does provide recognisable streets and spaces, which provides and promotes way finding; safety and accessibility. All of these features are already noted in the appropriate coding sections 02, 03 and 04.</p> <p>The sense of place is provided by the cohesive approach to the individual building designs, direction to principal points of access and will be fully inclusive.</p> <p>The note on plot-ratio however cannot be incorporated into the code, as responding to particular occupiers' requirements may mean that some units and in particular, the rail connected units, may need to be in excess of &lt;0.5.</p>	<p>Section 6, Design code 02, pgs 16 and 17, Section 7, Design code 03, pgs 18 and 19, Section 8 Design Code 04, pgs 20,21 and 22.</p> <p>Section 11, Design Code 07 pgs 26-31</p>
Section 2.3, Scale and Massing Pg15	<p>The LUC assessment, appears to use the nine illustrative buildings as a definitive. The fact is, there could be any number of other permutations on unit numbers and sizes, as is recognised on the Parameters Plan, which will affect the overall scale and massing of the final development.</p> <p>LUC are correct in their statement that the massing would not relate to the local area, but it has to be measured in the context of the functionality of a SRFI, and for that, the units shown are entirely appropriate and are designed to appeal to the widest range of</p>	NOTE



<b>LUC Landscape Design Review Section / Page Reference</b>	<b>Commentary</b>	<b>Updated Design Code Reference or note.</b>
	<p>occupiers to ensure a successful, occupied development.</p> <p>The comments on the streetscape are picked up within the Movement section.</p>	
Section 2.3, Hierarchy, Pg 15	<p>Contrary to the LUC comment, there is a street hierarchy, and this is already defined within the Design Code, in Codes 02, 03 and 04, picking out the A47 link road and the internal distributor roads.</p> <p>The scale of highways is appropriate to the scale of development which are served and provide safe use by all means, and similar scale highway infrastructure can be seen at other SRFI locations such as DIRFT, East Midlands Gateway and iPort, Doncaster</p> <p>Signage for way-finding will form part of the detailed proposals and enable safe navigation by all visitors.</p>	Section 6, Design code 02, pgs 16 and 17, Section 7, Design code 03, pgs 18 and 19, Section 8 Design Code 04, pgs 20,21 and 22.
Section 2.3, Urban Grain, Pg15	<p>Similar to the previous comments made, when reviewing the comments on the existing field pattern, applying smaller scale development Urban Grain principles to an SRFI simply isn't feasible given the technical and physical constraints on rail track level and gradient design that an SRFI scheme imposes, as well as the size and scale requirements of the buildings to serve it.</p> <p>Similarly, the rail connected buildings need to respond to those same level and gradient parameters with limited deviation, which is recognised by the levels noted within the parameters plan from them and operate correctly at the same.</p>	Section 3, pgs 11 and 12
Section 2.3, Relationship, Pg15	<p>Appreciation that LUC recognises the good practice of allowing for buffer planting and screening to the edge of the development. This is a large site, and the distances of buffer planting necessarily vary depending on the location. The work that EDP have undertaken addresses these conditions and the results of which have been incorporated into the evolution of the Parameters Plan and illustrative masterplan.</p>	NOTE
Section 2.4, Movement, Pg16	<p>Referencing the extracts from the NDG, the network is designed to be safe and accessible by all, with</p>	Section 6, Design code 02,

<b>LUC Landscape Design Review Section / Page Reference</b>	<b>Commentary</b>	<b>Updated Design Code Reference or note.</b>
	<p>different types of user segregated from each other, and this is already noted in the coding for the road designs.</p> <p>Other methods of transportation are encouraged with 100% access for pedestrians, cyclists, and a dedicated bus lay-by, all of which, is again, already within the coding.</p> <p>The scheme does promote activity and social interaction, with the provision of the walking network, new bridleways, and public footpaths, well-being zones with rest stops and exercise equipment. Again, this is already within the coding for the roads and also the ancillary elements.</p> <p>The scheme does include green infrastructure, avenue tree planting and bio-diversity enhancement, some of this is covered by the landscaping strategy, but is also covered by the existing design code sections for the development plots and road design.</p> <p>Responding to the extract from the NPS-NN in relation to the Public Rights of Way (PRoW), TSH has prepared a full section on the new Bridleway and PRoW within the Design Code stating how TSH propose to address this. This has also been responded to separately with the PRoW section of the application.</p> <p>The note from the Good Design Guide, does not reflect the requirements of an SRFI nor can the existing road network be maintained / reflected in the design. However, TSH provide a fully joined-up solution for providing network links to the wider area by all methods of movement.</p>	<p>pgs 16 and 17, Section 7, Design code 03, pgs 18 and 19.</p> <p>Section 12.11, pg 35</p> <p>Section 9, Design code 05, Pgs 23 and 24</p> <p>Section 8 Design Code 04, pgs 20,21 and 22.</p>
<p>Section 2.4, Existing PRoW, pg 17</p>	<p>TSH are re-routing the existing PRoW where they interact with the main HNRFI site. Similarly, where level crossings form part of existing routes, they are proposed to be closed, following discussions and agreement with Network Rail. It is not true that TSH are directing the public along the internal estate roads. TSH is not precluding the opportunity to do so, but directional signage, will, in the first instance, lead the public to and around the site, through the landscape corridors of the new Bridleways.</p>	<p>Section 8 Design Code 04, pgs 20,21 and 22.</p>

<b>LUC Landscape Design Review Section / Page Reference</b>	<b>Commentary</b>	<b>Updated Design Code Reference or note.</b>
Section 2.4, Permeability and Connectivity, pg 17	The scheme has been designed to route people, in the quickest and safest way to their destination. The routes have been prioritised deliberately and this links back to the comments on street hierarchy. The roads have been designed appropriately for the types of users.	NOTE
Section 2.4, Scale, pg 17	It is inevitable, that with an SRFI, vehicular use will be the predominant mode of transport for the new road infrastructure, however all roads promote and identify their use by alternative means, and do so in an appropriate and safe manner, limiting interaction and guiding users to their destination. This is all written into the existing coding sections.	Section 6, Design code 02, pgs 16 and 17, Section 7, Design code 03, pgs 18 and 19.
Section 2.4, User Experience, pg 17	Users can navigate along the internal estate roads and A47 link corridor. This is not the primary redirection for those that come from the surrounding area and wish to pass through the site. This is proposed to be along the new landscaped bridleway corridors. This new provision also means that users, that were previously deterred by having to walk along Burbage Common Road, can now use the far safer bridleway corridors around the perimeter of the development.	Section 8 Design Code 04, pgs 20,21 and 22.
Section 2.5, Nature, pgs 18 and 19	It is acknowledged that the majority of existing landscape features are lost as a result of the proposed development. The early iterations of the masterplan retained the watercourse through the site and much of Burbage Common Road Hedgerows which are designated as a potential Local Wildlife Site. To retain these features, several plateaus were required across the site to maintain a gradation of levels. Subsequent design evolution to improve the functionality of the site, increasing the size of the rail port and the number of rail connected units, precluded the ability to maintain a gradation of levels across the site. Thus, the current 2 plateau system was developed which led to the need to divert the watercourse and remove all vegetative features within the earth works of the HNRFI Site. Therefore, very few landscape features will be able to be retained with the exception of those habitats and features at the margins such as the Semi-improved grassland along the boundary with the M69.	

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	<p>The landscape and ecological strategies evolved with this design progression, TSH commit to deliver a 10% biodiversity net gain for the project and additional land being brought into the DCO as well as secured offsite to deliver this commitment.</p> <p>The proposed Western Amenity Area creates a generous natural separation between the Main HNRFI Site and provides an extension to the existing public open space at Burbage Common. This Western Amenity Area extends to approximately 22ha both north and south of the railway line which represents 25% of the area of Burbage Common and Woods Country Park. It is of note that overall, green and blue open space accounts for approximately 28% of the Main HNRFI Site and A47 Link Road Corridor combined and approximately 20% of the Main HNRFI Site.</p>	
<p>Section 2.6, Public Spaces, pgs 20 and 21</p>	<p>Referencing the extracts from the NDG, TSH has included for a number of wellbeing zones, that include activity equipment, and this has been referenced in the existing design code.</p> <p>The reference to park squares is not appropriate to the development of an SRFI, however TSH has created a whole new area of public open space and access in the form of the expansion of Burbage Common and Woods, and new green corridors around the site.</p> <p>New tree planting is a given, and TSH is providing 20,000 new woodland trees, over 600 avenue trees, in addition to the planting that will occur within the development plots.</p> <p>The NMDC extracts similarly do not sit comfortably for an SRFI, TSH has created public spaces outside of the main HNRFI operational area to improve the quality of the new public spaces that are being provided.</p> <p>When reviewing the LUC assessment against the provision of public spaces, TSH believe the scheme needs to be reviewed as two elements, the first, the main HNRFI site, which is not specifically a public realm, and then that of the new green corridors and</p>	<p>Section 12.11, pg 35</p> <p>Section 3, pgs 11 and 12, Section 4, pgs 13 and 14.</p> <p>NOTE</p>

LUC Landscape Design Review Section / Page Reference	Commentary	Updated Design Code Reference or note.
	extension to Burbage Common and Woods. If this approach is undertaken then a new review would result in a different and more positive response.	
Section 2.7, Uses, pg 22 and 23	<p>Referencing the extracts from the NDG, it refers to providing a mix of uses and well-integrated housing; clearly this is not an appropriate consideration of the scheme.</p> <p>The NMDC comment makes the same point, but goes on to mention the provision of useable, green, public spaces which the scheme provides.</p> <p>There is also a comment on providing car parking in multi-storey car parks or barns. We have avoided this approach, as providing surface level parking helps to distance the built form from the surrounding infrastructure and increase the feeling of openness and reduce overbearing. That is not to say that multi-storey car parks might never form part of a detailed application, as specific occupier enquiries may necessitate them, but this will not be the primary approach. This has now been noted in the Design Code.</p>	<p>NOTE</p> <p>Section 9.2, pg 23</p>
Section 2.8, Homes and Buildings, pg 24	<p>Referencing the extracts from the NDG on providing good internal and external environments, promotion of health and well-being, providing a positive response to private and public spaces and resolving the details of operation and servicing have all been addressed in the opening introduction in the Design Code, setting out TSH's commitment to being a class leader in this sector and encouraging a process of continuous evolution of the product.</p> <p>In addition, the external environments of the building have been already addressed in the design code section on the development plots, as well as picking up on the other point of being functional, healthy and sustainable in the other sections of the design code.</p> <p>The comments from the Good Design Guide SPD, to allow for contemporary design and avoiding replication of other developments within the area. TSH believe that the designs put forward do this satisfactorily and are appropriate to the development of an SRFI in this location.</p>	<p>Section 1.1, pg. 4</p> <p>Section 4, pgs 13 and 14. Section 5, Design Code 01, pg 15. Section 9, Design code 05, Pgs 23 and 24. Section 12.11, pg 35</p>

LUC Landscape Design Review Section / Page Reference	Commentary	Updated Design Code Reference or note.
		Section 11, Design Code 07, pgs 26-31
Section 2.8, Health and Wellbeing for All, pg 25	<p>On the matter of health and wellbeing, whilst the well-being areas may appear small relative to the main development, this is relative and TSH committed within the design code to providing them, along with trim trails and areas of social seating that provide many kilometres of activity routing around the site that is available for all users.</p> <p>In addition, and apparently overlooked is the expansion to Burbage Common and Woods, that provides an additional amenity that does not exist at present.</p>	Section 3, pgs 11 and 12, Section 4, pgs 13 and 14. Section 12.11, pg 35
Section 2.8, Unobtrusive, pg 25	<p>In assessing the proposed scheme, the LUC assessment appears to fail in making the connection to appropriateness in the context of an SRFI. Applying 'local vernacular' onto large scale buildings is neither appropriate, economic or a demonstration of sustainable resource. With that in mind, the design proposals set out in the Design Code, illustrate a contemporary warehousing solution that not only appeals to the widest range of occupiers but ensures that long lifespan, low energy consumption and maximum flexibility are maintained across the building's lifetime.</p> <p>It is inevitable, that in the creation of an SRFI, in an environment that historically has been used for agricultural purposes, will create a new aesthetic. However, the incorporation of buildings, particularly with a strong design identity from the outset, adds a constant rhythm to the environment that is missing when multi-faceted, mixed use design principles are applied.</p>	Section 11, Design Code 07, pgs 26-31
Section 2.8, Relationship with Public Space, pg 25	The main HNRFI development site has been defined by the Parameters Plan and seeks to segregate the uses to avoid impacting upon the public spaces as much as possible. As mentioned above, applying local vernacular to even the small elements of the development sites is inappropriate and at odds with seeking to create a strong identity for the development. The expansion of Burbage Common	Section 3, pgs 11 and 12

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	and Woods as part of the application seeks to mitigate the impact further and maintain the ability for it to serve its purpose for recreation and tranquillity.	
Section 2.9, Resources, pg 26	<p>The NDG extract comments on efficiency and resilience, are all fully applicable to the current TSH building design and are captured within their own detailed specifications. TSH’s commitment to meet and exceed where possible current legislation has been noted in the Design Code.</p> <p>TSH is committed to achieving BREEAM ‘Excellent’ as an improvement over Very Good that was originally proposed.</p> <p>Material choice and resource characteristics are also laid out in the sustainability section as well as in Design Code 08.</p>	<p>Section 1.1, pg 4</p> <p>Section 5, Design Code 01, pg 15</p> <p>Section 12.4, Design code 08, pg 34.</p>
Section 2.9, Reducing Resource, pg 27	Material use has been commented upon above, with regard to land take. An SRFI requires a certain land mass to make it viable, and that includes not only the rail terminal that needs to meet certain parameters in terms of train lengths and numbers, but also the buildings and infrastructure that serve the development as a whole. The NPS—NN recognises that an SRFI may have to be sited within the countryside given the restrictions of urban opportunities.	NOTE
Section 2.9, Adaptability and lifespan, pg 27	<p>Reference to the ‘masterplan’, as noted previously, misleads slightly in that it doesn’t take into account the ‘illustrative’ nature of that plan and that the final development is unlikely to exactly match that design. It is the Parameters Plan that defines where the various component parts of the development will exist, even allowing for limits of deviation given the precise design is not fixed at this stage.</p> <p>The scheme is inherently adaptable to respond to changes in requirements within given parameters.</p> <p>Comments on environmental benefit and flooding and other climatic events are addressed specifically in other submitted material.</p>	<p>Section 3, pgs 11 and 12,</p> <p>Section 4, pgs 13 and 14.</p>

<b>LUC Landscape Design Review Section / Page Reference</b>	<b>Commentary</b>	<b>Updated Design Code Reference or note.</b>
Section 2.9, Materiality, pg 27	<p>The materials chosen are purposefully functional, robust, and appropriate to developments of this type. Thought has been given to their application and the context of the site to address the points previously made.</p> <p>Permeable surfacing can only be applied to the parking areas for operational reasons and only if it meets the requirements of the SUDS strategy for each plot.</p> <p>Green areas will make up part of all the development plots, in addition to the site wide and infrastructure landscaping and this is noted in the Design Code.</p>	Section 9, Design Code 05, pgs 23 and 24
Section 2.9, SuDS, pg 27	A detailed drainage strategy will be supplied with each detailed submission, making use of the identified areas for blue infrastructure within the parameters plan. This does not preclude additional blue infrastructure such as rain gardens or balancing ponds within the plots themselves, but as individual requirements are not yet known it is not possible to commit to such features as they could have a bearing on the operational function of an individual development.	NOTE
Section 2.10, Lifespan, pg 28	<p>NDG extracted comments on 'Made to Last' references the following characteristics; designed and planned for long term stewardship, robust, easy to use and look after and adaptable.</p> <p>All of these characteristics and objectives are designed into a TSH building from the outset, and this includes the long-term maintenance of the external elements that remain within the ownership of TSH. Obligations are also put-upon occupiers when they sign up to take a building to ensure that the development is managed throughout its life.</p> <p>The comments in the NMDC echo these objectives and therefore is addressed in the same manner.</p>	NOTE
Section 2.10, Lifespan and adaptation, pg 29	TSH confirm that the materials are resilient, and that is important to the function they have to serve and the environment they have been designed to inhabit. Lesser quality materials, or those that are subject to ageing impose a maintenance or replacement regime	Section 11, Design Code 07, pgs 26-31



<b>LUC Landscape Design Review Section / Page Reference</b>	<b>Commentary</b>	<b>Updated Design Code Reference or note.</b>
	that which would be out of keeping with the desire for maximum sustainability.	
Section 2.10, Local Ownership, pg 29	The SRFI itself is not a public realm, and as such has to address the operational needs of such a facility. Public areas have been identified and these, particularly the new bridleway and expansion to Burbage Common and Woods have the ability to well used and adopted as a local community asset.	NOTE
Section 2.10, User Needs, pg 29	This follows the same response as Local Ownership, as the users' needs are different for the SRFI and the public realm areas. In terms of adaptation, the development itself is inherently flexible within the limits of the Parameters Plan, such that it can address individual occupiers needs and wishes.	Section 3, pgs 11 and 12
Section 2.10, climate Resilience, pg 29	The appraisal of the ecological and environmental elements of the scheme are addressed specifically in the other submission document. There appears to be a misconception that the proposal is to culvert the watercourse. This is not correct as the proposal is for it to be diverted but remain open and only be culverted where it passes under the highways.	NOTE

The LUC Design Review contains a section on Opinions and Suggestions. TSH's response is set out below in tabular form.

**Table 2**

<b>LUC Landscape Design Review Section / Page Reference</b>	<b>Commentary</b>	<b>Updated Design Code Reference or note.</b>
Section 3.1 - Components of Good Design, pg 31	No comment	
Section 3.2 – Layout, pg 31	The illustrative scheme is one possible solution to provide an SRFI and associated development, by its very nature it cannot address communities in the same way a residential scheme would. The Scheme does provide connection, in all manner of alternative forms through designed green corridors and provides a far greater area of public open space than currently exists, which is for the benefit of all.	
Section 3.3 Street Hierarchy, pg 31	Street hierarchy is not an approach that can be applied readily or easily to a development such as this. Meandering roads with mixed surfacing and micro level detailing do not create a safe, clear and defined environment for SRFI users, where the aim is to direct traffic clearly and efficiently to their destination, resulting in a reduction of movements and turning by large vehicles which in itself creates a danger to users. Highway design, similar to that already implemented at other SRFI locations such as DIRFT, East Midlands Gateway and iPort, Doncaster and which is described in the Design Code within Codes 02,03 and 04, sets out an appropriate form for the roads at HNRFI. The scheme has a clear definition between the A47 link road; the internal estate roads and the internal on plot infrastructure that does allow for a differentiation in status and design.	
Section 3.4 – Form, pg 31	TSH has described how the built form, is appropriate for its use and to artificially apply an alternative material character to the buildings would be inappropriate, inefficient, unsustainable, and cost prohibitive.	

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Section 3.5 – Field Pattern, pg 31	It is not possible to maintain the current field pattern when creating an SRFI as the engineering constraints imposed by the rail and the rail connected developments do so much to define the solution. With regard to the building’s appearance, any building of substantial size, can have the prospect of appearing monolithic. However, the buildings proposed make use differing materials; colours; and textures to break up the facades and add elements of greater detail and interest around the office elements.	
Section 3.6 – Scale, pg 31	It is acknowledged that there will be significant residual effects due to the nature of the proposed development and its location and surrounding context. However, there are substantial areas of open space and landscape areas, as identified on the Illustrative Landscape Strategy Plan and on the Masterplan. The Parameters Plan, shown in Section 6 of the Design Code, outlines the proposed development zones and parameters. This includes areas identified as landscape zones and development zones. As identified in the key of the Parameters Plan, the areas identified as development zones include “...elements pertaining to individual development plots including buildings, hardstandings, parking, energy services, landscaping, bunding and storm water attenuation”. While not always indicated as a green colour within the parameters plan, there are significant areas of landscape proposed within the overall site and within the development zones.	
Section 3.7 – Parameter Plan, pg 31	As shown on the Illustrative Landscape Strategy Plan, there is considerable green space proposed within the site. It is of note that overall, green and blue open space accounts for approximately 28% of the Main HNRFI Site and A47 Link Road Corridor combined and approximately 20% of the Main HNRFI Site.	
Section 3.8 & 3.9 – Appearance, pg 32	TSH acknowledge the consistency in design of the buildings, but this is intentional and creates the sense of place and constant rhythm which then avoids	

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	jarring design principles across such a large development.	
Section 3.10 & 3.11 - Landscape, pg 32	It is acknowledged that there will be significant loss of existing landscape features within the site as a result of the proposed development. The proposed landscape design, as indicated on the Illustrative Landscape Strategy, proposes considerable areas of open space and green corridors within the site, incorporating pedestrian and cycle routes and providing sustainable attenuation features to enhance Green Infrastructure provision within the site. Overall, green and blue open space accounts for approximately 28% of the Main HNRFI Site and A47 Link Road Corridor combined and approximately 20% of the Main HNRFI Site. Where appropriate, rain gardens and linear attenuation features will be incorporated.	
Section 3.12 – Materials, pg 32	As noted in 3.8, TSH disagree that the development lacks character and a sense of place. The buildings, by having that material consistency, create the place and allow for ease of navigation by its users. It also allows for greater flexibility in form to create buildings suitable for their occupant throughout their lifespan.	
Section 3.13 – Hard Landscaping, pg 32	Hard landscaping areas are a necessity for a fully functioning SRFI and enable it to operate both efficiently and safely. The amount of landscaping to the perimeter of the SRFI and to the west of the railway line is substantial, and the Design code confirms that landscaping will also be a detailed component of each development plot.	
Section 3.14 – Landscape, pg 32	The landscape section has been updated to expand the commitment and detail	
Section 3.15 – Appearance, pg 32	This seems to be a repeat of point 3.9?	

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Section 3.16 – Green Space, pg 33	It is not practicable to retain the existing field pattern and implement an SRFI scheme due to the large-scale nature of the development and the infrastructure implications that involves. The illustrative landscape strategy recognises the existing landscaping and works with it in the areas surrounding the main HNRFI site and incorporate the elements noted within the Design Code and provides those pedestrian priorities.	
Section 3.17 – Approach, pg 34	<p>In the Design Code, there is a recognition of street hierarchy, but it must be fit for purpose and appropriate to the function of an SRFI, allowing for free movement of differing types of vehicles, that does not compromise the safety of either them or other users of the infrastructure routes. In addition, these routes contain the associated infrastructure that allows for pedestrians and cyclists to have easy access around the development.</p> <p><b>Veteran Tree</b></p> <p>At 3.17 the Review states <i>‘Efforts could be made to retain more existing features such as the watercourse, hedgerows and trees including the veteran tree.’</i> This statement fails to recognise the engineering constraints in master planning a SRFI, and probably reflects the lack of experience by the author in designing such large scale developments.</p> <p>The HNRFI proposal, and the Parameters Plan that has been prepared, have defined the vertical parameters of the scheme based upon an engineering review and design that started with the rail element of the works and the connection to the existing Felixstowe to Nuneaton line. This has the least flexibility in terms of its vertical alignment and geometry, and therefore defined the levels for the Railport and the development sites where a direct rail connection can be attained. Once this parameter was set, the neighbouring areas then had to relate to these levels,</p>	

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	<p>and work with them in a complimentary manner in all three dimensions.</p> <p>The engineering design for the site, also took into account the need to tie into the existing levels around the perimeter of the site; have a scheme that worked on creating a cut/fill balance for the earthworks to avoid the need to remove material from site, whilst creating development plateaus that provide flexibility in the ultimate position of the boundaries of the individual development plots, and the location of the infrastructure that serves them.</p> <p>Also, and using the 'Rochdale Envelope' as a guide for the Parameters Plan given that all the details of the development are not yet confirmed, limits of deviation have also been set out within it, to allow for the movement of specific parameters to provide the required flexibility when responding to individual occupier enquiries.</p> <p>Within smaller scale developments, where smaller, non-rail connected, buildings are more appropriate, there is a greater ability to respond to the existing site levels. However, the requirements of an SRFI, with the provision of a rail terminal and larger building footprints, mean that significant level changes within the terminal itself or the buildings and their plots is not acceptable in order for them to operate effectively.</p> <p>Therefore, Veteran Tree (T486) cannot be retained in its current location, and its loss is unavoidable if TSH is to deliver an SRFI scheme based upon the Parameters Plan, with the engineering of the site levels and the flexibility required within the development plateaus that has informed it.</p> <p>The dead wood from the felling of veteran T486 will be placed in the natural areas to benefit wildlife. Replacement woodland and tree planting across the development including large trees. The proposed</p>	

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	<p>mitigation strategy would provide significant additional tree planting, including approximately 20,000 new trees within woodland areas and approximately 600 individual trees as street trees and in amenity areas, as depicted in the Illustrative Landscape Strategy (document reference 6.3.11.20). The trees, including some large trees, will provide structure for the development; create habitat connectivity to provide amenity and micro-climatic benefits and ensure succession to the existing tree stock. The new planting has potential for longevity within the landscape and will enhance the species diversity of the site, whilst also contributing to the Green Infrastructure for the area.</p>	
<p>Section 3.18 – Rural character, pg 35</p>	<p>It is not possible to apply a natural aesthetic or materials to an SRFI in a manner that is either appropriate; fit for purpose, or cost effective. It must be acknowledged that the aside from the main infrastructure routes that contain their own green verges and planting, and structural landscaping, each of the individual development plots will have their own green infrastructure elements including areas of tree, shrub, and hedgerow planting, as well as open areas of grass. There will also be areas set aside for blue infrastructure where the SUDS design requires it.</p>	
<p>Section 3.19 – Façade, pg 36</p>	<p>TSH acknowledge that the treatment of the facades enhances the overall feel and influence of the scheme on its environment, and also how successfully it can be assessed as being. TSH believe the character and components within the design, as it is currently shown, address these concerns and deliver on the promise to create a high-quality development. An explanation of how certain materials were considered and then dismissed has been provided within the Design Code.</p>	
<p>Section 3.20 – Assessment of Good Design, pg 37</p>	<p>The tabulated assessment of the design is considered to be unbalanced – and fails to properly account for</p>	

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	the functionality of a SRFI and the need for this critical national infrastructure to be fit for purpose.	