

# **RH/2/D**

**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**

**Rebuttal Proof of Evidence of Ian Grimshaw  
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**Landscape and Views**

1. This rebuttal evidence is prepared by Ian Jeffrey Grimshaw BA(Hons) MA(LM) MSc CMLI MRTPI engaged by Redrow Homes as landscape expert witness.
2. My qualifications and experience are outlined in my main proof of evidence at paragraphs 1.2 and 1.2 of RH/2/B-Pg3.
3. I have considered the proofs of evidence of Mr Beckmann on behalf of Warburton Parish Council and Mr Folland on behalf of Trafford Borough Council and identified matters on which I consider I can provide a response. For the avoidance of doubt, the matters raised in this rebuttal evidence are ones that I have identified and can address in the limited time available for rebuttals. There will be other matters with which I do not agree and on which I have observations and which will be discussed at the inquiry.
4. When I refer to proofs of evidence, I refer to the paragraphs and the document reference including page number. I have used sub-headings to identify the matters I address.

#### WPC Conflation of Landscape and Historic Environment

5. Mr Beckmann states at the beginning of his proof of evidence that it is concerned with landscape and visual impact assessment and design issues (**Paragraph 3, WPC/2/B-Pg 1**). However it addresses many matters related to historic environment and conflates these with landscape assessment.
6. A great deal is made of the former deer park in particular with repeated assertions that this elevates the value of the landscape because of its history. I do not go into matters relating to heritage assets and defer to Ms Kelly in that regard.
7. The approach taken to landscape character assessment is to comment upon the features present and apparent and the extent to which these contribute to the present landscape character. That is, the approach identifies the extant features of the landscape which influence and contribute to character. There is a relationship between historic interest and landscape and many important landscapes have historic interest which is apparent. However it is important to ensure that interest is not 'double-counted'. The approach summarised above is particularly appropriate where an assessment of the historic environment is undertaken in addition to a landscape assessment, as is the case here and in the great majority of Environmental Statements.

8. Mr Beckmann criticises this approach and at **paragraph 4 at WPC/2B-Pg 3** reports his serious reservations in respect of Table 6.4 (Landscape Value) of the Environmental Statement March 2019, assumed to be because it does not acknowledge the former deer park.
9. This omission also is observed by Mr Folland at **paragraph 3.6 on page 10 of his proof TBC/3/B** although he also acknowledges that when taken into account it does not change his agreement with the ES on the landscape value or its sensitivity.
10. I do not dispute that there was a deer park at Warburton or that it and the history of Warburton has been extensively studied. However I dispute that there are abundant clearly distinguishable features that put the observer in mind of a deer park when viewing the appeal site and its environs.
11. Ms Kelly has advised me that Dr Nevell is a known authority on the history of Warburton and I note that, in addition to providing evidence, one of his works is quoted by Mr Beckmann. At **paragraph 11 of his evidence (WPC/2/B-Pg 2)**, Mr Beckmann quotes from Dr Nevell explaining that '*Warburton hides a rich landscape history*' (my emphasis).
12. This supports my opinion that the various aspects of historic interest identified are those that are known to persons who have undertaken particular study of the history of Warburton rather than those which are apparent to the typical person considering the landscape. Mr Beckmann relies for much of his evidence of landscape value on study of works such as that of Dr Nevell which he quotes.
13. Mr Beckmann notes at his **paragraph 10 (WPC/2B-Pg 2)** that '*the full extent of deer park is easily distinguished on a map*' (my emphasis). In that paragraph he refers to a number of features outside of the appeal site speculating their relationship to the deer park (*almost certainly...; possibly used as...; probably more likely to be...*). I do not have any expertise to comment on these possibilities but these indicate ongoing debate and discussion of local history after much study; they are not descriptions of features on the appeal site.

14. I note in my proof of evidence in paragraph 4.26 at RH/2/B-Pg 32 that the historic presence of the deer park is acknowledged in the Greater Manchester Landscape Character and Sensitivity Assessment (CD I5) although that did not result in the landscape being specifically highlighted as an area of great sensitivity nor any landscape guidelines that refer to a different treatment of the former deer park as compared to other parts of the landscape.
15. I note that Trafford Borough Council's supplementary planning guidance on landscape SP30 (CDE9) acknowledges the manorial deer park when discussing changes to the landscape over time. The presence of the deer park does not feature in the Key Features of the Settled Sandlands nor is it addressed in the Policy Guidelines for that character area. I suggest that, as with the GMLCSA (CD I5), this is because that assessment did not find extant features in the landscape that give a contemporary impression of a deer park.
16. These observations are not to cast doubt on the historic presence of the deer park and I leave the matter of its importance and appropriate treatment to Ms Kelly.

#### Important Hedgerows

17. There are a number of references to important hedgerows within and outside of the appeal site by Mr Folland (first bullet point on page 16 of TBC/5/B) and Mr Beckmann (WPC/2/B-Pg 9). The approach taken to considering hedges in the LVIA has been to consider their landscape value. The criteria for considering whether a hedgerow is 'important' relate primarily to two matters: historic importance; and biodiversity value.
18. A hedgerow that has historic importance may comprise one that has relatively low landscape value, because of its condition and neglect. Similarly, a relatively recently established hedgerow that has high landscape importance because it is prominent and contributes to landscape pattern may be of low biodiversity value because of its composition and management.

19. The ES has a chapter on historic environment and one on biodiversity where these specific interests are addressed. The landscape assessment considers the landscape value of hedges. It does not consider their landscape value and then re-appraise them if they have value on another index. This is a very common approach where an ES is prepared and avoids ‘double-’ or ‘triple-counting’ of value. The LVIA is not deficient for failing to ascribe additional value to any hedgerows which meet other criteria for comprising ‘important hedgerows’. Where the criteria relate to historic interest or ecological interest that is pertinent to judgements in the relevant ES chapter.

Relevance of Natural England’s publication ‘An approach to landscape sensitivity assessment – to inform spatial planning and land management’ (CD 17)

20. Mr Beckmann suggests at **paragraphs 18 – 20 of his proof WPC/2/B – Pg 4** that the above document from June 2019 offers a relevant alternative method of assessing landscape sensitivity. I explain at **paragraph 2.5 of my main proof (RH/2/B – Pg 6)** that this document clearly excludes its approach from use in this circumstance of a specific proposal assessed under the guidance in GLVIA3. Mr Beckmann has not explained why this approach should be applied to this circumstance, contrary to Natural England’s advice in the document.

The appeal site as a ‘valued landscape’

21. Mr Beckmann asserts at **paragraph 15 (WPC/2/B-Pg 3)** that his considered opinion is that Site 2 and the study area to the south and west and land adjacent to the study area comprise a valued landscape to which the National Planning Policy Framework paragraph 170 applies. I have appended to my main proof the ruling in Stroud DC vs SSCLG and Gladman 2015 (**RH/2/C-Pg 6**) which sets out the matter that there should be physical attributes of the land that make a valued landscape distinctive from general countryside. None of the published landscape character assessments identify any such physical attributes on the appeal site or nearby or assert a distinction in the landscape of the appeal site from other landscape.
22. Mr Folland makes reference to text in Trafford Borough Council’s supplementary planning guidance on landscape and paraphrases it presented as a quote at the third bullet point on page 10 of his evidence TBC/3/B. The reference is to landscape quality and it is at CD-E9-P31 and is presented as direct quote in Box 1 below.

Box 1

*Pressures in the Landscape*

• ***Development on the fringes of the area.***

*This area comprises one of the largest remaining high quality rural areas within Trafford's Borough. A gradual deterioration in the rural character of the landscape is apparent in areas that abut Partington, Ashton-on-Mersey and Broadheath.*

23. It is clear that the guidance is referring to pressures in the landscape and the paraphrased text does not appear in the description of the landscape character area. There is no mention of any physical attributes of landscapes of high quality in the Borough. The guidance does not identify where specifically the high quality rural areas occur in the character area or where the other high quality rural areas referenced are found in the Borough. The only reference to any identified specific areas is to those which abut named settlements including Partington and the deterioration of their rural landscape quality which the guidance notes is apparent. It is clear that the appeal site is among landscape which the guidance identifies as suffering gradual deterioration.
24. Mr Beckmann acknowledges that there is case law referring to valued landscapes but does not cite any nor advance any argument in light of cases to explain his assertion that any part of the appeal site comprises a valued landscape.

Tree Loss at Access to Site 1 off Warburton Lane

25. Mr Folland correctly notes that a number of trees will require removal to construct the new access road into Site 1 off Warburton Lane (final bullet point on **page 15 of TBC/5/B**, continuing on page 16). To assist the Inspector, these are detailed in the information presented on Drawing D6811.01.003 in the Appendix to my rebuttal (**RH/2/E-Pg 2**).