



Cannock Chase AONB Partnership

c/o 2 Staffordshire Place
Tipping Street
Stafford
ST16 2DH

Website: www.cannock-chase.co.uk

Email: julia.banbury@staffordshire.gov.uk
Please ask for: Julia Banbury

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Planning Policy Manager
South Staffordshire Council,
Council Offices,
Codsall.
WV8 1PX

Dear Sirs

South Staffordshire Local Plan Review: Preferred Options Consultation

Following my conversation with Patrick Walker, thank you for inviting comments from Cannock Chase AONB to the above consultation. The comments are made on behalf of the AONB Joint Committee.

Question 3: Vision and Strategic Objectives

The AONB would welcome specific mention of Cannock Chase AONB in section 3.49. Strategic Objective 11 seeks to '*Protect and enhance the district's natural environment including the district's landscape character and key natural assets such as the Cannock Chase Special Area of Conservation, whilst ensuring that biodiversity net gain is delivered across the district.*' Cannock Chase AONB is distinct from Cannock Chase SAC.

Question 4 Green Belt and Open Countryside Policy DS1 Green Belt

The AONB is concerned that potential housing allocation and release of Green Belt proposed at Huntington, would result in inappropriate development in the setting of the AONB. Concerns are covered in more detail under Question 8.

The AONB Management Plan recognises that wide-ranging uninterrupted views from the AONB are one of the AONB's special qualities. Views towards the distinctive profile of Cannock Chase are also an important attribute within the surrounding area. The [AONB Views and Setting Guide](#) provides evidence and advice to help ensure that the surroundings of the AONB would be developed and managed in ways that conserve and enhance its significance and inherent special qualities. Reference to the AONB Views and Setting Guide

would support preparation of a Green Belt SPD or other policy relating to development in the setting of the AONB.

Policy DS2 Open Countryside

Close to Stafford the setting of the AONB lies in the area defined as Open Countryside as indicated on Map 1. As the southern edge of Stafford lies only 1km from the boundary of the AONB, land between the AONB boundary and Stafford is critical to the setting of the AONB. The AONB would therefore welcome additional wording in Policy DS2 to highlight the sensitivities of Cannock Chase AONB and its setting.

Question 5

Regarding potential allocation for housing on the edge of Stafford, for clarity and to ensure the sensitivities of the AONB and its setting are fully considered and addressed, the AONB boundary should be indicated on the Map Locality 1. Further comments are made in Question 8.

Question 7

The AONB supports provision of separate policy for strategic housing allocation sites.

Policy SA4 Land north of Penkridge

The site lies within the setting of the AONB, approximately 3.5km from the AONB boundary, bounded to the west by the A449 and abutting the north edge of Penkridge on its southern boundary. The M6 passes close to the eastern site boundary, on embankment. The site rises from approximately 80m AOD to slightly over 90m AOD on the western boundary, and the Plan provided indicates a wide area for Green Infrastructure on the eastern side of the site.

Reference in the policy to integrating the development into the wider landscape from the AONB to the east is welcomed. The AONB would warmly welcome reference to the AONB Views and Setting Guide, provides advice and guidance on minimising visual impact of development in the setting of the AONB, in Policy SA4 and the SPD developed for the site.

For your information the [AONB Views and Setting Guide](#) identifies representative viewpoints 15, 16 and 18 with views broadly in the direction of the site, and reference to the Viewpoint Specific Guidance would be helpful to consider potential visibility. From all representative viewpoints the plans showing the Zone of Theoretical Visibility, indicate that development between 1-10 m high would be theoretically visible. Views of development from the AONB would mainly be seen in the context of existing development at Penkridge. The guidance recommends retaining site vegetation (hedges, hedgerow trees and copses) to provide structure, screening and to break up the mass of the development. Reinforcing vegetation on the site boundaries would help to enhance the pattern of woodland characteristic in long views from the AONB and contain development.

A comprehensive and coordinated development approach is supported. A Landscape and Visual Impact Assessment should be used to inform the site layout and masterplan, as this would assist in identifying where structural planting additional to the proposed buffer along the River Penk could help to integrate the development into the landscape and reduce visual impacts. The AONB requests a sensitive approach to lighting to minimise light spillage.

Question 8

Huntington Preferred Options Sites 016 and 591

Site 016

The site lies approximately 400 m from the AONB boundary, east of Huntington. Land slopes away from the settlement edge. Aerial photos indicate the site perimeter is furnished with

intact hedges with hedge trees. When viewed from the AONB development would be seen in the context of and beyond the existing settlement. In views towards the AONB the site would be unlikely to intrude further on the setting of the AONB than Huntington does itself. The AONB recommends that proposals should ensure perimeter hedges are protected and enhanced to maintain a vegetative visual buffer to the site and enhance the development.

Site 591

Allocation of this site and potential erosion of the Green Belt east of Huntington is a serious concern to the AONB.

This site lies less than 50m from the AONB boundary on the eastern edge of Huntington. At this point the established eastern settlement edge is relatively straight and the land parcel forms a finger in Green Belt. The AONB is on elevated land rising to around 190 – 200m AOD from where there are expansive views across the Staffordshire Plain. When viewed from the AONB, Huntington appears to nestle in a wooded valley setting below about 165 – 170m AOD.

The site rises to approximately 180m AOD on its eastern edge, and with no established vegetation on the eastern edge and north boundary, is open to views. The AONB is concerned that as development would sit on higher ground than the rest of Huntington and would be open to views, it would be intrusive in the landscape detrimental to the setting of the AONB. This allocation and possible future review of the Green Belt here could have significant detrimental impact on the AONB as development would erode the separation between settlements, leaving the AONB as a finger of land sandwiched between urban development. The AONB seeks reconsideration of the potential allocation of this site.

If the authority is nevertheless minded to proceed, and / or be considering release of other land east of Huntington in the future, a strategic approach with development brief and masterplan for the area as a whole would be essential to secure appropriate mitigation for the AONB and its setting. A strong wooded buffer on the east and north boundaries should be considered as critical to acceptability.

Land South of Stafford

The site lies just over 1 km from the AONB boundary. Land rises from the north of the site at around 95m AOD to approximately 115m AOD on the southern site boundary. The site has a high hedge on the A34 but is otherwise bounded by low gappy hedges with a few mature hedgerow trees. The AONB requests further assessment of this site to ensure that development would not detrimentally affect the setting of AONB and, if allocated an acceptable level of mitigation could be provided. Reference to the AONB Views and Setting Guide is recommended. Although not particularly orientated towards the site, the ZTV for Representative Viewpoint 19 of the Views and Setting Guide indicates that development 0-10m high on the site would be theoretically visible from the AONB, therefore the setting of the AONB could be detrimentally affected. Much of the settlement edge of Stafford west of the site is well wooded, therefore development on the elevated south side of the site risks being exposed to views and obtrusive in the landscape. Housing development on the higher elevations should be resisted to avoid creating a stark developed edge. A strong wooded buffer could help assimilate development into the landscape and reduce visual impacts on the AONB. A development brief setting out key considerations and requiring mitigation for the setting of the AONB therefore sought. A sensitive approach to lighting to reduce light spillage is also sought.

Question 10

The AONB accepts that this site has development consent and supports retention of land for green infrastructure within the Green Belt. In considering any remaining details for the development, the authority is requested to fully take account of enhancing mitigation for detrimental effects on the AONB.

Question 12

Policy HC9

The AONB would welcome signposting to the [AONB Design Guide](#) in relation to any proposed development within the AONB. The guide aims to promote good practice and encourage any future development to be landscape-led and sympathetic to existing character, so it does not detract from the natural beauty of the AONB.

Policy NC1

This policy focuses on habitats. This is supported, however the AONB would welcome reference to protecting and enhancing Cannock Chase Area of Outstanding Natural Beauty. The primary provision of the AONB designation under the CROW Act is conserving and enhancing the natural beauty. Habitats and wildlife in good condition comprise an intrinsic part of natural beauty but there are other factors such as tranquillity, sense of wildness and views that warrant policy protection. The AONB is at risk of erosion of its natural beauty and special qualities due to recreational pressures unless appropriate mitigation measures are put in place. Impacts arising from recreation include those on landscape character, biodiversity, heritage, tranquillity, and visual effects on the SAC and the AONB as a whole.

Potential impact of new areas of housing close to the AONB could not only affect the setting of the AONB but as a result growing recreational activity which could harm the AONB's wildlife and special qualities. Policy should seek to maximise opportunities to reduce and mitigate for potential pressure from additional footfall in the AONB as a result of nearby housing development.

I hope these comments are helpful and can be taken into account.

Yours sincerely

Julia Banbury

Julia Banbury MA CMLI
AONB Landscape Planning Officer

Annexe: National legislation and guidance and the local planning and decision-making context.

Legislative Context. The AONB is a statutory designated area under the Countryside and Rights of Way Act 2000 (CRoW). The Act places a duty on all public bodies to “have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty”.

National Planning Guidance. The importance of conserving landscape and scenic beauty in AONBs is also stressed in the National Planning Policy Framework (para. 115).

Local Planning Context. The policies of the adopted Local Plan, including Policy CP1 (Strategy) and Policy CP14 (Landscape Character and Cannock Chase AONB), which includes consideration of the impact of development on the setting of the AONB.

AONB Management Plan (2019-2024). The Cannock Chase AONB Management Plan, prepared in accordance with CRoW, sets out how the AONB will be conserved and enhanced. The Cannock Chase AONB Management Plan 2019-2024 is available [here](#)

AONB Design Guide 2020. The [AONB Design Guide](#) has been prepared in response policies and actions in the AONB Management Plan. It aims to promote good practice and encourage any future development to be landscape-led and sympathetic to existing character, so it does not detract from the natural beauty of the AONB.

AONB Views and Setting Guide 2020. The AONB Management Plan recognises that wide-ranging uninterrupted views from the AONB are one of the AONB’s special qualities. Views towards the distinctive profile of Cannock Chase are also an important attribute within the surrounding area. The [AONB Views and Setting Guide](#) provides a guide to help ensure that the surroundings of the AONB are developed and managed in ways that conserve and enhance its significance and inherent special qualities.

AONB Planning Protocol. The AONB Partnership has also agreed a Planning Protocol which includes consideration of any applications that “are likely to have an adverse impact on either the character of the local landscape and/or nature conservation interests in the AONB or on its setting.”

AONB Governance. These comments are submitted by the AONB Landscape Planning Officer on behalf of the AONB Joint Committee.

AONB Executive. Further information on the AONB Unit and the AONB in general can be seen at:http://www.cannock-chase.co.uk/About_Us/