

RH/2/B

**Appeal by Redrow Homes Ltd
Land to east and west of Warburton Lane, Trafford**

PINS reference APP/Q4245/W/19/3243720

LPA reference 98031/OUT/19

**Proof of Evidence of Ian Grimshaw
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Landscape and Views

CONTENTS

1.0	INTRODUCTION	3
2.0	THE APPEAL DEVELOPMENT AND LANDSCAPE AND VISUAL IMPACT ASSESSMENTS	5
3.0	TRAFFORD BOROUGH COUNCIL'S LANDSCAPE OBJECTIONS	17
4.0	WARBURTON PARISH COUNCIL'S LANDSCAPE OBJECTIONS	27
5.0	OTHER REPRESENTATIONS RELATING TO LANDSCAPE AND VIEWS	35
6.0	CONCLUSIONS	36

1.0 INTRODUCTION

- 1.1 My name is Ian Jeffrey Grimshaw. I have a Bachelor of Arts degree with Honours in English, a Master of Arts degree in Landscape Management and a Master of Science Degree with Distinction in Environmental Planning. I am a Chartered Landscape Architect and Chartered Town Planner.
- 1.2 I have many years' experience in assessing landscape and visual effects of development at a wide range of scales. I have worked on many residential projects; commercial schemes and industrial developments including nationally significant infrastructure projects. I have presented expert evidence at public inquiries and hearings under the Planning Act 1990, Planning Act 2008, a Transport and Works Order and into acquisition of compulsory rights.
- 1.3 I am a Director of The Environment Partnership (TEP) Limited which I co-founded in 1997. TEP undertook the Landscape and Visual Impact Assessment (LVIA) reported in the Environmental Statement and its Addendum. I was not directly involved in the LVIA but have familiarised myself with it and the appeal site.
- 1.4 My evidence addresses landscape matters, particularly effects on the proposed development on landscape character and on views.
- 1.5 The application is in outline with scale, layout, appearance and landscaping reserved. TEP has been involved in considering aspects of these reserved matters which relate to design but I defer to Mr Haralambous on those matters.
- 1.6 I have noted some representations have closely related aspects of landscape character and sometimes views to effects on heritage assets. I make clear how I consider aspects of the historic environment in my assessment, deferring to Ms Kelly with regard to effects on heritage assets.
- 1.7 My evidence is structured as follows:
- In Section 2.0 I summarise the aspects of the appeal development which will give rise to effects on landscape character and on views. I summarise the landscape assessments that have been undertaken and to which my evidence refers.

- In Section 3.0 I consider Trafford Borough Council's reasons for refusal relating to landscape, its officer's reports and its Statement of Case and I set out my opinion on the concerns raised.
- I consider representations from the Rule 6 party Warburton Parish Council on landscape in Section 4.0.
- I consider other representations which refer to matters relating to landscape in Section 5.0.
- I draw conclusions in Section 6.0.

1.8 The evidence which I have prepared and provide for this appeal reference APP/Q4245/W/19/3243720 in this proof of evidence is true and has been prepared and is given in accordance with guidance of my professional institutions and I confirm the opinions expressed are my true and professional opinions.

2.0 THE APPEAL DEVELOPMENT AND LANDSCAPE AND VISUAL IMPACT ASSESSMENTS

- 2.1 The appeal development will comprise up to 400 houses on two sites separated by Warburton Lane in the parish of Warburton but closely abutting Partington.
- 2.2 When the application for outline planning permission for the appeal development was submitted, two related applications were made. Each was a full application for development on part of the appeal site. Site 1 is the land to the east of Warburton Lane and Site 2 is the land to the west of Warburton Lane. These two full applications have been withdrawn.
- 2.3 The appeal application was accompanied by documents including a parameters plan (Core Document (CD) A32) and an Environmental Statement (ES) (CDs A25 – A28). The ES Volume II Main Report (CD A26) includes Chapter 6 on Landscape and visual amenity and Volume III (CD A27) includes Figures 6.1 – 6.7 relating to that chapter.
- 2.4 The method used for the assessment of landscape and visual effects is derived from the Guidelines for Landscape and Visual Impact Assessment Third Edition (CD I4) and is set out in Appendix 6.1 of the ES Volume IV (CD A28) commencing on page CD-A28-PG118. It is common ground between the appellant and Trafford Borough Council that the method used is consistent with guidance and appropriate. Warburton Parish Council's witness Mr Beckmann noted in his representation of 15th July 2019 on the planning applications, including the outline application subject of this appeal, that he was confident that the method of assessment used is consistent with guidance. However in negotiating the Statement of Common Ground (CD C13) on Landscape, Warburton Parish Council has noted that it does not agree that paragraphs 5.9 and paragraph 5.33 of GLVIA3 (CD I4) have been applied correctly to Site 2. Paragraph 5.9 of GLVIA3 advises on historic features and paragraph 5.33 advises on reporting on the landscape baseline.

- 2.5 In considering the method used in the LVIA reported in the ES, I have referred to the Natural England 2019 publication '*An approach to landscape sensitivity assessment – to inform spatial planning and land management*' (CD I7). I note that document is clearly states in the first bullet point of CD-I7-Pg 6 that GLVIA3 should be used for the assessment '*of a known development proposal for a specific site*'. The Natural England 2019 document makes clear in the second bullet point on that page that its approach '*should be used to inform strategic spatial planning and land management*' and it explains that is the purpose of its approach in the second paragraph at CD-i7-Pg 8. Accordingly, I do not consider that the approach undertaken in the ES should be adjusted in any way by taking account of the Natural England 2019 guidance because it expressly states that assessment of specific proposals is not its purpose.

Baseline Landscape

- 2.6 The ES LVIA considers the baseline landscape character. It refers to published landscape character assessments and site visits.

Published Landscape Character Assessments

- 2.7 Two of the relevant published landscape character assessments are summarised at paragraphs 6.59 – 6.69 in the ES Chapter 6 in CD-A26-Pgs 31-34. These comprise the National Character Area 60: River Mersey published in 2013 and the Trafford Metropolitan Borough Supplementary Planning Guidance (SPG) 30: Landscape Strategy dating from 2004. It is common ground between the parties that these paragraphs summarise those published character assessments.
- 2.8 The ES did not refer in its baseline to the Greater Manchester Landscape Character and Sensitivity Assessment (GMLCSA) (CD I5) which was published in August 2018. I have reviewed that document and set out my commentary below.
- 2.9 The GMLCSA explains at paragraph 1.13 on page CD-I5-Pg 6 that one aim is to provide an evidence base for the landscape character and sensitivity of Greater Manchester and identification of sensitive and non-sensitive areas. Another aim is bridging the gap between the National Character Areas identified by Natural England, the North West Character Assessment and district-wide assessments (ie SP30 which applies in Trafford).

- 2.10 GMLCSA explains at paragraph 1.14 that it is designed to support the drafting of spatially specific development plan policies at a Greater Manchester scale and the assessment of the suitability of sites or areas to accommodate development informing the siting, spacing, scale and design conditions for particular forms of development.
- 2.11 The study identifies a series of Landscape Character Types (LCTs) which occur in one or more areas in Greater Manchester and identifies each occurrence of a type by name. It describes these in Section 5 of the GMLCSA.
- 2.12 The appeal site is in the LCT Mosslands and Lowland Farmland described at pages CD-15 Pages 64–70. The appeal site is in the specific character area 44: Warburton and Carrington Mosses which is the second most extensive of this LCT identified in Greater Manchester.
- 2.13 The GMLCSA identifies key characteristics for each LCT and refers to specific geographic areas sometimes by way of example and sometimes as locations where aspects or features are present. The only specific reference to land in the immediate locale of the appeal site I have identified is as follows:
- The mosslands are a simple, ordered landscape divided geometrically into a series of small to large sized fields with deep, open drainage ditches as field boundaries, interspersed with moss woodlands. Fields are post medieval (e.g. Warburton Park), 18th, 19th and 20th century origin. (CD-15-Pg 66)*
- 2.14 The GMLCSA identifies landscape sensitivity referring to a series of indices comprising:
- Physical character (including topography and scale)
 - Natural character
 - Historic landscape character
 - Form, density and setting of existing settlement/development
 - Views and visual character including skylines
 - Access and recreation
 - Perceptual and experiential qualities
- 2.15 The sensitivity has a five-points scale as follows:
- **High:** The key characteristics and qualities of the landscape are highly sensitive to change.

- **Moderate-high:** The key characteristics and qualities of the landscape are sensitive to change.
- **Moderate:** Some of the key characteristics and qualities of the landscape are sensitive to change.
- **Low-moderate:** Few of the key characteristics and qualities of the landscape are sensitive to change.
- **Low:** The key characteristics and qualities of the landscape are robust and are unlikely to be subject to change.

2.16 The sensitivity of the Mosslands and Lowland Farmland LCT is given a sensitivity rating of Moderate on each index other than for Access and Recreation where a Low-moderate rating is applied (CD-I5-Pgs 68-69).

2.17 GMLCSA considers the sensitivity of each LCT to two development scenarios:

- 2-3 storey residential housing developments; and
- Commercial/industrial developments (see CD-I5-Pgs 18-19).

2.18 Each of these is given a Moderate sensitivity rating for the LCT. The assessment identifies specific locations in the areas where this LCT is identified where a different sensitivity may arise. None are in the locale of the appeal site.

2.19 The descriptions and assessments of each LCT include a summary of special landscape features and attributes that would be sensitive to change (e.g. as a result of development). I do not consider that any of these apply specifically to the appeal site. I acknowledge references in the descriptions of the Warburton and Carrington Mosses Landscape Character Area at CD-I5-Pgs 68 and 69 to Warburton Conservation Area and the Grade I listed Old Church of St Werburgh and I defer to Ms Kelly regarding effects on those heritage assets. It is clear that the GMLCSA was undertaken with knowledge of Warburton Park when considering sensitivity because it refers expressly to it in the extract I have quoted earlier.

2.20 GMLCSA concludes its description relating to each LCT with *Guidance and opportunities for future development and landscape management/enhancement* (CD-I5-Pg 70). I consider that the most relevant of these to the appeal development are:

- Utilise areas of existing woodland (eg moss woodlands, valley woodlands, woodland along settlement edges) to integrate new development into the landscape, avoiding sites designated for their nature conservation importance.

- Restore and enhance areas of deteriorating farmland including additional, species-rich, hedgerow planting to fill gaps and replace post and wire fencing. Reintroduce hedgerow trees where appropriate.
- Consider additional woodland planting to enhance landscape structure, soften the urban fringe, screen industrial areas and reduce the noise and visual effects of motorway corridors, where appropriate.

2.21 The most relevant parts of the third bullet point above to the appeal site are those referring to additional woodland planting enhancing landscape structure and softening the urban fringe.

2.22 In my opinion, the GMLCSA is consistent with other relevant published landscape character assessments and is the most contemporary published landscape character assessment.

2.23 The GMLCSA stated one of its purposes is to guide development. It has been used in the Greater Manchester Spatial Framework (GMSF) (CD F1) which includes the proposed allocation for the New Carrington development. The GMSF is not a published landscape character assessment but it has been informed by the GMLCSA and I summarise relevant matters to the appeal development and landscape below.

New Carrington in GMSF Draft 2019

2.24 The appeal site forms part of the proposed allocation of New Carrington in the Greater Manchester Spatial Framework (CD-F1-Pg 19). The allocation includes land to the northeast and east of Carrington and also the appeal site. The extent of the New Carrington allocation is further west and east of the appeal site. The allocation includes land which presently is Green Belt remote from the appeal site.

2.25 There are 24 recommendations with which it is anticipated the New Carrington allocation should comply and I identify the following as most relevant to my evidence with regard to the appeal site:

13. Respect the urban/rural fringe setting in the design of the development, in terms of its height, scale and siting and demonstrate high standards of urban design;

14. Provide a significant green corridor through the site which remains in the Green Belt to provide an area of enhanced and accessible green infrastructure;

15. Provide publically accessible green spaces within the development areas which will be protected from future development. Consideration will be given to identifying some of this land as Local Green Space;

16. Enhance and improve the role of existing green infrastructure, including woodland;

17. Minimise the loss of landscape features such as the rides, hedgerows and tree belts and enhance these landscape features to create defensible Green Belt boundaries;

- 2.26 I have identified recommendation 17 as relevant to the appeal site, although there would be no change to the existing Green Belt south of the appeal site and its boundaries if the appeal proposals were constructed. My interpretation of recommendation 17 is that it applies primarily to the proposed New Carrington site where new boundaries to the Green Belt would be established following removal of existing Green Belt from the allocation much further to the east of the appeal site.

Landscape Character Assessment from Site Visits

- 2.27 The landscape character of the appeal site and the land around it is described at paragraphs 6.70 – 6.80 of the ES LVIA (CD-A26 Pgs 34-35) and summarised in bullet points following paragraph 6.81 at CD-A26-Pg 35. I have reviewed this and agree with it from my own assessment. This landscape baseline described in the ES LVIA is agreed as appropriate between the appellant, Trafford Borough Council, Warburton Parish Council with two exceptions. Trafford Borough Council and Warburton Parish Council consider that there should be reference to Important Hedgerows and to the historic Warburton Deer Park in the description.

Landscape Value

- 2.28 The method of landscape and visual impact assessment derived from GLVIA3 (CD I3) requires that landscape value is judged when the baseline landscape character is established. Where landscape is subject of a designation relating to its value, this assists the judgement. For example, GLVIA3 advises on page 21 that World Heritage Sites may be internationally acclaimed landscapes and that National Parks and Areas of Outstanding Natural Beauty are landscapes of national value.

- 2.29 Trafford Borough Council does not have local landscape designations relating to value in its Core Strategy and did not have such designations in its Unitary Development Plan. I do not consider that the designation of *Open countryside character areas* under Policy R2 of the Core Strategy (CD E2) is a designation identifying areas of particular local landscape value and I address that more fully in Section 3.0 of my evidence.
- 2.30 The LVIA at Table 6.4 at CD-A26-Pgs 36-37 presents an exercise advocated in GLVIA3 Box 5.1 on page 84 of CD I3 to assist in judging the landscape value of a site or area. This considers a number of aspects of landscape character and the extent to which these are present and contribute to character. I agree with the exercise undertaken and the judgements made.
- 2.31 Having reviewed comments in Warburton Parish Council's representations made on the applications, much is made of the historic value of the appeal site and wider area. I defer to Ms Kelly's evidence on the relative important of assets and whether and to what extent they may be affected by the appeal proposals. However I agree with the statement made regarding Conservation Interests in Table 6.4 at CD-A26-Pgs 36-37 of the LVIA Chapter of the ES. I do not consider that there are any features whose historic interest contribute substantially to landscape quality or visual interest. The listed buildings identified in Table 6.4 are not remarkable in their external appearance and some have contemporary or modern outbuildings or features apparent.
- 2.32 Similarly I am aware that the name Warburton Park relates to the deer park that was present in history and that there are some remnant landscape features including the copse to the southwest of Site 2 within which there is a cluster of ponds. However in my opinion there is nothing in the site's character generally when observed that puts the viewer in mind of a deer park or a managed estate. For example, the appeal site landscape contrasts sharply with that of the nearby Dunham Massey landscape in Trafford Borough with an intact deer park landscape and a wider managed estate with consistent architecture, signage, and livery of buildings.
- 2.33 The conclusion drawn in the LVIA in the ES is that the landscape is of local value and that is common ground between the appellant and Trafford Borough Council. Warburton Parish Council concurs with this value judgement in respect of Site 1 but disagrees with regard to Site 2 which it considers of regional value.

- 2.34 I do not consider that people other than the immediately local residential community attaches particular value to the proposed development site landscape. I do not consider that many people in the Borough of Trafford travel to experience or appreciate it. It is of high community value and at the lower end of a theoretical scale within the category of local value.

Landscape Susceptibility to Change

- 2.35 I agree with the ES LVIA judgement at paragraph 6.85 (CD-A26-Pg 38) that the landscape of the appeal site has medium susceptibility to change of the type described in the appeal proposals. I have noted when reviewing the LVIA and during site visits that two storey housing is common in the locale, particularly on the southern edge of Partington close to Site 2 and near the northwest and southwest corners of Site 1. The Fuse Centre and Broad Oak School comprise large buildings on the settlement edge beyond Red Brook. Further to the east in Site 1, there is less indication of large or concentrated built form although residences and outbuildings, particularly the agricultural buildings at Birch Farm are present.

Landscape Sensitivity

- 2.36 The LVIA method set out at in the ES Appendix 6.1 commencing at CD-A28-Pg 119 explains that, consistent with GLIVA3, sensitivity of a landscape to a proposed change is assessed by considering its value and its susceptibility to change. Table 3 in ES Appendix 6.1 (CD-A28-Pg 125) sets out that a landscape with medium susceptibility to change and local value typically has medium sensitivity.
- 2.37 However I have noted that the ES LVIA in states at paragraph 6.87 (CD-A26-Pg 38) that the landscape sensitivity overall is low. Having reviewed the assessment of effects, it is clear that the value of the landscape sensitivity has been taken as medium throughout and the ES paragraph 6.87 is incorrect. It is agreed between the appellant and Trafford Borough Council in the Statement of Common Ground on Landscape (CD C13) that the sensitivity of the appeal site and surrounding landscape is medium. Warburton Parish Council agrees this judgement with regard to Site 1 but considers that Site 2 is of medium to high sensitivity.
- 2.38 The GMLCSA's findings on sensitivity of the Warburton and Carrington Mosses which I describe above are consistent with those in the LVIA reported in the ES. They reinforce that the LVIA's judgement on sensitivity is appropriate.

Baseline Views

- 2.39 The ES LVIA describes the baseline views and refers to visual receptors and representative viewpoints which were set out in the Scoping Report (ES Appendix 1.3 in CD A28).
- 2.40 Visual receptors are people who experience a view and view and representative viewpoints are places where a typical view experienced by each group can be considered. The views are summarily described in paragraphs 6.88 – 6.98 of the ES Chapter 6 (CD-A26-Pgs 39-40), but much greater description and photographs of the existing (baseline) views is shown on the Visual Assessment Tables at Appendix 6.2 of the ES Volume IV commencing at CD-A27-Pg 16). The locations of the representative viewpoints are shown at ES Figure 6.6 at CD-A27-Pg 48).
- 2.41 The LVIA Method in ES Appendix 6.1 (CD A28) explains at paragraph 6.2.88 (CD-A28-Pg 137) how value of a view is considered and Table 7 of the LVIA Method (CD-A28 Pgs 138) sets out values and typical examples. The ES LVIA explains that public views have been ascribed local value and private views community value. It is common ground between the appellant, Trafford Borough Council and Warburton Parish Council that the viewpoints identified are appropriate for the assessment and the descriptions of the baseline views set out in the ES at paragraphs 6.88 – 6.98 on pages CD-A26 Pgs 39-40 are agreed (see CD C13).

Assessment of Effects

The Appeal Development

- 2.42 The ES was prepared to accompany each of the three planning applications made. The results of the LVIA are presented so that the anticipated effects from developing Site 1 can be seen separate from those for Site 2 and the anticipated effects from developing the appeal proposals (both sites) are also shown.
- 2.43 The development considered in each case was that in the relevant part of the Design and Access Statement (CD A9). For the now withdrawn Site 1 and Site 2 full applications, detailed layouts and house types with drawings relating to the layout were provided and were used for assessment. For the appealed development, the outline application is for up to 400 dwellings related to the parameters plan IN6942.005A (CD A32) and for a mix of dwellings up to 3 storeys high.

- 2.44 Using a 'reasonable worst case' within this development description, the LVIA for the outline application considered that approximately 10% greater density on each site would be constructed and that the tallest dwelling type from those shown for Site 1 and Site 2 could be constructed across each site.
- 2.45 The tallest house type in the mixes comprised in the Site 1 and Site 2 applications (98029/FUL/19 and 98030/FUL/19) was the 'Lincoln' house type which is approximately 10 metres to ridge height and approximately 6 metres to eaves.
- 2.46 With regard to treatment of open space and boundaries, the LVIA considered the areas shown on the parameters plan as non-developed to be landscaped in a similar manner to that shown on the detailed layouts for the full applications.

Method of Assessment

- 2.47 As noted earlier, the method of assessment used has been agreed as appropriate by Trafford Borough Council and Warburton Parish Council, although the latter noted a specific exception referring to two paragraphs of GLVIA3 which relate to assessment of landscape character.
- 2.48 Consistent with advice at paragraph 3.27 on page 38 of GLVIA3 (CD I3) the assessment uses a small number of categories of effects as set out in the Tables presented in the LVIA Method in ES Appendix 6.1 (commencing at CD-A28-Pg 119). Each magnitude and significance category has a typical example to assist understanding of how the method is applied.

Assessment of Effects on Landscape Character

- 2.49 The ES considers the three applications which were submitted being intended to be suitable to address each application if considered alone. The LVIA considers Site 1 alone; Site 2 alone; and combined effects (labelled as Site 1 and Site 2). For the appealed application, it is these combined effects which are relevant.
- 2.50 The anticipated effects on landscape character are reported at paragraphs 6.241 – 6.252 in the ES LVIA at CD-A26-Pgs 65-67. An assessment is presented based on effects from construction, in the short-and medium-terms and in the long-term. Minor adverse effects are anticipated during construction, with moderate adverse effects on completion and in the medium- and long-term.

- 2.51 The ES LVIA does not expressly state effects on the landscape character areas referenced in its review of published landscape character assessments and as I have noted did not refer to the GMLCSA. I have considered the effects on each character area below.
- 2.52 The appeal site is a very small part of the National Character Area 60 which is a large and relatively diverse character area. The appeal site does not compromise a distinctive or rare part of the National Character Area and it does not display characteristics that make it an archetype or exemplar of the character area. As much of the National Character Area 60: Mersey Valley comprises built form, I consider that an effect of negligible significance would result on that character area.
- 2.53 Considering the Warburton and Carrington Mosses character area identified in GMLCSA (CD I5), I did not identify any characteristics which were particularly distinctive or notable in the character area description on the appeal site which forms a very small part of this character area. I characterise the effect on this character area as being of moderate adverse significance, considering that there would be an effect of minor magnitude on a landscape of medium sensitivity and of local value.
- 2.54 The above judgement applies to the Settled Sandlands character area identified in SPG30 (CD E9).

Assessment of Effects on Views

- 2.55 The ES LVIA describes the anticipated effects on views in paragraphs 6.253 – 6.293 (CD-A26-Pgs 67-74) and there are summaries in Table 6.11 and Table 6.12. For convenience I have produced Table 1 in my Appendix 1 which combines these tables and shows the significance of effects during construction, on completion and during the mid- and long-term.
- 2.56 The Visual Impact Tables in Appendix 6.2 of the ES (commencing at CD-A28-Pg 16) have detailed assessments of anticipated effects on views and visual receptors and have annotated photographs.
- 2.57 I have visited the viewpoints, reviewed the judgements made and agree with them, applying the method set out in the ES Appendix 6.1 (CD A28). The Visual Impact Tables refer to effects from development on Site 1 and from Site 2 (referring to the full applications) and also describe anticipated effects from the appealed outline application (combined development).

The ES Addendum

- 2.58 Mr Haralambous' evidence explains that a Revised Design and Access Statement incorporating a Revised Parameters plan AI942.010 (CD A46) was submitted in December 2019. An Environmental Statement Addendum (CDs B4, B5 and B6) was prepared and each chapter was reviewed.
- 2.59 Chapter 6 of the ES Addendum (CD B4) notes that the changes to the design, comprising a reduction in the proposed development area and extended green corridors and new green corridors as compared to the original application parameters plan, are positive and beneficial.
- 2.60 I have explained that the categories for describing magnitude and significance of effects are relatively broad, as advocated by GLVIA3. The review of the LVIA in the ES Addendum notes that although the inclusion of greater greenspace in the development would be discernible and beneficial, it would not be so great as to cause a change in the judgements of significance of anticipated effects.
- 2.61 I consider that these are appropriate judgements and demonstrate that the LVIA has been applied robustly and fairly.

3.0 TRAFFORD BOROUGH COUNCIL'S LANDSCAPE OBJECTIONS

3.1 Reason for Refusal 5 relates to landscape. It asserts that the scale, distribution and lack of landscape buffers would be inappropriate to the site's rural context and would cause significant harm to landscape character and rural views contrary to Policy R2 of the Core Strategy, SPG30 Landscape Strategy and the NPPF. I defer to Mr Hann with regard to the extent to which policies are compliant with the NPPF and the weight to be afforded to policy.

3.2 The Council's Statement of Case (CD C3) notes at its paragraph 5.15 with regard to landscape matters that:

- the appeal site and its context has landscape sensitivity;
- the LVIA has underplayed the impacts that would arise;
- development would dramatically change the site's character and appearance;
- effects would exert themselves on the wider landscape;
- existing rural views would be destroyed; and
- there would not be sufficient landscape buffers.

The Site's Landscape Sensitivity

3.3 The Officer's Report (CD A62) notes responses to consultations. Only Warburton Parish Council raised an objection related to landscape matters. At CD-A62-Pg 17 the Officer's Report lists eight bullets relating to Landscape Impact noted in objections received in representations from other parties than the Consultees. The majority of these bullets are from a representation from Mr Beckmann to whom Warburton Parish Council refers. I address those points in section 4.0 of my evidence.

3.4 The Officer's Report discusses Landscape Impacts at paragraphs 138-153 at CD-A62-Pgs 59-64).

3.5 Paragraph 138 of the Officer's Report notes that the appeal site is part of a much wider area that has been specifically recognised for its landscape quality under Policy R2 of the Core Strategy. It is suggested that this is significant but I consider that assertion needs appropriate qualification. It is common ground between the appellant and Trafford Borough Council that the appeal site is not a valued landscape in the context of NPPF Paragraph 170 (in CD D1).

- 3.6 Trafford Borough Council Core Strategy Policy R2.3 (a) at CD-E2-Pg 88 sets out designated sites and species of national, regional and local importance. It includes at the final bullet point *Open countryside landscape character areas*.
- 3.7 Paragraph 22.7 of the Core Strategy, discussing Policy R2 explains that these Open countryside landscape character areas comprise all seven of the landscape character types identified in the Trafford Borough Council SPG 30 (CD E9). Policy R2 does not differentiate between the landscape qualities of different character areas and does not consider the landscape qualities of different sites within those character areas. It is not a specific recognition but a 'broad brush' designation that covers the open land outside of the built up area which was subject to the assessment in 2004. SPG30 notes at paragraph 1.3 at CD-E9-Pg 3 that this comprised 45% of the Borough when the survey was undertaken. This sets the appropriate context for the assertion that the appeal site comprises a local landscape character area: effectively every site in the Borough outside of a settlement is in this designation. I consider it incorrect to assert that there is specific recognition of landscape quality of the appeal site or wider area.
- 3.8 I have explained that the GMLCSA considers that the character area in which the appeal site lies has Moderate sensitivity on every index but one that it considered, including sensitivity to 2- 3 storey residential housing developments. The exception to the Moderate rating is that it rated Low to Moderate on one index. It is common ground between the appellant and Trafford Borough Council that the landscape of the site and environs is of medium sensitivity.
- 3.9 In my opinion, the appeal site would fall in the lower end of this range as it is impinged by the edge of Partington.

The LVIA has Underplayed Landscape Effects

- 3.10 The Officer's Report describes the application LVIA in paragraphs 142 - 148 before introducing the Council's landscape consultant's review at paragraph 149 (CD-A62-Pg 62).

- 3.11 The Council notes that its landscape consultant has overall confidence in much of the LVIA including the method and its application. However there are differences in some of the judgements. I discuss these below under subheadings points raised in the Officer's Report.

Expectation of Significance of Effects

- 3.12 A point made in the Officer's Report at paragraph 150(CD-A62-Pg 160) which is repeated occasionally in further paragraphs refers to an interpretation of 'significance' of effects and apparently what was 'expected' from the LVIA in the ES. Paragraph 150 of the Officer's Report asserts that the LVIA is inappropriate because it has identified few 'significant' effects (although the LVIA identifies effects of negligible, low and moderate significance).
- 3.13 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 implement relevant EU Directives and require the reporting of *significant effects of the proposed development*. There is no definition in the Regulations of what comprises a significant effect and it is common practice to include all effects found and instances of no effect.
- 3.14 A theoretical question sometimes arises as to what would comprise an effect which likely would give rise to the need to report it in an Environmental Statement and so be deemed 'significant'. This is not required under Regulations but commonly appears. Sometimes it is phrased as 'significance in EIA terms'.
- 3.15 TEP is a Registered Practice with the Landscape Institute and a Quality Mark Registrant with the Institute of Environmental Management and Assessment. These organisations co-authored the Guidelines on Landscape and Visual Impact Assessment Third edition (GLVIA3) comprising CD I3. GLVIA3 states at paragraph 3.32 that '*LVIAs should always distinguish clearly between what are considered to be the significant and non-significant effects*'. A clarification note was issued in 2013 (GLVIA3 Statement of Clarification 1/13) (CD I4) which in summary advises that assessors of landscape effects can use the term 'significance' in EIA to express the judgement of magnitude against sensitivity but should avoid the term significance in non-EIA landscape appraisals.

3.16 The LVIA states a professional opinion on relative weight to be attached to the described landscape effects in the planning balance. It does not assert that any below moderate adverse significance are not to be considered in the planning balance. To do so would be bizarre as the logical extension of this approach implies that where EIA is not required, there are no adverse effects carried forward to the planning balance. That clearly is inappropriate.

3.17 I do not address this criticism based on expectation any further.

Embedded Mitigation is Ineffective

3.18 A further criticism of the LVIA at paragraph 150 of the Officer's Report (CD A62) is an assertion that the LVIA concedes that embedded mitigation will be ineffective. This assertion is based on a minor adverse effect on landscape character being reported in the short to medium term and also in the long term.

3.19 I anticipate that a similar criticism could be made on this basis that the changes described in the revised Design and Access Statement December 2019 (CD A51) have not resulted in the judgements of landscape effects in the ES Addendum changing.

3.20 I have explained in Section 2.0 of my evidence that the LVIA follows guidance in GLVIA3 (CD I3) paragraph 3.27 in using relatively few broad categories of effects. Exercising professional judgement, there will be changes over time as tree and hedge planting establish and mature on boundaries, in the large areas of open space and incidentally throughout the development.

3.21 These changes will be beneficial and of landscape value to the development. However applying robust and honest assessment to these changes, not all incidences will result in the judgement 'clearing the bar' into a different category. It is emphatically the case that greater areas given over to planting and incorporation of considered design described in Mr Haralambous' evidence will be beneficial. The fact that the judgements have remained as previous is a reflection of the application of a robust assessment method rather than an indication of weak or ineffective mitigation.

Differences in Judgement of Significance of Landscape Effects and on Views

3.22 Paragraph 150 of the Officer's Report (CD A26) states that the LVIA had understated the likely landscape character impacts but provides no explanation or justification other than the reference to expectations of 'significance' which I address above.

- 3.23 Paragraph 151 of the Officer's Report notes that there is disagreement regarding the magnitude of effect which would arise from some of the representative viewpoints considered. This difference in judgement leads to disagreement on significance of effects on views and examples are given in the Officer's report and in the Council's Statement of Case. Trafford Borough Council and Warburton Parish Council have confirmed the specific viewpoints and receptors about which there is disagreement in the Statement of Common Ground (CD C13) as follows:
- Viewpoint 1;
 - Viewpoint 2;
 - Viewpoint 3;
 - Viewpoint 5;
 - Viewpoint 6; and
 - Viewpoint 10.
- 3.24 I have explained in Section 2.0 of my evidence the method which has been applied and that the Visual Impact Tables in Appendix 6.2 of the ES (commencing at CD-A27-Pg 16) set out in detail the matters that have been considered. In my opinion, the assessment of effects presented is robust and appropriate.
- 3.25 I am aware from the Statements of Case from Trafford Borough Council and Warburton Parish Council that there are differences between us with regard to judgement of magnitude of effect. The LVIA considers that many of the magnitudes of effect fall within the Low category with others falling in the Moderate category. I have considered these judgements in the context of the visual assessment method employed and set out in Appendix 6.1 commencing at CD-A28-Pg 133. I am content that they are appropriate.
- 3.26 I have experience in a wide range of projects and amongst recent experience, including in northwest England, are large developments related to modern logistics and schemes relating to energy provision. Some of these projects involve construction of single buildings of thousands of square metres and of heights of up to around 25m - 30m and some individual structures of much greater heights. Where these are proposed in areas where there is no similar structures, they cause a great scale of change to character because they are wholly uncharacteristic. In these cases the High magnitude of effect generally applies.

- 3.27 The Low magnitude category notes that this is where there is the introduction of features which may already be present in the landscape. In the case of the appeal proposals, this comprises housing. I have considered this application of the method to the appeal site and think it is appropriate. The appeal site is edge of settlement and built form is clearly apparent, comprising existing housing off Oak Road on the western part of the site and other areas of housing along with The Fuse building and Broad Oak School to the east.
- 3.28 It is important for the assessment method to have calibration. If an assessment reports that houses on undeveloped land result in a major magnitude of adverse effect, it makes it difficult to articulate the magnitude of change that larger development would bring. It is not helpful to the decision-maker if almost any change which would be experienced on landscape or on views is deemed of major significance.
- 3.29 Similarly, some calibration needs to be applied to sensitivity of landscape character and sensitivity of views. If housing which excludes large apartment blocks or towers on non-designated land on a settlement edge is deemed to be of major adverse significance, it becomes challenging to describe the effects of a proposal for much larger development on that landscape or, say, on a designated landscape. The significance of effect would be greater but there may no effective term to acknowledge that fact within a scale which follows guidance in GLVIA3.
- 3.30 That is not to say by any means that any development should be 'acceptable' because a larger or less sympathetic development may be proposed in the same location. I do not make a judgement on the 'acceptability' of the appeal proposals because that is a judgement of planning balance. The majority of development that ever is proposed brings some harm to landscape and views where built form appears on undeveloped land. However I consider it important that the decision-maker has a clear explanation of the harm to weigh in the planning balance. It is not helpful to assert that any form of development is of 'major' adverse importance simply because a change will occur.
- 3.31 I do not consider that the LVIA understates the relative significance of effects of the appeal proposals on landscape character and on views.

Development Would Dramatically Change the Site's Character and Appearance

- 3.32 This statement is a value judgement which does not relate to any description advocated in GLVIA3.

- 3.33 It is accepted that there would be a change in the site's character and appearance if the appeal development proceeds. As I have explained, this is inevitable and arises commonly where built development takes place on presently undeveloped land. The appellant's LVIA sets out a robust and accurate description of how character and appearance would change against a clear framework framing the judgements reported.

Effects Would Exert Themselves on the Wider Landscape

- 3.34 The appellant's LVIA sets out at Figure 6.5 at CD-A27-Pg 47 the study area considered and it is common ground between the appellant and Trafford Borough Council that this is appropriate. (I note from the Statement of Common Ground on Landscape (CD C13) that Warburton Parish Council considers that the study area should cover a greater extent: I disagree and refer to this in Section 4.0 of my evidence.)

- 3.35 The LVIA reported in the ES correctly identifies that development on the appeal site will affect landscape outside of the site. I consider those effects will arise in a localised area.

Existing Rural Views would be Destroyed

- 3.36 As for landscape effects, it is clearly the case that the appeal development would change any view of one of the two fields comprising the appeal site from undeveloped land to housing. Account has been taken of that change in the LVIA.
- 3.37 The appellant's LVIA sets out Representative Viewpoints at Figure 6.6 (CD-A27-Pg 48) which were approved by the Council for the assessment in scoping the EIA. It is common ground between the appellant, Trafford Borough Council and Warburton Parish Council that these are appropriate to consider the appeal proposals.
- 3.38 As with the assessment of landscape effects above, I consider that the Representative Viewpoints demonstrate that effects will be localised, that is that the effects will arise within a limited area relatively close to the appeal site.

- 3.39 It is common ground (paragraph 21 of CD I3) between the appellant and Trafford Borough Council that the value and susceptibility to change of views are set out in Table 6.6 of the ES. This identifies that the public views are of local value and private views are of community value. (Warburton Parish Council does not agree with the judgements in Table 6.6 at CD-A26-Pgs 41-42.) The values agreed with Trafford Borough Council acknowledge that the views are valued by those who see them because they are seen from where they live, work or pass but that they are not views which are sought out to be appreciated by others because of any distinctive aspect or any single or combination of features.
- 3.40 Referring to Figure 6.6 and the photographs on Figure 6.7 commencing at CD-A27-Pg 49, I note that Representative Viewpoints 7, 9 and 12 do not show existing rural views. Viewpoints 1, 5 and 6 show existing views where the edge of settlement is clearly apparent and comprise urban fringe views. The foreground of these shows a field which will become developed land.
- 3.41 The foreground of views from Viewpoints 3, 4, 11 and 8 which presently show undeveloped fields will remain unchanged although some development will appear in these views.
- 3.42 The views from Viewpoints 2 and 10 presently appear as rural views which will alter. Each of these is immediately adjacent the appeal site. The assessment of effects on views presented in the appellant's LVIA takes into account these changes.

Landscape Buffers are Inadequate

- 3.43 The Trafford Borough Council Officer's Report includes a description of the general area and at paragraph 140 (CD-A62-Pg 59) includes quotes from the Design Review Panel Report, comprising two letters (CD I1). The quote in the Officer's Report refers to the appeal site comprising two '*gorgeous sites*' whilst omitting an explanation that the description is a reference to the high development opportunity it saw in the two sites. There is no indication at all in the Design Review Panel's comments that development should not take place on the appeal site nor any indication that development should be over smaller extents.

- 3.44 My review of the Design Review Panel Report (CD I1) is that much is made of more open boundaries, with a variable '*push and pull*' approach to the boundary with Moss Lane and notes referring to greater views out from the development on Site 2 (a more permeable boundary that would allow views in too). There is reference to Site 2 possibly appearing as housing in woodland, but this is in reference to internal planting. I have not seen any reference to the Design Review Panel recommending that the development should be screened by substantial landscape buffers. Mr Haralambous' evidence explains the evolution of the design, notwithstanding that this is an outline application with matters including design reserved.
- 3.45 Paragraph 141 of the Trafford Borough Council Officer's Report (CD-A62-Pg 59) acknowledges that the appeal site is part of the draft GMSF's New Carrington allocation (in CD F1) and that the landscape qualities of the site are noted in the allocation. These include *respecting the site's urban/rural fringe setting; minimising loss of landscape features such as hedgerows and tree belts; and enhancing these features to create defensible Green Belt boundaries.*
- 3.46 I have explained earlier that my interpretation of the principles set out for the New Carrington allocation, of which the appeal site is only one part, make reference to Green Belt Boundaries specifically when new boundaries are to be created (the principle expressly uses the word '*create*'). The appeal site's boundaries with the Green Belt will remain as existing which comprise the hedge to the south of each of the fields with the hedge to the eastern part of the appeal site (Site 1) abutting Moss Lane. It is a matter of fact that these are established defensible Green Belt boundaries that have been in place for decades. They will not be diminished by the appeal development proposals but will be reinforced.
- 3.47 There are swathes of new planting of varying widths along the southern boundary of Site 2 as described in Mr Haralambous' evidence. I consider these appropriate and consistent with retaining and enhancing existing defensible Green Belt boundaries.
- 3.48 It is notable that although the inadequacy of landscape buffers is asserted as a deficiency in the appeal proposals, there is no mention of the phrase landscape buffers or indication as to what adequate landscape buffers may comprise in the New Carrington allocation. Trafford Borough Council has had substantial influence on the New Carrington allocation, the important principles that it should follow and how these should be implemented.

- 3.49 I do not believe that it is necessary for the boundaries of development to be completely screened and enclosed by dense planting and Mr Haralambous explains how the Council's and others' comments have influenced the boundary with Moss Lane in particular. If a dense landscape buffer screening all development on the appeal site was an important requirement, I am confident that would have been stated clearly as a principle to apply to the New Carrington allocation in GMSF. That is not the case.
- 3.50 Considering relevant specific views, Viewpoint 11 is southeast of the appeal site, approximately 50m from the closest part of Site 1. The existing view is shown at the Visual Assessment Table for that viewpoint in Appendix 6.2 of the ES at CD-A27-Pg 54. The filtering and screening of views over Moss Lane by existing hedgerow trees is clearly apparent. Birch Farm on the right hand side of the photograph has tall modern farm buildings in a group. Hedgerow trees are effective in breaking up and filtering views of this group of large buildings. I consider that hedgerow trees and small copse planting at intervals in the buffer along Moss Lane similarly will be effective in the appeal development.
- 3.51 Viewpoint 3 is south of the appeal site, approximately 300m from the closest part of Site 2 and 500m from the closest part of Site 1 shown at CD-A27-Pg 50. Views towards Site 1 are screened and filtered by existing roadside hedgerows, hedgerow trees and the existing development at Top Park Close. There are open views to the closer boundary of Site 2 although as Mr Haralambous explains, the southern boundary parameters plan shows a landscape buffer ranging between 10m to 12m width along this edge and connecting with the existing wider copse to the west and the buffer increasing to 50m width adjacent Warburton Lane. This will filter or screen views of the appeal development.
- 3.52 The Council apparently advocates a greater depth of landscape buffer to the development is appropriate although I disagree that this is likely to make material difference. When filtering and screening views, the height of vegetation will be more important than its density. This is apparent when looking at the effectiveness of vegetation screening existing development as I describe above. A single line of trees is less effective than multiple staggered tree groups. However during establishment and early growth, it is the height of the trees rather than their density which achieves the screening. The proposed landscape buffer provides sufficient space for tree groups and there will be appropriate screening.

4.0 WARBURTON PARISH COUNCIL'S LANDSCAPE OBJECTIONS

4.1 I have considered representations made by the Parish Council comprising the following:

- Warburton Parish Council's Statement of Case (CD C4);
- The Parish Council's letter of 22nd July 2019 Reference RAP/MKG/3322-01/LPA; and
- The Parish Council's letter of 10th October 2019 Reference RAP/MKG/3322-02-LPA.

4.2 The Parish Council's Statement of Case refers to two matters. It notes concerns that the description of the site and extent of the Zone of Theoretical Visibility (ZTV) is lacking in the ES. It notes particular concern that the LVIA in Chapter 6 was not based on a worst-case scenario of up to 400 dwellings, with a maximum height of 3 storeys with 25-30 dwellings per hectare. The Parish Council submits that a ZTV would be very substantially well beyond the Landscape Study Area shown at Figure 6.5 in Volume 3 of the ES (CD-A27-Pg 47). In addition, Warburton Parish Council's Statement of Case (CD C4) notes that the Visual Assessment Tables in the ES do not appear to reflect the magnitude of impact of houses of 3 storeys in height (with an assumed height of 13.4 metres).

4.3 I note at paragraph 3.34 of my evidence that Warburton Parish Council considers that the LVIA's study area, agreed as appropriate by Trafford Borough Council, should extend further.

4.4 The Parish Council's Statement of Case also asserts that the site comprises a valued landscape and the development of it would give rise to significant harm.

4.5 The representation of 10th October 2019 is about matters other than landscape and I do not address it in my evidence.

4.6 The Parish Council's letter of 22nd July 2019 notes its concerns regarding landscape impact on a valued and valuable landscape. The letter refers to and endorses the matters relating to landscape in the representation of Mr Paul Beckmann in his letter of 15th July 2019.

4.7 Mr Beckmann's letter addresses a range of issues relate to the development. I have summarised those primarily related to landscape to be:

- The site comprises a very precious landscape;
- The proposals are not consistent with landscape policy guidelines in the Trafford Landscape Strategy adopted as Supplementary Planning Guidance 30 (CD E9) and not consistent with the '*Guidance and opportunities for future development and management/enhancement*' in the Greater Manchester Landscape Character and Sensitivity Assessment (GMLCSA) (CD I5).
- There would be effects of Major adverse significance on the landscape from the proposals;
- There would be visual effects of Major adverse significance;
- Landscape mitigation is inadequate around the boundaries of the site, notably along the southern boundary;
- The HS2 route should not have been considered; and
- There should be a fully costed landscape management plan for at least 10 years.

4.8 I address each of the matters raised by the Parish Council in turn below.

Height of Buildings Assessed and Zone of Theoretical Visibility

4.9 I have explained at paragraph 2.49 of my evidence the heights of buildings assessed when the outline application was considered in the LVIA. The three storey building which is the maximum height envisaged was considered across the site based on a design which would not exceed a ridge 10m high.

4.10 I have noted that the GMLCSA (CD I5) considered the sensitivity of all Landscape Character Areas, including the Warburton and Carrington Mosses encompassing the appeal site, for residential development it describes as 2-3 storeys. This demonstrates that the landscape architects undertaking the assessment to inform the GMSF assumed that there would not be material difference in landscape effects between housing of two-storeys and housing of three-storeys.

- 4.11 I do not know why Warburton Parish Council would assume a maximum height of buildings of 13.4m across the appeal site. This may explain why it has concerns that the ES LVIA has understated the anticipated effects: essentially Warburton Parish Council has over-stated the effects by considering development much taller than that proposed. It likely also explains why the Parish Council considers that the LVIA study area, agreed as appropriate by Trafford Borough Council, should extend over a greater area.
- 4.12 A Zone of Theoretical Visibility (ZTV) is used for assessment of some forms of development. Computer software considers the height of the proposed development and the ground level and then shows on a map base the area from which the development may be visible. Depending on the software and information available, it may take account of intervening vegetation and buildings as well as landform and the earth's curvature.
- 4.13 In my experience ZTV generally is used for unusual or very tall developments. I am engaged on a project at present where tall overhead line pylons exceeding 100m high may be increased in height by around 10%. The purpose of a ZTV in that case is to compare the existing ZTV with that for taller pylons to indicate if taller pylons would be visible from a substantially wider area. The form of development being considered in that case is unusual and can be challenging to visualise.
- 4.14 It is rare in my experience for ZTV to be used for housing developments because they are a very familiar form of development and generally have ready reference points in existing views. This is the case for the appeal site as there are buildings adjacent in each case.
- 4.15 ZTVs are limited in their value because they do not distinguish between a full view and a glimpse of the uppermost parts of a structure; they simply indicate that it will be theoretically possible to discern the structure from a point. A structure needs to be visible to have a visual effect, but, as is explained in the LVIA method, it is not the case that visibility directly relates to a visual effect. The extent of view affected, the nature of the view and the characteristics of the development influence the visual effect.
- 4.16 A ZTV has not been prepared and was not requested by the Council when agreeing the study area and representative viewpoints. Trafford Borough Council has agreed that the LVIA the study area and viewpoints are appropriate (see CD C13) and has not suggested that ZTV is necessary or helpful.

The Site as a Valued Landscape

- 4.17 The National Planning Policy Framework (NPPF) (CD D1) states at paragraph 170 that the planning system '*should contribute to and enhance the natural and local environment by...protecting and enhancing valued landscapes ... (in a manner commensurate with their statutory status or identified quality in the development plan)*'. The NPPF does not give a definition of protected landscapes and there is case law which has guided how they should be identified and what may comprise a valued landscape.
- 4.18 The case of Stroud DC vs. SSCLG [2015] EWHC 488 (Admin) in Appendix 2 to my evidence gave the judgement of Ouseley J on a challenge that an Inspector had made an error in considering whether a landscape is valued, considering designations and physical attributes. Ouseley J found that designation and valued landscapes are not the same and a landscape does not have to be designated to be valued. However 'valued' means something other than popular and a valued landscape must have physical attributes which take it out of the ordinary.
- 4.19 The phrase in brackets in the quote from NPPF paragraph 170 above was added to the latest version of the NPPF and did not appear in the 2012 version of the guidance in force when the Stroud judgement was given.
- 4.20 There is no designation which applies to the appeal site or the landscape character areas of which it is part. I have set out in Section 3.0 of my evidence that the quality identified in the development plan applies equally to other character areas and so to approximately 45% of the borough of Trafford. I am not aware that the appeal site or other land in its locale has ever been subject of a designation for its special landscape quality.
- 4.21 I am aware that the Stroud judgement stated that a landscape does not have to be designated to be valued and this has been re-stated in other cases.

- 4.22 The ES LVIA acknowledged that landscape value cannot be determined solely from the presence of a designation and this has been acknowledged in GLVIA3 since its publication. The ES LVIA undertook the 'Box 5.1 exercise' to which I refer in Section 2.0 of my evidence and found the landscape to be of Local value. The guidance is not designed to determine whether a landscape comprises a 'valued landscape' as referenced in NPPF paragraph 170 but nonetheless it is helpful. In the Landscape Statement of Common Ground (CD C13), Trafford Borough Council notes that it considers that the LVIA's Table 6.4 should have acknowledged the presence of the historic Deer park. Notwithstanding, it is agreed between the appellant and Trafford Borough Council that the appeal site is of local value and not a valued landscape in terms of NPPF paragraph 170.
- 4.23 I have not identified any physical attributes of the landscape of the appeal site which make is notable, remarkable or different from much of the undeveloped land around it.
- 4.24 I have reviewed the GMLCSA (CD I5) which comprises the most contemporary landscape character assessment undertaken. It acknowledges Warburton Park but does not describe the area of the appeal site as having notable distinctive qualities within a wider area. It finds that the appeal site is part of an area which is of no greater than moderate sensitivity to a range of developments, including that comprised in the appeal proposals.
- 4.25 The GMLCSA (CD I5) does not find that the landscape character area of Warburton and Carrington Mosses including the site is of high sensitivity on any index it uses. The document sets out for each character area a table comprising 16 bullet points as *Summary of special landscape qualities and key features or attributes that would be sensitive to change (eg as a result of development)* (CD-I5-Pg 69). Some of these for the Warburton and Carrington Mosses have examples such as views from Trafford into neighbouring Warrington and Cheshire East Districts across the Bollin Valley. I do not consider that any of these are present on the appeal site. The River Bollin is approximately 2km from the appeal site at its closest and there are no publicly accessible high points on the appeal site. This lends support to my opinion that the appeal site is of local value and should not be a considered a valued landscape under NPPF paragraph 170.

- 4.26 Although Warburton Park is mentioned, there is no reference in the GMLCSA to the historic Deer Park as a special landscape quality, key feature or attribute sensitive to change. Similarly there is no reference to the historic Deer Park and so no reference to any related qualities or features to be protected in the GMSF New Carrington allocation 45 (CD F1).
- 4.27 Taking account of these matters, it seems clear that no part of the appeal site can be considered a valued landscape under NPPF paragraph 170, contrary to the assertion of WPC.

The Proposals are not Consistent with Landscape Policy Guidelines

- 4.28 It is fair to observe that the landscape policy guidelines in each of the guidance documents (Trafford SPG30 CD E9 and GMLCSA CD I5) generally envisage their application primarily on land which remains undeveloped. I have been involved in similar studies and have written similar guidelines. It is inevitable that forms of development will not be wholly consistent with these guidelines.

Trafford SPG30 (CD E9)

- 4.29 Accepting the point immediately above, my analysis of the development's performance against landscape policy guidelines is that it complies with a number in each case. Considering Trafford SPG30 the development will conserve and maintain the majority of hedgerows and hedgerow trees and opportunities will be taken to plant new hedgerows and hedgerow trees with traditional species and managed in a traditional manner.
- 4.30 Development will not retain existing visual unity and views insofar as there would be a change from the existing situation. However developing adjacent the existing settlement would minimise disruption to visual unity (as compared to a development further distant from the settlement edge with other undeveloped land on each side).
- 4.31 Developing on undeveloped land will alter the landscape pattern although there are no substantial changes in levels or landform. Mr Haralambous addresses the style and scale of development.

- 4.32 There are no traditional features on the local highway that would be affected by the development. There would be no harm to woodlands; greater interest in them by people and overlooking may lead to restoration and enhancement opportunities.
- 4.33 There are no objections from relevant consultees relating to nature conservation and ecological features.
- 4.34 Matters relating to other aspects of the Trafford SPG30 (CD E9) are addressed by Ms Kelly with regard to historic environment and Mr Haralambous with regard to design.

GMLCSA (CD 15)

- 4.35 Turning to policy guidelines in GMLCSA, I disagree that there is any serious harm done by the appeal proposals to these guidelines which relate to landscape. I note that Mr Beckmann considers that the appeal proposals would be contrary to guidelines that advise *Ensure that the sense of separation the landscape provides between distinct settlements is maintained*. I acknowledge that the appeal development would be in the parish of Warburton and that the separation between the edge of Partington and Warburton would be diminished by one field's width. The appeal proposals would not result in a perception that Partington and Warburton are no longer distinct settlements.
- 4.36 In summary, I do not consider that the appeal proposals would cause substantial harm to the relevant landscape policy guidelines.

Effects of Major Adverse Significance on Landscape and on Views

- 4.37 I have explained in Section 3.0 of my evidence the method of assessment that has been used in the LVIA Chapter of the ES and in the ES Addendum. I addressed the judgements used on magnitude and on significance. I consider that to ascribe effects of major adverse magnitude and significance to the appeal proposals is disproportionate and brings into question any method used for such results.
- 4.38 I have not seen another assessment of the appeal proposals using a method consistent with the Guidelines for Landscape and Visual Impact Assessment. If it is accepted that there are larger and more obtrusive types of development than 2-3 storey housing and more sensitive landscapes than the appeal site, it is very difficult to justify describing the anticipated effects as being of major significance.

Landscape Mitigation is Inadequate

- 4.39 I have explained in Section 3.0 of my evidence that I consider the landscape mitigation is adequate and appropriate. I have noted that an objection may be that the entirety of built form should be screened by planting and have explained that I do not think that is necessary, appropriate or consistent with the Design Review Reports on the appeal development.

The HS2 Route should not have been Considered

- 4.40 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 require at Schedule 4 paragraph 5.(e) that assessments consider '*cumulation of effects with other existing or proposed developments*'.
- 4.41 Trafford Borough Council confirmed the developments which should be considered as possibly cumulative with the appeal proposals and requested HS2 was included. The height of crossing of the Manchester Ship Canal and the levels of the rail development in the vicinity of the appeal site were taken from publicly available information. It is acknowledged that the HS2 development may not proceed and that its detailed design is to be confirmed. I consider that it has been reasonable to include a cumulative assessment considering HS2 along with the appeal development. The base case of the LVIA does not assume that HS2 will be in place and it is not part of the appellant's case that the landscape effects of the appeal proposals should carry little weight because of the HS2 proposals.

A Fully Costed Landscape Management Plan should be Included

- 4.42 As landscape is a reserved matter, it is not possible to derive a landscape management plan and costs for the outline application. However the design, implementation and management of landscape in the scheme will be secured at the appropriate stage through enforceable conditions or an agreement as appropriate.

5.0 OTHER REPRESENTATIONS ON LANDSCAPE MATTERS

- 5.1 Trafford Borough Council's Heritage Officer's internal consultation response of 16th October 2019 noted that the LVIA viewpoints do not sufficiently take into account designated and non-designated heritage assets. The officer also commented that wireframes should be undertaken to understand the full impact of the development on this open landscape and the contribution it makes to the setting of all heritage assets and that it would be useful if the views identified on photographs were mapped. Similar comments were repeated in January 2020 with a reference to ZTV.
- 5.2 I have explained that the assessment of landscape character considers aspects of the historic environment only insofar as they are clearly manifest to an observer and influence perception of character. It is clearly stated in the Scoping Opinion that the approach to landscape and visual effects will not 'double-count' effects on the historic environment. It was noted in the Scoping Opinion that a separate heritage assessment would be undertaken and it has been submitted and is addressed in Ms Kelly's evidence. The LVIA is not an assessment of effects on heritage assets. The Representative Viewpoints agreed with Trafford Borough Council during scoping were to assess effects on views and not effects on heritage assets. Figure 6.6 of the ES shows the locations of the Representative Viewpoints. I have explained in addressing Warburton Parish Council's representations that ZTV has not been prepared and is not necessary or helpful in considering landscape and visual effects of the proposed development.
- 5.3 I have not seen references to matters relating to landscape and views in other representations on the appeal development.

6.0 CONCLUSIONS

- 6.1 My evidence demonstrates that the LVIA presented in Chapter 6 of the ES accompanying the appeal application is consistent with professional guidance. Trafford Borough Council and Warburton Parish Council have accepted that the method is appropriate. My review demonstrates that it is robust and reliable and an honest appraisal. The assessment applies proportionality to assist the decision-maker.
- 6.2 It is common ground between the appellant and Trafford Borough Council that the landscape has medium sensitivity to the appeal development. The Greater Manchester Landscape Character and Sensitivity Assessment expressly considered the sensitivity of the landscape incorporating the appeal site to 2-3 storey housing and concurs with this judgement. I do not agree with Warburton Parish Council's assertion that the landscape has greater sensitivity and comprises a 'valued landscape' for the purposes of paragraph 170 of the National Planning Policy Framework.
- 6.3 The appeal proposals will lead to landscape change as occurs inevitably whenever almost all built form appears on land presently without it. The ES LVIA acknowledges that harm and accurately describes the scale of effects to be taken forward to the planning balance.
- 6.4 Landscape is a reserved matter to be detailed at a later stage. However the parameters plan has appropriate allowances for details to respect existing landscape character, work with relevant guidance. Appropriate landscape treatment will be applied to boundaries and I disagree with criticism that landscape buffers are required which will screen all built form from the wider landscape.
- 6.5 I do not find Trafford Borough Council's objection to the appeal proposals on landscape grounds coherent or convincing.