

Hinckley & Bosworth Borough Council
Interested Party Reference Number: 20039546

Deadline 5 Submission:

Response to:

**REP4 – 133: Doc 18.14 Applicant's response to HBBC and
BDC deadline 3 submission on design matters**

**Application by Tritax Symmetry (Hinckley) Limited for an
Order Granting Development Consent for the Hinckley
National Rail Freight Interchange**

(ref. TR050007)

Landscape Design

It is important to state that this document is in direct response to the deadline 4 changes, amendments and comments received from the applicant. Unless superseded through this document the points within the Landscape Design Review previously carried out by LUC still stand and should be taken into consideration to give a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.

Executive Summary

LUC were 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). 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 further updated Design Code and clarifications relating to the design from the applicant, LUC has concluded that the findings of their original assessment still stand. In their view the proposals 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. While there have been improvements to the Design Code in particular, this has primarily involved providing additional detail on the current proposal, rather than addressing the fundamental points on landscape character raised in the original Landscape Design Review. It is noted in a number of places through the Design Code, a reference to future detailed design approvals to resolve design issues has been added. While this may be acceptable for specific plot-by-plot details (building materials, SuDS features, etc.), this would further emphasise the need for a strong Design Code and Landscape Strategy to offer acceptable options and guide the future development applications. This level of detail is currently missing from the Design Code.

Table 1.1: LUC comment on Applicant response to BDC joint response with HBBC on design matters of the HNRFI DCO Examination (ref. TR05007) issued at Deadline 4 (REP4-133)

Document Reference	Summary of Representation	Applicant's statement	HBBC Response
Page 2, section 1	General Design Approach	By necessity for a scheme of this nature, no one discipline has led the design approach per se. A number of different factors have been key at different stages including rail requirements, operational requirements and landscape and ecological factors. A practical approach has been taken that goes beyond the boundaries of the site, recognising that the best practicable environmental option	The updated Design Code does provide additional information on typical landscape proposals within the 'pink' zone indicated on the parameter plan. While it is appreciated that the design needs to be considered in the context of the SRFI scale and practical

Document Reference	Summary of Representation	Applicant's statement	HBBC Response
		<p>at a district or national level is to maximise the development potential of this site and avoid the potential need for further greenfield site use beyond the well contained boundaries of the current DCO. Therefore, while the traditional aspects of a 'landscape' led approach on a smaller scale mixed use development' are not central to this design, a different set of landscape benefits have been considered and taken into account including creation of 22ha of publicly accessible green space and a well contained scheme which minimises its impact on the wider landscape for the scale of logistics benefits it can deliver. Moreover, it should be noted that green and blue infrastructure account for 28% of the Main HNRFI and A47 Link Corridor area which, at over a quarter of the total area, demonstrates the extent to which landscape and ecology have been a central part of the design development process. Also of note, whilst the parameter plan shows a central development area without green space to avoid creating additional constraints, a significant part of the area will constitute green and blue infrastructure with attenuation basins, structural planting, amenity areas, tree lined streets and green corridors all forming a part of the 'pink' zone'. As many landscape and ecological features have been retained as is possible within the constraints of delivering an SNRFI, to defined parameters within a defined area whilst ensuring the necessary flexibility to ensure the development meets the needs of future occupiers. This is a clear approach which has remained constant throughout the application process. The design needs to be considered in the context of an SRFI and what is realistic for a development of that scale. There is not an option to deliver a smaller scale business park or mixed-use scheme which can readily incorporate most key landscape features and respond to local character in terms of scale.</p>	<p>requirements, a design code should set out the rules that future plot development proposals should adhere to and can be assessed against.</p> <p>The current Design Code does not provide the expected level of detail to do this.</p>
Pages 3 & 4, section 2	Loss of existing landscape features/ consideration of landscape character	<p>The local authorities are focussing on the features that are to be removed within the main development site but it must be noted that the many landscape and ecological features within the DCO boundary are to be retained. For example, of the 872 arboricultural features (individual trees, groups of trees, woodlands and hedgerows) surveyed, 312 are to be lost or partially lost. However, this leaves the majority – 540 features retained within the DCO boundary. As a result of the central nature of the features to be lost, a misconception has developed that the applicant has not respected the existing vegetation and features on site. That is not the case. Whilst the nature of the scheme does require the loss of more features than other types of development, the proposals have retained as many of the existing features as possible. Further, the proposals respect existing vegetation patterns in so far as they replicate the existing vegetation within the local area. For example, wet woodland and grassland alongside stream courses to respect the existing character in lower lying areas within Elmesthorpe Floodplain Landscape Character Area; woodland copses, scrub and meadow grassland to reflect the vegetation in the Country Park; and copses, ponds and hedgerows which are characteristic of the broader countryside of the Aston Flamville Wooded Farmland LCA and Stoney Stanton Rolling Farmland LCA. A summary of proposals that accord with the Landscape Character Area Opportunities and Guidelines is contained below:</p> <ul style="list-style-type: none"> • Provision of 22ha of new accessible green space; 	<p>A clear landscape strategy would help to identify and quantify both landscape elements that require removal and the proposed additions. While the updated Design Code does provide some additional high-level information on typical landscape additions, this is not demonstrated in a structured manner that could be described as a true landscape strategy.</p> <p>This should include setting out how the green and blue infrastructure define the development plots along the key movement routes, as shown in principle on the illustrative landscape plan and accompanying section and plan (Fig 18) showing typical details to internal distributor roads.</p>

Document Reference	Summary of Representation	Applicant's statement	HBBC Response
		<ul style="list-style-type: none"> • New hedge planting which will be managed with traditional 'Midlands-style' hedge laying to improve structure and biodiversity; • Planting trees of appropriate size and species within open ground and hedgerows with opportunity to grow large spreading canopies and be the veteran trees of the future; • Planting wet woodlands in lower lying ground to extend this local habitat type; • Establishing a SuDs scheme to manage run-off and any pollutants from the development; • Establishing new areas of meadow grassland; and • Establishing new areas of woodland. 	
Page 4, section 3	Detailed Design Matters	The local authority is looking for more detail and 'certainty' on a number of design matters. As noted above, this will be delivered at the requirements stage but in the meantime, the applicant is conscious that some of the detail that currently exists within the application is spread between documents and may not be fully appreciated by the councils. We have therefore prepared a more comprehensive Landscape Strategy Section within the DAS that pulls all of these strands together for ease of understanding and added some further detail to the Design Code Document that may assist the examining authority.	The effort has been acknowledged. However, the majority of additional information included in the revised Design Code are high level statements taken directly from the Design and Access Statement (DAS). The landscape strategy in the Design Code is primarily high-level statements of landscape intentions, rather than a design code to inform and guide future development plot proposals as to requirements and structure.
Page 4,	Remarks on Executive Summary	It is considered unfortunate, that Land Use Consultants Limited still feel that the updated Design Code, statements, and clarifications, put forward in the initial response, have not, in their view, yet been deemed acceptable in landscape design terms based upon their own review of the scheme. It is not the case, that the Applicant has not taken onboard the comments made in the initial review in the manner in which they have been purported to have been made, but moreover the initial response set out to explain how, in the very specific case of an SRFI, the appraisal of the scheme against the ten characteristics of a 'well designed place' is a different process to that, of say, a residential scheme, which, as previously established, the National Design Guide is focussed upon. The Applicant is committed to delivering a well-designed scheme, that seeks to respond in a positive manner to the existing landscape context, but it does need to be appreciated, that in the provision of an SRFI scheme, there are limitations, and this is recognised in NPS-NN, paragraph 4.30: <i>'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.'</i>	<p>Acknowledgment welcomed.</p> <p>While some limited comments have been taken on board and the Design Code expanded to demonstrate typical landscape typologies, most of the responses are still weak. The overall illustrative landscape proposals remain as previously submitted, with limited additional detail.</p> <p>The specific status of the SRFI is of limited consequence to a landscape assessment. The landscape assessment uses established design guidance to assess the impacts on the existing landscape, irrespective of proposed land use.</p>

Table 1.2: LUC design comment on *Response on Points raised at Issue specific Hearing 03 – Environmental Matters - November 1, 2023 (REP4-133)*

Document Reference	Summary of Representation	Applicant Response	HBBC Response
Loss of Veteran Tree Page 1	Points 1 & 2	LUC's commitment to their original standpoint on the Veteran Tree is acknowledged and the NPS-NN requirement fully understood, as is the need to demonstrate that its loss is unavoidable.	Noted
	Points 3 & 4	Reviews of the previous iterations of the masterplan, place the Veteran Tree in the centre of a parking area or within the estate road, and to retain the tree would not just require a reworking of the plan in a top down two dimensional way, but also require retention and protection of its current natural habitat for a minimum of 15 times the diameter of the tree, including the levels and hydrological conditions to maintain the condition of the tree. This also, only pertains to the final state environment, with further construction and design restrictions going beyond these bounds. It is appreciated that the technical points surrounding the scheme have been understood, but just as important is the understanding that this isn't a scheme where the final detailed design is known, and the masterplans were produced to 'illustratively' show what the development could look like and hence why is a parameter led application. As was stated in the hearing, the retention of the Veteran Tree and further changes in the number and location of plateaus within the development zones would not allow the Applicant to satisfactorily respond to all occupier enquiries in a way that would not affect the operation, functionality, or safety.	No additional justification for removal provided. The Council stand by LUC's original assessment that the removal of the Veteran Tree on site has not been proven to be unavoidable.
	Point 5	Tree planting details will be provided as part of Requirement 22. The LEMP set out the tree species mixes and management for new planting. As noted in the LEMP and would be usual, woodland mixes will be planted as whips for the greatest chance of sound establishment. The masterplan while illustrative, is guided by the parameter plan which sets the area requirements for landscape proposals. The landscape and visual assessment is based on the mitigation as set out in the parameter plan and detailed in the illustrative landscape strategy. Whilst the exact locations may vary at the detailed stage depending on the configuration of the layout, the overall quantity and nature of planting is required to be broadly as described in the illustrative landscape strategy as that is the embedded mitigation that is relied upon for the assessment and the ultimate success of the scheme.	Additional information provided within the updated Design Code on tree species mixes to specific areas and typologies. However, while some detail on sizing for certain areas (Amenity areas suggest extra heavy standards and semi-mature) additional information on sizing generally would be required to set the ground rules for future development proposals and to close out comment. A succinct tree strategy diagram is required to demonstrate and quantify the different typologies. Noted that detail design deferred to future detail approvals.
Sense of Place Pages 1	Points 6 & 7	The current landscape character has not been disregarded, the Statements of Environmental Opportunity within NCA94 – Leicestershire Vales and the Landscape Guidelines associated with the relevant district Landscape Character Areas have been taken into account in the proposals and a number of aspects incorporated into the planting proposals in particular. However, as is recognised within the NPS-NN 'it may be that countryside locations are required for SRFIs'.	While it is appreciated that ' <i>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</i> ', this does not justify an identikit approach to

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		<p>(NPS-NN paragraph 2.56) and as previously referenced; <i>'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.'</i> (NPS-NN, paragraph 4.30) and it needs to be recognised that an SRFI will be quite distinct from the pattern of nearby villages in terms of scale and design. The proposals that have been put forward, follow a detailed study that was undertaken, to establish the architectural typology within the locality, especially those of comparative use, to ensure that the proposals put forward for HNRFI are of the highest standard and appropriateness. The proposed building design is the result of years of evolutionary development work with the Applicant, that has culminated in a form, design, and application of material, that can respond to the location, environment, constraints, and occupiers' operational requirements in a positive way, as well as providing an aesthetic that can establish and create its own sense of place without replicating other surrounding logistic / industrial developments. Whilst the buildings will follow the same aesthetic theme, this does not dictate a monotonous design, the buildings will change in scale, mass and orientation as well as having constant active frontages and key focal points provided by the office locations. In addition, each will be set in their own landscaped environment, and accessed via a seasonally changing avenue and streetscape. By creating a clear distinction between the main HNRFI site and the surrounding publicly accessible areas, it allows for the necessary larger form and scale of buildings to be accommodated in a considered manner, appropriate to their function and operation, alongside the more 'human-scale' components of the development such as the landscaped green corridors of the new bridleway and the extension to Burbage Common and Woods. This simplicity means that visitors to the site can make clear directional choices in terms of either entering the main HNRFI site to their place of work, or along defined routing and pathways laid out for walking, cycling or horse riding. Signage will be provided for information purposes, guidance and safe navigation, but as with all developments, familiarity for repeat visitors will render this unnecessary. Reasoning has already been provided, as to why the veteran tree and other landscape features cannot be retained in order to deliver an SRFI in this location. The illustrative landscape strategy sets out how the creation of new landscaped areas will tie the development into the existing area with new woodland, scrub and grassland linking to surrounding habitats</p>	<p>development proposals and abandonment of existing landscape character.</p> <p>As commented previously, the scheme will rely heavily on signage and wayfinding, instead of utilising existing landscape features to create an evolving and mutable landscape. Where this is not possible, good design distinctions can be made between routes through locally distinct planting design and style.</p> <p>The Design Code provides the opportunity to set up and define characteristics of the landscape environment and typologies to inform each development plot and future proposals. While progress has been made in explaining some elements and landscape typologies, it is not considered a thorough design code.</p> <p>The Council disagrees with the statement regarding signage <i>'but as with all developments, familiarity for repeat visitors will render this unnecessary'</i>.</p>
Wayfinding within the development and hierarchy Page 1	Point 8	To clarify, this statement was made in the context of the examples set out within the NDG, which as already stated, is at its core, a document for residential development. The response went on to state how the principal infrastructure proposed for the development does display the characteristics of street hierarchy, and the Design Code (Ref 13.1A) identifies the differences between the A47 Link Road proposals and the internal estate roads. Importantly, it also recognises that these must fundamentally provide appropriate and safe ways and means for access by all means to their destination. It is difficult to see how,	<p>Additional information provided within the Design Code, including additional specific codes relevant to this point for:</p> <ul style="list-style-type: none"> - A47 Link Road - Internal Distributor Roads - Public Realm and Public Rights of Way

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		when purposefully, the number of access points and nodes along the A47 Link Road are limited, how this can be seen as anything other than making wayfinding as easy as possible for users, and as mentioned above, familiarity for repeat users will render the signage provision unnecessary.	<p>- Development Plots</p> <p>This provides information on street hierarchy and characteristics, with specific detail on footpath widths, materiality, planting strategy and SuDS. Additional detailed plans and typical sections also assist to illustrate.</p> <p>This additional information provides sufficient detail to satisfy the Council's comment on street hierarchy.</p>
	Point 9	The detail requested will come forward pursuant to the Requirements, notably Requirement 4 'Detailed Design Approval'	Noted
	Point 10	See point 8.	Noted
Use of Materials and Architectural Style Page 2	No point reference against this heading.	Reference has already been made, and recognised by LUC within their response, as to how the introduction of an SRFI within a countryside setting has its limitations, especially in terms of how it can respond to a local vernacular or context. The suggestions made, and the Applicant understands the thought and reasoning that went into them, were not dismissed out of hand, and due consideration was given to them in the prepared response, and the reasoning why these weren't adopted in this instance explained in detail. The Applicant has confidence in the architectural style and how the palette of materials, and the application of them, that breaks down the mass of the building both horizontally and vertically, provides the best and most appropriate response in this setting, especially when utilised in conjunction with the illustrative landscaping proposals. It is true that AJA Architects have made use of other materials in their designs for other developments, as any Practice would for specific commissions, but not in their work on other SRFI's or large-scale logistics parks, and therefore the comment is misleading in this context. Where appropriate, within the landscape settings and smaller architectural elements, the use of local materials is not dismissed and this can be captured as part of Requirement 4 'Detailed Design Approval'. The use of graduated cladding was not ignored, but its application on large scale distribution units, because of its 'block on block' application draws the eye to the mass of the building in a horizontal way, and the use of colour, whether it be blue as suggested or another, because of the limitations of the colour palettes available always looks foreign in a landscape setting, something that is very evident at the development at Magna Park. Similarly, given the proximity of Magna Park to the site, if HNRFI is to have its own identity, this is something to avoid. The point made on the undulating roofline, was made against the suggestion that consideration could be given to a continuous parapeted eaves design, and in that context it is a more natural form than a straight line, and far from being monotonous, when applied to buildings of	<p>No further detail provided in the Design Code. The Council's previous comments that the proposed architectural detailing and style would be foreign within the landscape setting are still relevant. It is the Council's view that diversity between the buildings would help reduce the impact of this large-scale logistic park.</p> <p>This distinction on use of local materials is not referenced in the Design Code as guidance for consideration. While section 11.4 specific codes – office design refers to 'different cladding types used on office elevations to assist in creating an active and well-designed frontage which is readily distinguished from the rest of the building'; section 11.5 – materials states 'office elevations will use either flat or micro-rib profile panels.</p> <p>Noted that design deferred to Requirement 4 'Detailed Design Approval'. While the detail could follow in future applications, the principles and strategy should be set out within this application.</p>

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		differing scale and form, provides change and interest, whereas buildings with a continuous parapet have a tendency to blur and be read as one mass.	
Detail within the Design Code Page 2	Points 11, 12 & 13	The Design Code (Ref 13.1A) has been updated again with greater detail and information and will form part of the Deadline 4 submission documents. It is worth reiteration that the Design Code and Illustrative Masterplan (ref 2.8A) have been submitted having regard to the National Design Guide proportionate to the decision taking for this DCO, and that additional detail will come forward pursuant to Requirements 4 (Detailed Design Approval).	The Council acknowledges the effort put into the Design Code and the progress made. However, elements are largely taken directly from the DAS without introductory text and/or diagrammatic explanation. The Parameters Plan and the Landscape Strategy are still unchanged. Specific notes on Design Code in table below.

Table 1.3: LUC design comment on *the Applicant's response to LUC Comment on the Applicants amendments to the Design Code (REP4-133)*

Document Reference	Summary of Representation	Applicant Response	HBBC Response
Page 4, section 1.3	Point 16	Noted, no further comment.	N/A
	Point 17	It is submitted, that explanation of how this has been applied has been detailed, not only within the document, but also by the other responses that have been made in the original response at Deadline 2, the ISH and this further response.	Noted
Pages 5, section 1.5	Point 20	The local authorities are focussing on the features that are to be removed within the main development site but it must be noted that the many landscape and ecological features within the DCO boundary are to be retained. For example of the 872 arboricultural features (individual trees, groups of trees, woodlands and hedgerows) surveyed, 312 are to be lost or partially lost. However, this leaves the majority – 540 features retained within the DCO boundary. As a result of the central nature of the features to be lost, a misconception has developed that the applicant has not respected the existing vegetation and features on site. That is not the case. Whilst the nature of the scheme does require the loss of more features than other types of development, the proposals have retained as many of the existing features as possible. Further, the proposals respect existing vegetation patterns in so far as they replicate the existing vegetation within the local area. For example, wet woodland and grassland alongside stream courses to respect the existing character in lower lying areas within Elmesthorpe Floodplain Landscape Character Area; woodland copses, scrub and meadow grassland to reflect the vegetation in the Country Park; and copses, ponds and hedgerows which are characteristic of the broader countryside of the Aston Flamville Wooded Farmland LCA and Stoney Stanton Rolling Farmland LCA.	No change to this section of document. As detailed in previous response, the proposal does not align with core policy due to the removal of existing green infrastructure including watercourse, hedgerows and veteran tree within the primary development zone set by the parameter plan. For this reason the Council does not agree that the proposal respects existing vegetation patterns.

Document Reference	Summary of Representation	Applicant Response	HBBC Response
Pages 5, section 1.6	Points 21, 22, 23, 27, 28, 29	Whilst the nature of the scheme is such that it has not been possible to retain all features of landscape and ecological interest, as the landscape strategy illustrates, many features are being retained and a considerable network of new habitats and landscape features will be created which will provide a richer natural environment in and around the site. There has been no simplification of design proposals, the proposals remain as they were at the application stage and as set out in the illustrative landscape strategy.	<p>The Council's previous comment noted that the simplification of the previously detailed landscape strategy 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 it's situated within.</p> <p>The Council 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> <p>While it is acknowledged that the revised Design Code document does start to set up rules for the different boundary and streetscape typologies within the active 'pink' zone, the detail is light and language is not definitive beyond meeting standards.</p> <p>This fundamentally conflicts with the applicant's statement that 'the illustrative landscape strategy has been developed iteratively to maximise the potential for betterment at the site'.</p>
Page 12, section 3.1	Point 32	The point made previously, was that the parameters plan did not seem to show the same evolutionary process as the illustrative masterplan did, however this is not the case, and the Parameters Plan did indeed keep in step with the evolution of scheme.	No change to document wording – the point previously raised that despite comments outlined in the original LUC design report regarding character, scale, impact on nature and the locality (also raised independently by other parties during consultation), the scheme doesn't appear to have taken these comments into consideration.
Page 14, section 4.1	Point 33 & 36	<p>An SRFI requires a uniformity within which the Railport, serving infrastructure and development plots can be laid out within. Notwithstanding the larger scale that an SRFI dictates, and as was noted at the ISH, only smaller, non rail served developments, could seek to achieve this.</p> <p>This point is not correct, and none of the previous iterations of the masterplan retained the veteran tree.</p>	<p>Noted</p> <p>Noted</p>
	Point 37.	As has been previously stated, multiple plateaus, when the detail of the development is not yet known, would not allow the Applicant to satisfactorily respond to all occupier enquiries in a way that would not affect the operation, functionality, or safety.	Noted, but this is not a concern of landscape assessment.

Document Reference	Summary of Representation	Applicant Response	HBBC Response
Page 20, section 5.2	Point 41	Applications to achieve a BREEAM Excellent rating, will be made, specific to the individual developments, as this is how the process is designed to be, with the rating being attributable to a specific building. The detail of any application will be subject to the characteristics of that development, but will, where appropriate make reference to elements outside of the individual developments demise, e.g. the provision of bus facilities. The Design Code will be reviewed to provide greater clarity.	<p>Minor amendment to document to describe commitment to permeable paving within parking areas and footpaths. However, no firm commitment to proportion. No additional details provided on existing landscape and ecology matters. Previous comments remain.</p> <p>Further detail required on how the development will achieve Ecology and Land use credits to achieve BREEAM Excellent.</p>
	Point 42	The landscape proposals as set out within the illustrative scheme are subject to the rigour of the biodiversity net gain process which has ensured that all opportunities to maximise biodiversity within the DCO boundary have been explored alongside the natural landscape design development process of seeking to introduce and enhance characteristic landscape features within the local landscape.	The Council would disagree that all opportunities to maximise biodiversity with the DCO boundary have been explored. As highlighted previously, existing landscape features within the development zone have been disregarded to maximise opportunities for development plots.
Page 25, section 6.3.1	Points 46 & 47	The local authorities are focussing on the features that are to be removed within the main development site but it must be noted that the many landscape and ecological features within the DCO boundary are to be retained. For example of the 872 arboricultural features (individual trees, groups of trees, woodlands and hedgerows) surveyed, 312 are to be lost or partially lost. However, this leaves the majority – 540 features retained within the DCO boundary. As a result of the central nature of the features to be lost, a misconception has developed that the applicant has not respected the existing vegetation and features on site. That is not the case. Whilst the nature of the scheme does require the loss of more features than other types of development, the proposals have retained as many of the existing features as possible. Further, the proposals respect existing vegetation patterns in so far as they replicate the existing vegetation within the local area. For example, wet woodland and grassland alongside stream courses to respect the existing character in lower lying areas within Elmesthorpe Floodplain Landscape Character Area; woodland copses, scrub and meadow grassland to reflect the vegetation in the Country Park; and copses, ponds and hedgerows which are characteristic of the broader countryside of the Aston Flamville Wooded Farmland LCA and Stoney Stanton Rolling Farmland LCA.	<p>No further commitment or detail provided in the updated Design Code on the retention of key ecology and habitat.</p> <p>As commented previously the Council would urge the applicant to explore ways in which to retain valuable site assets within the primary development zone. This aligning with policy and generally master planning best practice.</p>
	Point 48	As many landscape and ecological features have been retained as is possible within the constraints of delivering an SNRFI, to defined parameters within a defined area whilst ensuring the necessary flexibility to ensure the development meets the needs of future occupiers. This is a clear approach which has remained constant throughout the application process.	As the applicant states, the approach to flexibility of development over retention of existing landscape and ecological features has remained constant throughout and has not considered the Council's previous comments to align the scheme with policy and best guidance.

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			As commented previously the Council would urge the applicant to explore ways in which to retain valuable site assets within the primary development zone. This aligning with policy and generally master planning best practice.
Page 25, section 6.3.2	Point 60	Noted, no further comment.	N/A
	Point 61	Further details are provided in the updated DAS /Design Code	Updated DAS & Design Codes acknowledged. Further detail provided across the Design Code including typical sections and plans, providing high level guidance on spatial requirements to landscape features and typologies. While the description is relatively generic and high level for a design document such as this, they do provide a level of reference to develop and assess future landscape proposals.
	Point 62	The point is noted, but this needs to be reviewed in the context of an SRFI and what is realistic for a development of that scale. There is not an option to deliver a small-scale business park or mixed-use scheme which can readily incorporate most key landscape features and respond to local character in terms of scale.	While the point is noted, the scale of a development should not override matters of landscape character. The Council's position remains unchanged. The landscape character and sense of place would be further strengthened if the existing green infrastructure could be better retained and enhanced.
	Point 63	The A47 link lies to the north of the Country Park and does not sever it. The option remains to increase the verge between the carriageway and the footway and provide increased segregation at the detailed design stage.	No further comment to add.
	Point 64	To be checked with BWB.	Noted. Additional detailed text provided to confirm segregation, however graphic section shows conflicting information with combined cycle/footway.
No specific point reference, but taken from note 67	The local authority appears to misunderstand the application when making these comments. The applicant is bound by the parameters plan, the proposals as set out in the illustrate landscape strategy, the embedded mitigation, the biodiversity net gain requirements, and all of the requirements of the DCO. The changes to the wording of the design code submitted at Deadline 2 have been taken out of context and not in the spirit of which they were intended. The approach to the application remains the same. For the avoidance of doubt a landscape strategy document has been prepared which draws together all of the key landscape	On review of the landscape strategy, the Council does not consider that this sets out a clear, concise strategy for landscape elements. A simple series of diagrams would help to illustrate how the various strands of landscape and ecology fit together with the functional requirements of the application. In the Council's view this should be provided as	

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		information in one place to ensure all aspects of the landscape character approach, landscape features retention, landscape proposals and management approach is fully understood.	part of the current documentation to set clearly the outline the framework for green and blue infrastructure.
	No specific point reference, but taken from note 71.	The well-being areas are captured within the design code (section 12.11), and the precise detail would be part of the Requirement 4 (Detailed Design Approval). The statement is correct in that the public routing, for those that are not visitors or employees of the main HNRFI, is not along the internal estate roads, and this is clear from both the illustrative masterplan, parameters plan, and PROW plans, with the routing being set out around the main development area. However, use of the footpaths and cycleways within the main development area is not precluded by the public should they so wish to use them.	Reference is made throughout the revised Design Code, deferring most of the landscape design to detailed design approvals as per DCO Requirements. This confuses the purpose of a Design Code as the guidance and rules are designed to guide future detail of the development. While the detail could follow in future submissions, the principles and strategy should be set out within the current documentation. Descriptions of the different spaces are limited and would benefit from explanatory text/diagrams and location plans.
	No specific point reference, but taken from note 73.	As above, the changes to the wording of the design code submitted at Deadline 2 have been taken out of context and not in the spirit of which they were intended. The approach to the application remains the same. For the avoidance of doubt a landscape strategy document has been prepared which draws together all of the key landscape information in one place to ensure all aspects of the landscape character approach, landscape features retention, landscape proposals and management approach is fully understood.	On review of the landscape strategy, the Council does not consider that this sets out a clear, concise strategy for landscape elements. A simple series of diagrams would help to illustrate how the various strands of landscape and ecology fit together with the functional requirements of the application. In the Council's view this should be provided as part of the current documentation to set clearly the outline the framework for green and blue infrastructure.
	No specific point reference, but taken from note 75.	It will be the local authorities who discharge the requirements of the DCO and will therefore be in a position to ensure adequate and expected details appear within the detailed landscape scheme in broad accordance with the illustrative scheme which formed the basis of the assessment. Species mixes are detailed in the LEMP and DAS submitted with the application.	Reference is made throughout the revised Design Code, deferring the majority of landscape design to detailed design approvals as per DCO Requirements. This confuses the purpose of a Design Code as the guidance and rules are designed to guide future detail of the development. While the detail could follow in future submissions, the principles and strategy should be set out within the current documentation.
Page 34, section 8.5	No specific point reference, but taken from note 77.	There is a clear PROW Strategy that has been discussed and agreed with the councils and there is no apparent confusion beyond the wording of this design response document. Permissive footpath and cycle routes offer direct access through the development for those who desire it, noting this will require multiple	No further comment to add.

Document Reference	Summary of Representation	Applicant Response	HBBC Response
		road crossings. A new offroad bridleway is proposed around the perimeter of the site within a broad green corridor with one signalised road crossing.	
	No specific point reference, but taken from note 80.	<p>Text changes have been taken out of context, noting the species mix lists are within the LEMP and DAS and incorporate a variety of species of local importance and landscape character is promoted through a range of different proposals including</p> <ul style="list-style-type: none"> • Provision of new accessible green space; • New hedge planting which will be managed with traditional 'Midlandsstyle' hedge laying to improve structure and biodiversity; • Planting trees of appropriate size and species within open ground and hedgerows with opportunity to grow large spreading canopies and be the veteran trees of the future; • Planting wet woodlands in lower lying ground to extend this local habitat type; • Establishing a SuDs scheme to manage run-off and any pollutants from the development; • Establishing new areas of meadow grassland; and • Establishing new areas of woodland. 	<p>The additional detail, description and typical plans/sections within the Design Code do assist with understanding the proposals and setting some rules for future development applications.</p> <p>Reference is made throughout the revised Design Code, deferring the majority of landscape design to detailed design approvals as per DCO Requirements. While the detail could follow in future submissions, the principles and strategy should be set out within the current documentation.</p>
	No specific point reference, but taken from note 83.	This comment has been addressed in the previous notes under the heading of Use of Material and Architectural Style.	Point noted. No amendment or additional information provided within to Design Code
Page 45, section 11.6	No specific point reference, but taken from note 85.	It is not a case of strengthening the Tritax brand, but moreover, that the Applicant has developed a form that meets the needs, and can be adapted to suit the widest range of occupiers, a material application that works well in breaking up the visual mass and scale of the buildings, and through the use of a range of monotone hues, works far better as a backdrop to a considered landscaping scheme than an introduction of colours, that in reality to align to the natural environment.	<p>No amendment to Design Code.</p> <p>While utilising the Tritax brand colours is not an issue in itself, as per the Council's previous comment, the Council would advise such an intention at this scale is inappropriate with respect to impact on the 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.</p>

Table 1.4: LUC comments on Applicant's response to LUC Comment on the Applicants response to Local Impact Report – LUC's Landscape Design Review (REP4-133)

Document Reference	Summary of Representation	Applicant Response	HBBC Response
Page 1, point 3 Intro remarks - consultation	Point 89	The points are noted, however the response was to merely note that the detail contained within the review couldn't be appraised or assimilated prior to its issue.	Noted
	Point 90	The note is not an acceptance of deficiencies, but an observation on timing and how the application couldn't address the detailed points prior to its issue.	No comment to add
Page 2, point 6 Landscape Vision	Points 93,94 and 95	It is accepted that the changes incorporated into the Design Code at Deadline 2 introduced a number of inconsistencies and misunderstandings. All documents have now been subject to a full review and wordings updated to reflect the applicants clear position with regard to design which has not changed.	Design Code and DAS documents have been updated and the logic is clearer. The additional detail, description and typical plans/sections within the Design Code do assist with understanding the proposals and setting some basic rules for future development applications. However, as the applicant states, their position on design has not changed. This has not addressed the fundamental issues of scale and character raised in the previous landscape design reviews and the Council still considers the overall landscape design to be of poor quality.
Page 2, point 7 Good Design	Point 100	By way of clarification, is the note stating they believe that the NPS or NDG should carry the greater weighting? By way of confirmation, the Applicant isn't applying a greater or lesser degree of importance on either document, and that it believes that the application addresses both in an appropriate way.	This note was not stating a greater weighting for either document, as they should be read in tandem.
Page 3, point 12 Design Detail	Point 105	Agreed.	N/A
	Point 106	Agreed, and it is submitted, that in the context of the application for an SRFI and the absence of a known detail, that it provides this.	Noted
	Point 107	It is clear from the council's commentary that they do not fully understand or appreciate the landscape and green infrastructure proposals that form a part of the application. That may be a result of information being split across a number of documents – the Landscape ES Chapter including Appendices noting in particular the Baseline Assessment and Arboricultural Impact Assessment, Illustrative Landscape Strategy, Design and Access Statement, Design Code and LEMP. To address this, an updated Landscape Strategy	The Landscape Strategy section added to the Design Code is acknowledged and does assist with review of the landscape and green infrastructure by specific area – albeit illustratively. The additional detail, description and typical plans/sections within the Design Code do assist with understanding the proposals and setting some rules for future development.

Document Reference	Summary of Representation	Applicant Response	HBBC Response
		Section has been included in the DAS which draws all of the relevant aspects together in one place.	However, a coherent overarching landscape strategy should be provided to demonstrate how the various strands of landscape link together across the masterplan site.
Page 3, point 16 Functionality	Points 111, 112 and 113	This isn't a case of semantics, but that the use of function or functionality is applied as a negative connotation in the review of the scheme, and that it shouldn't be seen as one of the key drivers for the basis of the development. It is agreed, that function should not be prioritised to the detriment of all other considerations, but it is a fundamental consideration in the planning of an SRFI.	Noted. No additional detail relative to landscape assessment provided.
Page 4, point 20 Characteristics	Points 117	The point misleads, as the Applicant doesn't state that it isn't successfully integrated, rather that because of its countryside location, it will be distinct from the neighbouring villages, by reason of it being an SRFI and capturing the characteristics of village design within it aren't appropriate.	Noted
	Point 118	The scale of the development zone is proportional to delivering a successful SRFI in this location	Noted
	Point 119	The point has already been made in that for smaller developments and non-rail related schemes, it is possible to respond to the existing grain of the landscape, but not in the case of an SRFI, which requires the larger development plateaus for safe, functional, operational purposes.	Noted. No additional detail provided. The Council maintains its previously stated view that working with the existing grain of the landscape may have been more appropriate.
	Point 120	Where appropriate, within the landscape settings and smaller architectural elements, the use of local materials is not dismissed and this can be captured as part of Requirement 4 'Detailed Design Approval'.	Noted. No additional detail provided in Design Code as guidance. While it would be appropriate for detail design to be determined at a future application, reference should be made within the Design Code to local material options and strategy to assist future development design and approvals.
Page 4, point 22 Parameter Plan Preparation	Point 123	See point 118 and 119 above	N/A
	Point 124	The scheme has been developed by a full team of professionals, experienced in developing schemes of this type throughout the UK, and is not the result of a single imposed vision.	Noted
	Point 125	By necessity for a scheme of this nature, no one discipline has led the design approach per se. A number of different factors have been key at different stages including rail requirements, operational requirements and landscape and ecological factors. A practical approach has been taken that goes	As previously stated the primary development zone within the parameter plan appears disproportionate to the site, which puts pressure on the resultant design

Document Reference	Summary of Representation	Applicant Response	HBBC Response
		<p>beyond the boundaries of the site, recognising that the best practicable environmental option at a district or national level is to maximise the development potential of this site and avoid the potential need for further greenfield site use beyond the well contained boundaries of the current DCO. Therefore, while the traditional aspects of a 'landscape' led approach on a smaller scale mixed use development' are not central to this design, a different set of landscape benefits have been considered and taken into account including creation of 22ha of publicly accessible green space and a well contained scheme which minimises its impact on the wider landscape for the scale of logistics benefits it can deliver. Moreover, it should be noted that green and blue infrastructure account for 28% of the Main HNRFI and A47 Link Corridor area which, at over a quarter of the total area, demonstrates the extent to which landscape and ecology have been a central part of the design development process. Also of note, whilst the parameter plan shows a central development area without green space to avoid creating additional constraints, a significant part of the area will constitute green and blue infrastructure with attenuation basins, structural planting, amenity areas, tree lined streets and green corridors all forming a part of the 'pink' zone'.</p>	<p>and leads to inadequate opportunities for mitigation of the scheme.</p> <p>The scale of the development should not be a reason to discount a landscape led or hybrid approach. In fact, such is the regional importance and potential impact for such a sensitive site that this would have benefitted the masterplan and result in a proposal that is more sensitive to its environment and assist in meeting key aspects of environmental policy.</p> <p>While it is acknowledged there is a quantity of landscape benefits and publicly accessible greenspace to the periphery, this does not address the fundamental issues of scale and loss of existing landscape to the central development zone.</p> <p>To assist in demonstrating the green and blue infrastructure, structural planting, amenity areas, tree lined streets and green corridors described in the applicant's response and sporadically through the Design Code, the Council would suggest producing a series of clear landscape strategy diagrams to demonstrate how these elements/strands fit together in the landscape masterplan.</p>
<p>Page 4, point 24 Landscape Design Review</p>	<p>Point 128</p>	<p>Not sure how the statement misleads when it just confirms that the Landscape Design Review comments have been responded to and in what way.</p>	<p>No comment to add</p>
	<p>Point 129</p>	<p>To confirm, all of the points were addressed in the initial response, and changes made in line with the response.</p>	<p>As noted previously, this statement is misleading.</p> <p>The majority of points raised within the Landscape Design Review have not been addressed and the scheme appears to remain largely unchanged.</p> <p>While limited additional detail has been provided on specific issues (street hierarchy and tree planting, as examples), the fundamental issues raised on scale of development, existing landscape features and character have not been addressed.</p>
<p>Page 5, 1.2</p>	<p>Point 132</p>	<p>Noted.</p>	<p>N/A</p>

Document Reference	Summary of Representation	Applicant Response	HBBC Response
core documents Design Code	Point 133	The response went into detail to explain, how, the proposals, in the context of an SRFI, has addressed the 10 characteristics of a well-designed place	Noted
Page 6, 2.2 Identity	Point 137	Agreed	N/A
	Point 138	See responses above relating to species and landscape character.	N/A
Page 7, 2.3 built form Wayfinding & Sense of Place	Point 141	It is correct that the development will create its own sense of place, as this is inherent in the creation of a new SRFI in this location. It is not the case however, that the current and neighbouring characters have been disregarded, merely that replication of such character within the main HNRFI site is not appropriate to a well-designed scheme of this type.	No additional justification or change to design proposals within Design Code. As noted previously, the applicant states the development proposes to create its own sense of place, but little detail is provided on how this will be achieved without disregarding the current and neighboring characters.
	Point 142	Clarification is sought on why it is believed that this goes against guidance, so that an appropriate response can be provided.	As noted in the Landscape Design Review, draft NPS (4.24) states development should; <i>'make a positive contribution to local landscapes within and beyond the project boundary.'</i> From a landscape perspective, the Council cannot agree that this proposal meets this criteria due to negative impacts on the surrounding local landscapes, both physically and visually.
	Point 143	By creating a clear distinction between the main HNRFI site and the surrounding publicly accessible areas, it allows for the necessary larger form and scale of buildings to be accommodated in a considered manner, appropriate to their function and operation, alongside the more 'human-scale' components of the development such as the landscaped green corridors of the new bridleway and the extension to Burbage Common and Woods. This simplicity means that visitors to the site can make clear directional choices in terms of either entering the main HNRFI site to their place of work, or along defined routing and pathways laid out for walking, cycling or horse riding. Signage will be provided for information purposes, guidance and safe navigation, but as with all new developments, familiarity for repeat visitors will render this unnecessary.	Additional information provided within the Design Code, including additional specific codes relevant to this point for: <ul style="list-style-type: none"> - A47 Link Road - Internal Distributor Roads - Public Realm and Public Rights of Way - Development Plots This provides information on street hierarchy and characteristics, with specific detail on footpath widths, materiality, planting strategy and SuDS. Additional detail plans and typical sections also assist to illustrate.

Document Reference	Summary of Representation	Applicant Response	HBBC Response
			This additional information provides sufficient detail to satisfy our comment on street hierarchy.
	Point 144	Many of the landscape features are being retained and new planting is designed to respond to local character. The nature of the development is such that a new 'sense of place' will be established which will draw on larger scale features such as woodlands, ponds and meadows.	Noted. No change to design proposals or justifications. The Council's previous comment remains valid – 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.
Page 8 section 2.3	Point 147	This point has been addressed in our previous note on response on Points 8 and 9.	Noted
Hierarchy	Points 148, 149, 150, 151	These points have all been addressed in our previous response on Points 8 and 9.	Noted
Page 8 section 2.3	Point 158	Noted.	N/A
Relationship	Point 159	The applicant does not consider the planting scheme to be inadequate. Yes, there are some significant visual impacts but that is to be expected for a scheme of this nature. Notably they are contained within 1km of the site and the effects are relatively well contained.	No change to design proposals or justifications. The Council maintains its comment that 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.
Page 13, section 2.8	Point 187	Where appropriate, within the landscape settings and smaller architectural elements, the use of local materials is not dismissed and this can be captured as part of Requirement 4 'Detailed Design Approval'	No further detail provided in the Design Code. This distinction is not referenced in the Design Code as guidance for consideration. While section 11.4 specific codes – office design refers to 'different cladding types used on office elevations to assist in creating an active and well-designed frontage which is readily distinguished from the rest of the building'; section 11.5 – materials states 'office elevations will use either flat or micro-rib profile panels.
New Buildings	Points 188 & 189	It is not a case of imposing the Tritax brand, but moreover, that the Applicant has developed a form that meets the needs, and can be adapted to suit the widest range of occupiers, a material application that works well in breaking up the visual mass and scale of the buildings, and through the use of a range of monotone hues, works far better as a backdrop to a considered	No change to design proposals or justifications. Previous comment remains valid - a more sensitive approach would be more aligned with national policy and lead to a better development more integrated into its local context.

Document Reference	Summary of Representation	Applicant Response	HBBC Response
		landscaping scheme than an introduction of colours, that in reality to align to the natural environment.	
Page 14, section 2.9 Adaptability	Point 193	It is submitted, that in the context of the application for an SRFI and the absence of a known detail, that the level of detail provides sufficient information to inform and guide future submissions pursuant to Requirement 4 (Detailed Design Approval.)	Noted
	Point 194	This point has been addressed in our previous note on response on Point 118.	Noted
Page 15, Section 2.9 Materiality	Point 197	The SUDS and overall drainage strategy is a holistic site wide consideration, and it is only the detail of how it will be applied that will be undertaken on a plot by plot basis.	Holistic method requires site-wide strategy which suggests an opposite approach than plot-by-plot basis described. A diagram to demonstrate the SuDS strategy, and referencing the Concept Drainage Strategy Plan would help to explain the proposals and SuDS interconnections with the wider landscape. This should be provided as part of the landscape strategy.
	Point 198	Reference to the provision of a SUDS compliant drainage scheme has been made within the Design Code within Section 5 – Sustainability.	Limited reference in Design Code to what SuDS elements would be employed and how they would function as a complete system. Refer to note above.
Page 19, section 3.12 Materials	Point 201	Agreed	N/A
	Point 202	By creating a clear distinction between the main HNRFI site and the surrounding publicly accessible areas, it allows for the necessary larger form and scale of buildings to be accommodated in a considered manner, appropriate to their function and operation, alongside the more 'human-scale' components of the development such as the landscaped green corridors of the new bridleway and the extension to Burbage Common and Woods. Whilst the buildings will follow the same aesthetic theme, this does not dictate a monotonous design, the buildings will change in scale, mass and orientation as well as having constant active frontages and key focal points provided by the office locations. In addition, each will be set in their own landscaped environment, and accessed via a seasonally changing avenue and streetscape. This simplicity means that visitors to the site can make clear directional choices in terms of either entering the main HNRFI site to their place of work, or along defined routing and pathways laid out for walking, cycling or horse riding. Signage will be provided for information purposes, guidance and safe navigation, but as with all developments, familiarity for repeat visitors will render this unnecessary.	Relating specifically to building materials (as per the origin of this comment), while it is appreciated that <i>'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'</i> , this does not justify an identikit approach to development proposals and abandonment of existing landscape character. As commented previously, due to the consistent approach described within the development itself it will not be distinct at the 'human scale' and will likely appear monotonous. This does not align with good design or encourage natural wayfinding and will rely heavily on signage.

Document Reference	Summary of Representation	Applicant Response	HBBC Response
<p>Pages 20, 21 & 22</p> <p>Approach – Veteran Tree Removal</p>	<p>Points 207 & 208</p>	<p>To reiterate the previous response in respect of the loss of the veteran tree in this response:</p> <p><i>‘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. 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. 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. 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. 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 provide structure for the development; create habitat connectivity to provide amenity and microclimatic 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.’</i></p>	<p>Noted – no change to proposals or justification from a landscape perspective. The Council stands by LUC’s 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>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>

Document Reference	Summary of Representation	Applicant Response	HBBC Response
		In addition, responses provided within this document, go further in explaining how its loss is unavoidable in the provision of an SRFI in this location.	
	Points 209, 210 & 211	See points 207 and 208 above.	Noted
	Point 212	Repeat of point above – tree size will be determined at the discharge of requirements with variations in size depending on type and timing of planting and location.	Noted
Page 22, section 3.2 Assessment of Good Design	Point 216	LUC's position on this point is noted, however the Applicant still submits that this assessment doesn't take the value of the function and operation of an SRFI fully into account	Noted. The value of function and operation of the SRFI are not a matter of consideration for landscape assessment. The landscape assessment purely considers planning policy guidance.

LUC Landscape Design

On behalf of BDC & HBBC

05.02.24