

KEDD
Limited

LANDSCAPE & VISUAL IMPACT ASSESSMENT (LVIA)
2nd Response to Consultee Comments

In respect of the Erection and Operation of an
Expanded Polystyrene Factory

FP McCann
Bullhurst Lane
Mugginton
Ashbourne
Derbyshire

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FINAL

Produced by **Kedd Limited**

1.0 INTRODUCTION

1.1 This document has been prepared on behalf of FP McCann in response to the consultation comments provided by DE Landscape and Heritage Ltd in respect of the proposed expanded Polystyrene (EPS) Manufacturing Facility at Bullhurst Lane, Weston Underwood.

1.2 The consultation comments have been carefully considered and have informed additional visual assessment, further explanation and continued refinement of the proposals, assisting the Local Planning Authority in understanding the likely landscape and visual effects of the Proposed Development.

1.3 Following receipt of the original consultation comments, supplementary information was prepared, including:

- the adoption of recessive green cladding;
- updated photomontages;
- additional structure planting to the north of the building; and
- the incorporation of proposed larger planted tree stock within the landscape proposals.

1.4 These amendments have been made directly in response to matters raised during consultation and further reduce visual contrast whilst improving the integration of the Proposed Development within its landscape setting.

1.5 The purpose of this document is therefore to:

- Explain the approach taken in preparing the supplementary information;
- Respond to the principal consultation themes;
- Describe the evolution of the proposals; and
- Confirm why, having regard to the additional information available, the conclusions of the original LVIA are robust.

Key Matters

1.6 Before responding to the individual consultation comments, four key points are considered important.

- The proposal is located wholly within an existing operational manufacturing facility and not on previously undisturbed land.

- The proposal does not materially extend the operational footprint or industrial influence laterally into the surrounding countryside.
- The development replaces an existing area of open storage and operational activity with a permanent building positioned on a deliberately lowered development platform.
- The proposal has evolved through consultation, incorporating revised green cladding, strengthened landscape proposals, larger stock specification for tree planting, and updated visualisations.

1.7 These principles underpin the assessment presented within the original LVIA and the responses contained within this document.

2.0 RESPONSE TO CONSULTATION COMMENTS

Scope of the Supplementary Information

2.1 The consultation responses sought additional visual information to assist in understanding the likely landscape and visual effects of the Proposed Development, including winter photography, wireframe visualisations and winter photography.

2.2 Each request was carefully considered to determine where additional information would assist the Local Planning Authority in interpreting the likely effects of the proposal. Rather than revisiting the original LVIA in its entirety, the intention was to supplement the assessment with additional evidence and clarification where this would meaningfully inform the decision making process.

2.3 Accordingly, the supplementary submission included representative winter photography, photomontages, wireframe visualisations, contextual cross sections and additional viewpoint information. Together, these documents substantially expanded the evidence base supporting the application, enabling the proposals to be considered under both summer and winter conditions whilst providing additional clarity in relation to the principal issues raised during consultation.

2.4 In determining the scope of the supplementary information, regard was also had to the principle of proportionality. The additional visual material focused on representative viewpoints and key receptor groups where further information was considered most likely to assist interpretation of the proposals. It was not considered necessary to prepare visualisations that would simply duplicate existing viewing circumstances or demonstrate little or no

meaningful visibility, as these would not materially improve understanding of the likely landscape and visual effects.

2.5 It is therefore considered that the supplementary information provides a representative and proportionate evidence base from which the likely landscape and visual effects of the proposal can be robustly understood.

Existing Baseline and Nature of the Proposed Development

2.6 A recurring theme within the consultation response is the increased presence of built form associated with the Proposed Development. Whilst this is acknowledged, it is important that the proposal is considered against the existing landscape and visual baseline.

2.7 The application site already forms part of the established FP McCann facility, being utilised for open storage, operational plant and HGV movements, and associated industrial activity. The proposal therefore does not introduce industrial development into previously undeveloped countryside, nor does it establish a new industrial site within the wider landscape.

2.8 Instead, the proposal redevelops an existing operational parcel by replacing open storage with a permanent manufacturing building.

2.9 This distinction is important. Whilst the form of development changes, the underlying land use remains unchanged, and the proposal remains physically contained within the existing operational envelope.

2.10 Equally important is the fact that the proposal does not materially extend the developed footprint. The building occupies land already in industrial use and does not project into adjoining agricultural land or establish a new area of industrial development beyond the existing site.

2.11 The assessment has therefore considered the proposal as redevelopment / change occurring within an established industrial site rather than the expansion of industrial development into the wider countryside. This approach informs both the landscape character assessment and the assessment of visual effects.

Visual Representation

2.12 The consultation responses requested a wider range of visualisations that those ultimately prepared.

2.13 Following review, additional visual material was concentrated on representative locations where further information would materially assist interpretation of the assessment. This included sensitive heritage receptors, representative Public Rights of Way, locations immediately surrounding the Site and representative winter viewpoints.

2.14 Representative winter photography was undertaken from the requested locations (23No.) across the study area, informed by the Zone of Theoretical Visibility and refined through field survey. This supplemented the 45No. viewpoints included within the original LVIA and significantly expanded the visual evidence available to the Local Planning Authority.

2.15 Whilst it is acknowledged that further visualisations could always be prepared, it is considered that the submitted material provides an appropriate balance between completeness and proportionality.

2.16 Additional photomontages representing materially similar viewing circumstances, or demonstrating little or no meaningful visibility, would not have materially altered the understanding of the proposal or the conclusions of the assessment.

2.17 The submitted visualisations should therefore be viewed as representative of the principal receptor groups rather than an exhaustive catalogue of every possible viewing location.

Evolution of the Proposal

2.18 The consultation process has provided a valuable opportunity to review both the supporting assessment and the design of the Proposed Development.

2.19 Following receipt of the consultation comments, the applicant undertook further assessment and continued to refine the proposals to respond positively to the issues raised.

2.20 The principal amendments comprise:

- Replacement of the previously illustrated light-coloured cladding with a recessive green finish;
- Additional structural planting to the north of the building;
- Incorporation of larger stock specifications for tree planting to provide immediate landscape structure and to enhance maturation of the mitigating planting proposals; and
- Preparation of updated photomontages reflecting the revised building appearance.

2.21 Together, these amendments have been made specifically to reduce visual contrast, strengthen the existing landscape framework and improve integration of the Proposed Development within its surroundings.

2.22 The proposal currently before the Local Planning Authority therefore differs from that considered within the earlier consultation responses and should be assessed having regard to these refinements.

3.0 LANDSCAPE CHARACTER,VISUAL EFFECTS & THE SETTING OF KEDLESTON PARK

Existing Landscape Context

3.1 The consultation responses conclude that the Proposed Development would result in a greater degree of landscape and visual change than identified within the original LVIA. These comments have been carefully considered together with the supplementary visual information and the subsequent evolution of the proposals.

3.2 The applicant accepts that the Proposed Development introduces additional built form within the existing FP McCann manufacturing facility and that localised adverse landscape and visual effects will arise, particularly within proximity to the Site. However, it is considered important that these effects are assessed against the existing baseline and the nature of the change proposed.

3.3 The application site already forms part of an established operational manufacturing facility and is currently characterised by hardstanding, external storage, operational plant, HGV movements and associated industrial activity. Consequently, the proposal does not industrialise a previously undeveloped landscape but instead modifies an existing industrial parcel that already forms part of the established landscape baseline.

3.4 This distinction is fundamental to understanding the likely effects of the proposal.

Nature of Change

3.5 Throughout the consultation responses the proposal is described as an expansion of the existing manufacturing facility. Whilst this is factually correct in operational terms, it is considered important to distinguish between the operational expansion of a business and the physical expansion of industrial development within the landscape.

3.6 The Proposed Development does not extend industrial development laterally into adjoining agricultural land, nor does it establish a new industrial focus within the wider countryside.

3.7 Instead, the proposal replaces an existing area of open storage and operational activity with a permanent manufacturing building occupying substantially the same operational parcel.

3.8 The principal change is therefore one of built form, rather than land use or geographic extent. Due to the site's location on a hillside, current and historic industrial operations form part of longer distance views from the south and south east, to which the Proposed Development would form a variation of. These views being wider range / panoramic and incorporating a variety of landscape features, built form and infrastructure.

3.9 Importantly, the proposal represents a transition from a visually active area of open industrial storage to a more permanent and physically contained form of development. Whilst the proposed building introduces additional built mass, it replaces an area whose appearance is inherently variable, comprising changing stockpiles, operational plant and HGV activity. The proposal therefore changes the form of industrial development rather than introducing industrial activity where none presently exists.

3.10 This distinction has informed the assessment of both landscape character and visual effects throughout the LVIA.

Landscape Character

3.11 The consultation responses express concern that the proposal would erode the character of the surrounding Estate Farmlands landscape through increased presence of industrial development.

3.12 It is recognised that the building increases the amount of built form associated with the existing manufacturing facility. However, it is not considered that the proposal fundamentally alters the characteristics that define the surrounding Landscape Character Types.

3.13 The underlying landform, field pattern, woodland structure, settlement pattern and wider agricultural landscape remain unchanged.

3.14 The proposal does not remove any characteristic landscape features, interrupt the existing landscape frameworks or extend industrial development into the surrounding farmland.

3.15 Instead, the principal change relates to the appearance of an existing operational site viewed within the wider landscape.

3.16 Accordingly, whilst localised changes to the perception of the existing manufacturing facilities are acknowledged, it is not considered the proposal results in a fundamental change to the character of the wider landscape.

3.17 Visual Effects

3.18 The consultation responses place considerable emphasis upon the visibility of the proposed building from a number of representative viewpoints.

3.19 It is accepted that the building will be visible from a number of locations and that the greatest visual effects occur immediately surrounding the site. This was recognised within the original LVIA and reflects the anticipated relationship between distance and visual change.

3.20 However, visibility alone does not determine the significance of visual effects.

3.21 The existing FP McCann facility already forms a component of views from a number of surrounding receptors. The Proposed Development is consistently experienced as part of this existing operational complex rather than as a separate or isolated feature within the wider landscape.

3.22 Consequently, the proposal modifies the experience of an existing industrial site rather than introducing new, alien elements into the landscape.

3.23 The magnitude of visual change must therefore be considered in the context of the existing industrial baseline, the relationship between the proposed building and the existing manufacturing facility, and the absence of any meaningful lateral expansion of industrial development.

Landform and Site Design

3.24 An important component of the proposal is the deliberate use of existing topography to reduce the apparent scale of the building.

3.25 The development platform is established at approximately 169.0mAOD, allowing much of the building to sit below the surrounding landform rather than being positioned prominently above.

3.26 The supplementary cross sections clearly demonstrate this relationship and illustrate the extent to which existing topography contributes towards the physical containment of the development and is an attribute of the site.

3.27 This approach differs significantly from a conventional industrial building constructed on or above ground and forms an integral part of the overall building siting and design response.

3.28 When considered alongside the retained woodland belts and existing vegetation surrounding the operational site, the receiving landscape already provides a substantial degree of containment that will be further reinforced by the proposed landscape enhancements.

Landscape Integration

3.29 The consultation responses question the effectiveness of the proposed planting in reducing visual effects.

3.30 It is important to recognise that the planting illustrated within the photomontages intentionally represents the landscape proposals during the early stages of establishment rather than at full maturity. This provides a realistic representation of the completed development following implementation and avoids overstating the immediate effectiveness of the landscape proposals.

3.31 The revised scheme now incorporates:

- Recessive green cladding to reduce visual contrast;
- Additional structural planting to the north of the building;
- Increased stock sizes / specifications for tree planting to provide immediate landscape structure; and
- Updated visualisations illustrating the revised proposals.

3.32 It is noted that the northern planting will be established on land approximately 7.5 metres above the finished development platform. Consequently, comparatively little vertical growth is required before the proposed trees extend above the upper elevations of the building when viewed from lower lying land to the south, enhancing the vegetative skyline.

3.33 The revised landscape strategy should therefore be considered as part of a comprehensive landscape framework that includes existing woodland, retained vegetation, landform,

architectural treatment and proposed planting, rather than relying upon any single mitigation measure in isolation.

Kedleston Park

3.34 The consultation responses identify the setting of Kedleston Park as the most sensitive landscape receptor and conclude that the Proposed Development would have a greater influence on the Registered Park and Garden than identified within the original LVIA.

3.35 The applicant fully acknowledges the sensitivity and importance of Kedleston Park and, for this reason, additional assessment was undertaken through representative winter photography, verified photomontages, wireframe visualisations and supplementary cross-sections to further examine the relationship between the Proposed Development and its wider setting.

3.36 The supplementary information confirms that the proposed building will be visible from parts of the Registered Park. However, it also demonstrates that the proposal is experienced in direct association with the existing FP McCann site rather than as an isolated feature within the wider landscape.

3.37 Views from Kedleston Park extend across a broad panorama encompassing estate farmland, woodland, settlements, agricultural buildings, transport infrastructure, renewable energy development and the existing FP McCann site.

3.38 The Proposed Development therefore represents a modification to an existing industrial grouping rather than the introduction of a new industrial feature into an otherwise undeveloped landscape.

3.39 The proposal also remains physically contained within the existing operational site and does not extend industrial development laterally into the surrounding countryside. The revised architectural treatment, strengthened landscape proposals and deliberate use of landform further reduce visual contrast and improve integration of the development within its wider landscape context.

3.40 Whilst the proposal changes the appearance of the existing operational site within the wider panorama, it principally replaces views of disturbed ground and open industrial storage with permanent built form associated with the established manufacturing complex. The proposal therefore represents a change to the form of existing development rather than the introduction of a new industrial feature within the setting of the Registered Park and Garden.

Overall Assessment

3.41 Having considered the consultation responses, the supplementary visual information and the refinement of the proposals, the conclusions of the original LVIA remain robust and reflective of the nature and scale of the Proposed Development within its existing baseline context.

3.42 The proposal increases the amount of built form associated with existing manufacturing site; however, it remains wholly contained within an established operation site. It does not extend industrial development into the surrounding countryside and has been deliberately designed to work with the existing landscape and site attributes, through the use of landform and architectural treatments, in combination with a strengthened landscape framework.

3.43 Whilst localised adverse landscape and visual effects are acknowledged, it is not considered that the proposal fundamentally alters the character of the wider landscape or results in unacceptable landscape visual effects when assessed against the existing baseline.

4.0 CONCLUSIONS

4.1 The consultation process has provided an opportunity to further consider the landscape and visual effects of the Proposed Development, to strengthen the supporting evidence and to refine both the architectural and landscape design of the scheme. Additional field work has been undertaken, together with the preparation of supplementary visual information.

4.2 The revised scheme incorporates:

- Recessive green cladding (RAL 6007) to reduce visual contrast with the surrounding landscape;
- Updated photomontages illustrating the revised architectural treatment;
- Additional structural planting to the north of the building;
- Increased stock sizes / specifications for tree planting to provide immediate landscape structure; and
- A strengthened landscape framework designed to reinforce the existing woodland structure surrounding the operational site.

4.3 Collectively, these amendments respond directly to the consultation comments and improve the integration of the Proposed Development within its landscape context.

4.4 Where the supplementary information indicated that refinement of the assessment was appropriate, this has been acknowledged. In all other respects, the additional work confirms our judgement that the conclusions of the original LVIA remain appropriate.

4.5 It is acknowledged that the proposal results in additional built form within the existing FP McCann manufacturing facility and that localised adverse landscape and visual effects will arise, particularly within proximity to the site.

4.6 However, these effects should be considered within the context of the existing and true baseline.

4.7 The proposal:

- Is located wholly within an established operational manufacturing facility;
- Does not materially extend industrial development laterally into the surrounding countryside;
- Replaces and existing area of open storage and operational activity with a permanent manufacturing building;
- Utilises existing landform to reduce the apparent scale of the development;
- Remains visually associated with the existing manufacturing complex rather than creating a new industrial focus within the landscape; and
- Is supported by a strengthened landscape framework that reinforces existing woodland structure and improves integration over time.

4.8 Accordingly, the proposal represents the evolution and consolidation of an existing operational site rather than the industrialisation of previously undisturbed countryside.

4.9 The applicant team also recognise the importance of Kedleston Park and the sensitivity of the surrounding landscape.

4.10 For this reason, particular emphasis has been places upon assessing views from the Registered Park and Garden and providing additional information to aid in the review.

4.11 With respect to the supplementary visual evidence, the revised architectural treatment has further reduced the perception of visual change within views. It is highlighted that Kedleston Park viewpoints are location some 3.7km to the south of the site. As highlighted, views from Kedleston Park are panoramic and encompass a wide variety of landscape elements extending over several kilometres, including the existing FP McCann manufacturing facility. The Proposed

Development is therefore experienced as a modification (non lateral) to an existing industrial grouping rather than the introduction of a new feature within an otherwise undeveloped panorama.

4.12 Proposed northern and internal woodland / landscaping would establish to limit its impression and to strengthen the vegetative skyline, and the revised cladding colour will allow the proposal to visually recede into its landscape context.

4.13 Our judgement remains that the Proposed Development would result in a minor increase in the prominence of the existing manufacturing facility rather than a fundamental change to the wider setting of Kedleston Park. Whilst the proposal will remain perceptible from parts of the Registered Park and Garden, as will the existing site, it is not considered that this materially alters the appreciation of the designed landscape or the contribution made by its wider setting to its significance.

4.14 The submitted LVIA in combination with this and previous consultation responses and supplementary information, provide a comprehensive and proportionate basis upon which the landscape and visual effects of the Proposed Development can be understood and assessed.

4.15 It remains our professional opinion that the conclusions of the original Landscape and Visual Impact Assessment are robust. Whilst the proposal gives rise to localised adverse effects associated with the continued development of an existing operation manufacturing facility, it has been designed to work with the receiving landscape both with respect to topography, architectural treatment and a strengthened landscape framework. The Proposed Development would not give rise to significant adverse landscape or visual effects and reflects a variation to an existing operational baseline.

4.16 Ultimately, the principal area of professional disagreement relates not to whether the Proposed Development is visible, but to the degree of change arising from development within an existing operational industrial site. Having undertaken additional survey work, prepared supplementary visual information and refined the proposals in response to consultation, it remains our professional opinion that the revised scheme can be successfully accommodated within its existing landscape context without giving rise to unacceptable landscape or visual effects.