
LANDSCAPE POSITION PAPER

ON BEHALF OF

BLOOR HOMES MIDLANDS

FOR

LAND NORTH EAST OF BRIDGNORTH ROAD,

WOMBOURNE,

SOUTH STAFFORDSHIRE

V3 December 2021



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APPENDIX 1 – EXTRACT FROM DEFRA MAGIC MAP

Document History

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EXECUTIVE SUMMARY

Zebra Landscape Architects ('ZLA') has been commissioned by Bloor Homes Midlands (the 'Promotor') to prepare a Landscape Position Paper. This document appraises the potential impact of future development on existing baseline landscape and visual resources on land north east of Bridgnorth Road, Wombourne, South Staffordshire (the 'site').

This Landscape Position Paper has considered the feasibility of developing the site area for a new residential scheme. The site is being promoted through the Local Plan Review process, and we have been mindful to assemble an appraisal based on pertinent landscape analysis published at a national and local level.

In landscape terms, the site is situated on lower lying landform on the south eastern edge of Wombourne. Consequently, the site is not prominent and is not situated within an elevated position whereby its development would break the skyline and fundamentally alter the character of the existing (baseline) views towards Wombourne.

The site is not an untouched piece of open countryside. The site currently accommodates a contractor's yard, a complex of portacabins, car parking for the construction of Himley Meadows, a new residential development, which adjoins the site. The wider site area was previously managed for equestrian pasture, although existing field hedgerows have been heavily degraded and outgrown. Whilst the site adjoins a mature broadleaf woodland spinney, the site area contains few trees.

There is an extensive woodland plantation (Himley Plantation) to the south east, and given the aforementioned woodland spinney to the site's eastern edge, the site does not interrupt views towards the settlement edge of Wombourne. The strongly wooded and hedged character of the site's context limits intervisibility to the outside of the site to the east, south and south west.

Consequently, might the development be situated within these strong buffers, as recommended by the Local Planning Authority's Landscape Sensitivity Assessment (2015), then the development would be *'visually more contained due to the presence of a significant woodland block immediately to the east'*.

The site is spatially and visually well related to the village of Wombourne, and its settlement edge. The completion of Himley Meadows has extended the recognised urban influence across the site area. Consequently, ZLA consider that the site has a resulting low to minor landscape sensitivity, particularly given the substantive degradation of landscape features within the site.

Through the emerging masterplan for this site, there is opportunity to retain, protect and enhance landscape fabric within then site, as well as implement new landscaping to strengthen existing landscape buffers, promote landscape character and also enable ecological betterment and habitat creation. This is reflective of the landscape management guidelines for the host LCT ('Sandstone Estatelands' Landscape Character Type) in the published assessment to *'maintain the tree cover', 'encourage the planting of new woodlands, reflecting the scale, shape and composition of the existing ancient woodland character', 'conserve and restore tree cover'* and *'seek opportunities to enhance tree cover'*.

Consequently, there is opportunity to reinforce existing hedgerows, as well as replace those lost over time (where practicable) to create green corridors through the site to break up the mass of any future development scenario. This adds to the locally found wide hedgerows, woodland blocks and spinney, and hedgerow oaks in the landscape encouraging landscape regeneration at a point where landscape character is less intact and weak. This is in line with the recommendations from the Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011.



As noted by the Local Planning Authority in their South Staffordshire Council's Sustainability Appraisal of the South Staffordshire Local Plan Review Preferred Options Plan Regulation 18 (III) SA Report August 2021, the effect of developing this site for new residential development is likely to have minimal effect on visual amenity and landscape character.

In this recent 2021 Sustainability assessment, the LPA considers the development of the site for residential development would (at worst) have only have a minor negative impact on local landscape character, a minor negative effect on the visual amenity of local residents, only a minor negative impact on the surrounding countryside, and no record effect on the visual amenity of PRoW users.

However, further analysis of this Sustainability Appraisal has found that the Local Planning Authority's assertion that the likely scheme at the site would lead to 'major negative implications'. This conclusion is based on the possible effects of development in the Green Belt, and not due to the probable minor impacts on visual amenity and landscape character.

As notes within Section 2 of this Landscape Position paper, ZLA considers this element of the Sustainability Appraisal to be flawed in the manner in which conflates spatial openness and visual openness.

Spatially, the release of the site for development would result in a reduction in existing spatial openness simply by a dint in the Green Belt area. However, visually, the effect of the development is likely to be shaped by a more complex combination of factors.

Taking these matters into account, and accounting for implementation of the design recommendations and mitigation, there is no reason to suggest that the site could not be developed without undermining the character of the 'Sandstone Estatelands' Landscape Character Type, as well as the resulting significant visual impacts across the surroundings of the site.



1. INTRODUCTION

Introduction

- 1.1. Zebra Landscape Architects ('ZLA') has been commissioned by Bloor Homes Midlands (the 'Promotor') to prepare a Landscape Position Paper. This document appraises the potential impact of future development on existing baseline landscape and visual resources on land north east of Bridgnorth Road, Wombourne, South Staffordshire (the 'site').
- 1.2. This Position Paper facilitates an independent technical evidence base for the site's promotion through the Local Plan process. The assessment was informed by a desk-based review of available data, policy, landscape character publications and mapping. A site visit was undertaken by an experienced Chartered Landscape Architect in winter-time (December 2021).
- 1.3. The site is situated entirely within the administrative area of South Staffordshire District Council, which is the Local Planning Authority (the 'LPA'). The site is located north east of the Bridgnorth Road on the south eastern periphery of Wombourne, and is found at OS Grid Reference: SO 87330 91782 (site centre). The site area is circa. 10 Hectares, and is entirely situated within the West Midlands Green Belt.
- 1.4. Zebra Landscape Architects is part of the wider Zebra Consultancy Group providing independent development consultancy and advice to landowners, land promoters and development clients in the public and private sectors. We work in the fields of landscape, ecology, arboriculture, masterplanning and architecture. The Practice operates throughout the UK from offices in Worcester and central London.

The Purpose of this Position Paper

- 1.5. The site is being promoted through the Local Plan process for residential development. The scheme would represent the second phase to the existing Himley Meadows scheme which was delivered recently by Bloor Homes (see Image 1.1 overleaf).
- 1.6. The purpose of this Position Paper is therefore to examine the site against landscape studies published by the Local Planning Authority and the pertinent National and Local Plan policies. It examines the site's suitability for future development against the Sustainability Appraisal of the South Staffordshire Local Plan Review Preferred Options Plan Regulation 18 (III) SA Report August 2021. The aforementioned provided inputs towards the identification of housing allocations in the South Staffordshire District Council's Local Plan Review.

Site Appraisal

- 1.7. A site visit was undertaken by a Chartered Landscape Architect on 1st December 2021, during which the character of the site in respect of the surrounding landscape was recorded. The existing site comprises a parcel of land covering an area of circa 10 Hectares (Ha). Image 1.1 provides an aerial view of the site and its surroundings:



Image 1.1: Aerial photograph of the site area on the southern edge of Wombourne (source: Google Earth, dated circa 2021). N.B. The extent of the site is demarked by ZLA with a solid red line. To the west adjoining the site is Bloor Homes Midlands' phase one of 'Himley Meadows'



- 1.8. Furthermore, the site was formerly managed for equestrian pasture. The site contains a modest timber built stable blocks to its north-north eastern edge. The site contains, few if any landscape features typical of the host landscape character area with an obvious lack of field hedgerows, scattered trees and small woodlands and spinneys which are common within the open countryside south of Woodbourne (and outside of the Himley hall Registered Park and Garden).

The Site and its Surroundings

- 1.9. ZLA undertook a site visit on the 1st December 2021, from which we made the following observations on the site and its surroundings:
- 1.10. The Site:
- The site contains a temporary management compound for building out Himley Meadows with portacabins, car parking, roadway and extensive soil storage.
 - A modest (timber) stable block is situated at the norther-north eastern edge of the site, and there are remnants of timber post and wire fencing which within the northern site area. This fencing would have once divided the site are into smaller equestrian fields. This is similar to the condition of the land immediately north of the site between the site's boundary and the A449 Kidderminster Road;
 - Landform within the site slopes from the north eastern boundary (with open fields and the existing settlement edge) to the south (boundary with the B4176 Bridgnorth Road); circa 92m AOD to 81m AOD respectively. Landform also slopes west to east circa 91m AOD to 82m AOD respectively.



- There is a SUDs attenuation pond situated in the south-south eastern edge of the site. This has been newly built for the Himley Meadows scheme.
- There are significant elements of degraded and missing field hedgerows, limited scattered hedgerow trees and no woodland spinneys or blocks which are typical features of the host landscape character area;
- The site is experienced in combination with the existing urban edge of Wombourne. The newly built Himley Meadows and the long-established dwellings on Beggars Bush Lane are readily seen across the site;
- The site is overlooked by significant urban development and has an extremely limited sense of openness; and
- There is no Public Right of Way which passes through the site area. There are no Public Rights of Way which pass along or around the site's boundary.

1.11. The surroundings to the Site:

- The northern edge of the site is relatively open. The edge of the site is delineated by the remnants of a field hedgerows;
- The eastern edge is enclosed by a woodland spinney of native broadleaf species. This spinney encloses and limits views outwards to the wider open countryside and the outlying settlement of Himley village (circa 0.45km south east of the site). There is an interlying farmstead with access from Bridgnorth Road. The farmstead has a number of outbuildings and an all-weather yard. There is a further two detached residences situated within the intervening landscape.
- The southern boundary is enclosed by the extensive native hedgerow running along the Bridgnorth Road with a pedestrian pavement running along. The existing vehicle access to the temporary management compound runs from this site edge. This route is assumed to have previously serviced the stable block and equestrian fields (former land use of the site)
- There is a relatively new vehicular access leading to the Himley Meadows development to the south -south western edge of the site,;
- The western edge is defined by the recently built out Himley Meadows scheme with predominantly two storey (at most two and a half storey) dwellings situated overlooking the site area. There is public open space adjoining the site's western boundary within Himley Meadows, and land form falls through the site from west to east (see above).
- The Stych Lane Cemetery (opened in 2009) adjoins the site's north western edge, within which, there are extensive tree components. Beyond this there is extensive agricultural buildings and external storage areas, as well as an equestrian menage.

1.12. Within the wider surrounding, there is an elevated ridgeline to the north east beyond the A449 (circa 1km east of the site). This landform encloses views eastwards. This ridgeline is situated within the Himley Hall Registered Park and Garden (Grade II). There is no public access across this ridgeline.



- 1.13. To the south of the site is the Himley Plantation. This is an extensive area of broadleaf woodland (exceeding 25 Ha in area). This woodland plantation is situated on the opposite side of the Bridgnorth Road from the site, and forms the backdrop to the south-south western edge of the village, and the site area.
- 1.14. The site is sandwiched between this extensive woodland block (Himley Plantation) and woodland spinney feature to the site's eastern edge. These features define the southern periphery of Wombourne. Additionally, the Smestow Valley Railway Walk runs along the southern edge of the village. These features are long-established, limiting the intervisibility with the open countryside outside of the village from within the site area.



2. THE PLANNING CONTEXT AND RELEVANT CONSIDERATIONS

2.1. The findings of the relevant environmental and planning designations are illustrated in Appendix 1 (extract from DEFRA MAGIC Map), and summarised in this section.

2.2. The following documents are relevant and will be discussed as appropriate later in this Position Paper:

- National Planning Policy Framework Revision (revised 20th July 2021); and
- South Staffordshire Council Local Plan - Core Strategy Development Plan Document (2028) adopted 2012;
- South Staffordshire Council Strategic Housing & Economic Land Availability Assessment (SHELAA, updated 2021); and
- South Staffordshire Council's Sustainability Appraisal of the South Staffordshire Local Plan Review Preferred Options Plan Regulation 18 (III) SA Report August 2021.

National and Local Landscape Designations

2.3. With consideration of the online Local Plan Map prepared by South Staffordshire Council, we note the following (see Image 2.1):

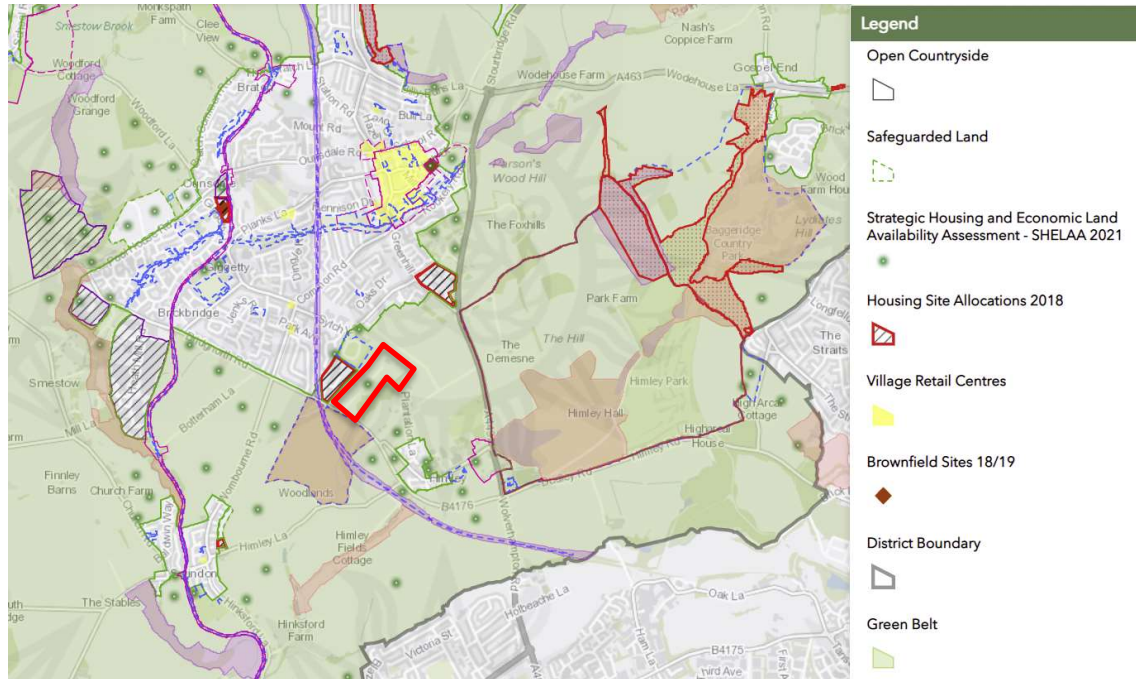
- National landscape designations: The site does not lie within or adjoin a nationally designated landscape; and
- Local landscape designations: The site does not lie within or adjoin a locally designated landscape. Additionally, the site does not lie within or adjoin other local designations such as a Significant Gap or Local Green Space.

2.4. Notwithstanding the above, the site is situated within the Green Belt, albeit on the very periphery of the designation and abuts the existing settlement edge of Wombourne. The recently built out (Himley Meadows) adjoins the site's western edge.

2.5. Consequently, the site is afforded elevated protection under National and local planning policy. This designation is a spatial planning designation, and not one relative to landscape character and quality.



Image 2.1: Extract from the South Staffordshire Local Plan on line map (extraction taken December 2021.) N.B. The approximate site area is demarked with a solid red line by ZLA. The LPA has shown the extent of Green Belt designation is shown with a green fill and the settlement boundary for Wombourne with solid green line



2.6. Additionally, we also note the following (see Image 2.2):

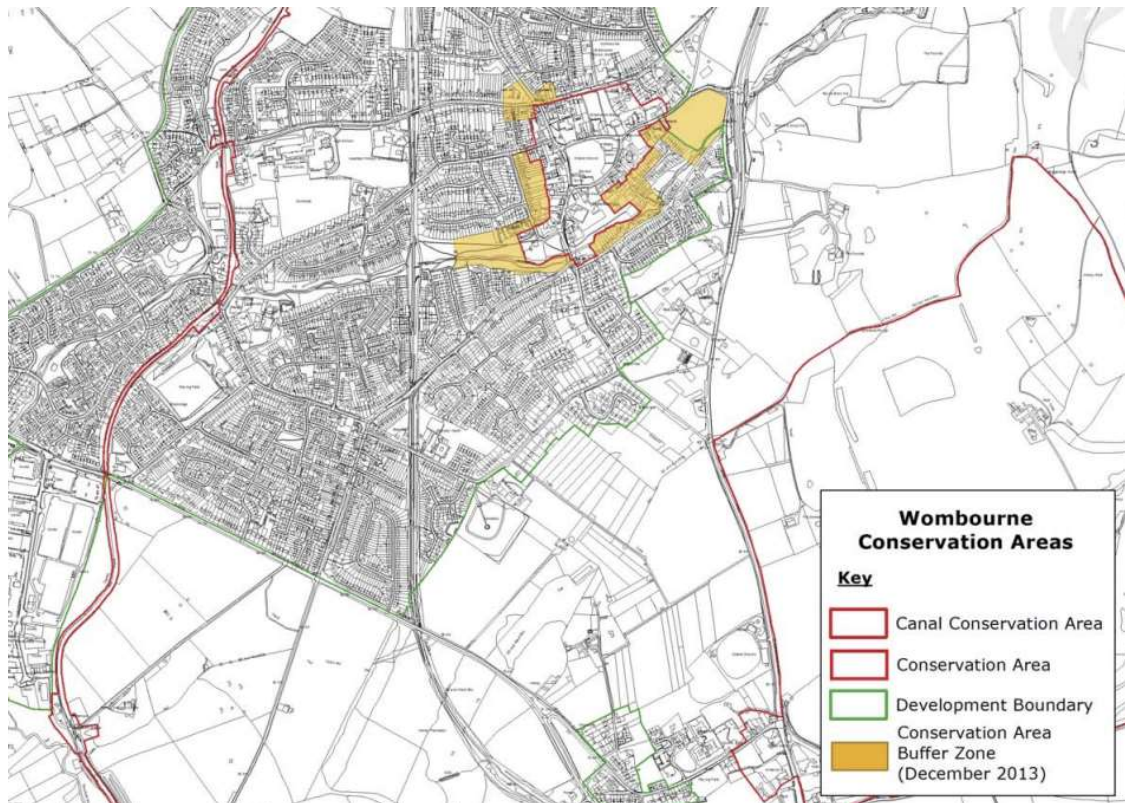
- The site is located outside of the Wombourne Conservation Area, and the nearby Canal Conservation Area. The Wombourne Conservation area is situated to the north of the site, which at its southern extent is situated off Gravel Hill, circa 0.9k north; and
- The Canal Conservation Area is situated on the Staffordshire & Worcestershire Canal circa 1.2km west of the site at its closest location.

2.7. Given the intervening distance, residential development and urban built form, ZLA considers that the site is unlikely to be discernible from the Wombourne Conservation Area. This is particularly the case as the site does not occupy a topographical advantage to the southern edge of the village; see Image 2.2 overleaf.

2.8. With regard to the Canal Conservation Area, this route of the canal is lower lying than the site. Consequently, there is unlikely to be any intervisibility between the site and the Canal Conservation Area; see Image 2.2 overleaf.



Image 2.2: Extract from the South Staffordshire Council's published map of Wombourne Conservation Areas (extraction taken December 2021.) N.B. The LPA has shown the extent of each Conservation Area as per their Legend



National Planning Policy Framework

- 2.9. On the 20 July 2021, the Government published a revised version of the National Planning Policy Framework (NPPF). At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development; this being the golden thread running throughout the document.
- 2.10. For landscape, this means recognising the intrinsic character and beauty of the countryside (para. 174 (b)) and balancing any 'harm' to the landscape resource with the benefits of the scheme in other respects. Para 174 (b) states the following:
- '.....recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'
- 2.11. Furthermore, Section 12 of the NPPF addresses the issue of good design and recommends that planning decisions should aim to ensure that developments respond to the local character and history. Specifically, in paragraph 127 it is stated that development should '*add to the overall quality of the area...*', '*are visually attractive as a result of good architecture, layout and appropriate and effective landscaping...*' and '*be sympathetic to local character and history, including the surrounding built environment and landscape setting...*'.



- 2.12. The site is situated on the periphery of the West Midlands Green Belt (see ZLA's accompanying Green Belt Position Paper (ref: ZLA_1242_Green Belt, version 2, dated 08.12.2021).
- 2.13. The Government formerly set out its policies and principles towards GBs in England and Wales in Planning Policy Guidance Note 2: Green Belt, but this planning guidance was superseded by the NPPF in March 2012, and has been subsequently superseded with the revised NPPF (July 2018 and February 2019), and most recently by the Revised NPPF (July 2021).
- 2.14. There is now more detailed guidance in the National Planning Policy Guidance (NPPG) that deals with 'compensatory provision'. Paragraph 142 states: 'Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'
- 2.15. Planning Authorities are strongly urged to follow the Revised NPPF's detailed advice when considering whether to permit additional development in the Green Belt.

South Staffordshire Council Local Plan - Core Strategy Development Plan Document (2028) adopted 2012

- 2.16. Policies pertinent to appraising this site, and those which would logically inform any emerging masterplan, and would be utilised to test the appropriateness of a planning application are as follows:

Policy EQ4: Protecting and Enhancing the Character and Appearance of the Landscape

- 2.17. Policy EQ4 states the following:

'The intrinsic rural character and local distinctiveness of the South Staffordshire landscape should be maintained and where possible enhanced. Trees, veteran trees, woodland, ancient woodland and hedgerows should be protected from damage and retained unless it can be demonstrated that removal is necessary and appropriate mitigation can be achieved.....The Council will encourage and support the creation of new woodlands and the management of existing woodlands particularly where they contribute to community forestry.....'

- 2.18. This policy continues:

'Proposals should retain and strengthen the components of landscape character and local distinctiveness, with particular attention to the detailing of any proposal and its relationship with existing buildings, features and vegetation..... Where possible, opportunities should be taken to add character and distinctiveness through the contribution of new landscape features, particularly to landscapes which have been degraded.'

- 2.19. This is the most pertinent 'landscape' related policy. There are wider ancillary policies which include the following:

Policy EQ12: Landscaping

- 2.20. Policy EQ12 states the following:

'Landscaping of new development must be an integral part of the overall design, which complements and enhances the development and the wider area, and:



- a) creates a visually pleasant, sustainable and biodiversity rich environment;
- b) provides for sustainable solutions including the use of Sustainable Drainage Systems (SUDS). Designs should respond to the potential implications of climate change;
- c) protects and enhances key landscape features;
- d) creates new features and areas of open space that reflect local landscape character;
- e) contributes to character, appearance and sense of place;
- f) promotes a public realm which is attractive and safe.'

Policy HWB2: Green Infrastructure

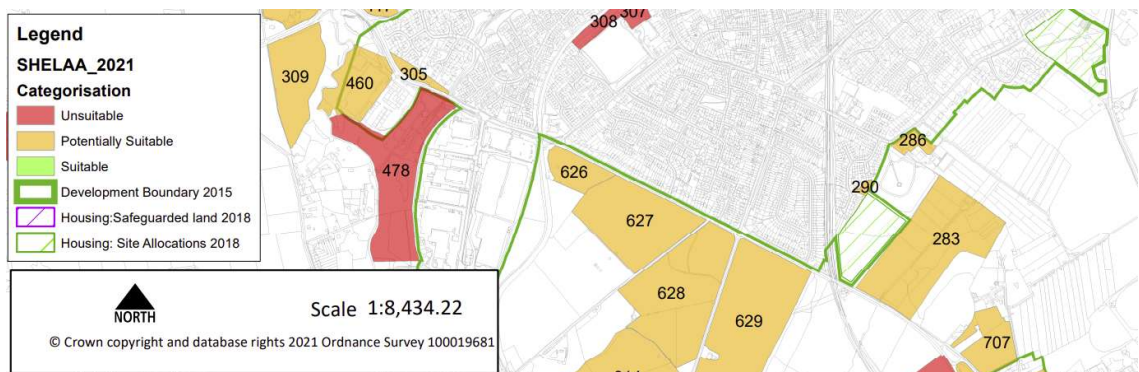
2.21. Policy HWB2 states the following:

'The Council will support the protection, maintenance and enhancement of a network of open space, natural and semi-natural greenspace in South Staffordshire and cross boundary links. The Council will support proposals to improve and expand the key components of this green infrastructure network including the enhancement of green corridors such as disused railway lines and the enhancement and creation of native woodlands.....'

South Staffordshire Council Strategic Housing & Economic Land Availability Assessment (SHELAA, updated 2021)

- 2.22. Initially undertaken in 2018, The SHELAA has been updated for 2021 to reflect more recent land supply updates and site suggestions made since the original assessment. The site in its quantum is identified by the LPA with reference '283' and their summary of findings is contained in 'Locality 5 (Kinver, Wombourne, Swindon, Bobbington, Trysull, Himley, Seisdon)'.
- 2.23. This assessment states the following on the suitability of the site for future development, as '*potentially suitable but subject to policy constraints - Green Belt.*' This assessment considered the site to have a '*village edge*' location and their findings were based on the assumption of a 'site modelled at 32 dwellings per hectare'. N.B. Please see ZLA's Green Belt Position Note which supports the release of the site from Green belt for the future delivery of residential development; see Image 2.33:

Image 2.3: Extract from South Staffordshire Council Strategic Housing & Economic Land Availability Assessment (SHELAA, updated 2021) - Wombourne SHELAA map. N.B. The whole quantum of the site is situated within the land parcel referred to as '283' by the LPA



South Staffordshire Council's Sustainability Appraisal of the South Staffordshire Local Plan Review Preferred Options Plan Regulation 18 (III) SA Report August 2021

- 2.24. South Staffordshire Council's Sustainability Appraisal of the South Staffordshire Local Plan Review has been prepared to provide an appraisal of each option (called Reasonable Alternatives in Sustainability Appraisal terms) in the Preferred Options Plan to identify their likely sustainability impacts on each objective of the Framework.
- 2.25. South Staffordshire District Council (SSDC) is in the process of writing the South Staffordshire Local Plan Review (LPR). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the Local Plan making process by identifying the likely environmental effects of reasonable alternatives and various options.
- 2.26. The methodology used a number of broad planning subjects, one of which was 'landscape and Townscape' which assessed a number of pertinent sub-subjects against a score criterion. The LPA stated:
- 'Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.'
- 2.27. The sub-subjects included: (Vicinity and likely effects on) Cannock Chase AONB - Green Belt Boundary Review – Landscape Sensitivity – (distance to) Country Parks – (availability and sensitivity of) Views. See Image 2.3 overleaf for an extract of Table 2.3 of the aforementioned Sustainability Assessment which defines the scoring criterion.



Table 2.3: Extract from South Staffordshire Council’s Sustainability Appraisal of the South Staffordshire Local Plan Review Preferred Options Plan Regulation 18 (III) SA Report August 2021, Table 2.3

Table 2.3: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; Cause a very high-quality receptor to be permanently diminished; Be unable to be entirely mitigated; Be discordant with the existing setting; and/or Contribute to a cumulative significant effect.
Minor Negative -	<p>The size, nature and location of development proposals would be likely to:</p> <ul style="list-style-type: none"> Not quite fit into the existing location or with existing receptor qualities; and/or Affect undesignated yet recognised local receptors.
Negligible 0	<p>Either no impacts are anticipated, or any impacts are anticipated to be negligible.</p>
Uncertain +/-	<p>It is entirely uncertain whether impacts would be positive or adverse.</p>
Minor Positive +	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> Improve undesignated yet recognised receptor qualities at the local scale; Fit into, or with, the existing location and existing receptor qualities; and/or Enable the restoration of valued characteristic features.
Major Positive ++	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; Restore valued receptors which were degraded through previous uses; and/or Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

2.28. In this assessment, the site continues to be identified as ‘283’. At page 674, the LPA conclude this ‘headline’ assessment under the sub-heading of ‘Key Positives and Negatives’ that the site had ‘major native impacts predicted against the landscape criteria’. This conclusion is supported by the LPA at pages 409 onwards of the Sustainability Assessment, for which I summarise below:



- Green Belt Harm: ‘Development of.....283.....could cause ‘moderate-high’ levels of harm to the purposes of the Green Belt. Therefore, development.....is assessed as having a potentially major negative impact.’
- Landscape Sensitivity: ‘Site 283.....within an area of ‘low/moderate’ landscape sensitivity. Development (has) been assessed as having a potentially minor negative impact.’
- Landscape Character: ‘Site 283..... the proposed residential development.....could potentially be discordant with the key characteristics of the associated LCTs. Therefore, a minor negative impact on the local landscape character would be expected.’
- Views from the PRow Network: N.B. ZLA notes that the site is not referred to by the LPA in this matter. Wee assume that there would be no discernible impact on the visual amenity of PRow users, so, ZLA record this as imperceptible/indiscernible effect, or neutral.
- Views for Local Residents: ‘The proposed development at Site 283.....could potentially alter the views experienced by local residents, including those on Pool House Road, Wood Road and Bridgnorth Road. Therefore, a minor negative impact on the local landscape would be expected.’
- Urbanisation of the Countryside: ‘Site 283..... the proposed development.....would be likely to contribute towards urbanisation of the surrounding countryside and therefore, have a minor negative impact on the local landscape.’

- 2.29. Given the foregoing, the LPA consider that the site (‘283’) has the potential for major negative impacts due to the site’s location within the Green Belt, albeit on the periphery of the Green Belt designation adjoining (and overlooked by) the existing urban edge of Wombourne.
- 2.30. However, all other landscape planning considerations assessed were deemed to of minor negative impact. Consequently, the LPA considers the development of the site for residential development would have only minor negative impact on local landscape character, minor negative impact on the visual amenity of local residents, minor negative impact on the surrounding countryside, and no recorded effect on the visual amenity of PRow users within the wider open countryside surrounding Wombourne.
- 2.31. To an extent, this Sustainability Appraisal us reliant on previously assembled assessment information, one of which is the 2019 ‘South Staffordshire Green Belt Study Stage 1 and 2 Report’. This assessment was undertaken prior to the building out of Himley Meadows, and in the case of this particular site, is out of date, due to the change in the existing urban edge.
- 2.32. From the undertaking this site specific Green Belt review in December 2021, we conclude that the LPA must only consider there would be potential major negative effects on the spatial openness of the Green Belt. However, the LPA consider that the development of the site would at worst lead to minor effects to the landscape character, open countryside and visual amenity for local residents) and it is assumed have no effect on the visual amenity of PRow users.
- 2.33. The release of this land from the Green Belt for new residential development would have an effect on spatial openness. However, it is unlikely such a development would have a harmful effect on the visual openness of the Green Belt (visual amenity) or the landscape character of the site or the surrounding countryside. Whilst the change to the site’s fabric and character would be discernible locally, it is considered that the eventual development will have no, or no additional, effect on the Green Belt, in terms of visual amenity and landscape character.



- 2.34. Given our analysis of this Sustainability Appraisal, ZLA considers that the Local Planning Authority's assertion that the likely scheme at the site would lead to 'major negative implications' is flawed in the manner in which conflates spatial openness and visual openness.
- 2.35. The LPA's conclusion appears to be based on their judgement that the development of the site would result in major, adverse impacts to the Green Belt. This level of effect would be significant. However, the development of the site would only result in minor, adverse effects (at worst) on visual amenity and landscape character.
- 2.36. Spatially, the release of the site for development would result in a reduction in existing spatial openness simply by a dint in the Green Belt area. However, visually, the effect of the development is likely to be shaped by a more complex combination of factors.
- 2.37. The Local Planning Authority evidently only considers the physical reduction in Green Belt land, and fails to recognise the visual openness in its judgement. If this is not the case, then the Local Planning Authority would not appraise Green Belt harm as potentially a major negative impact through development when its considers the scheme to lead to only minor effects on then visual amenity of local residents and fails to register any negative concerns or comments on the likely effects of development on ten visual amenity of PRoW users. These are indices of how the scheme would impact visual openness.
- 2.38. Consequently, we agree with the Local Planning Authority that development of the site would only lead to minor adverse effects (at worst) on landscape character (surrounding the site) and visual amenity of local residents and users of PRoW. However, ZLA considers that the release of the site from the Green Belt for development would not lead to major negative implications, and whilst there would be impacts to the Green Belt, the reduction in spatial openness would not be significantly harmful as asserted by the Local Planning Authority.



3. PUBLISHED LANDSCAPE CHARACTER ASSESSMENT

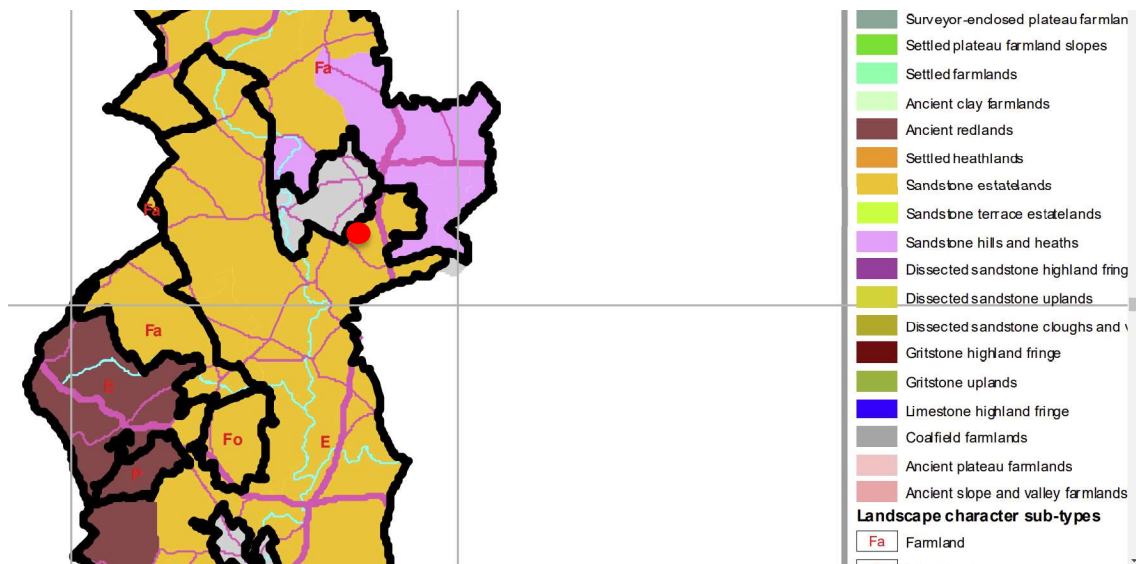
National Landscape Character

- 3.1. The landscape of England has been subject to a nationwide Landscape Character Assessment, 'The Character of England: Landscape, Wildlife and Natural Features' (Natural England). The site falls within National Character Area (NCA) Profile 66. 'Mid Severn Sandstone Plateau'.
- 3.2. Whilst Natural England's accompanying description is broadly representative of the wider landscape, it is too generic to provide specific characterisation of the site. For the scale of the site and potential developable area the description of landscape character undertaken at the sub-regional level is more relevant in establishing the landscape resource baseline.

Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011

- 3.3. At a local level, the 'Planning for Landscape Change' is the pertinent Landscape Character Assessment for South Staffordshire. This Supplementary Planning Document was prepared by the County Council and was first published in 1996.
- 3.4. This document remains the definitive landscape character assessment for the South Staffordshire, and the wider County. At over 20 years old, this should now be of limited material weight.
- 3.5. The site is located within the Landscape Character Type (LCT) 'Sandstone Estatelands' (an extract from Staffordshire County Council's Planning for Landscape Change document is shown in Image 3.1 below):

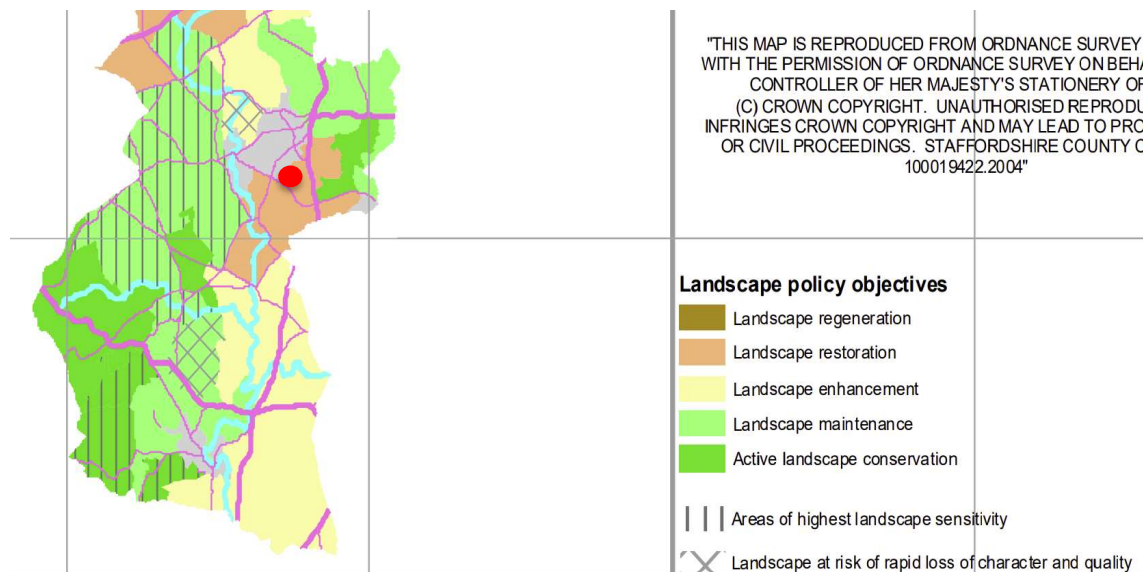
Image 3.1: Extract from Map2: Landscape Character Types, Appendix 2 of the Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011. N.B. ZLA has identified the approximate site area is indicated with a solid red circle



- 3.6. The overall character of the LCT is described as being “a varied agricultural landscape of intensive arable production but with pockets of less intensive pastoral farming. The rolling landform gives way to flatter land along the river valleys.....Many of the woodlands have a heathy character to them. This is a landscape that appears far more wooded than it actually is, with prominent positioning of woodlands and the coalescence of mature hedgerow oaks in places.....Increased numbers of mature hedgerow oaks locally provide filtered views.....’
- 3.7. Outside of the urban setting, this was found to be broadly true of the area in which the site lies. The key characteristic features of the LCT are listed as. N.B. ZLA has underlined those key characteristics which are typical of the surroundings to the site area:
- ‘Estate plantations;
 - Heathy ridge woodlands;
 - Hedgerow oaks;
 - Well treed stream valleys;
 - Smooth rolling landform with scarp slopes;
 - Red brick farmsteads and estate cottages;
 - Mixed intensive arable and pasture farming;
 - Large, hedged fields;
 - Halls and associated parkland;
 - Canal.’
- 3.8. The site is located within an area of the ‘Sandstone Estatelands’ LCT which was not identified by the aforementioned supplementary planning document to be of ‘*highest landscape sensitivity*’ and also not within an LCT which is of ‘*risk of rapid loss of character and quality*’; see Image 3.2.



Image 3.2: Extract from Map 1: Landscape Policy Zones within Staffordshire, Appendix 2 of the Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011. N.B. ZLA has identified the approximate site area is indicated with a solid red circle



3.9. The management strategy for the 'Sandstone Estatelands' LCT is one of landscape regeneration (see Image 3.2). Under the sub heading '*Incongruous landscape features*', the County Council identify the following features. N.B. ZLA has underlined those key characteristics which are typical of the surroundings to the site area:

- 'Power lines;
- Village expansion;
- Urban edge;
- Modern farm buildings;
- Deteriorating hedgerows;
- Commuter dwellings;
- Busy roads.'

3.10. The landscape management guidance states: 'the critical factors which currently limit landscape quality are the loss of characteristic landscape features, the poor condition of those features that remain, and the spread of incongruous features listed above. This landscape character type is locally sensitive to the impacts of development and land use change.'

3.11. The focus of the management strategy has the potential to focus on improving settlement edges which may be experienced as incongruous within the setting due to poor design, as well the protection of hedgerow structures and increasing the number of hedgerow Oaks, retaining, enhancing and increasing tree cover through woodland enhancement and new provision to facilitate filtered views commonly experienced within the LCT.



South Staffordshire Landscape Sensitivity Assessment - Final Report (2015)

- 3.12. The purpose of this report is to provide a landscape sensitivity assessment of areas of Green Belt land within the Black Country and South Staffordshire. This assessment of landscape sensitivity is for housing and commercial development uses. The purpose of this study is to provide an assessment of the extent to which the character and quality of the landscape abutting the West Midlands conurbation within the Black Country and South Staffordshire and also around settlements in South Staffordshire is, in principle, susceptible to change as a result of introducing built development.
- 3.13. The site area is situated within a larger parcel of land running along the south eastern edge of Wombourne. This land parcel adjoins the settlement edge surrounding the site area, including existing residential development (at Dickinson Road) and the Stych Lane Cemetery. This assessment pre-dates the building out of the new residential dwellings adjoining the site area (Himley Meadows).
- 3.14. The site is part of the larger 'WM8' land parcel. Predominantly, this land parcel has a high landscape sensitivity to residential development, although half of the site area is recorded as being of Low sensitivity; see Image 3.3:

Image 3.3: Extract from Wombourne Landscape Assessment Map, South Staffordshire Landscape Sensitivity Assessment - Final Report (2015)



- 3.15. This assessment is broadly supportive of development of land adjoining the site (now Himley Meadows) and also within the southern half of the site (highlighted by the LPA in green (low sensitivity) in the extract at Image 3.3 above). The LPA states:

‘.....for south western corner of LCP, which is visually more contained due to the presence of a significant woodland block immediately to the east. Part of the South Staffordshire Railway Walk cuts off the south western corner of the parcel and forms a strong boundary.’

- 3.16. The LPA also state the following:

‘.....low – minor urban influence from settlement edge within the Dickinson Road estate – views are possible from this part of the settlement to the east. The LCP is visually contained in views from the east. The extent of any development should be limited to the western edge of the woodland block to the south east.’



- 3.17. Through the addition of the recently developed Himley Fields, the whole of the site area now experiences similar urban influences as noted previously for the south western corner of WM8 (by the LPA in 2015). None the less, there remains a consistency that the existing woodland spinney to the eastern edge of the site has the capacity to visually contains views from outside of the site area, especially from the east around the settlement edge of Himley Village.
- 3.18. Consequently, ZLA consider that the landscape sensitivity of the whole site area is low landscape sensitivity, and that like in 2015, the extent of any development should be *'limited to the western edge of the woodland block to the south east.*
- 3.19. Broadly, given an appropriate and sensitive site masterplan, this assessment is not a constraint to development.



4. RECOMMENDED DESIGN RESPONSE

- 4.1. Key constraints, issues and opportunities have been illustrated on Bloor Homes Midlands' Constraints and Opportunities Plan that accompanies the Site Promotion submission. The site benefits from its location adjoining the urban edge of Wombourne, as well as between a mature woodland spinney (eastern edge) and the extensive Himley Plantation (opposite the site to the south west of the B4176 Bridgnorth Road).
- 4.2. This woodland is mature and long-established, limiting the intervisibility with the open countryside outside of the village, and will play a key role in reducing the visual impact of any future scheme.
- 4.3. The site is situated on relatively low lying land that gently undulates to the east and to the south, which will also reduce the visual prominence of the development. The future scheme would be seen against the existing urban development of the adjoining settlement edge which overlooks the site area. Therefore, new development would not break the skyline, and would generally be experienced against this backdrop, and so, would not fundamentally alter the character of the existing (baseline) views to the village.
- 4.4. Additionally, the landscape fabric of the site is of poor quality and quite heavily degraded. The intactness of the local landscape character is very limited with only the landform being prevailing. There are significant elements of degraded and missing field hedgerows and limited scattered hedgerow trees. The neighbouring equestrian fields are enclosed by timber post and wire fencing to form long and narrow fields (incongruous to the local field pattern of the host landscape character area).
- 4.5. The landscape management guidelines for the host LCT ('Sandstone Estatelands' Landscape Character Type) in the published assessment to '*maintain the tree cover*', '*encourage the planting of new woodlands, reflecting the scale, shape and composition of the existing ancient woodland character*', '*conserve and restore tree cover*' and '*seek opportunities to enhance tree cover*'.
- 4.6. Given the foregoing, the focus is on conserving the overall landscape structure in this settlement context. The following design recommendations and landscape strategy are proposed, underpinned by the preliminary findings in relation to the site's landscape and visual baseline resource:
 - To strengthen the northern boundary restoring the existing field hedgerow (native species of local importance) and provide new tree cover to define and enclose this boundary. This initiative will also provide landscape amenity, as well as ecological/habitat betterment within the site area;
 - To protect, retain and enhance the existing woodland spinney running along the eastern site edge with enhancement planting of new native trees and understorey (native species of local importance) to bolster this robust durable edge to the new development, as well as provide ecological/habitat betterment within the site area;
 - To limit new built form from the north eastern corner of the site (stepped back from the S72s1 area) and utilise the land area for green infrastructure. This initiative will deliberately limit new built form to the edge of the site (outside the envelope of the existing woodland spinney). This will enable the opportunity for new trees structure planting to extend from the northern boundary to link with the existing spinney to enclose and limit the site. Planting should be of native species of local importance.



- To facilitate green infrastructure, public open space and landscaping within the northern block area as a nodal point within the development when progressing from the B4176 Bridgnorth Road through the scheme. This provision will also break up the mass of development from the wider settlement.
- Historically, the site area contained a limited number of field hedgerows within its interior. There is opportunity to plant up new native hedgerows to develop green infrastructure corridors with tree planting (scattered Oak trees) for amenity, creating a walkable neighbourhood, and also ecological/habitat betterment.
- Retain existing native hedgerow along the southern site boundary (where practicable).
- Design attenuation SUDs attenuation ponds within the scheme (rather than underground drainage) where practicable to do so. If feasible, the attenuation ponds should retain water for an enhanced bio-diversity opportunity.
- Retain existing boundary hedgerows and trees and provide adequate buffers to development parcels, underground services and utilities. Reinforce these boundaries with additional native species, introducing locally native trees where these are appropriate;
- Avoid development on the western, steeper parts of the site and ensure building heights are below those neighbouring the site in the existing settlement edge, and an appropriate stand off distance to the Stych Lane Cemetery.
- Limit dwelling heights over 2 storey to nodal points within the scheme, but not to be situated on the development edge. Building heights to the northern and eastern edge limited to 2 storeys maximum.
- Use visually recessive materials and roof tiles to better assimilate the development into the landscape.

4.7. The outcomes of these recommendations will be to conserve the key characteristic of the ‘Sandstone Estatelands’ Landscape Character Type. Suitable buffers with sufficient off-sets to development parcels will ensure the hedgerows continue to read as part of the strong hedged field pattern, whilst combining with existing and new trees, woodland spinneys and extensive woodland plantation to provide softening of future development parcels.

4.8. As this site is situated within Green Belt, the above approach would accord with guidance presented at a Chapter 13 of the NPPF. NPPF paragraph 142 states:

‘When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.....They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.’

4.9. The development of the site affords the opportunity to provide public open space for amenity with permissive access for residents of the scheme, and the wider residents of the village. Additionally, the landscape of the site would enable ecological betterment and bio-diversity net gain through habitat creation, formal and informal landscaping.

4.10. The landscape management guidelines for the host LCT in the published assessment are to retain and enhance tree cover and seek opportunities to plant new woodland. Consequently, the scheme could also afford the opportunity to retain, protect and enhance the existing woodland spinney adjoining the site,



as well reinstate lost and degraded hedgerows in the site area (where practicable) as well as the rejuvenation of the site's northern boundary.

- 4.11. These feature create ecological linkages for habitat creation and bio-diversity net gain, as well as retain and enhance the existing landscape character surrounding Wombourne, which act as compensatory for improvements to the environmental quality following the removal of land from the Green Belt designation.



5. SUMMARY & CONCLUSION

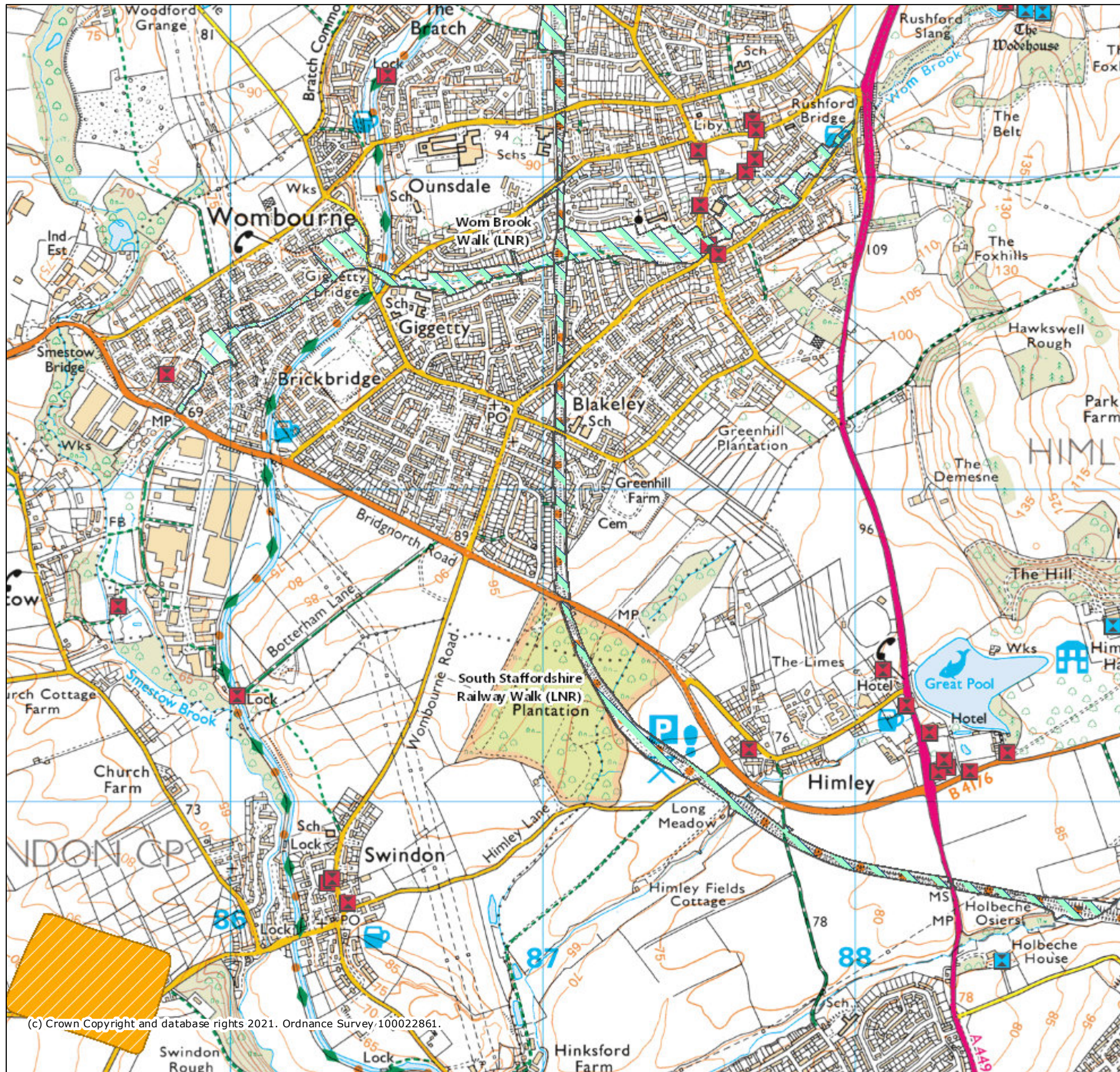
- 5.1. This Landscape Position Paper has considered the feasibility of developing the site area for a new residential scheme. The site is being promoted through the Local Plan process, and we have been mindful to assemble an appraisal based on pertinent landscape analysis published at a National and local level.
- 5.2. We note the following in support of the scheme's promotion through the Local Plan process:
- The site is spatially and visually well related to the village of Wombourne, and its settlement edge.
 - The site is situated on lower lying landform on the south eastern edge of Wombourne. Consequently, the site is not prominent and is not situated within an elevated position whereby its development would break the skyline;
 - The strongly wooded and hedged character of the site's context limits intervisibility to the outside of the site the east, south and south west;
 - The site has a notable level of landscape degradation with limited intactness of landscape character;
 - The completion of Himley Meadows has extended the recognises urban influence across the site area. Consequently, ZLA consider that the site has a resulting low to minor landscape sensitivity, particularly given the substantive degradation of landscape features within the quantum of the site.
 - There is opportunity to reinforce existing hedgerows, as well as replace those lost over time (where practicable) to create green corridors through the site to break up the mass of any future development scenario. This in line with the recommendations from the Planning for Landscape Change: An Introduction and User's Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011.
- 5.3. Through the emerging masterplan for this site, there is opportunity to retain, protect and enhance landscape fabric within then site, as well as implement new landscaping to strengthen existing landscape buffers, promote landscape character and also enable ecological betterment and habitat creation. This is reflective of the landscape management guidelines for the host LCT ('Sandstone Estatelands' Landscape Character Type) in the published assessment to 'maintain the tree cover', 'encourage the planting of new woodlands, reflecting the scale, shape and composition of the existing ancient woodland character', 'conserve and restore tree cover' and 'seek opportunities to enhance tree cover'.
- 5.4. Taking these matters into account, and accounting for implementation of the design recommendations and mitigation, there is no reason to suggest that the site could not be developed without undermining the character of the 'Sandstone Estatelands' Landscape Character Type, as well as the resulting significant visual impacts across the surroundings of the site.



APPENDIX 1:

EXTRACT FROM DEFRA MAGIC MAP





Legend

- National Trails (England)
- ★ Doorstep Greens (England) - points
- ★ Millennium Greens (England) - points
- Country Parks (England)
- Registered Common Land (England)
- Areas of Outstanding Natural Beauty (England)
- Local Nature Reserves (England)
- National Nature Reserves (England)
- National Parks (England)
- Scheduled Monuments (England)
- World Heritage Sites (England)**
- Buffer Zone
- World Heritage Site
- Listed Buildings (England)**
- I
- II
- II*
- Registered Battlefields (England)
- National Forest (England)

Projection = OSGB36
 xmin = 384300
 ymin = 290500
 xmax = 389800
 ymax = 293200

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