

Landscape & Visual Summary Rebuttal Response to the Landscape Comments contained within the Employment Site Assessment Response produced by South Staffordshire District Council

Land at Wall Heath

- 1.1 This summary rebuttal note has been produced by Tyler Grange, in response to the Employment Site Assessment Response undertaken by South Staffordshire District Council. It provides a high-level response to the principal areas of commentary related to landscape matters.
- 1.2 The main point of concern identified by the Council is that *“major negative effects are predicted against the landscape criteria, due to the site’s Green Belt harm”*. Green Belt harm is therefore predicted as being *“Very High”*.
- 1.3 That assertion is incorrect, for the following reasons.
- 1.4 The Council’s Landscape Sensitivity Assessment confirms that the Site (and wider parcel SL13) is considered as being of Low-Moderate sensitivity. Based on the accompanying methodology, that confirms that the landscape is not considered to have a strong character or qualities. Nor is it considered highly sensitive to change.
- 1.5 Para. 4.2 of the Landscape Sensitivity Assessment, also confirms that *“Generally the visual influence of adjacent development and infrastructure extending from the urban area, as well as development beyond the settlement edge, semi-rural land uses, and the consequent erosion of field patterns, landscape features and loss of strong rural perceptual qualities, all combine to lower landscape sensitivity to further development, for example around Wombourne (e.g. SL8, SL12, SL13, SL21)”*. That is of direct relevance to the Site.
- 1.6 The landscape associated with the Site is ordinary. Historic maps identify the loss of historic hedgerows resulting in the larger field parcels, which provides an opportunity for the reinstatement and enhancement of hedgerows to better define any future development parcels.
- 1.7 Furthermore, other assessment parcels adjoining the Dudley, Wolverhampton and Wombourne conurbation are considered to be of moderate or moderate-high sensitivity. These have greater sensitivity to change than the Wall Heath Site.
- 1.8 In Green Belt terms, the South Staffordshire Green Belt Review (LUC – 2019), considers the Site to have a ‘weak / no contribution’ to Purpose 2 (Preventing Merging Towns) and Purpose 4 (Preserving Setting and Special of Historic Towns); and a ‘strong’ contribution to Purpose 1 (Checking Unrestricted Sprawl) and



Purpose 3 (Safeguarding Countryside from Encroachment). However, nearly all of the other sites have also been assigned a 'strong' contribution for Purpose 3.

- 1.9 Our own focused assessment of the Green Belt context and contribution of the Site to Purpose 1 (Checking Unrestricted Sprawl) is that it is well contained, with the raised and wooded South Staffordshire Railway Walk forming a strong boundary to the north. To the northwest, mature tree belts assist to further screen the Site with limited views possible beyond the boundary. The Site sits adjacent to the existing urban extents of Wall Heath to the south adding further containment. Any sense of perceptible sprawl would be minimal and highly localised and future sprawl is restricted by permanent urban and landscape features.
- 1.10 With regards to Green Belt Purpose 3 (Safeguarding Countryside from Encroachment), our focussed assessment has determined that the topography and existing landscape framework, as well as the urban fringe context, reduces the extent to which any future development would be seen as inappropriate encroachment into the surrounding countryside.
- 1.11 The Green Belt Study considered large parcels of land, and the methodology is clear, in that Green Belt shouldn't be considered a landscape designation. Para. 1.9 also notes that:
- "There is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character and sensitivity are also likely to play a role in the spatial relationship between urban areas and the countryside. However there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land."*
- 1.12 It is evident that the Council have inflated perceived major negative landscape effects as a direct result the predicted Green Belt harm, rather than undertake two separate and transparent judgements. That is the wrong approach. There is no evidence provided as to why 'major' effects will arise as a result of the development of land that is ordinary and of Low-Moderate sensitivity, particularly given the potential for substantial enhancement of the existing landscape framework.
- 1.13 Overall, it is accepted by the Council that the Site is not of the highest sensitivity and that it has a weak (or no contribution) in terms of Green Belt merging. The Site represents an urban fringe location and is not open countryside. The proposed development is compact, and the Site has a clear relationship with the adjoining built-up area. The retention, enhancement, and incorporation of a proposed substantial network of Green Infrastructure also has the ability to strongly separate the Site from the surrounding area.
- 1.14 On that basis, the Site represents a logical and sustainable location for development from a landscape perspective.

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