

HINCKLEY NATIONAL RAIL FREIGHT INTERCHANGE

Blaby District Council (IP ref. 20040018) joint response with Hinckley and Bosworth Borough Council (IP ref. 20039546) on design matters of HNRFI DCO Examination (ref. TR05007).

Deadline 3 - November 14, 2023

Landscape Design

Executive summary

Land Use Consultants Limited was appointed by Blaby District Council (BDC) and Hinckley and Bosworth Borough Council (HBBC) in July 2023 to undertake a review of the Landscape Design for the Hinckley National Rail Freight Interchange (HNRFI) Nationally Significant Infrastructure Project (NSIP) (“the Proposed Development”).

Fundamentally the purpose of the review is to establish if the applicant’s scheme can be deemed as ‘good design’ in relation to the national and local planning policy it will be assessed against.

Following review of the updated design code and various statements and clarifications relating to the design from the applicant we have concluded that the findings of our original assessment still stand and that the proposals on balance fail to deliver an acceptable scheme in landscape design terms when measured against national and local policy and in particular the criteria for good design within the National Design Guide.

Throughout this process we feel it is unfortunate that the applicant has gone to lengths to reason why the LUC suggestions to improve the current design are inappropriate rather than taking on board comments in good spirit and in a proactive manner that would ultimately lead to a much-improved scheme. Unfortunately it would appear that this approach is summative to the applicants methodology which lacks sensitivity to the existing landscape context and is absent of a desire to improve the environment through good design.

Points raised at Issue Specific Hearing 03 environmental matters 01/11/23

Loss of the Veteran Tree

- 1 LUC stand by our original assessment that the removal of the Veteran Tree on site has not been proven to be unavoidable. The National Policy Statement for National Networks (NPS NN) states:
- 2 *Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is **unavoidable**, the reasons for this.* S. 5.32, NPS NN
- 3 The applicant has described previous iterations of the scheme that would suggest that removal of the Veteran Tree is avoidable and not a necessity.
- 4 The technical points surrounding rail and gradients are noted and constraints understood yet due to the large distance the tree is situated from the rail interface it would be reasonable to assume a workable solution for retention of this feature could be achieved through introducing further plateaus. There is no denying it would require further detailed design work to inform a more sensitive parameter plan but instead the applicant appears to have favoured a ‘blank canvas’ approach to the site through removal of all of its existing features within the primary development zone.
- 5 The quantity of planting is noted but we have seen no detail on the size that these trees will be planted at, their density or proposals for their future management. The applicant also links these numbers to the masterplan & landscape strategy which has been confirmed by themselves as illustrative giving no apparent weight to the numbers quoted.

Sense of Place

- 6 As stated by the applicant the development proposes to create it’s own sense of place based on the image the applicant has chosen to be most appropriate for the site, this new character apparently disregarding the current landscape character areas.
- 7 This approach does not align with guidance set out within both national or local policy and would not be considered best practice for any development.

We have no doubt that the development will have its own strong identity within the local area, however this is at odds with its context and create a tension that we would not deem as appropriate. Due to the consistent approach described by the applicant within the development over a large area it will not be distinct within itself at the 'human scale' and would likely become monotonous.

This does not align with good design or encourage natural wayfinding and will rely heavily on signage.

Retention of some of the landscape features such as the veteran tree, existing hedgerows or Brook are opportunities missed to give the development a strong sense of place that is both rooted to and respects the current environment. Equally the applicant may have chosen within the design code to celebrate and reinforce local character which unfortunately is not the case.

Wayfinding within the development & hierarchy

8 The proposed streetscape lacks legibility with little means for natural wayfinding or orientation. The design code does little to better this. The applicant states on page 17 of their own LIR response: '*Street hierarchy is not an approach that can be applied readily or easily to a development such as this.*'

9 On review we would agree with the applicant that the current proposal has not been able to achieve a strong street hierarchy. It is accepted that there are limitation in surfacing and the design of particular highway areas. Yet through good design distinctions can be made between routes, be it through planting design or changes to materiality of footpaths etc. These aspects we would normally expect to find fully detailed within the applicants design code yet the proposals fall short of this and are not definitive relying on vague statements.

10 As there doesn't appear to be a strong hierarchy within the development or distinct features within it wayfinding will be a challenge and rely on signage to guide people.

Use of materials and architectural style

The current architectural detailing and style is foreign within the landscape setting and character of the area (see landscape design review for further detail). Within our design review we made suggestions that could be considered to improve the architectural detailing and general materiality of the scheme based on the principles of 'good design' within the NDG. This was not based on the typology of building within the locality but rather the general material palette used that thus sets the character.

Although the applicant has reasoned why some of the suggested sympathetic materials would not be appropriate. The applicants own architect A J A Architects (Whom we assume the applicant has mistyped in the LIR response as A J Architects) appear to have used several of these suggested treatments including brick and timber cladding in their previous development schemes to good effect.

It is unreasonable to expect these large buildings to be constructed entirely from these materials but good design would seek to incorporate these materials in selected areas assisting to break up the scale of development and relate it back to its context.

Some of the smaller scale architecture and aspects of the landscape design should reflect a local material palette respecting and enhancing local character. Other suggestions such as gradation of the cladding system or architectural screens appear to have been ignored.

On the point of architectural form the applicant described the roofline as 'curvaceous and organic'. Following review of the proposed elevations it would be reasonable to come to the conclusion that this statement is an exaggeration of what is in reality is a repeating curved roofline. This form introduces a foreign monotony into the landscape and due to its scale appears to worsen the visual impact of the scheme compared to a more reasoned, sensitive approach where efforts could have been made to break up this massing.

Detail within the design code

11 We would anticipate a higher level of detail in a development design code with more definitive guidance on how future development will take shape, especially in the absence of a confirmed detailed layout. As with all design we as professionals should aspire to the best possible design for any given site and use. We have a duty towards the environment, the public and the end user.

12 It is accepted that much of the scheme at this stage is 'high level' but the supporting design code and illustrative masterplan should provide a benchmark of quality of how the scheme will be taken forward.

13 Unfortunately these documents when reviewed against the principles of good design fail to meet the basic standards that are expected of any such landscape design and appear to give no confidence in the appropriateness or successful integration of the future detailed scheme within its rural setting.

Comments on Applicant's response to deadline 2 and written representations.

The tables below set out LUC's comments with respect to Landscape Design matters on behalf of Blaby District Council's and Hinckley and Bosworth Borough Council's regarding the Applicant's deadline 2 responses including: The amended design code, responses to the Landscape Design review, responses to the Local Impact Report and Written Representations.

It is important to state that this document is in direct response to the deadline 2 changes, amendments and comments received from the applicant. Unless superseded through this document the points within the Landscape Design Review previously carried out still stand and should be taken into consideration to give a complete picture of the scheme and landscape design in the eyes of national and local policy.

Please note that we felt it relevant to include and review both new inserts into the design code document alongside those statements and sections being removed as this is enlightening and assists in understanding the applicants design intent.

(a) LUC comment on the Applicant's amendments to the Design Code

Document Reference	Summary of Representation	Applicant's statement	LUC comment on Applicant's response
14 Page 4, section 1.3	15 Design code informants	Informing the content and format of this Design code, use has been made of nationally available documentation in the form of the National Design Guide (NGD), The National Model Design Code (NMDC) Parts 1 and 2, together with the National Policy Statement for National Networks and its specific references to the need for and assessment of Strategic Rail Freight Interchanges (SRFI). Whilst the NGD, and both sections of the NMDC, do not make reference specifically to an SRFI, they do offer a template of ten defining characteristics by which the HNRFI can be appraised and delivered against, whilst accepting the very specific requirements of an SRFI.	16 We welcome the applicant's acknowledgement of the relevance of national policy within the design code and that this scheme should follow and be assessed through the lens in which it provides. 17 Unfortunately, although the applicant has acknowledged the importance of such policy through stating so it appears the scheme remains to depart from much of what is set out.
18 Page 5, section 1.5	19 The Landscape Vision	The combination of the proposed architecture, built form vernacular and structural landscaping that respects existing vegetation patterns and provides additional planting where appropriate to enhance tree cover and habitat connectivity across the site. This aims to work with the scale of the proposed built form to provide a well-vegetated setting for the scheme, adding to its strong sense of identity 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. which provides opportunities for public realm and amenity spaces for site users and attractive publicly accessible routes which are organised around strong design principles.	20 The existing green infrastructure including watercourse, hedgerows and veteran tree within the primary development zone set by the parameter plan is proposed to be removed by the applicant. With this in mind we do not agree that the proposal respects existing vegetation patterns. 21 It is unfortunate that the applicant has removed reference to respecting and enhancing existing vegetation and creating a development with a strong identity preferring to state 'creating a well vegetated scheme'.

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		<p>The development has been designed to respond to the arboriculture, ecological, landscape, visual, hydrological, and topographical constraints of the site. Where possible, existing vegetation is retained and new green infrastructure elements are proposed, and where possible, retain and enhance the existing green infrastructure as part of the development proposal.</p> <p>The proposed landscape will provide considerable new areas of planting which softens the likely effects on surrounding landscape character and local views. A natural separation is proposed between the Main HNRFI Site and Burbage Common and Woods Country Park, which provides an amenity area that enhances tree cover and habitat connectivity. 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.</p>	<p>22 Based on the current scheme we agree that the applicant cannot achieve these aspects that would align with good design hence the removal of such statements from the design code is unfortunate but appropriate in the context of the proposal.</p> <p>23 Finally, it is an honest reflection of the current proposal that the applicant has chosen to remove reference to creation of a <i>'fully landscaped setting which enhances local landscape character, generates opportunities for ecological diversity, as well as reduces potential impacts of the proposal on the landscape, as well as on arboriculture and ecology'</i> this again is unfortunate and detaches the proposal from aligning with core policy.</p> <p>24</p>
25 Page 5, section 1.6	26 Landscape Principles	<p>These include:</p> <ul style="list-style-type: none"> • To work in combination with the proposed architecture to create a high quality development. In line with the 'contemporary' vision for the wider site, this will involve creating simple, yet aesthetic, development plots with landscaping at a scale which respects the development scale. There will be the opportunity to use a variety of species, and the different functional areas (on plot, estate roads, landscape buffer, etc.) will have their own identity as a result; • To assimilate the proposal into the local environment by providing effective mitigation measures to reduce and / or offset the potential effects of the proposal on landscape and visual amenity, as well as arboriculture and ecology. This will primarily be achieved through the retention and enhancement of existing vegetation around the site boundaries and creating areas of ecological interest. The landscape treatment will provide green spaces which address the limitations and the opportunities identified; • To provide a strong landscape framework within which individual development parcels can be arranged. A robust set of landscape principles, following the contemporary vision whilst using predominantly native species, allows each of the individual development plots to be brought forward independently but with a consistent aesthetic and appearance. • The landscape fabric will promote green infrastructure (ecology and landscape), as well as blue infrastructure (hydrology and landform) through the creation of a mosaic of landscape types. This will include the 	<p>27 The evident simplification of the landscape design principles has further eroded the quality of the applicants proposals.</p> <p>28 It appears that this simplification has been carried out to ensure the applicant can meet its own design principles through the proposal although to the detriment of the delivered scheme and the environment its situated within.</p> <p>29 We would anticipate a design code to set out a series of detailed rules and principles for a development. The current code appears to amount to a series of high level statements very few of which have definitive language to guarantee anything or to guide the future detailed development.</p>

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		<p>selection of native species and in more functional areas, the use of some ornamental planting;</p> <p>• To realise a walkable environment which is equestrian, pedestrian and cycle user friendly, pedestrian and cycle routes will be provided throughout the development, which link to individual plots and the wider landscape where possible, with equestrian public bridleways around the perimeter of the site. Key routes will pass through the key green spaces and the existing footpaths and bridleways will be diverted and new routes provided as necessary to respond to the layout proposals.</p> <ul style="list-style-type: none"> • Contain development to the west of the M69; • Retain as many landscape features as possible given the nature of the development; • Provide a natural buffer between the development and the SSSI, Local Nature Reserve, Ancient Woodland and Country Park to the south; • Maintain broad green corridors through the development for amenity and biodiversity purposes; • Maximise the biodiversity potential of the sustainable urban drainage scheme with tree planting and swales within green corridors. Attenuation basins designed to have some • permanently wet areas to allow wet grassland and wet woodland to thrive; • Use the existing landscape character of the Burbage Common and Woods Country Park as a reference for planting strategies and habitat creation in open spaces; • Use native species found locally within the landscape as the basis of the planting strategy; • Planting strategies to aim to maximise biodiversity and reduce maintenance with 'nature' taking precedence over traditional maintenance heavy amenity landscapes; and • Planting strategies to respond to the clay content of the soil. 	
30 Page 12, section 3.1	31 Scheme parameters	The parameters plan was informed by, and evolved as responses, feedback and constraints were fed into the design.	32 The majority of the comments outlined in the LUC design report regarding character, scale, impact on nature and the locality were raised independently by other parties during consultation. The scheme doesn't appear to have taken these comments into consideration.
33 Page 14, section 4.1	34 Rural aesthetic	Within the main HNRFI site, in order to deliver a successful SRFI, it is not possible to maintain or recreate the existing rural aesthetic, as the development requires large regular building plateaus	35 We disagree that the landscape design cannot reflect the existing rural aesthetic at least in part. Sensitive design of planting and material selection

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		in order to order to accommodate the rail terminal and associated buildings and infrastructure.	<p>would allow for this character to be achieved while fulfilling the sites primary use.</p> <p>36 The justification of removing much of the existing site vegetation and grain due to creation of development plateau's is misleading. The applicant's own optioneering exercise found solutions to retain valuable site assets such as the veteran tree but these options have been disregarded.</p> <p>37 The level design on the west of the site we understand to be constrained due to the proximity to rail interface but we would expect the east of the site to have more design flexibility and thus have the capability of introducing plateaus at new levels which would enable retention of such valuable existing features.</p>
38 Page 16, section 5.2	39 Sustainability	40 The development will target BREEAM – Very good Excellent and an EPC A rating as is standard for Tritax Symmetry buildings	<p>41 We welcome the intention of the applicant to achieve Breeam Excellent but understood this to be only for the buildings. Clarity should be given on this point. Either way the language used within the design code does not make a commitment of any substance and lacks sufficient detail.</p> <p>42 We suggest that further steps could be made to improve the environmental credentials of the landscape through this or another metric. Retention of habitat is a key ecological consideration that would assist in achieving a better environmental outcome for the site.</p>
43 Page 18, section 6.3.1	44	45 The landscape will afford strong ecological connectivity, retain, and enhance existing landscape fabric , and establish new planting (including native species of local importance).	<p>46 Based on the applicants current proposal to removal all natural features within the primary development zone we agree with the applicants decision to remove reference to '<i>retain, and enhance existing landscape fabric</i>' as the current scheme does not achieve this.</p> <p>47 As laid out previously we would urge the applicant to explore ways in which to retain valuable site assets within the primary development zone. This aligning</p>

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			<p>with policy and generally master planning best practice.</p> <p>48 We note that the applicant has stated retention of some of these assets as possible within their previous optioneering exercise however have not opted for this approach.</p> <p>49</p> <p>50</p>
51 Page 18, 6.3.2	52	<p>53 Avenue tree planting will be provided along the A47 Link Road to define the edge of the A47</p> <p>54 Link Road infrastructure;</p> <p>55 Proposed tree planting to be set back from carriageway to ensure trees are protected from potential physical damage caused by moving vehicles and HGVs;</p> <p>56 Species selection to provide seasonal interest. Use similar species to define road hierarchy and enhance legibility;</p> <p>57 Crossing points to be highlighted by feature planting to create attractive pedestrian and cycle</p> <p>58 routes between the Main HNRFI Site and the Western Amenity Area;</p> <p>59 Fig 10. Image of dual carriageway, footpaths, cycleways and landscaping segregation</p>	<p>60 We welcome these additional points which will assist in enhancing the scheme and attempt to make it more legible for users.</p> <p>61 We would normally anticipate seeing a higher level of detail for aspects such as this in the design code.</p> <p>62 This character and sense of place would be further strengthened if the existing green infrastructure could be better retained and enhanced.</p> <p>63 Figure 10 within the design code illustrates the applicants intention for the aesthetic of the A47 link road. This route essentially severs the north and south of the site including access to the newly proposed 'country park.' From the north. We would suggest that such a prominent feature within a country park should be designed to suit this aesthetic. Pedestrian routes should be pulled away from the highways edge and a better landscape buffer installed to separate pedestrians and traffic.</p> <p>64 Following best practice provision for defined cycle and pedestrian routes should be made as shared routes can be unsafe.</p>
65 Page 19, section 7.3.1	66	<p>67 The landscaping will afford strong ecological connectivity, retain, and enhance existing landscape fabric, and establish new planting (including native species of local importance). Establish new planting, incorporating native</p>	<p>It is clear from the changes to the wording of the design code that there is no longer an aim from the</p>

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		<p>species of local importance, which creates new green infrastructure links across the site.</p> <p>Fig 12. Image of avenue tree planting Fig 13. Plot boundary hedgerow planting.</p>	<p>applicant to retain and protect the existing landscape nor to afford strong ecological connectivity.</p> <p>This is unfortunate and will in turn impact the character of the site and surrounding area as well as its biodiversity.</p> <p>The applicant has included reference images that appear to have little incorporation of native species or species of local importance.</p> <p>This exemplifies the apparent lack of understanding the applicant has on what would be ecologically beneficial for the site.</p>
68 Pg 21, section 8.1	69 Public realm general	<p>70-Despite the unavoidable loss of some enclosed farmland, the current condition and key characteristics of the landscape have been considered throughout the design of the Proposed Development and integrated into the layout where possible, such as the nearby character of the Burbage Common and Woods Country Park which has contributed to the design of the area south of the A47 Link and the western extent of the Main HNRFI Site.</p> <p>71 The site's existing condition and context has influenced the proposed site layout to incorporate high quality green infrastructure and amenity features. This includes the proposed Western Amenity Area, which increases the overall area of natural recreational green space associated with Burbage Common and Woods Country Park in line with policy requirements. A minimum of three well-being and amenity areas are proposed around the site, which are publicly accessible and benefit users of and visitors to the site. Overall, there is a network of high-quality and safe routes proposed within the site which allow for pedestrian and cycle permeability across the site, with new connections between Burbage Common, Elmsthorpe and Hinckley.</p>	<p>Based on the current proposal it is unfortunate but correct that the applicant has removed reference to incorporating key characteristics of the surrounding landscape character into the development.</p> <p>The applicants preferred statement for this section of the design code appears to be a diluted version of the original. We welcome the inclusion of 'well being' areas but note that these lack detail or any clear definition.</p> <p>We welcome the statement that overall there is a network of routes across the site assisting permeability but note that this contradicts the applicants LIR response that '<i>It is not true that TSH are directing the public along the internal estate roads.</i>'</p> <p>Again the design code lacks detail on what the experience of these routes will be for the user which should be a key consideration.</p>
72 Pg 21, section 8.,2	73 Public realm general	<p>Species chosen for planting to reflect those present within the landscape locally to enhance local distinctiveness within the character area Species selection to reflect existing, local species within the landscape context to enhance local distinctiveness;</p>	<p>The omission of character within this statement is noted and confirms the applicant's apparent intention that the proposal does not align with local landscape character.</p>

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74 Page 22, Fig 16.	75 Site perimeter landscaping	Figure 16 is an image of the proposed perimeter landscaping (see page 22)	In our experience within a typical design code we would expect more definitive guidance on sizing, species etc of perimeter planting to give certainty. Especially if it is only the parameters of the scheme that are fixed.
76 Page 23, section 8.3.1	77 Public Rights of Way	<p>The local network of footpaths are key assets for existing and future users in the area. Together, these present a number of recreational opportunities, including access to Burbage Common and Woods Country Park and the wider countryside to the north, south, east and west and the development of the Main HNRFI Site and A47 Link Road presents an opportunity to enhance Enhance access to Burbage Common and Wood Country Park, both in terms of improving existing access and through the creation of additional access points;</p> <p>Two footpath routes (Footpaths V23/1 and U50/3) cross the Hinckley to Leicester railway line via unprotected crossings, including a third beyond the main HNRFI site on route U8/1 (the 'Outwoods' crossing). These are footpath, bridleway and user worked crossings where the onus is on the crossing user to check for an approaching train before they cross the railway. The proposal is to close these two crossings and instead pProvide a link southward from Footpath U50/4 along the northern edge of the railway, passing Footpath V23/1 and linking with Bridleway U52/9 and Footpath U52/8 which provide a safer route via a new bridge over the railway. The proposal at the third crossing point at the Outwoods is to upgrade to a pedestrian bridge, improving safety for footpath users;.</p> <p>Shared paths will be provided adjacent to all roads through the site, allowing continued pedestrian access north, east, south and west through the site;.</p> <p>There is limited equestrian use of the existing bridleway network within the study area although it is noted that Burbage Common Road is also used regularly by riders gaining access to Burbage Common. There are currently no suitable connections to the Bridleway network within or to the east of the Main HNRFI Site. There is therefore opportunity to cCreate a new traffic free link, routing a bridleway around the eastern edge of the Main HNRFI Site to</p>	<p>The applicant has extensively altered this section which may require further comment from the relevant highways authorities.</p> <p>It is regrettable that the applicant appears to have reduced the scope and ambition of the local network of footpaths offered.</p> <p>Within the TSH response to LUC's Design Review (Page 9, section 2.4) the applicant states:</p> <p><i>It is not true that TSH are directing the public along the internal estate roads.</i></p> <p>Yet the applicants design code states that the development will:</p> <p><i>Incorporate footpaths and cycle routes along internal distributor roads to provide connectivity across the site and enhanced access to Burbage Common and Woods Community Park;</i></p> <p>The applicants approach to the public realm and public rights of way appears confused and it is not clear what is being proposed. Fig. 17 within the design code illustrates a network that largely follows the new planned vehicular routes. If these are not to be encouraged for use by the public it will lead to an even greater loss of amenity. Further design critique of this proposal can be found within the landscape design review.</p> <p>The loss of amenity due to severance of some routes is an important consideration. As is the loss of visual</p>

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		<p>connect with Bridleway V29;.</p> <p>Incorporate footpaths and cycle routes along internal distributor roads to provide connectivity across the site and enhanced access to Burbage Common and Woods Community Park;</p> <p>Proposed routes will be tree-lined and/or within green corridors where appropriate to create attractive walking and cycling routes across the site;</p> <p>Surfacing to footpaths and cycle routes to follow LCC Highways Design Guidance;</p> <p>78 Signage to be provided to enhance wayfinding across the site.</p>	<p>amenity of these routes which will impact the public's enjoyment of them.</p>
79 Page 27, section 9.3.1	80 Development plot landscaping	<p>Native tree, shrub, hedgerow and wildflower species to be selected to reflect local species</p> <p>Composition planting will be designed to reflect the native species of local importance;</p> <p>These hedgerows will support a network of habitat routes and environments, whilst promoting local landscape character;</p> <p>As part of the commitment to BREEAM Excellent, an onsite amenity area made up of hard and soft landscaping will be provided on each individual plot, for use by the occupants.</p> <p>81</p>	<p>We note the removal of the applicant's intention to reflect and support native species of local importance in the scheme. We feel this will have a detrimental affect to local ecosystems.</p> <p>We note that the applicant has removed the reference to promotion of landscape character. This is unfortunate as it is a key element within national and local policy to enhance local landscape character.</p> <p>As previously stated we welcome the intention of the applicant to achieve Breeam Excellent but understood this to be only for the buildings. Clarity should be given on this point. Either way the language used within the design code does not make a commitment of any substance and lacks sufficient detail.</p>
82	83	<p>Specific Codes – Materials</p> <p>The correct choice of materials is key to the successful integration of the development into the existing landscape. The existing buildings within the application site, consist of traditional, domestic scale buildings and associated farm outbuildings. The material palette is one of traditional brick and tile appropriate to scale of the properties and when they were constructed. Large format rendering of commercial distribution buildings with such material types presents difficulties in scale and application, as well as not being appropriate to the functionality or future adaptability of the buildings.</p> <p>Other materials such as render and timber were also considered, but again they were dismissed on the same grounds, as well as the ongoing maintenance and replacement they require affecting their sustainability credentials.</p>	<p>We note the applicant has added extensively to this section.</p> <p>Within our design review we made suggestions that could be considered to improve the architectural detailing and general materiality of the scheme. This not based on the typology of building within the locality but rather the general material palette used. This in order to help meet the applicant's aim to integrate the proposals into its context.</p>

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		<p>The use of green walls was also considered, but the ability for them to grow successfully, in an operational environment was questioned given their susceptibility to impact and also the areas required to make a meaningful statement made them very cost prohibitive.</p> <p>On that basis, the use of metal cladding systems, combined with the integration of feature glazing panels, with alternative panelling systems and curtain walling for the office elements was deemed to be the most appropriate range of materials for the buildings within the SRFI, and their application can be defined as follows:</p> <ul style="list-style-type: none"> • The building designs will include the use of different cladding profiles, to create subtle variations in texture and provide relief to large elevations; • Office elevations will use either flat or micro-rib profile panels; • Where the offices are inset into the body of the main building, then the band of cladding below the building eaves will be consistent around the whole building; <p>Warehouse elevations will use profiled cladding types in a combination of both vertical and horizontal orientations.</p>	<p>We agree that the correct choice of materials is key to the successful integration of any development into its context.</p> <p>Although the applicant has reasoned why some of the suggested sympathetic materials would not be appropriate. The applicants own architect A J A Architects (Whom we assume the applicant has mistyped in their response as A J Architects) appear to have used several of these treatments including brick and timber cladding in their previous development schemes to good effect.</p> <p>It is unreasonable to expect these large buildings to be constructed entirely from these materials but good design would seek to incorporate some of these materials in selected areas assisting to break up the scale of development and relate it back to its context.</p> <p>To align with policy some of the smaller scale architecture and aspects of the landscape design should reflect a local material palette respecting and enhancing local character.</p> <p>Other suggestions such as gradation of the cladding system or architectural screens appear to have been ignored.</p>
84 Page 32, section 11.6	85 Colour palette	<ul style="list-style-type: none"> • The colours have been chosen to reflect those of other, established Tritax Symmetry developments and identify themselves as a continuation of their developments, creating a subtle yet contemporary appearance, and one that doesn't mimic surrounding developments to create its own sense of place. 	<p>We note the applicant wishes to strengthen the Tritax brand through use of the applicants colour palette, creating their own sense of place.</p> <p>We would advise such an intention especially at this scale is inappropriate with respect to impact on the</p>

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			surrounding area and is not in line with local or national policy. Based on the submitted sections and visualisations it certainly will not create a subtle appearance as described by the applicant.

(a) LUC design comment on the Applicant's response to Local Impact Report - LUC's Landscape Design Review

Document Reference	Summary of Representation	Applicant Response	LUC comment on Applicant's response
86 Page 1, point 3	87 Introductory remarks - consultation	<p>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.</p> <p>88</p>	<p>89 The LUC design review assess the scheme against national and local policy. We have noted the applicants point regarding timing of consultation however:</p> <ul style="list-style-type: none"> - The conclusions of the design review largely reflect comments received during informal stages of consultation regarding environmental issues therefore should have been taken into account. - The review uses national and local policy as a framework to critique the proposals as is common practice. <p>90 A well designed scheme would have taken these points into consideration throughout the design process. Through this statement the applicant appears to accept there are deficiencies in the landscape design of the proposals.</p>
91 Page 2, point 6	92 Landscape vision	<ul style="list-style-type: none"> - <i>'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.</i> - <i>Key to achieving this will be the realisation of a high-quality environmental setting and public realm organised around strong design principles.</i> - <i>In combination, the architecture and the landscaping of the site will create a safe and welcoming environment for new employment facilities.</i> - <i>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.</i> 	<p>93 The applicant's scheme appears to have multiple inaccuracies often with contradictory statements which leads to an unclear and confused proposal.</p> <p>94 An example of this is the landscape vision within this statement which differs from the vision stated in the design code.</p> <p>95 We would advise the applicant to review their information and present a clear, concise and consistent proposal in order to best communicate</p>

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		<p>- <i>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.</i></p>	<p>what they are proposing and to enable it to be assessed appropriately.</p>
96 Page 2, point 7	97 Good design	<p>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.</p> <p>98</p>	<p>99 'Good design' is set out in the National Design Guide and as the applicant concedes in point 4 (page 1) of their statement the provision of this guidance may be a matter that the secretary of state considers both important and relevant in informing any decision.</p> <p>100 We would echo this statement and highlight that the draft NPS strengthens this relationship to the NDG making it carry even more weight when determining the scheme.</p> <p>101</p>
102 Page 3, point 12	103 Design detail	<p>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.</p> <p>104</p>	<p>105 As with all design we as professionals should aspire to the best possible design for any given site and use. We have a duty towards the environment, the public and the end user.</p> <p>106 It is accepted that much of the scheme at this stage is 'high level' but the supporting design code and illustrative masterplan should provide a benchmark of quality of how the scheme will be taken forward.</p> <p>107 Unfortunately these documents when reviewed against the principles of good design fail to meet the basic standards that are expected of any such landscape design and give no confidence in the appropriateness of the future detailed scheme within the landscape.</p>
108 Page 3, point 16	109 Functionality	<p>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.</p> <p>110</p>	<p>111 This is a misleading statement and a case of semantics. The landscape design review refers to function and use throughout the review document.</p> <p>112 Most notably within the 'Uses' section on page 22 & 23 of the Landscape Design Review. The report states:</p>

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			<p>113 It is accepted that the sites primary use is proposed to be a rail freight terminal. This does not automatically mean the proposal should be solely focused on this use and currently it does include a number of public amenities including replacement PRow's, welfare areas with some seating and outdoor gym equipment. However the proposed uses within the landscape feel as if they have been proposed through necessity to fulfil requirements rather than a purposeful design striving to achieve a high quality environment that would support a diversity of incidental uses.</p>
114 Page 4, point 20	115 Characteristics	<p>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.</p> <p>116</p>	<p>117 We agree with the applicants view that the current development is not successfully integrated into the current grain of the landscape nor with the local settlement pattern.</p> <p>118 It would appear there is a fundamental flaw in the parameter plan that proposals a primary development zone too large for the local context. If this was reduced significantly there may be a way to integrate the development in a better way.</p> <p>119 Through our landscape design review we have highlighted that working with the existing grain of the landscape may have been more appropriate.</p> <p>120 The statement that none of the design characteristics within the local area can be replicated or reinforced appears untrue as there are opportunities highlighted within our design review especially within the smaller pieces of proposed architecture and in particular within the landscape / public realm.</p>
121 Page 4, point 22	122 Parameter plan preparation	<p>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.</p>	<p>123 As previously stated the primary development zone within the parameter plan appears disproportionate to the site which puts pressure on the resultant design and leads to inadequate opportunities for mitigation of the scheme.</p> <p>124 The applicant confirms that the parameter plan and illustrative masterplan has been led by an architect. This is evident in the approach and</p>

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			<p>resultant impact to the existing landscape which appears not to have been prioritised within the development of the scheme.</p> <p>125 A landscape led approach or at least a hybrid may have been more appropriate for such a sensitive site and result in a proposal that is more sensitive to its environment and assist in meeting key aspects of environmental policy.</p>
126 Page 4, point 24	127 Landscape Design Review	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.	<p>128 This statement is misleading.</p> <p>129 The majority of points raised within the Landscape Design Review have not been addressed and the scheme appears to remain largely unchanged.</p>
130 Page 5, 1.2 core documents	131 Design code	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...	<p>132 We welcome the fact the design code now makes reference to core national policy.</p> <p>133 Unfortunately through review of the changes it appears much of the proposed design code remains consistent with the previous version and does not meaningfully engage with the 10 characteristics of well designed places.</p>
134 Page 6, 2.2 identity	135 Identity	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. This has been made clear and set out within the Design Code. With regard to the heritage comment, it is not possible to recreate a rural aesthetic within the main HNRFI site,	<p><i>Good design enhances local culture and character and supports local ecology</i></p> <p>136 s. 4.24, draft NPS NN</p> <p>137 The Landscape Design Review focusses on the Landscape and Urban design of the scheme. It is accepted that the buildings and associated infrastructure will of course inform a large part of the sites future character (which is why architectural detailing is critical).</p> <p>138 It is unclear why in the applicant's opinion the proposed landscape cannot reflect more closely the rural aesthetic the development is set within. Aspects such as planting mixes and materiality all would enrich the current landscape character within the SRFI. These points are laid out in the landscape design review reflecting the guidance set out in the NDG.</p>

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139 Page 7, 2.3 built form	140 Wayfinding & Sense of place	<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>141 As stated by the applicant the development proposes to create it's own sense of place and disregard the current and neighboring characters.</p> <p>142 This goes against guidance set out within national policy.</p> <p>143 The applicant's statement is correct in that the development will provide streets that are recognisable distinct from those of the surrounding area. As there doesn't appear to be a strong hierarchy within the development or distinct features within it wayfinding will be a challenge and rely on signage to guide users.</p> <p>144 Retention of some of the landscape features such as the veteran tree, existing hedgerows or Brook are opportunities missed to give the development a strong sense of place that is connected to the current environment.</p>

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145 Page 8 section 2.3	146 Hierarchy	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>147 The streetscape lacks legibility with little means for natural wayfinding or orientation. The design code appears to do little to better this.</p> <p>148 The applicant states on page 17 of their own response:</p> <p>149 <i>Street hierarchy is not an approach that can be applied readily or easily to a development such as this.</i></p> <p>150 These contradicting statements are confusing as the latter appears to suggest that the SRFI site does not have a strong hierarchy as previously stated.</p> <p>151 We would agree with the applicant that the current proposal has not been able to achieve a strong street hierarchy. It is accepted that there are limitations in surfacing and the design of particular highway areas. Yet through good design distinctions can be made between routes, be it through planting design or changes to materiality of footpaths etc. We would normally expect to find these aspects detailed within the applicants design code yet the proposals appear to fall short of this.</p> <p>152</p> <p>153</p> <p>154</p> <p>155</p>
156 Page 8, section 2.3	157 Relationship	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>158 We thank the applicant for sharing our view that buffer planting is essential to a development of this scale and size.</p> <p>159 However to clarify the areas set aside to buffer this development dictated by the parameter plan are severely inadequate leading to the significant visual impact to the surrounding receptors that has been found to be a matter agreed on by both parties.</p>

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160 Page 9, section 2.3	161 Movement	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>162 In considering revisions to an existing right of way consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent.</p> <p>163 s. 5.184, NPS NN</p> <p>164 We do not agree that the NPS NN statement does not apply for the SRFI site.</p> <p>165 The applicant must consider both the existing network and its convenience to residents such as at Elmsthorpe and also the attractiveness of the routes being provided.</p> <p>166 The proposals lead to a loss of physical and visual amenity for local residents and do not reflect the principles of good design.</p> <p>167</p>
168 Page 9, section 2.4	169 Existing PRoW	It is not true that TSH are directing the public along the internal estate roads.	<p>170 Please refer to page 22 Fig. 17 of the applicant's design code.</p> <p>171 This diagram contradicts the TSH statement and suggests public routes will be alongside trafficked routes throughout the development.</p>
172 Page 10, section 2.4	173 User experience	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.	<p>174 Please refer to page 22 Fig. 17 of the applicant design code.</p> <p>175 The user experience proposed is diminished compared to the current rural character of the public routes through the site.</p> <p>176 The bridleways appear to be positioned in undevelopable land such as in floodplain and on the verge of the M69. The latter raises particular concern in relation to use of this route with horses and a conflict with traffic. This may pose a significant risk to the public and we ask the applicant to review this aspect of the design urgently.</p>

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177 Page 10, section 2.5	178	<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>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>179 We have not had the benefit of reviewing the previous iterations the applicant explored that retained much of the existing features on site.</p> <p>180 It is encouraging that the applicant was able to find design solutions that retained much of the current green infrastructure and respected the site.</p> <p>181 However it is inexplicable that the applicant has moved away from such a sensitive approach to prefer one that removes all site features within the primary development zone.</p> <p>182 The applicant has proven through previous iterations and particular efforts to integrate valuable features such as the veteran tree a more favorable proposal is possible and loss of such features is not unavoidable.</p> <p>183 We welcome the applicants commitment to achieving 10% biodiversity net gain (this is the minimum the applicant is required to achieve) but note the detail of how this will be achieved has not been provided.</p> <p>184 Such a commitment to public open space is welcomed, although the scheme may benefit from it being more evenly distributed throughout rather than focused in an area that may be prone to flooding.</p>
185 Page 13, section 2.8	186 New buildings	<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>	<p>187 We are in agreement that there will always be a new aesthetic when a SRFI is proposed. However the applicants landscape and smaller architectural proposals could respect the local vernacular and character more than is currently illustrated.</p> <p>188 The applicant has chosen to impose a new identity for the site based on their own preference and brand.</p> <p>189 A more sensitive approach would be more aligned with national policy and lead to a better development more integrated into its local context.</p>

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190 Page 14, section 2.9	191 Adaptability	The scheme is inherently adaptable to respond to changes in requirements within given parameters.	<p>192 We acknowledge the point with regard to the illustrative nature of the masterplan. Our design review focusses on the themes and intentions this masterplan introduces. The masterplan is supported by the design code which is at a similar 'high level' amount of detail.</p> <p>193 Given the flexibility of the plan we would have anticipated more certainty within this document to give confidence that the future proposals will be guided by a tight set of information and rules to ensure the development meets the requirements for good design as far as practicable. Unfortunately this is not the case and the design code currently offers little in the way of definitive guidance.</p> <p>194 As stated previously the parameter plan appears to be flawed in that it sets a primary development zone for the site that is disproportionate to the areas for landscape buffering and in the context of the surrounding area.</p>
195 Page 15, section 2.9	196 Materiality	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. 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>197 It is unfortunate that these important aspects are being considered on a plot to plot basis leading to a lack of connectivity and ultimately impacting the overall sustainability and connectivity of the scheme.</p> <p>198 A rigorous design code would assist in securing the future success of the proposal however the applicants code appears not to contain the appropriate level of detail to enable this.</p>
199 Page 19, section 3.12	200 Materials	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.	<p>201 The applicant has confirmed that the intention for this development is to create a new sense of place associated with the development itself.</p> <p>202 We have no doubt that the development will have its own sense of place within the local area. Yet due to the consistent approach described within the development itself it will not be distinct at the 'human scale' and may even appear monotonous. This does not align with good design or encourage natural wayfinding and will relies heavily on signage.</p>

Document Reference	Summary of Representation	Applicant Response	LUC comment on Applicant's response
<p>203 Pa ge 20,21 & 22 204</p>	<p>205 Approach 206 Veteran tree removal</p>	<p>Veteran Tree 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 SFRI, 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, 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. 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 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</p>	<p>207 We stand by our original assessment that the removal of the Veteran Tree on site has not been proven to be unavoidable. The NPS NN states:</p> <p><i>208 Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.'</i></p> <p>209 S. 5.32, NPS for National Networks</p> <p>210 The applicant has described previous iterations of the scheme that would suggest that removal of the Veteran Tree is avoidable.</p> <p>211 The technical points surrounding rail and gradients are noted and understood yet due to the large distance the tree is situated from the rail interface it would be reasonable to assume a workable solution for the retention of this could be achieved. It would require further detailed work which the applicant appears resistant to carry out, favouring a 'blank canvas' approach to the site and its existing features.</p> <p>212 The quantity of planting is noted but no detail exists on size that these trees will be planted at. The applicant also links these numbers to the masterplan & landscape strategy which has been confirmed as illustrative giving no weight to the numbers quoted.</p> <p>213</p>

Document Reference	Summary of Representation	Applicant Response	LUC comment on Applicant's response
		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.	
214 Page 22, section 3.2	215 Assessment of good design	The tabulated assessment of the design is considered to be unbalanced – and fails to properly account for the functionality of a SRFI and the need for this critical national infrastructure to be fit for purpose.	216 Under the tabulated assessment that relates directly to the NDG functionality is covered under the 'Use' section and has been deemed as moderate in terms of landscape & urban design. The overall finding of the assessment is that the applicant's proposal is of a poor design in landscape design terms.

(a) LUC design comment on the Applicant's response to the HBBC Local Impact Report

Summary of Representation	Applicant Response	LUC comment on Applicant's response
217 The Good Design SPD is divided into two parts, part two focusses on specific village identity and features and is not relevant to the determination of this application. Part one, however, deals with the approach and objectives to achieving good design and is relevant to the determination of this application and should be considered alongside the guidance in the NPS and other national design guidance. In particular chapters 1 (Planning and Design Process), 2 (Design Objectives) and 7 (Commercial Development) are relevant.	<p>218 The SPD properly referenced design as a process rather than an end product. The design of HNRFI has evolved as an iterative process with advice from a specialist team of consultants and through engagement with stakeholders, informal and formal consultations with the local community.</p> <p>219 Chapter 2 identifies a range of design objectives including:</p> <p>220 1. Be functional: HNRFI is designed to function to the specific requirements of a SRFI as a component of national infrastructure.</p> <p>221 2. Support mixed uses and tenures: This objective is not well related to a SRFI.</p> <p>222 3. Include successful public spaces: the thrust of this objective is directed at neighbourhoods in a living environment rather than a SRFI which will not function to attract social activities and avid life.</p>	<p>227 The applicant's submission addresses a 'campus approach' without duly recognising the significance of mixed-uses, and public spaces for communal purposes, a stance that appears incongruent.</p> <p>228 Concerning the unique character of the SRFI, the National Design Guide asserts "a response to how today's lifestyles could evolve in the future," should be a consideration, which has not been adequately attended to by the current scheme.</p> <p>229 The notion of the development being deemed 'attractive' is inherently subjective, and not an assertion we would agree with based on our landscape design assessment when measuring this against the characteristics of good design.</p> <p>230 The idea that the development provides ease of movement only considers the needs of the development itself -as discussed 'inside the park'. The development necessitates rerouting of existing public footpaths, and will increase road traffic to the M69 and overall results in a loss of amenity for the local area.</p>

Summary of Representation	Applicant Response	LUC comment on Applicant's response
	<p>223 4. Have distinctive character. HNRFI will have a distinctive character as a SRFI – the design details will be approved by the relevant Local Authority.</p> <p>224 5. Be attractive: the details of HNRFI will be attractive representing an efficient business environment.</p> <p>225 6. Encourage ease of movement: the layout of HNRFI will enable efficient movement within the park.</p> <p>226 Chapter 7 refers to the success of commercial developments that take a 'campus' approach developing a holistic and integrated environment of integrated streets, spaces and buildings. That is the purpose of the Design Code (document reference: 13.1, APP-354). It is submitted that care needs to be applied to the provisions of a Design Guide where the principles are clearly not focused upon the form and character of a SRFI – which necessarily will comprise very large scale buildings primarily functioning for logistics. That is not to say the development will not be of high quality with good design, and extensive areas of landscaping. The scale of development will create its own identify on the edge of Hinckley urban area.</p>	<p>231 As stated by the applicant the development proposes to create it's own sense of place based on the image the applicant has chosen to be most appropriate for the site, this new character apparently disregarding the current landscape character areas.</p> <p>232 This approach does not align with guidance set out within both national or local policy and would not be considered best practice for any development.</p> <p>233 We have no doubt that the development will have its own strong identity within the local area, however this is at odds with its context and create a tension that we would not deem as appropriate. Due to the consistent approach described by the applicant within the development over a large area it will not be distinct within itself at the 'human scale' and would likely become monotonous.</p> <p>234 This does not align with good design or encourage natural wayfinding and will rely heavily on signage.</p> <p>235 Retention of some of the landscape features such as the veteran tree, existing hedgerows or Brook are opportunities missed to give the development a strong sense of place that is both rooted to and respects the current environment. Equally the applicant may have chosen within the design code to celebrate and reinforce local character which unfortunately is not the case.</p> <p>236</p> <p>237</p>

(a) LUC comments on Applicant's response to BDC & HBBC Written Representations

Summary of Representation	Applicant Response	LUC comment on Applicant's response
<p>238 HBBC feels the proposals do not constitute 'Good Design' and have jointly commissioned a Landscape Design Review with Blaby District Council within which the merits of the proposal are considered taking into account the applicant's submitted 'design code' and the National Design Guide, National Model Design Code and the HBBC Good Design Guide SPD. The design of the</p>	<p>239 The matter of design and the applicant's response to design is addressed in a detailed document appended to the Local Impact Report response as Appendix A (document reference: 18.4.1). Should this work have been presented during consultation and ahead of submission it would have been considered in the proposals, nevertheless the Applicant has considered the recommendations of the</p>	<p>240 The design code lacks clarity in any detail of what is being proposed. Additionally there is not enough detail in the document to comment on how the feedback as shaped the design code. Conversely It is evident that a substantial portion of the modifications to the design code aims to reduce prescriptiveness and introduce greater vagueness.</p>

Summary of Representation	Applicant Response	LUC comment on Applicant's response
Proposed Development has significant deficiencies and fails to meet the criteria for 'good design' set out in paragraphs 4.28 – 4.35 of the NPSNN. BDC would go as far as to consider the scheme constitutes poor design.	Landscape Design Review and has updated the Design Code (document reference: 13.1, APP-354) and Design and Access Statement (document reference: 8.1, APP-349) accordingly.	
241 The Proposed Development fails to deliver the aim on page 4 of the Design Code and does not propose a landscape scheme of the highest quality or maximise benefits for users and its neighbours would lead to an overdevelopment of the site and the proposed landscape is alien to the surrounding landscape character. This in turn would significantly damage the setting to the site and sensitive areas such as Burbage Common, Burbage Woods and Aston Firs SSSI. Masterplan has been designed in an insular fashion disregarding urban grain and vernacular. The parameters plan outlines a primary development zone too large for its context and relies on insufficient fringe areas to adequately buffer the development	242 The matter of design and the applicant's response to design is addressed in a detailed document appended to the Local Impact Report response as Appendix A (document reference: 18.4.1). Should this work have been presented during consultation and ahead of submission it would have been considered in the proposals, nevertheless the Applicant has considered the recommendations of the Landscape Design Review and has updated the Design Code (document reference: 13.1, APP-354) and Design and Access Statement (document reference: 8.1, APP-349) accordingly.	243
244 The intended approach to clear all existing natural site assets in the primary development zone is typical of the proposals and illustrates a general lack of sensitivity.	245	246 Has not been addressed by the applicant's amendments
247 There is a loss of both visual and physical amenity. Scale and massing of the Proposed Development and its position make it visible from a large number of receptors. This is worsened by the architectural design that has made little attempt to blend into its surroundings. The severance of existing PROWS particularly impact the residents of Elmesthorpe. The proposed diversions are inadequate in quality and poorly laid out. The experience of the user changes from encountering a natural aesthetic to an urban one as a result of the majority of the proposed routes being adjacent to roads.	248 Landscape considerations have been a part of the design evolution since the land was first considered for development by TSH in 2016. 249 The impact on the landscape has been considered at various stages including the initial extent of the development and the scale of detail of the design. It is acknowledged that there would be significant adverse residual effects on identified representative landscape and visual receptors, as noted at paragraphs 11.189, 11.190 and 11.191 in the Summary and Conclusion of Chapter 11: Landscape and Visual Effects of the ES (document reference: 6.1.11, APP-120).	250 As noted by the applicant there will be significant adverse effects on landscape receptors. These have not been addressed by the applicant's amendments.
251 The streetscape is repetitive and has limited legible hierarchy. Hard surfaces dominate the landscape including large, uninterrupted areas for	252 The matter of design and the applicant's response to design is addressed in a detailed document appended to the Local Impact Report	253 We welcome the limited amendments made by the applicant, including taking our suggestion to use

Summary of Representation	Applicant Response	LUC comment on Applicant's response
parking. The detailed proposals are vague in areas some of which are set out in the design code. Wording in this document is not definitive enough and lacks certainty in terms of what will be delivered.	response as Appendix A (document reference: 18.4.1). Should this work have been presented during consultation and ahead of submission it would have been considered in the proposals, nevertheless the Applicant has considered the recommendations of the Landscape Design Review and has updated the Design Code (document reference: 13.1, APP-354) and Design and Access Statement (document reference: 8.1, APP-349) accordingly.	species of tree to create a sense of hierarchy and character. 254 However these proposals still lack clarity and do not go far enough to address the predominant presence of hard landscape in the design. For these principles to be successful a rigorous design code is needed to guide future development, this has not been put forward by the applicant. 255 It is worth noting that this would be much more successful if the applicant retained some of the key existing features on site to strengthen identity.
256 Green infrastructure is largely focussed on the fringe areas of the site. The proposed green areas are disproportionate to the scale of the development and often occur as fragmented spaces of little ecological value. The inclusion of SuDS is welcomed but layout and form is dictated by infrastructure, seems to have missed opportunities to include other features including enhancing existing watercourses that would assist biodiversity.	257	258 Has not been addressed by the applicant's amendments
259 The proposed materiality is generic and lacks sensitivity to the local area. The large amounts of hardstanding and built form will lead to a future maintenance burden that will likely impact on the schemes overall sustainability.	260	261 Has not been addressed by the applicant's amendments
262 BDC considers deign improvements are needed and the issues listed from 9.11.1-9.11.7 warrant further discussion and consideration.	263	264 Has not been addressed by the applicant's amendments
265 BDC considers the Proposed Development does not satisfy the requirements for design in NPSNN para 4.32.	266	267 Has not been addressed by the applicant's amendments

LUC Landscape Design

On behalf of BDC & HBBC

09.11.23

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