

# Consideration of the Detailed planning application 22/00667/FUL on behalf of Dummer Parish Council

## A RESPONSE TO THIS PLANNING APPLICATION

This is the second report that has been prepared in connection with this site near Dummer. It has been prepared by Sue Illman; a chartered landscape architect, and Managing Director of Illman Young, a landscape architectural practice established for over 30 years. Sue Illman is a Past President of the Landscape Institute, an Honorary Fellow of the Society for the Environment, an Honorary Fellow of the University of Gloucestershire, and the Construction Industry Council Champion for Flood Mitigation and Resilience.

The report has been commissioned by Dummer Parish Council, who wish to object to the Full planning application for the proposed Basingstoke Gateway project due to the layout and appearance of the proposals and how they have been designed for this site, as well as the scale and nature of the adverse effects the buildings will have on both the character of the local landscape, and visually, as experienced by those living, working, or visiting the area.

This report therefore considers the documents submitted with the planning application, and the revisions submitted to the Council up to the production of this report. It should be noted that many of the matters raised in the response to the first (refused) planning application are reiterated here, as the key issues around the scale, siting and design of the site remain essentially the same.

This report will follow the format below:

1. Development and intent of local policy
2. The principles of the design approach
3. Key statistics for the current application vs the original application
4. Comment on the Urban Design Officer's report
5. Comment on the Landscape Officer's report
6. Scale of the development
7. Landscape design issues
8. The proposal landscape mitigation
9. Landscape effects
10. Visual effects
11. Policy considerations
12. Conclusion

### 1. THE DEVELOPMENT AND INTENT OF LOCAL POLICY

- A Landscape Sensitivity Study undertaken for the Council in 2021 by HAD to identify the sensitivity of all potential development sites that were being brought forward through the SHELAA, and their suitability for use as either housing or commercial land. The Study identified 6 levels of sensitivity, and assessed the application site as having 'Medium' Landscape sensitivity' and concluded that:

*'The large site is remote from any existing significant areas of employment or settlement with limited suitability for development overall. Any limited development should be located towards the northern part of the site which is more contained in*

*views from the rural landscape to the west, provided it is supported by further detailed assessment.'*

Similarly, the Study considered the land on the western side of the A30, opposite the warehouse site as having High sensitivity (level 5). Major development directly opposite such a sensitive site, would potentially also have significant adverse effects on it.

- Local plan policies support an environmental approach that considers the landscape context for new developments. These are:

**EP1** – this policy sets out a range of criteria, **all** of which must be satisfied if permission is to be granted. Criterion g. requires that landscape impacts must be mitigated.

**EM1** – requires proposals to be sympathetic to the character and visual quality of the area, and must respect and enhance the character or visual amenity of the landscape

**EM10** – requires new development to be of high quality, and based upon a robust design-led approach

This report will therefore consider the extent to which both the Landscape Sensitivity Study and these policies have been followed in developing the current proposal, and whether the proposals:

- i. align with the recommendations of the Landscape Sensitivity Study
- ii. mitigate their landscape impacts
- iii. are sympathetic to, and enhance the character and visual amenity of the landscape, and
- iv. are based on a robust design-led approach

## 2. IN PRINCIPLE:

- A key consideration for any proposal is the intrinsic suitability of the site for the development proposed.
- The site at present comprises 3 agricultural fields with mature trees to the majority of the north-western boundary along the A30, but with a visually open boundary to the southernmost field. Internally, the land is divided centrally by a hedgerow, with the small field to the south-west enclosed by 2 internal hedges. The ground is broadly sloping, falling around 7m overall from north to south, but varying more across its width, falling around 14m east to west through buildings 2 and 3 end, but falling around 20m across its width, in the location of unit 1. Development therefore necessitates substantial remodelling.
- The proposed buildings ideally require the site to be flat, as their use as a major distribution hub requires Heavy Goods Vehicles (HGVs) to be able to access all or most sides of the buildings to deliver or receive goods. Additionally, not only has the main building and all its hardstanding for the HGV loading around it, been set at a single level, but the two other buildings (and their hardstandings) have also been set at this same level, compounding the problem further. This inherent unsuitability of the buildings and their servicing requirements on this sloping site, generates an entire sequence of levels problems that have to be solved; none of which would be necessary if a site with flatter gradients was used.

- The site is also constrained by the pipeline that runs parallel with the A30 within the site, sterilising the area of land that it occupies, and making the necessary level changes more severe.
- Consequently, a whole series of high retaining walls on all sides contain the car parks, buildings and their service zones, with further steeply sloping land up to the motorway above. (see Figure 1 composite site section formed from 2 sections by Illman Young). This drawing is useful in understanding the levels of the site, as the cross sections provided with the planning application, either deal with the landscape or the building, but no section drawings illustrate the two together so the extent of the level changes can be understood.
- In combination with the tree removals to both construct the new roundabout and internal access roads, the whole frontage including the parking is set on a raised level up to nearly 10m above the existing A30 road levels, with parking and access roads within 40m of the roadside boundary. The main building is 22m high, with the combination of retaining walls and building being 30.88m above the A30, and 13.88m above the motorway at its southern end. The scale of the works required demonstrate the unsuitability of the site, and the elevation of the building and its parking and loading areas, will inevitably make the built form visible both locally, and within the wider landscape.

### 3. KEY STATISTICS FOR THE APPLICATION vs THE ORIGINAL APPLICATION

	<b>Original refused application</b>	<b>Current application</b>	<b>Difference between the two buildings</b>
Roof level of the main building AOD	170.25	168.88	Proposed building is 1.37m lower
Ground level of the plateau at building 1 (variable for the original application which stepped up to 149 & 150m)	144.7	146.88	Proposed plateau level is 2.18m higher than building 1
Height of building above the A30 (at 138m AOD near the entrance)	32.25	30.88	Proposed building is 1.37m lower
Length of the main building	340m	460m	Proposed building is 120m longer

### 4. COMMENT ON THE URBAN DESIGN OFFICER'S REPORT

- The report from the Urban Design Officer states that the proposed building is smaller than the original, but which aspects are smaller is not defined (volume or height?). Whilst its height AOD is 1.37m lower its footprint is now 120m longer, with the plateau on which it sits 2.18m higher than the refused building.
- Comparisons are not simple, as the 1.37m reduction in height of the roof, when the roof of the building is nearly 31m above the road level, is a relatively minor change, whereas raising the entire plateau level affects a much larger area. A far more significant point is the fact that all three buildings will be perceived as an almost continuous line of development, just short of one kilometer in length.
- The scale and height of the proposed buildings is similar, but their massing is now greater.
- The collective length of the buildings as shown on the drawings – 955m (architects illustrative site sections), with the overall length of the plateau area including the buildings and vehicle access space is 1.180Km.

- At over one kilometre in length, up to (nearly) 31m above the A30, these structures have the potential to create significant adverse effects on the local landscape character and visually.
- The approach to Basingstoke from the south is a rural one, with the town only becoming evident right at its boundary. The proposed buildings would radically change this positive characteristic.
- The tree lined avenue is emphasized as an important local characteristic by the Urban Design Officer, but the removal of at least 120m of it, and the inability to replant them (one tree in the middle of the large roundabout) due to site constraints, is not mentioned.
- In summary, the Urban Design Officer's response is more of an 'urban' assessment, whereas this is a rural site, and requires a broader view of buildings in the landscape.

#### 5. COMMENT ON THE LANDSCAPE OFFICER'S REPORT

- This report is more nuanced, but also fails to analyse the relative levels and extent of the proposed buildings and plateau, taking a simplistic view of the changes.
- The comment that warehouses are typical along motorways has no relevance when considering whether it is appropriate to permit them within this landscape setting.
- Whilst the M3 may influence the site at present '*...to some degree*', the effect of these proposals is substantial and cannot be contrasted with that of the M3., which is well assimilated within the landscape.
- The landscape proposals are only considered to '*...have the potential*' to provide adequate mitigation. The extent of the site constraints, and the large level changes, make this highly questionable on such a constrained site.
- Whilst the site planting can offer '*...some filtering*' the LVIA confirms that there will be moderate adverse landscape effects from a number of key locations that cannot be mitigated in the longer term.

#### 6. SCALE

- The scale of the buildings cannot be hidden, due to their height, bulk and extent, with views possible from local housing and businesses, from footpaths local to the site and within the rural landscape, local roads and from the M3. They will continue to be seen beyond year 15 as confirmed by the LVIA, and whilst these views may not technically be 'significant' in LVIA terms (as this is considered to only occur when the effect is so severe that it remains 'major adverse' for longer than 15 years). Those living in the vicinity, unsurprisingly, disagree.
- Due to this scale, their depth and close proximity to each other, in most views they will coalesce into an apparent single line of built form, emphasizing their extent.
- The suburbs of Basingstoke are generally well screened from the M3, but where seen, these are buildings at a domestic scale, rather than (almost) 1Km of near continuous building up to 13m higher than the motorway boundary, with the effect from the A30 being even more extreme as stated above.
- Buildings 2 and 3 are shown substantially closer to the motorway boundary than Building 1, and whilst their rooflines are lower, the motorway boundary ground levels are also lower, allowing them to be seen high above the motorway.

#### 7. LANDSCAPE DESIGN ISSUES

- The circulation and separation of vehicle types appears better considered than the previous application.
- The large retaining walls fronting the A30 are up to 7m in height, with some dependent on very high hedging (up to 4m in height) to partially screen their extent, with much of the

planting to both the base and top of the walls being planted into areas subject to ground engineering, necessary for the adjacent high retaining walls. The feasibility of growing and then maintaining a clipped 4m hedge in the longer term, has to be questionable.

- The car parking areas are completely devoid of any planting.
- The SuDS infiltration basins are unlikely to be an ornamental feature, but with little to no detail being provided. They appear to be typical steep sided 'bomb craters' to accommodate the large temporary storage volumes required. Being designed for infiltration these are dry features, which are required to discharge all water within 24 hours, and are unlikely to add amenity value.
- There is still no external amenity or recreation space for staff identified on any of the plans, which is essential in a location remote from adequate facilities to support their health and wellbeing.

#### 8. THE PROPOSED LANDSCAPE MITIGATION

- The planting strategy plans show a much more comprehensive approach to the wider site planting, with the assessment of what it can achieved within the LVIA. However, this still assesses some key local views as being subject to 'moderate' landscape effects after 15 years, and clearly these view would take many more years to potentially be fully mitigated. Whilst such views may be considered only 'moderate' in assessment terms, they are significant to the local population who live locally, and affects those of the A30, and local footpaths both east and west of the site including Wayfarers Walk.

#### 9. LANDSCAPE EFFECTS

- The scale and siting of the building will have a major effect on the character of the landscape, particularly to the north/west of the motorway, and the footpath to the north-west of Dummer. This area of rural countryside, whilst accommodating the M3 with both its traffic and signage, does so relatively well, with these man-made additions being variously visible or screened depending on their location and the seasonal foliage cover. Beyond this highways 'line in the landscape', the structure of the surrounding countryside with its broadly rolling topography of fields, hedgerows and copses remains relatively intact, and is reflected in the Sensitivity Assessment.
- At the site level, a minimum of 120m of mature trees along the road will be removed, alongside (almost) all of the internal planting in the developed part of the site. Where it can be replaced, it will only achieve a similar level of maturity in the long term. Whilst the new planting and its wildflower grassland may deliver Biodiversity Net Gain, the local character of the landscape will not be restored by it, nor will the buildings be screened. As such, the development will introduce an urbanising character to this rural landscape.
- It should also be noted, that it is unlikely that such a large scale building could be successfully integrated even if it were better considered, as its mass and scale are entirely out of character with this rural location, and appear to have been determined by the wishes of future occupants, rather than the ability of the site to accommodate development.
- From the south of the motorway, the use of a bund to provide screening has now been abandoned, this now being provided solely through planting woodland or scrub. From the photomontages, it is clear that the planting will not screen buildings 1, 2 and 3 within 15 years, so the adverse effects will be long term. Buildings 1 is likely be fully screened relatively soon after 15 years, but not the other two.
- Overall, the proposed development will have a significant adverse effect on the character of the landscape both north and south of the motorway. The scale of the building will be seen

either against or above the ridge from the west and will rise above the motorway embankments in views from the east in both the short and longer term.

- This is an area of countryside that can be valued and appreciated for what it is. It does not have to be special, contain features of particular historic or cultural interest or even exhibit wildness or other perceptual qualities to stop it being valued and well used by the local people who live here; and it is clear that this is indeed a well used, and locally valued landscape, whose character will be adversely and significantly changed by the scale and location of the development proposed.

## 10. VISUAL EFFECTS

- Whilst the LVIA is a generally a comprehensive and well considered document in its analysis of the baseline landscape, it fails to sufficiently recognise the scale of the changes proposed, and their long term effects. LVIA uses viewpoints to express the effect of development, but this analysis must also reflect the entirety of the effect, such that long stretches of footpath from which the effect of large unmitigated views of development will be seen, must be considered in their entirety. This is particularly true for footpaths between the motorway and the housing in Dummer, and both footpaths and roads to the west of the site, which includes part of the County designated 'Wayfarers Walk', from which the buildings will be seen. The photomontages clearly show that the development will continue to be seen beyond 15 years, and that these views will continue to be adverse despite partial screening. Those most affected even after 15 years are:
  - Viewpoint B: footpath due N of site near Southwood Farm – clear views of upper third of building, with views of the lower parts variable intermittently along its length
  - Viewpoint C: clear views of the upper third of the north and western end elevations above the boundary screening
  - Viewpoint H? (not given a letter): view near junction 7 westwards towards site, with near distance clear and part filtered views of the north and east elevations
  - Viewpoint L: view westward from Dummer with clear views of the upper part of buildings 2 and 3
  - Viewpoint N: footpath south-west of Dummer looking NE with clear views of the upper parts of building 3, the southern end and upper parts of its eastern elevation of building 2, and the roofline of building 1
  - Viewpoint R: from the A30 – the roofline of the end of building 3
  - Viewpoint S: footpath west of site – the majority of all 3 buildings are clearly visible due to their elevation above the trees on the A30
  - Viewpoint Z: from roundabout at the front entrance – clear views of the upper levels of the building, with filtered views of the lower levels and retaining walls
- From the east, the planting will partially screen the buildings in the medium to long term, but will take longer than 15 years to be fully effective. In viewpoints from the west, the timescale for effective screening is even more long term, and well beyond 15 years in some of the identified locations. Overall, effects will still be moderate/major due to their extent from various locations, and collectively significant.
- The visual effect of the development will be experienced to its greatest extent from the A30, which whilst busy, still has a strong rural character, but will become urbanised by the very large increase in vehicle movement, the vast majority of which will be HGVs, as well as the scale and visibility of the elevated internal roads and building 22m above; all of which will be exacerbated by the removal of a 120m section of the existing roadside trees and hedgerow

to create the entrance. Reliance on hedges to grow to 4m in height to mask (up to) 7m retaining walls, must be considered unlikely. Additionally, the comprehensive lighting proposals, being used throughout the night will add a further urbanising element in this rural location.

- With regards to lighting, the area is currently assessed as being **E2 RURAL – Low district brightness**, which is described as : *Sparsely inhabited rural areas. Village or relatively dark outer suburban locations.* The site is to be comprehensively lit, with the lighting used throughout the night, albeit the light levels will be reduced from 11pm until 4am in some locations, but will be on from dusk until dawn around the loading bays. Some lighting is wall mounted (around the building), and at a height of 8m but is 10m standards in yard areas, along the roads and within parking areas.
- Lighting columns along footpath are 5m but 6m on public footpaths. Whilst the lighting levels are as recommended, this will make a major adverse change to the existing light levels in this rural area.

## 11. POLICY CONSIDERATIONS

- **Consideration of the analysis within the Landscape Sensitivity Study** –made 4 key points regarding the scale and location of potential development on this site, and the following considers how well the proposed development complies with it:
  - ***‘The site is remote from any existing significant areas of employment or settlement with limited suitability for development overall...’*** – the development proposal completely ignores this assessment and proposes development across almost the entirety of the site
  - ***Any limited development should be located towards the northern part of the site*** - the development proposal is not limited nor is it located solely towards the northern end of the site.
  - ***‘...limited development should be located towards the northern part of the site (which) is more contained in views from the rural landscape to the west...’*** consideration of the visibility of the site from the rural western areas has not significantly influenced its siting, scale or design, and has not been mitigated
  - ***‘Any limited development ...should be supported by further detailed assessment’*** – whilst a LVIA has been undertaken it has not addressed the specific issues of Landscape Sensitivity as considered in the Study or been used as a tool to assess the capacity of the site to accommodate development so that its effects can be appropriately mitigated.

Whilst the Landscape Sensitivity Study is a specific tool for considering and ranking sites as a whole, the issues raised are key when considering a site’s appropriateness for development.

- **EP1** – whilst the use of the land for storage and distribution may be acceptable, this policy sets out a range of criteria, all of which must be satisfied if permission is to be granted. Criterion g. requires that landscape impacts must be mitigated. However, it is clear that the proposed development cannot adequately mitigate its visual effects or its effects on the local landscape character, for the various reasons stated above. These are its scale, height, siting, appearance, and lack of adequate space for appropriate physical and visual integration, with consequent long term adverse effects that will be significant. The site is clearly physically unsuitable for this scale and type of development.
- **EM1** – requires proposals to be sympathetic to the character and visual quality of the area, and must respect and enhance the character or visual amenity of the landscape. However, the LVIA

has not been used to determine the size and scale of appropriate development or its siting. The policy also requires a comprehensive landscape scheme to ensure that the development can be successfully integrated within the landscape and surroundings, however, the landscape mitigation is squeezed in where possible, and cannot effectively integrate this scale of development. Therefore the proposed scheme also fails in this respect.

- **EM10** – requires new development to be of high quality, and based upon a robust design-led approach. In this location, a ‘landscape led’ approach would have been appropriate, but the LVIA has been used purely as an assessment process, rather than a tool for considering the most appropriate way for development to be sited and designed, alongside its scale and visibility. Whilst the buildings are a modern design, they show no consideration for their location within the local landscape or any effort to integrate within it. Nothing in its design suggests that an understanding of the surroundings, local context and character has been considered.
- The architecture and its layout purely expresses its function as a modern urban building, and therefore does not fulfil the requirements of this policy.

## 12. CONCLUSION

Whilst this second planning application is an improvement on the first, this is primarily because the information supplied is more coherent and better coordinated by the Design Team. Submitting a single application, instead of both outline and detailed applications for different aspects of the site, has also reduced the inconsistencies in information. However, the proposal, despite the reduction in internal floor space, has not substantially reduced the scale of the built form, and therefore does not substantially reduce its adverse landscape and visual effects on the local countryside; they are just different.

Basingstoke and Deane Council have acknowledged the need for additional commercial space within the Borough, with the HDA *Landscape Sensitivity Study* having been a key part in the process of identifying suitable locations for both commercial and housing land. A wide range of sites have been identified for potential development, but this was not one of them, except for its ability to deliver some small-scale commercial development towards its northern end.

A call for sites followed by a Sensitivity Analysis, allows the key issues related to their development to be identified in a manner appropriate to each site. The Local Plan with its policies then provides further support and direction.

These proposals do not accord with the identified parameters for the site or comply with some key aspects of policy. Consequently, the effects of this development, both visually, and on the character of the local landscape, would be both adverse and significant in the long term.