

Spring Park P6

Rebuttal to Landscape Technical Note by Ecology Solutions Ltd on behalf of Rangeford Villages

edp7897_r010a

QA: CMY/NPR_FMi/CRo_031224

1 INTRODUCTION

- 1.1 The Environmental Dimension Partnership (EDP) was commissioned by Ark Data Centres (the Applicant) to undertake a Landscape and Visual Appraisal (LVA; Document Reference: edp7897_r007c, dated May 2024) for the Proposed Extension of Spring Park Data Centre Campus – Land South of Westwells Road, Neston, Corsham (hereafter referred to as the Site). The LVA was submitted as part of the planning application for the Proposed Development in June 2024.
- 1.2 Ecology Solutions Ltd (ES) were instructed by Rangeford Villages, the freehold owners of the Wadswick Green Retirement Village (located to the south-southwest of the Site), to undertake a review (Document Reference 12528L TN01) of the submitted LVA.
- 1.3 This rebuttal responds to the ES review of the LVA.
- 1.4 Both the original LVA and the rebuttal have been written by a Chartered Member of the Landscape Institute with 18 years of experience in the landscape profession, and 30 years of experience overall in land management professions.
- 1.5 For clarity, paragraph numbers referenced below are set out thus:
 - EDP X.XX – paragraphs from the submitted LVA; and
 - ES X.XX – paragraphs from the ES review.

2 REVIEW OF THE EDP LVA

- 2.1 Paragraph ES 1.1: The ES review acknowledges that the LVA methodology is sound.
- 2.2 Paragraph ES 1.2: EDP stand by our original assessment of the landscape character of the main part of the Site in that the former MoD uses of the Site “*strongly influence*” the character. While EDP acknowledge that the building foundations and roadways do not extend above ground level, the hard standing areas are so extensive and cover such a large proportion of the main site that they clearly exert a strong influence on the character of the Site. The ES review references Image EDP 2.1 from the LVA, where the concrete foundations are visible but less prominent. But in this paragraph the ES review fails to reference

Images EDP 2.2 and 2.3, where the foundations and roadways are much more visible and provide a truer reflection of the main site character. The 'clear' military former use was also referenced at paragraph 13 of the Inspectors Report (IR) on the previous residential application.

- 2.3 Paragraph ES 1.3: EDP acknowledge that Image EDP 2.3 shows residential properties to the north of the Site, and that these properties form part of the context to the Site. Images EDP 2.1 and 2.2 clearly show the existing industrial development to the north-north-west, albeit with vegetation between the Site and the industrial buildings. The perceived and visible setting to the Site is therefore a mix of industrial and residential, rather than being entirely "*residential in scale*". The IR of the previous residential application supports this notion, stating at paragraph 17 that it is "*immediately adjoining commercial development*."
- 2.4 Paragraph ES 1.4: It is acknowledged that there are different types of development which provide the setting and context to the Site, but these differences were also noted in the EDP LVA at Paragraph EDP 2.13. The Wadswick Green development to the south-south-west is a further style of development, which is different to both the industrial/commercial buildings to the north and north-west of the Site, and the more traditional residential areas to the east of the Site.
- 2.5 It is claimed that the vegetation to the north-west of the Site provides a robust green edge between the Spring Park and MoD sites and the village to the east, and the Site is more related to a "*smaller, more intimate scale*" typical of the 'village' to the east. It is presumed this relates to the vegetated northern site boundary to Rowan Lane and Westwells Road. This tree line is acknowledged to form a positive feature for the Site's setting and helps to break up the cumulative mass of the Site and wider Spring Park (and wider afield the MoD land). However, as noted elsewhere, the Site is much more comparable in scale to Spring Park/the MoD land – exacerbated by evidence of previous uses – than it is to the settlement to the east. Furthermore, the settlement to the east is not considered characteristic of village development; it is more a suburban residential area, different in scale and typology to village development as is experienced in nearby Neston.
- 2.6 The landscaping proposed as part of the scheme will also provide a soft and verdant setting/buffer to the adjacent residential areas, and propose sections of dry stone walling, pathways, bunding and significant tree and shrub planting to the east of the proposed building.

3 BASELINE CHARACTER ASSESSMENT

- 3.1 Paragraph ES 1.5: The visual analysis of the Site and its environs in the LVA included the use of the Zone of Theoretical Visibility (ZTV) modelling (screened and unscreened), followed by groundtruthing during the field survey, for 18m high buildings on the northern parcel of the Site – see Paragraphs EDP 5.3 onwards. The reference here to limited intervisibility relates to this.
- 3.2 Paragraph ES 1.6: The retention of the majority of the existing vegetation on and surrounding the Site, as well as the extensive planting that forms part of the overall

Proposed Development, would maintain and enhance the function of the existing (currently unmanaged) vegetation. As noted at paragraph 2.2 above, EDP considers that the influences of the former MoD uses of the Site on its character are much stronger than the ES review suggests.

- 3.3 Paragraph ES 1.7: Paragraph EDP 4.36 also recognises the “*transitional*” nature of the Site (as quoted from the pre-app advice). The ES review then fails to acknowledge the important opinion of the Council’s Landscape Officer in that same pre-app advice, an opinion that is generally positive towards the Proposed Development.
- 3.4 Paragraph ES 1.8: The presence of the recreational routes crossing the Site is recognised at Table EDP 4.1. The transitional nature of the Site is noted at Paragraph EDP 4.36. The routes crossing the Site will be reorientated and set within new green corridors, improving the experience for users.
- 3.5 Paragraph ES 1.9: The ES review downplays the influence of the consented but not yet built out sections of the wider Spring Park campus. The ES review again fails to acknowledge the importance of the former MoD uses of the Site in influencing its character.
- 3.6 Paragraph ES 1.10: The ES review refers only to the scale of the proposed buildings in the assessment of susceptibility, without any consideration of the proposed development as a whole, with the substantial areas of landscaping, tree planting etc. that are proposed in combination with the built form of the data centre. This failure to consider the Proposed Development as a whole then leads to an incorrect assessment of the susceptibility of the Site and its environs.

4 BASELINE VISUAL ASSESSMENT

- 4.1 Paragraph ES 1.11: The photoviewpoints (PVP) were all agreed with the LPA, so must be considered to be an appropriate selection. PVP12 is from the end of CORM136 where it meets Moor Green.
- 4.2 Paragraph ES 1.12: PVP EDP 5 was specifically chosen to represent views obtained by receptors in the vicinity of the play area. PVP EDP 7 is from the junction of Westwells Road, Westwells and Moor Green, and views from Westwells Road and the eastern end of Rowan Lane are not dissimilar to this, especially in the winter months when deciduous vegetation is not in leaf. PVPs EDP 4, 5 and 7 are all within the Zone of Primary Visibility (ZPV) to the north-west, north and north-east of the Site.
- 4.3 Paragraph ES 1.13: The extents of the Site marked on the PVP represent the area proposed for the built form of the Proposed Development, rather than the wider landscaping and Biodiversity Net Gain (BNG) areas (which would not be readily visible). It is acknowledged that the marked extents should extend very slightly further towards the telecoms mast – see **Image EDP 4.1**.

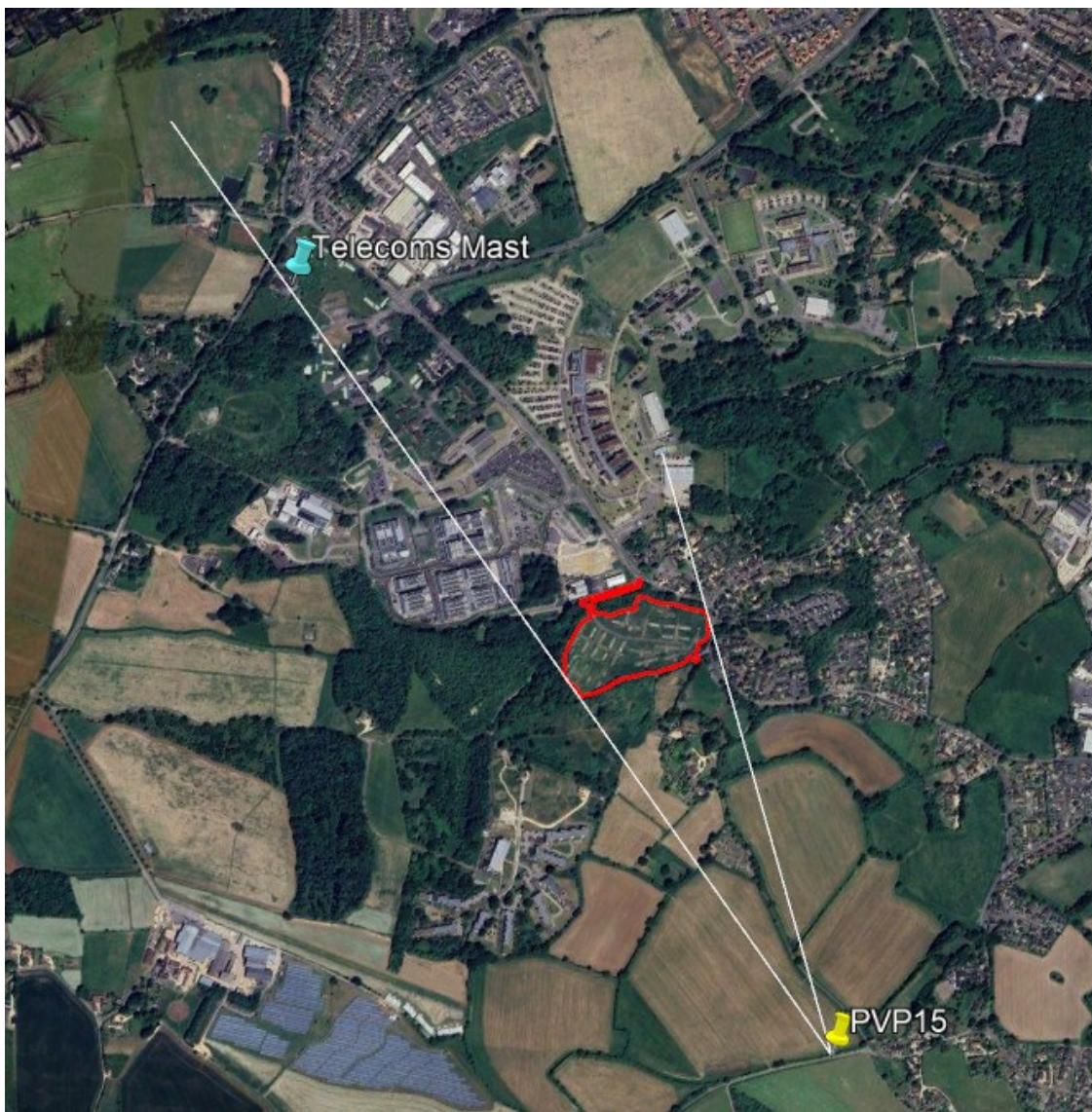


Image EDP 4.1: Extract from Google Earth showing PVP EDP 15

- 4.4 The parts of the overall site closer to the Wadswick Green development are all proposed for landscape enhancements and BNG so would not be readily visible.
- 4.5 **Image EDP 4.1** does also clearly show the prominence of the concrete footings and roadways within the Site.

5 ASSESSMENT OF EFFECTS

- 5.1 Paragraphs ES 1.16 to 1.18: While it is acknowledged that the Proposed Development is different in form and scale to the extant permission, the Proposed Development is one of very high-quality built form (as demonstrated by the visualisations contained within the Design and Access Statement (DAS)) and includes substantially greater areas of landscape enhancement than the extant permission. The landscape enhancement areas extend across the majority of the land between the northern parcel (where the proposed built form would be located) and the Wadswick Green development.

- 5.2 Paragraph ES 1.19: Noise from the generators is not relevant to landscape and visual matters. The proposed earth mounding and planting would, in the longer term, limit their visibility from the retained and diverted public rights of way (PRoW).
- 5.3 Paragraph ES 1.20: Considerable thought and consultation with the LPA (which is ongoing) has gone into the design of the security arrangements for the Proposed Development, with fencing set back from the Site boundaries and screened with earth mounding and planting. It is acknowledged that security fencing is not a characteristic feature of the land to the south of the Site, but it is very much a feature of the townscape to the north, with Corsham being a military town.
- 5.4 Paragraph ES 1.21: At no point was a nighttime assessment requested by the LPA or considered necessary as part of authoring the LVA. In repeating the aspirations set out at the Consultation stage, the DAS details the following with regards to lighting, and how it will limit impacts during the operational stage:
- Working collaboratively, the consultants design will be an environmentally friendly lighting scheme with zero Lux wildlife corridors for the protection of species; and
 - Lighting incorporated in scheme to be screened by extensive boundary landscaping enhancement.
- 5.5 Impacts upon lighting during construction will be addressed through a Construction Environmental Management Plan.
- 5.6 Paragraph ES 1.22: The ES review states that “*the proposals would preclude public access across much of the site*”. While there are PRoW crossing the Site, the Site is not formal publicly accessible land, irrespective of whether or not there may be informal access at present. The Proposed Development would result in some of the existing PRoW being diverted, creating a new landscaped circulatory route around the Site, albeit in the context of the Proposed Development. The finer details of the planting and structures along this route (including the inclusion of drystone walling following consultation with the LPA Landscape Officer) will serve to provide an attractive route. Existing routes in the southern parcel would be maintained, with enhanced landscaping and BNG.
- 5.7 The Proposed Development would not therefore preclude public access across the Site as a whole, as contended. References to landscape character in this paragraph of the ES review appear to just repeat points made elsewhere.
- 5.8 Paragraph ES 1.23: The LVA acknowledges that the Proposed Development would result in a very large change to the character of the Site. With the substantial landscape enhancement measures proposed and the limited sensitivity of the brownfield site, EDP stand by the assessment that in the long term, the Proposed Development as a whole would result in a neutral effect.
- 5.9 Paragraph ES 1.24: EDP stand by the assessment that users of the PRoW which cross the Site are of reduced sensitivity due to the brownfield character of the Site. The proposed re-routing of the PRoW within the Site would mean that the new routes would only be adjacent to the security fences and infrastructure in a limited number of places, and the proposed

earth mounding and planting has been designed in detail to ensure appropriate separation from the built parts of the Proposed Development for the majority of the routes, and to create an attractive through route from the southern parcel/wider landscape to the wider settlement. EDP therefore stand by the original assessment of the effects on users of the PRow network within and adjacent to the Site.

- 5.10 Paragraphs ES 1.25 to 1.27: The ES review lacks consistency, at times comparing the Proposed Development to the existing brownfield site, but then comparing it to the development that would arise should the extant planning permission be enacted. Clearly there is a difference of professional opinion as to the scale of effects that would arise, but EDP stand by the assessment in the submitted LVA, particularly in respect of the reduction in effects that would arise in the longer term as a result of the proposed earth mounding and landscape mitigation, in particular the extensive tree planting.
- 5.11 Paragraph ES 1.28: Again, there is a difference of professional opinion. EDP stand by our assessment, particularly with respect to the effects of the extensive tree planting and landscape enhancement/BNG that would occur in the southern parcel of the Site, between the main development area and the Wadswick Green development. It should also, of course, be remembered that under UK planning law there is no right to a view from private residential properties. Whilst it is acknowledged in the LVA that there would be some visibility of the Proposed Development from properties at Wadswick Green, the proposed built form (located at least 150m from the boundary of the Wadswick Green development and with extensive planting in the intervening space) would not be so close to these properties so as to make them unattractive places to live.
- 5.12 To date, the LPA have raised no concerns on the content or findings of the landscape and visual assessment and have only commented on the details of the landscaping proposals, which are subject to review.

6 CONCLUSIONS

- 6.1 There is a difference of professional opinion on both sensitivity of receptors and scale of effects between the author of the ES review and the authors of the submitted LVA.
- 6.2 EDP stand by the assessment of effects as set out in the submitted LVA. EDP maintain that although the proposed new built form would be substantial, the Proposed Development as a whole, including extensive landscaping over a large area, particularly around the main built form but also to the south-west, would mean that the Proposed Development is not inappropriate for the Site and its environs.