

East Midlands Freeport

Review of Landscape and Visual Appraisal for
East Midlands Gateway 2

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1 Introduction

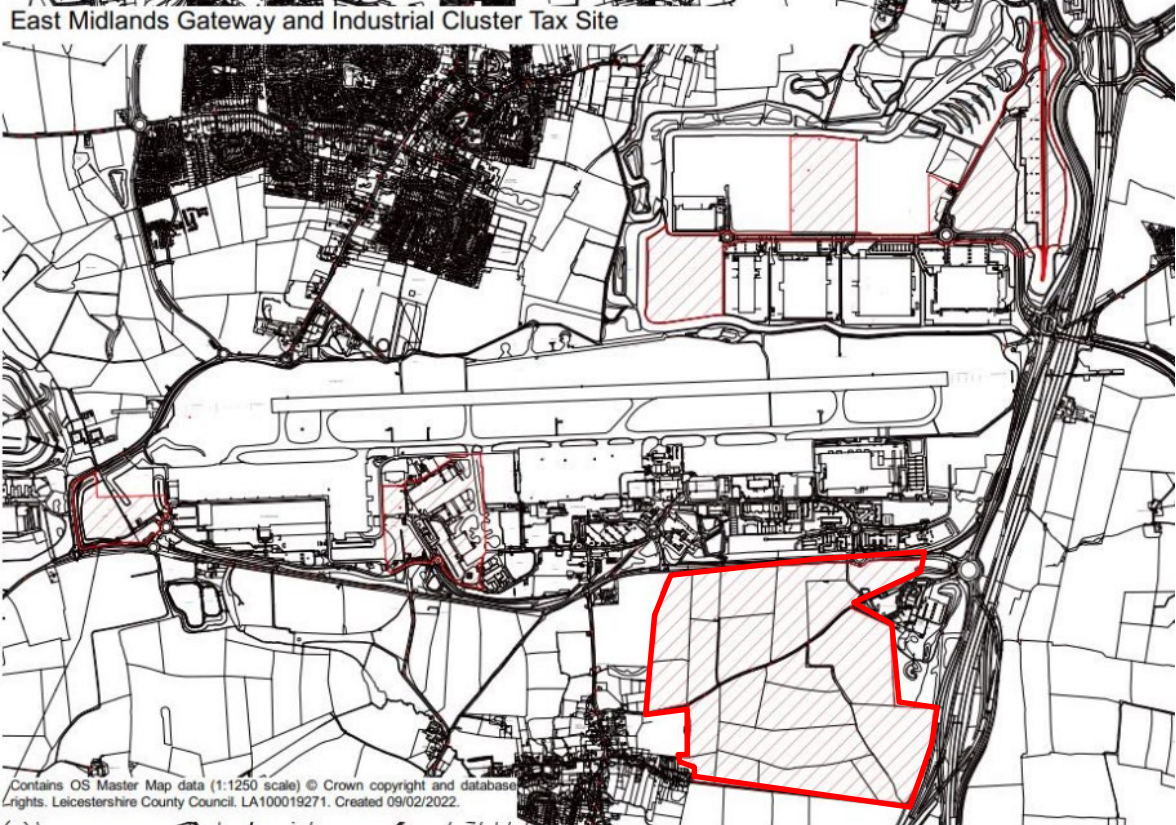
- 1.1 In July 2024, Gillespies were commissioned by North West Leicestershire District Council (NWLDC) to prepare a review of the Landscape and Visual Appraisal (LVA) submitted in respect of an application for the development of land within the East Midlands Freeport site.
- 1.2 As the site will be subject of a Development Consent Order under the 2008 Planning Act, NWLDC will not be the determining authority, and this review will be used to assist NWLDC to form a view to its position regarding the application.
- 1.3 Gillespies have previously considered this site as part of two studies. Firstly, it was appraised in 2021 as part of the North West Leicestershire Landscape Sensitivity Study which considered the sensitivity of this site to employment development. Gillespies also undertook a landscape and visual appraisal in 2022 which considered the potential effects of the draft illustrative masterplan for the site. The results of those previous appraisals are summarised in Section 2 Background.
- 1.4 It is not the intention in this report to make any recommendations as to the acceptability, or not, of an application on the site, but, using experienced and professionally qualified landscape architects, it is intended as an independent and objective view on the appropriateness and accuracy of the LVA in light of the previous sensitivity assessment and appraisal work undertaken. The review also provides advice to NWLDC on any considerations which may improve the scheme in terms of landscape and visual effects.
- 1.5 The following documents have been provided by NWLDC for review:
 - Landscape and Visual Appraisal – East Midlands Gateway 2, FPCR, March 2024
 - Vision Document, Land South of East Midlands Airport, SEGRO, March 2024
 - North West Leicestershire Local Plan Review Proposed Policies and Site Allocations Consultation, Representations Statement prepared by SEGRO in respect of Land South of East Midlands Airport, Delta Planning, March 2024

2 Background

East Midlands Freeport

2.1 The East Midlands Freeport was designated by the government in March 2022. The designation covers three locations, one of which is centred on East Midlands Airport within North West Leicestershire and includes land to the south of the A453/J23a of M1 and to the immediate east of Diseworth as shown on **Figure 1**. Known as East Midlands Airport and Gateway Industrial Cluster (or EMAGIC), this is in effect, an economic designation, as the government did not undertake an appraisal of the acceptability of the site in planning terms.

Figure 1: Map taken from the East Midlands Freeport websiteⁱ



North West Leicestershire Sensitivity Study

2.2 In 2019, when preparing the Local Plan, NWLDC undertook an appraisal of landscape and visual sensitivity for a number of land parcels around each of the principal towns, key service centres, local service centres and sustainable villages within the Local Plan area. This documentⁱⁱ is part of the evidence base for the new Local Plan which is in preparation. Two land parcels (13DIS-A and 13DS-B) were included for Diseworth which included land adjacent to the north and south of the existing village.

ⁱ <https://emfreeport.com/sites/emf/files/2023-05/EMAGIC-location.pdf>

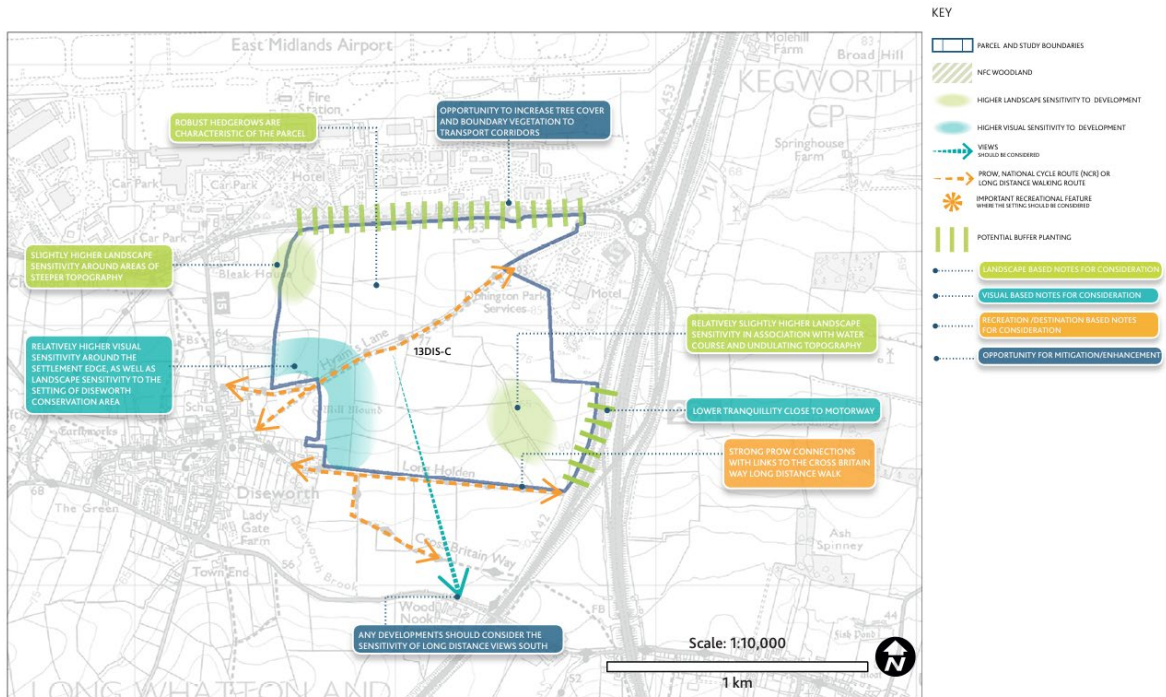
ⁱⁱ https://www.nwleics.gov.uk/files/documents/further_landscape_sensitivity_study/Sensitivity%20Parcel%20Appraisals%20-%20Final%20Report.pdf

- 2.3 A further Landscape Sensitivity Study was completed in 2021 which included the area of the East Midland Freeport site that fell within the NWLDC areaⁱⁱⁱ (outlined in red on **Figure 1**). The parcel was named 13DIS-C and the sensitivity appraisal undertaken for new employment development.
- 2.4 Overall, the parcel was appraised as being of medium landscape sensitivity to new employment development. Although the landscape sensitivity was reduced due to the presence of the M1 and A42, the land parcel was considered to form an important function in separating the development and infrastructure to the north and east from the village of Diseworth.
- 2.5 In terms of visual sensitivity, this was also appraised as being medium sensitivity to new employment development. This was due to the scenic long distance views to the south of the parcel and beyond and the high level of public access, although did acknowledge the presence of the airport buildings to the north were a detractor.
- 2.6 A number of guidance and mitigation considerations were drawn up for each land parcel as shown on **Figure 2**. For 13DIS-C these included:
- An area of higher landscape and visual sensitivity around Diseworth due to the visual receptors and setting of Diseworth Conservation Area;
 - Areas of higher landscape sensitivity around area of steeper slopes and the watercourse;
 - The strong footpath links due to the presence of the Cross Britian Way;
 - Consideration of the long distance views south from footpaths; and
 - Opportunities to increase tree cover and boundary vegetation along the road to the north.

iii

https://www.nwleics.gov.uk/files/documents/further_landscape_sensitivity_study/Sensitivity%20Parcel%20Appraisals%20-%20Final%20Report.pdf

Figure 2: Extract from North West Leicestershire: Further Landscape Sensitivity Study, 2021



Landscape and Visual Appraisal 2022

- 2.7 In 2022, Gillespies was commissioned to undertake a landscape and visual appraisal considering the effects of proposed development on the site. The appraisal considered the draft illustrative masterplan (prepared by UMC Architects) shown on **Figure 3**.
- 2.8 The overall conclusion of the appraisal was that *‘the proposed development of this Site would have a high level of adverse impact on recreational and residential receptors in the vicinity, particularly those living and moving around the north eastern edge of Diseworth. There would be a change from a rural agricultural land use, which provides an attractive landscape setting to the Diseworth Conservation Area, to an employment development with an abrupt relationship with the village. Indirectly, there would be a loss of legibility of Diseworth as a standalone settlement in a rural setting and a reduction in tranquillity’*.

Figure 3: 2022 Illustrative Masterplan for East Midlands Gateway Phase 2 (UMC Architects)

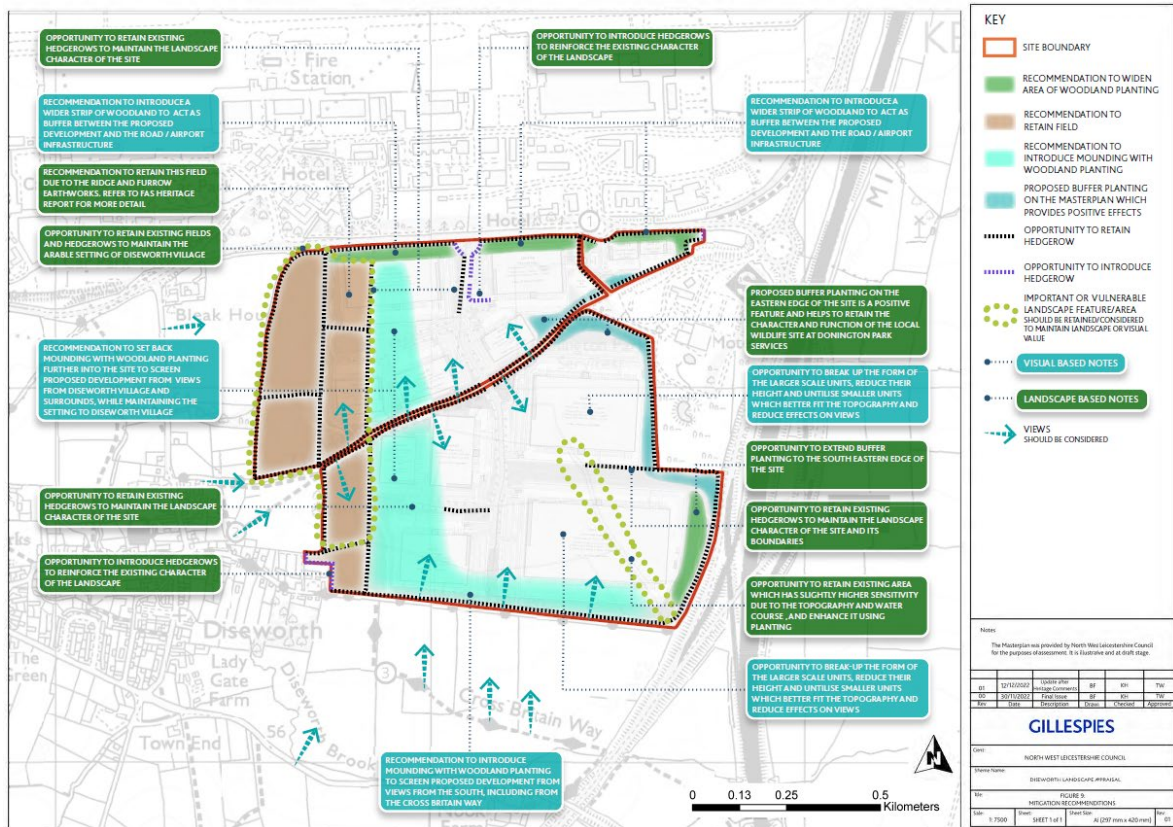


2.9 It identified major adverse effects on both landscape and visual receptors including the users of the public right of way network and properties along the north eastern edge of Diseworth as while planting would mature there would still be loss of views of the rural landscape due to the mounding and planting.

2.10 As part of the summary, a series of recommendations were made to try and reduce the effects of the development. These are listed below and the plan shown on **Figure 4**.

- Reduction of the footprint of Proposed Development and further set back from the north east edge of Diseworth in order to reduce effects on the village;
- Reduction of the height of proposed units (which range from 15m on smaller units to 24m on larger units) in order to reduce its visibility;
- Breaking up larger units into smaller ones to reduce the presence of very large buildings;
- Retention of existing fields and hedgerow boundaries to the north east edge of Diseworth in order to maintain a landscape setting to this edge of the Conservation Area;
- Wider planting buffers with mounding to the north and south of the Site;
- Retention of hedgerows along Hyam's Lane and Long Holden Lane, in addition to some hedgerows which sit within the Site;
- Introduction of some hedgerows to reinforce the existing landscape character of the Site; and
- Retention of higher sensitivity existing landscape area to the south east of the Site, where there is an existing watercourse set within an area of lower topography.

Figure 4: Extract from Diseworth Landscape and Visual Appraisal (P21109-00-001-GIL-0700)



Draft North West Leicestershire Local Plan 2020 – 2040

- 2.11 In January 2024, NWLDC published the Proposed Housing and Employment Allocations for Consultation^{iv} following on from the Council’s Strategic Housing and Employment Land Availability Assessment (SHELAA)^v in 2021. The SHELAA identified the land parcel as EMP90 – Land south of East Midlands Airport and south west of M1 J23a and noted that ‘*impacts of development of this scale on the wider landscape and on Diseworth itself would require careful consideration and mitigation. Development on the parts of the site closer to Diseworth is also likely to be sensitive for heritage and residential amenity reasons*’.
- 2.12 Due to the concerns with the effects on Diseworth, Diseworth Conservation Area and the level of traffic which could be generated, this site was not proposed as an allocation and instead a slightly reduced area within the site has been referred to as a ‘Potential Location for Strategic Distribution’ (EMP90 (part)) and shown in **Figure 5** below. This took into account the landscape and visual mitigation measures identified in the 2022 Landscape and Visual Appraisal, reducing the footprint and including the proposal for landscaping (e.g. planting and mounding) to help screen the development.

^{iv}

https://www.nwleics.gov.uk/files/documents/proposed_housing_and_employment_allocations/Reg%2018%20%28Site%20Allocations%29%20Consultation_final.pdf

^v https://www.nwleics.gov.uk/pages/strategic_housing_and_economic_land_availability_assessment

Figure 5: Extract from the Proposed Housing and Employment Allocations for Consultation



- 2.13 The document lists a number of matters which would need to be addressed if the site were to be allocated including the following related to landscape and visual aspects:
- There being no harmful impact upon Diseworth Conservation Area or its setting;
 - The provision of an appropriate landscaping scheme which includes both extensive boundary treatment and also internal planting, so as to minimise the impact of development on the wider landscape and the setting of Diseworth; and
 - A satisfactory design and layout which takes account of site's sensitive location, both in landscape terms and its adjacency to Diseworth Conservation Area.

Long Whatton and Diseworth Neighbourhood Plan

- 2.14 In 2023, Long Whatton and Diseworth Parish Council published the Pre-Submission Draft or the Long Whatton and Diseworth Neighbourhood Plan (2021-2039)^{vi}. This plan acknowledges East Midlands Freeport although goes on to propose to designate the site as a Vulnerable Landscape under Policy LW&D4. This policy states:

'Development should be located and designed in a way that is sensitive to the open landscape, natural and historic features that characterise the Neighbourhood Area. Proposals will not be supported if potential impacts on landscape cannot be adequately mitigated through design and landscaping. In designated Vulnerable Landscapes, development that does not conserve or maintain its characteristic features will not be supported.'

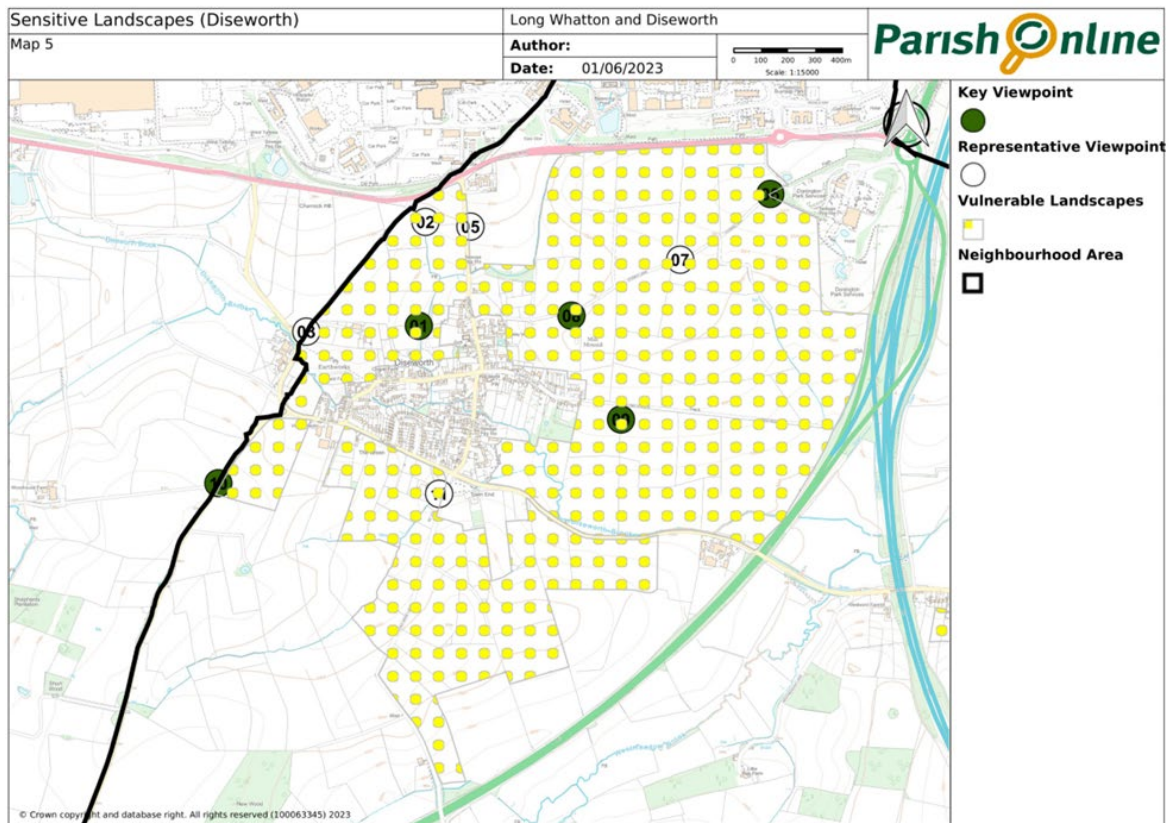
- 2.15 The plan also identifies a number of key views and representative viewpoints (Policy LW&D3) which should be considered. The policy states:

^{vi} <https://www.lwdpc.org.uk/uploads/neighbourhood-plan-pre-submission-draft.pdf>

'Where a development proposal within the Neighbourhood Area would have a significant visual impact on the Representative Viewpoints, a Landscape and Visual Impact Assessment or similar study should be provided to demonstrate that the levels of effects are acceptable, and that the scheme has been sited and designed sensitively and appropriately reflecting, respecting, and where possible, enhancing its landscape context. Particular sensitivity should also be shown for the Key Viewpoints that are regarded as highly characteristic.'

- 2.16 Key to this site are the sequential views identified (Viewpoints 6, 7 & 8) which are described as being the historic route between Kegworth and Diseworth, encompassing the characteristics of the landscape which define the setting and context of Diseworth.

Figure 6: Extract from Long Whatton and Diseworth Neighbourhood Plan



3 Review of LVA

Introduction

- 3.1 This section provides a review of the Landscape and Visual Appraisal (LVA) – East Midlands Gateway 2 by FPCR Environment and Design Ltd (FPCR) in March 2024. The primary focus of this report was *‘to consider the potential implications and landscape and visual effects that could arise from future employment based development on the site and to advise on design and mitigation proposals to minimise these effects where applicable and maximise other landscape and green infrastructure opportunities’.*

Figure 7: Masterplan



Methodology

- 3.2 The LVA has been undertaken as a preliminary assessment tool to identify the likely landscape and visual issues with respect to development of the site. It clearly states that further landscape and visual assessment will be undertaken to fully identify the landscape and visual effects.
- 3.3 The appraisal has been undertaken in accordance with Guidelines for Landscape and Visual Impact Assessment (3rd Edition) (GLVIA3). The methodology is set out in Appendix A of the report. It sets out criteria for the value, susceptibility and magnitude of change for both landscape and visual receptor. It also sets out the levels of effect for the appraisal, in this case

being major down to negligible. The methodology is appropriate for a landscape and visual appraisal of this type.

Baseline

Planning

- 3.4 This section refers to the following documents:
- National Planning Policy Framework;
 - Draft North West Leicestershire Local Plan 2020 – 2040: Proposed Policies for Consultation (Jan 2024);
 - Draft North West Leicestershire Local Plan 2020 – 2040: Proposed Housing and Employment Allocations for Consultation
- 3.5 It does not make reference to the Long Whatton and Diseworth Neighbourhood Plan so does not pick up on the key views or vulnerable landscape polices as discussed in Section 2 of this report.

Landscape

- 3.6 No national or local landscape designations are identified.
- 3.7 This section refers to the following character assessments:
- National Character Area 70: Melbourne Parklands;
 - East Midlands Regional Landscape Character Assessment (2010);
 - Landscape Sensitivity and Green Infrastructure Study for Leicester & Leicestershire (LUC, 2017);
 - North West Leicestershire Landscape Sensitivity Studies (2019 and 2021)
- 3.8 Using the above it identifies that the above studies *‘conclude that it is a landscape of medium or moderate sensitivity to new employment development, indicating that it can potentially accommodate this type of development with suitable landscape and visual mitigation and attention to the design and layout proposals’*.
- 3.9 Landscape value is considered using factors listed in Landscape Institute Technical Guidance Note (TGN) 02/21 ‘Assessing landscape value outside national designations’. It discusses each of the factors in turn and then makes an overall judgement, stating that overall, the site and its immediate context have a medium landscape value.
- 3.10 Susceptibility and overall landscape sensitivity is not described in this section, although noted this is discussed in the appraisal section of the report.

Visual

- 3.11 The visual baseline section describes the visibility of the area in relation to the development and identifies a number of receptors including properties, public rights of way including the Cross Britain Way and road receptors. This section is supported by a number of viewpoint photographs taken between summer 2022 and winter 2023.
- 3.12 There is no discussion on the location of the viewpoint photos and how locations were identified in relation to visual receptors.
- 3.13 The report does not identify the susceptibility of visual receptors or discuss the value of views from those key receptor groups as set out in the methodology.

Landscape and Visual Appraisal

Landscape

- 3.14 The landscape appraisal discusses the potential changes to the landscape in general terms. It does not appraise the effects of the proposed development on any published landscape character assessment, although does draw off previous studies in discussion around sensitivity. It identifies the value of the landscape to be medium and goes on to discuss susceptibility in terms of the features that could be lost, but does not come to a conclusion on high, medium or low.
- 3.15 The appraisal goes on to describe the importance of mitigation, but does not give detail on where that mitigation should be located, other than to say there should be *‘the creation of a robust landscape framework (or ‘buffer’) to the perimeter of the future development’*.
- 3.16 There is no discussion on the potential changes to landform, or the effects that mounding or planting would have on landscape character. There is also no appraisal on the level of effect.

Visual

- 3.17 The visual appraisal discusses the potential changes for each receptor group; settlements and properties, public rights of way and other pedestrian/cycle routes, roads and other potential receptors including surrounding employment areas.
- 3.18 There is no appraisal of the magnitude of change or the level of effect that may result from the changes described, only on whether the proposed development may be visible or not, using terms like ‘will be visible’, ‘likely to be visible’ and ‘notable change’.
- 3.19 It would have been a useful exercise to reference the viewpoint locations within the visual appraisal section to understand which receptors are represented by which viewpoint locations.

Review of EMP90 (part)

- 3.20 The report reviews the plans submitted in the Regulation 18 Local Plan. It is considered that extending the area of development west would not give rise to *‘any marked increase or change to the likely landscape and visual effects arising from comparable employment development on site’*. It goes onto state that *‘the built development area shown on the NWLDC (page 81) plan could be extended further to the west than shown on the plan, providing also that the outer landscape proposals similarly extended further to the west and were increased in area and width’*.
- 3.21 Without an appraisal which indicates the magnitude of change or level of effects on receptors, it is hard to understand how this conclusion has been formed. It is true to say that mounding and planting could be used to help mitigate a larger development, but does not discuss the potential effects of the scale of mounding and planting required and the consequent effects on landscape character or views to and from Diseworth and from the local footpath network. Mitigation in the form of mounding may have effects on landscape, visual and heritage receptors in itself depending on the size and scale proposed.

Figures and Photos

- 3.22 A series of figures and photo sheets support the appraisal.
- 3.23 Photographs are provided for each viewpoint location, each having key features labelled and the extent of the proposed development indicated. Although useful, it is difficult to relate the

photo locations to each of the receptor groups identified, there is no analysis of specific viewpoint locations.

4 Illustrative Masterplan

- 4.1 This section is included to show the changes between the draft landscape masterplan which was the subject of the 2022 appraisal (Gillespies) versus the current masterplan which was the subject of 2024 appraisal (FPCR). **Figure 8** shows the current masterplan superimposed onto the draft to illustrate the changes.

Figure 8: Masterplan Comparison – Draft and Current



- 4.2 The location of the main spine road is unchanged although the road layout has been amended to suit the new position of units. There have been minor adjustments to some of the buildings plots shown, buildings in some areas the overall number of units being reduced and replaced with buildings comprising a larger footprint.
- 4.3 The largest changes to the layout are to the blocks which were identified as Units 5a and 5b on the draft masterplan and within Zone 5b of the current masterplan, as circled in red on **Figure 8**, and the size and orientation of Zone 3 circled in blue.
- 4.4 In Zone 5, two buildings have been consolidated into one larger building, which has pulled the building further east and away from the field boundary to the west. It is considered that this is an improvement in the scheme, allowing more space for mounding and/or screening in this area, however it needs to be balanced with the concept of breaking up larger units to be able to integrate them more effectively into a landscape. In Zone 3, the three units have been condensed into one large unit.

- 4.5 It should be noted that no building heights were referred to in the 2024 appraisal (FPCR) but the revised parameters plan provided indicated no change from the 2022 parameters plan that was used to inform the 2022 appraisal (Gillespies). The draft masterplan had majority of building heights set at 18m, with the southeastern (Zone 1) and eastern units (Zone 3) at 24m in height and the small block to the northeast at 15m (Zone 7).
- 4.6 **Figure 9** compares the current masterplan to the plan provided in the Proposed Housing and Employment Allocation document. This shows that the proposed development still encroaches onto fields to the west, outside of the land identified as 'Potential Location for Strategic Distribution' (EMP90 (part)), and develops on the potential areas of landscaping (e.g. planting and mounding).

Figure 9: Masterplan overlaid on plan for EMP90 (part)



- 4.7 The recommendations made by Gillespies as part of the 2022 appraisal are still relevant, the masterplan has not changed that significantly. The parameter plan indicated no changes to the building heights previously assessed. The consolidation of units into larger units may mean the development is harder to integrate into the landscape, the larger footprints required large flat plateaus.

5 Summary and Recommendations

- 5.1 Although the methodology sets out criteria for value, susceptibility, magnitude and level of effect, these do not appear to be used within the appraisal itself. Value and susceptibility is set out for landscape along with the resultant medium sensitivity, however landscape is only looked at generally and no assessment is provided of the published landscape character assessments for the area.
- 5.2 There is no mention of the value of views from visual receptors or the susceptibility of the visual receptors identified.
- 5.3 Magnitude of change and level of effect is not discussed for the different receptor groups. For example, in the appraisal of settlements and properties, the appraisal only discusses if the proposed development would be visible or not but does not go into discussion on the magnitude of the change. This could be as a result of unknown parameters of the proposals being assessed, but this has not been set out in the methodology or limitations section of the appraisal.
- 5.4 There is no reference to the neighbourhood plan or the policies regarding key views and vulnerable landscapes and the resultant effects the proposed development may have on these aspects.
- 5.5 The LVA concludes that built development could be extended further west than the area described as in EMP90 (part) in the Draft Local Plan, but it is difficult to see how this concluded as does not discuss or illustrate the effects in any detail, and in particular the effects of the mitigation itself on receptors.
- 5.6 The original recommendations for the Gillespies 2022 Landscape and Visual Appraisal of the draft masterplan listed in 2.10 are still relevant, the masterplan not changing significantly since that report. To provide a sufficient buffer from residential receptors within Diseworth and the conservation area, it would still be recommended to retain the fields to the west free from mounding and planting to retain the rural setting of the village.
- 5.7 The following should be considered by NWLDC to help inform their opinions further:
 - Production of some wirelines^{vii} to consider and support discussions on building height and effects from Diseworth. Gillespies undertook viewpoint photography in 2022 and this could be used to create 'rough and ready' wirelines using blocks at various heights so NWLDC can understand the effects further and inform discussion on maximum building heights; and
 - Further consideration from heritage – The draft masterplan was reviewed by FAS Heritage and a note included on the original recommendations in the 2022 LVA about retaining ridge and furrow earthworks. The current masterplan still encroaches onto these fields. The heritage section of the SEGRO Representation Statement does not mention this as a feature that would be affected, although the full heritage report was not issued for review. A series of wirelines would also help confirm the potential effects on the conservation area.
- 5.8 There is obviously a balance to be struck between the effects of the development of the site and the economic viability of any development. More work is required to understand the effects of the proposed building heights and therefore the quantum of mitigation which may be required to ensure the proposed development is acceptable.

^{vii} Wirelines are visualisations of a proposed development, superimposing the outline of the development onto baseline photography so assessors and decision makers can understand the scale of development within a particular view. Refer to LI TGN 06/19 Visual Representation of Development Proposals for further information on the types of wireline and visualisations available. https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/09/LI_TGN-06-19_Visual_Representation.pdf

Gillespies

gillespies.co.uk

mail@gillespies.co.uk

London | Oxford | Manchester | Leeds | Abu Dhabi