



REPRESENTATION

in respect of
Land to the East of Wrottesley Park, Perton
South Staffordshire Draft Local Plan Regulation 19 Consultation

on behalf of
Barberry Developments

30 May 2024

Client Reference: 00035h-P

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1. INTRODUCTION

- 1.1. This representation is made by RCA Regeneration Ltd on behalf of Barberry Developments, in respect of Land to the East of Wrottesley Park, Perton to the latest South Staffordshire Publication Plan 2024 Consultation (Regulation 19), which is running from Thursday April 18th – Friday 31st May 2024.
- 1.2. South Staffordshire Council have progressed their local plan review to another Regulation 19 stage having reached the following previous stages:
 - Issues and Options – 2018
 - Spatial Housing Strategy and Infrastructure Delivery (SHSID) -2019
 - Preferred Options – 2021
 - Publication Plan (Pre-submission) – 2022
- 1.3. The Planning Practice Guidance (PPG) and SEA Directive¹ requires a clear and transparent process of identifying, describing and evaluating reasonable alternatives in both policy and site allocation terms. There is often a direct conflict between the imperative to deliver new homes and enough jobs to support the local economy, whilst continuing to offer sufficient protection to the environment. There is also a soundness and legal compliance element to the preparation and production of SA documents and as such we have considered these as part of our submission.
- 1.4. This representation provides a case for the allocation of the subject site as well as providing a view on some emerging policies.
- 1.5. The timetable for the preparation of the Local Plan is understood to be as follows:
 - Evidence Gathering - 2016
 - Issues and Options - 2018
 - Spatial Housing Strategy & Infrastructure Delivery Consultation – 2019
 - Preferred Options Plan – 2021
 - Publication Plan (i) – 2022
 - Publication Plan (ii) – 2024
 - Submission and Examination – 2025
 - Adoption - 2026
- 1.6. We do not respond to all sections of the Publication Plan Consultation, only those which we currently consider relevant to our clients and/or the sites they are promoting and areas/villages/settlements within which those sites are located.
- 1.7. To reflect the requirements of the consultation process, the following table sets out which paragraphs/page numbers we have commented on, and these are then dealt with, in turn, throughout this document.

Policy	Paragraph	Page
DS1	5.1	24
DS4	5.6	46

¹ <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

SA3	6.19	64
HC1	7.3	74
HC2	7.5	76
HC3	7.9	78
HC4	7.12	80
HC5	7.16	82
HC6	7.18	83-84
HC7	7.20	85
HC10	8.3	91
HC11	8.4	93
HC12	8.9	95
HC13	8.11	97
HC14	9.1	99
HC15	9.3	100
HC17	9.10	103
HC18	9.14	105
HC19	9.18	107
EC1	10.3	109
NB4	12.17	141
NB5	13.3	143
NB6A	13.6	145
NB7	13.24	153-154
NB8	14.4	157

- 1.8. These views are without prejudice to future submissions or hearing statements, which may be made in advance of the Examination.

2. PART A: CONTEXT AND DEVELOPMENT STRATEGY

- 2.1. Part A of the Publication Plan discusses the context and development strategy. Our comments are as follows:

Cross Boundary Issues and Duty to Cooperate

- 2.2. At paragraph 3.6, the publication plan acknowledges the LPA's duty to cooperate with neighbouring authorities on strategic matters that cross administrative boundaries, for issues such as housing delivery.
- 2.3. South Staffordshire Council were originally proposing to take c.4,000 homes as 'unmet need' from the Greater Birmingham, Black Country Housing Market Area (GBBCHMA) or Functional Economic Market Area (FEMA), but this appears to have fallen away, despite there being deep concerns that the need has, if anything, worsened.
- 2.4. Neighbouring Dudley Metropolitan Borough Council (who are currently at the Regulation 18 stage of their draft local plan), propose to allocate sites for around 10,876 dwellings. However, in the Black Country Plan, Dudley MBC were originally accommodating 13,235 dwellings up to 2039². Indeed, Dudley Borough in reducing their housing requirement, still cannot accommodate over 1,000 new homes within their authority boundary but have removed all proposed Green Belt allocations.
- 2.5. The other neighbouring authority Wolverhampton (who have also recently completed a Reg.18 consultation) have also removed their proposed Green Belt allocations resulting in an unmet need figure of 11,998 homes, which will need to be accommodated in neighbouring authorities³.
- 2.6. Given the scale of the unmet need of both Dudley and Wolverhampton, we consider it would be helpful for South Staffordshire Council to immediately publish their thoughts on the approach being taken by these authorities, given the shared boundaries and relationships. We have already made representations to both emerging neighbouring plans and have criticised the perverse approach being taken.
- 2.7. Our question to South Staffordshire is why they have reduced the number of new homes that will be accommodated in the Borough and whether they are now abandoning the Duty to Cooperate.
- 2.8. The approach is now likely to result in the under-delivery of potentially 000s of additional new homes simply because Dudley and Wolverhampton have assumed that under the Duty to Cooperate that South Staffordshire (and others) will 'step-up' and meet this need within their own areas.
- 2.9. It is potentially catastrophic that so much housing development will not be delivered in the area, despite there being overwhelming evidence that the need exists. We consider there to be a failure of the Duty to Cooperate not only on the part of South Staffordshire, but its neighbouring Black Country Authorities. This is contrary to the Planning Practice Guidance⁴ which states:

“Local planning authorities should bear in mind that failure to demonstrate compliance with the duty at the Local Plan examination cannot be corrected after the Local Plan has been submitted

² <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/draft-dudley-local-plan-consultation/>

³ <https://www.wolverhampton.gov.uk/planning/planning-policies/wolverhampton-local-plan>

⁴ Paragraph: 012 Reference ID: 9-012-20140306

for examination. The most likely outcome of a failure to demonstrate compliance will be that the local planning authority will withdraw the Local Plan.”

Vision and Strategic Objectives

- 2.10. We disagree with Strategic Objective 1 in its aim to require “*compensatory improvement to the environmental quality and accessibility of the remaining Green Belt*”. We question how this will be mandated and what level of viability testing has been undertaken to ensure that development is not stymied due to the requirement to make further contributions towards off-site improvements, beyond that of established and impending S106, CIL, Biodiversity Net Gain and Net Zero obligations. In accordance with paragraph 57⁵ of the NPPF, which only requires s106 to be necessary to make development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind.
- 2.11. We agree with Strategic Objective 2 with regards to meeting housing needs of the district whilst making a proportionate contribution towards the unmet needs of Greater Birmingham. It would be helpful to understand what proportion would be assisting Birmingham and what proportion for the Black Country authorities? We have repeatedly asked for this information to be made available in our previous representations.
- 2.12. We agree with Strategic Objective 3 with regards to meeting housing needs for different groups in the community, including a range of market and affordable housing.
- 2.13. We agree with Strategic Objective 4 with regards to developing a high-quality design and character.
- 2.14. We agree with Strategic Objective 5 with regards to encouraging healthy communities through the provision of health, education, open space, sport and leisure infrastructure, acknowledging the positive contribution house building makes to these services via S106 agreements.
- 2.15. We agree with Strategic Objective 6, to foster sustainable economic growth and inward investment, acknowledging the significant growth, employment and tax revenue associated within house building.
- 2.16. We agree with Strategic Objectives 7 & 8, to support rural areas and villages and the community services they depend on. In supporting these objectives, we acknowledge the positive contribution housing growth has to sustaining these communities, maintaining and enhancing demand for services and ensuring the vitality.
- 2.17. We agree with Strategic Objectives 9 & 10, to ensure new development is served by infrastructure and transport networks, particularly for development that grows existing settlements with established transport links, services and infrastructure. However, it is also here that meeting the Duty to Cooperate is essential in identifying and delivering cross-boundary infrastructure which would facilitate unmet housing need from neighbouring authorities.
- 2.18. Strategic Objectives 11 & 12 are laudable and seek to protect and enhance the natural environment and deliver climate change mitigation, whilst acknowledging the positive impact housing development in South Staffordshire can have on these objectives. Mandatory Biodiversity Net Gain will enhance habitats and the natural world, whilst delivering housing growth. Low carbon and energy efficient technology, such as Air and Ground Source Heat Pumps, solar PVs, EV charge points and provisions made within new building regulations will ensure appropriate climate mitigation through the delivery of new homes. It is our view that the building regulations regime

⁵ https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

is the best way to set standards for energy performance in new buildings. We would refer the council to the Ministerial Statement⁶ of 13 December 2023 which sets out that:

“... the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations”.

- 2.19. We agree with Strategic Objective 13 to protect and enhance historic environments across South Staffordshire.

Green Belt

- 2.20. Whilst we acknowledge that South Staffordshire is heavily constrained with regards to the level of Green Belt land across the district (80%), we believe a proactive approach to releasing Green Belt land to meet strategic objectives, such as housing delivery, should be adopted. We are encouraged that “*boundary amendments*” will be made to accord with the development strategy. It is clear that there are exceptional circumstances in place to justify a wholesale review of the Green Belt within the authority, or opportunities to meet burgeoning housing need will be lost. The obvious lack of cooperation with neighbouring authorities on this approach is disappointing.
- 2.21. With regards to policy DS1, we agree that Green Belt development should enhance access to outdoor sport and recreation, enhance landscape, visual amenity and biodiversity – as indeed many proposals within the Green Belt are capable of (including the subject site).
- 2.22. We also agree with DS1 that where Very Special Circumstances can be demonstrated with regards to inappropriateness, planning permission should be granted. However, this is a difficult hurdle to get over and the most appropriate way to deliver large scale new housing is through a positively prepared local plan.
- 2.23. We do not agree that affordable housing to meet local community needs should be “limited”, considering the significant and worsening affordable housing shortage within South Staffordshire, as demonstrated by the c.1,500 households on its social housing waiting list. South Staffordshire should look to encourage as many forms of affordable housing delivery as possible, including via Rural Exception Sites.

Green Belt Compensatory Improvements

- 2.24. Despite paragraphs 147 and 148 of the latest NPPF, we disagree that Green Belt proposals must require “*compensatory improvements*” in order to gain planning consent. We instead agree with motion set by paragraph 57 that requires contributions to be necessary to make development acceptable in planning terms, directly related to the development and related in scale and kind. Improvements on adjacent site or sites elsewhere in South Staffordshire would not, in our view meet the tests within paragraph 57, as they are not directly related to the development.
- 2.25. We further question whether these further obligations have been tested within South Staffordshire’s evidence base with regards to financial viability. The cost of these compensatory improvements must be tested against existing assumptions for developer contributions, to ensure financial viability. Without such testing, this requirement cannot fairly be applied to development across an LPA which is mostly Green Belt.

Housing

- 2.26. We are concerned that the previous publication plan had a target delivery of 9,089 homes over the plan period, which has now inexplicably been halved to 4726 dwellings over the plan period up to

⁶ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hlws120>

2041 (just 227 dwellings per annum). This figure takes into account South Staffordshire's own identified minimum housing need of 4,086 dwellings and the additional 640 Dwellings from the unmet needs of the GBBCHMA.

- 2.27. The unmet need identified in paragraphs 5.9 to 5.11 attributed to the authorities in the Black Country and Birmingham have as much as 106,653 homes worth of unmet need (78,415 from Birmingham and 28,643 from the Black Country). Wolverhampton and Dudley alone account for over 12,000 homes as unmet need. It appears that South Staffordshire have all but abandoned their previous approach of meeting c4,000 units of this unmet need via the Duty to Cooperate, and since then very little has changed to warrant this new approach.
- 2.28. We would stress that the 4,726 figures should be viewed as a minimum and should not discount opportunities to provide housing on the edge of the Black Country urban area, which benefits from existing services and infrastructure.

Development Needs & Spatial Strategy to 2041

- 2.29. Policy DS4 should make clear that the delivery of 4,726 homes is a minimum target and should encourage sustainable development on all sites where all other development plan policies are met.
- 2.30. We believe that the spatial strategy should allocate potential housing sites on the urban fringes of the Black Country which already benefit from good sustainable transport links and higher order services such as surgeries, schools and shops. There are also significant employment opportunities throughout the Black Country that simply do not exist within the rural areas of South Staffordshire. We believe policy DS5 should encourage strategic development in urban fringe locations to extend existing larger settlements.

3. PART B: SITE ALLOCATIONS

Site Allocations – Housing

- 3.1. The housing allocations at Policy SA3 do not allocate any housing to urban edge sites, which would take advantage of existing services and transport infrastructure of neighbouring Black Country settlements. We do not agree with allocations over reliant on the tiered settlements of South Staffordshire as this completely ignores the fact that the authority is inter-dependent with the Black Country for employment, retail and educational opportunities and that meeting the needs of the Black Country will require the release of some Green Belt land within South Staffordshire: something that was acknowledged in the later iteration of the emerging Black Country Plan and the previous Reg 19 Local Plan for South Staffordshire published in 2022.

4. PART C: HOMES AND COMMUNITIES

- 4.1. We agree with Policy HC1 and the need to deliver a strong housing mix that meets the needs of a variety of different households, regarding bedroom numbers and mix. However, we would urge flexibility in its application where there are clear vagaries in the housing market throughout the authority.
- 4.2. We also agree with Policy HC2, that development should seek to make efficient use of land by achieving a least the minimum density of 35 dwellings per ha, and in many cases should exceed this minimum density, to encourage the delivery of more housing across South Staffordshire. However, this should not be at odds with prevailing character, nor the need to accommodate 10% BNG for instance.
- 4.3. We agree with Policy HC3 that 30% affordable housing should be delivered at the tenure mix as described within the policy. On small sites of less than c.10 units, specific wording should be added to allow a given lower end threshold for on-site affordable housing, below which an off-site payment in lieu may be provided.
- 4.4. We agree with Policy HC4 & HC5 and the need to provide homes for older people and those with special housing requirements. The provision of sheltered living and other specialised accommodation could be provided within new settlement allocations or on strategic development sites.
- 4.5. Policy HC6 is not clear as to how some of the exceptional circumstance criteria would apply. Exception (a) is not clear, as it does not consider a scenario where development is proposed inside the settlement boundary, therefore creating a potential reason for refusal by a policy that seeks to prevent sprawl outside the settlement, and consequently rejects development inside the settlement. This appears contradictory and should clarify its position on proposals inside the settlement.
- 4.6. We completely disagree with requirements to involve the Parish Council and a Rural Housing Enabler for a Rural Exception Site; as is clear from recent cases, if the Parish uphold their right to not engage with a developer, the policy cannot be met. It is true that many affordable housing providers also require the endorsement of the parish, which again, would preclude the ability to meet HC6 if a parish choose not to engage with the applicant, effectively holding the process to ransom. Policy HC6 should remove the unnecessary requirement to involve a parish and a Rural Housing Enabler as it is not in accordance with the NPPF or PPG – the parish council and Rural Housing Enabler are not the planning authority and should not be given the role of decision taker.
- 4.7. We agree with Policy HC7 and the need to make exceptional provision for First Homes across South Staffordshire.
- 4.8. We agree with Policies HC10, HC11, HC12 & HC13, and the need to design visually attractive homes with high quality residential amenity, adequate internal space and correct parking provision. HC13 should however make clear at Appendix H (table 10) that the spaces requirement is a maximum.
- 4.9. We recognise the importance of supporting infrastructure for health (Policy HC14), education (policy HC15), open space (policy HC17), sports facilities and playing pitches (HC18) and green infrastructure (Policy HC19), for development sites. It is true that the provision of housing contributes significantly to such supporting infrastructure via Section 106 agreements and schemes designed with new open space and recreational facilities which are publicly accessible. Reliance on brownfield development is commonly far more limited in its contribution to any form

supporting infrastructure on financial viability grounds or as a result of vacant building credit being applied.

5. PART D: ECONOMIC PROSPERITY

- 5.1. Policy EC1 should recognise the positive economic impacts of housing delivery across the district and make note of the value of investment in local supply chains as well as the creation of short- and long-term employment opportunities, as well as supporting apprenticeships noted in EC3. Local tax revenue associated with more households paying council tax will contribute positively towards funding local services and supporting infrastructure.

6. PART E: THE NATURAL AND BUILT ENVIRONMENT

- 6.1. We agree with the plan's ambition to protect, enhance and maintain the natural environment, recognised within Policies NB1 & NB2. The mandatory requirements of biodiversity net gain means all development sites should make a positive contribution to biodiversity of at least 10%. Housing development should therefore be recognised within the plan as a key contributor to improving the natural environment. There is no such obligation placed on agricultural operations.
- 6.2. We agree with Policy NB4 with regards to landscape character, that distinct landscape features such as trees, woodland, and hedgerows must be protected and maintained.
- 6.3. As previously mentioned, the contribution of housing development to creating renewable and low carbon energy generation should be acknowledged within policy NB5, for the introduction of technologies such as Air and Ground Source Heat Pumps, solar PVs and EV charging. This has been rightly recognised within the requirements set out in Policy NB6A, but we reiterate the point we have already made about the building regulations regime taking a primary role in this.
- 6.4. We agree with policy NB7 with regards to managing flood risk, and sustainable drainage solutions.
- 6.5. We agree that historic assets must be protected and enhanced, as policy NB8 requires.

7. THE SITE AND PROPOSALS

- 7.1. We would firstly like to highlight that we are disappointed that our client's site: Land to the East of Wrottesley Park Road, Perton has not been included as an allocation within the Publication Plan document. The site would make a valuable contribution towards meeting the district housing target 4,086 homes over the period to 2041 and make a contribution towards the significant unmet need arising from neighbouring authorities.
- 7.2. The site itself extends across 30.1 Ha (74.35 acres), comprising of four regularly sized agricultural fields. The fields are bounded by mature, trimmed field hedgerow with the occasional hedgerow tree.
- 7.3. The topography of the site is relatively flat, but there are gentle undulations. The site lies at 130m elevation towards the western boundary and 125m elevation on the eastern boundary, with a fall into the centre of the site. Overall, the site is situated on the upper plain of the local ridgeline that falls south of Pattingham Road.
- 7.4. The site abuts existing residential development to the north, Wrottesley Park Road to the western boundary and Pattingham Road to the southern boundary. The site plan below shows the extent of the site in relation to the existing surrounding settlements.



- 7.5. Apart from being within the Green belt, the site is considered to be unconstrained. It is within Flood Zone 1 and there are no further landscape or heritage designations associated with the site. there are no PRow running throughout the site.
- 7.6. The site has already been subject to previous representations at preferred options, Issues and Options, Spatial Housing Strategy stages and the previous iteration of the Publication Plan, under the site reference 238. The deliverability comments received in the assessment suggested that the site was potentially suitable for residential development but was constrained by the Green Belt. Whereas the assessment commented that the site was:

'Previously proposed as mixed use including 200 dwellings, employment, allotments, open space and sports facilities and local community facilities, but now promoted primarily for residential. Significant highways works required, access off Edge Hill Drive to be considered. Village edge site modelled at 32 dwellings per hectare'.

- 7.7. The site is also within close proximity to another former proposed allocation to the south 'Land West of Wrottesley Park (south) (site reference: 239 Policy SA2) within the previous Reg19 Publication Plan (2018-2039). However, this site cannot deliver a similar amount of dwellings and would further extend Perton in a westerly direction of which would be significantly disproportionate with the existing settlement boundary. Also, this site would require further infrastructure work compared to that of our proposed site.
- 7.8. We would like to highlight the following points about the site, particularly as the site could deliver around 600 new market and affordable homes, without the need for major infrastructure investment. The site relates well to the existing established settlement edge of Perton, whilst having the opportunity to provide a more definitive boundary to the Green Belt beyond. We therefore consider that the site presents a sustainable opportunity to deliver sought-after housing within Perton.
- 7.9. The site would also seek to deliver expansive areas of green infrastructure, which would be an example of biodiversity net gain. Also, the proposals would provide other public benefits within the first five to ten years of the next South Staffordshire plan period.
- 7.10. Moreover, the site benefits locationally in relation to the existing facilities within a close proximity of the site (<700m and a 5-10-minute walk) both in Perton (South Staffordshire) and Wightwick (Wolverhampton Metropolitan Borough). These amenities include educational facilities and communal and leisure facilities such as:
- GP surgeries
 - Libraries
 - Shops
 - Public houses
 - Recreational grounds
 - Golf courses; and many more.
- 7.11. We acknowledge that if the site were to come forward, it would result in the loss of some Green Belt land. However, this would be mitigated through accessibility, biodiversity and environmental quality improvements to the nearby Smestow Valley Nature Reserve.
- 7.12. Overall, for the reasons stated above, we believe that the site could deliver a successful example of sustainable development which would benefit the public realm extensively. The development of the site would result in new parks and play spaces, as well as a safe route to school for children living in Perton itself. As a result, we believe that our clients site can sustainably deliver a strong mix of housing in accordance with the density and type prescribed within the proposed policies.
- 7.13. An allocation here would serve as a logical site to deliver unmet housing need arising from neighbouring authorities of Dudley and Wolverhampton who continue to be unable to deliver their own housing need within their boundaries.
- 7.14. Barberrry have submitted a vision document as part of our previous representations which further details the benefits of the site. This has been included in Appendix A.

7.15. For the reasons highlighted above, we urge that the council should give further consideration to our client's site: Land to the east of Wrotesley Park Road and it should be included as a housing allocation within the Submission Plan.

APPENDIX A: VISION DOCUMENT

Proposed development of

Land at Perton

South Staffordshire

Landscape-led Residential Masterplanning Representation Report

on behalf of

Barberry

December 2019



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December 2019

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Preface

This landscape-led masterplanning Representation Report has been prepared by One Creative Environments Ltd. on behalf of Barberry to support the promotion of Land at Perton in the South Staffordshire's Local Plan.

This document has been prepared as part of a suite of representation reports and is intended to assist the Council with its consideration of land at Perton and its suitability for removal from the Green Belt and allocation as a strategic residential site.

The report sets out our approach to a landscape-led residential development that is supported by best practice design principles and a concept masterplan.

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1. Introduction

Introduction

This landscape-led masterplanning Representation Report illustrates the potential for residential development on land at Perton, South Staffordshire.

This report follows on from previous submissions in respect of the same site at the Issues and Options stage, during late 2018.

The report forms part of a package of information prepared to support the promotion of the site as a strategic housing allocation to the South Staffordshire 'Spatial Housing Strategy and Infrastructure Delivery Consultation'.

The site comprises 30.1 hectares (ha) /74.35 acres of land immediately adjacent to the southern built boundary of Perton, a large village and civil parish that lies within Staffordshire County yet directly adjacent to Wolverhampton Metropolitan Borough.

The site is under the control of Barberry, and is sustainable, available, deliverable and suitable for residential development - to help meet the growth requirements of South Staffordshire for the plan period 2018 to 2037.



Background

The site is being promoted by Barberry on behalf of the landowner Lord Wrottesley who has a real desire to provide a legacy. The site was promoted through South Staffordshire's Site Allocation Plan process at the Issues and Options stage in November 2018.

His requirements are for an exemplar scheme that embodies design best practice and BFL12. The site is fully owned and controlled by Lord Wrottesley Voluntary Settlement (LWVS), the beneficiaries of which have had an association with the area for over 900 years.



Approach

Our approach to masterplanning is landscape-led from the outset, underpinned by a strong vision for a sustainable residential development with environmental sensitivity and green infrastructure at its heart to deliver multiple social, ecological and economic benefits.

Design principles are based on 'place-making' and 'what makes a great place to live' to provide around 600 contemporary new homes with a real sense of community, safe pedestrian /cycle routes and natural, wildlife-rich green spaces.



Everyone deserves
to live in a
healthy,
wildlife-rich
place.



Vision

The site offers a sustainable and strategic residential opportunity to provide significant new residential development on Land at Perton. It is within close walking and cycling distance of local facilities.

The vision is to deliver a landscape-led, high quality residential development that responds to the qualities and characteristics of its landscape setting to create a desirable place to live, play and socialise.

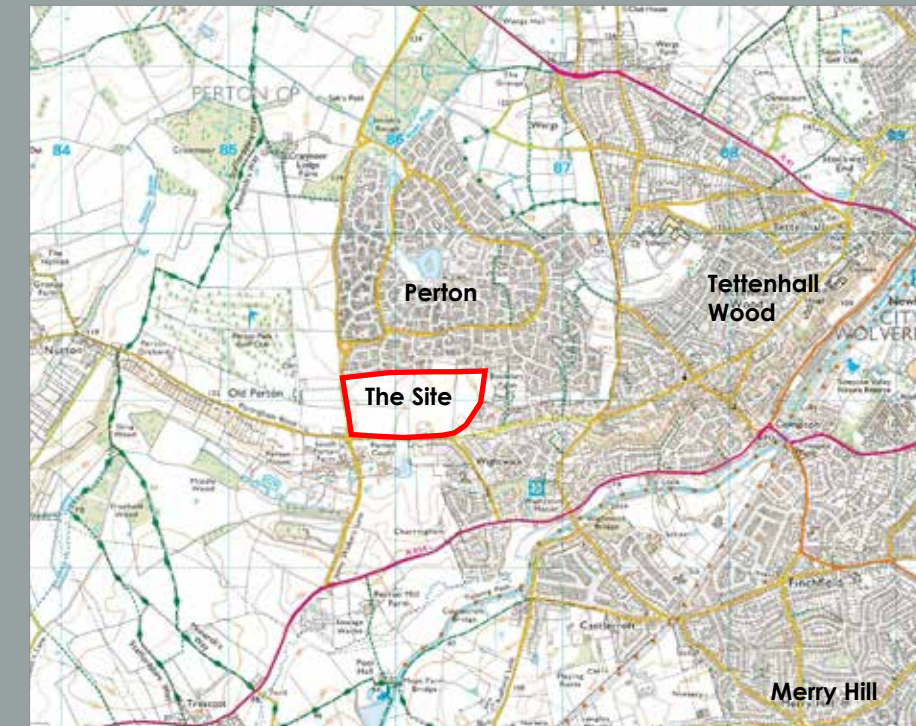
A distinctive and well-connected development that follows the principles of good placemaking - with generous, nature-rich public open spaces for informal recreation and enjoyment by the local community, strong walking and cycling routes, sustainable drainage, enhanced biodiversity and high visual amenity.

Five key guiding principles underpin the vision for the development:

- Local character and quality
- Green spaces for all
- A walkable neighbourhood
- Healthy living
- Environmental sustainability



Aerial view of the site



Site location (source: OS map 1:25000) NTS

Site Location

The site is positioned in a highly accessible location immediately abutting Perton - a large village and civil parish - and Wightwick that forms the settlement edge of Wolverhampton Metropolitan Borough.

Administratively, the site is located within South Staffordshire on the border with Wightwick, part of the Tetterhall Wightwick ward of Wolverhampton.

Site Description

The site is 30.1 ha (74.35 acres) in size, comprising four regularly sized fields of agricultural land bound by mature, trimmed field hedgerows with the occasional hedgerow tree. It is relatively featureless.

The ground is relatively flat with gentle undulations. It lies at 130m AOD on the western boundary and 125m AOD on the eastern boundary with a fall into the centre of the site.

It lies on the upper flat plain of the local ridgeline that falls south of Pattingham Road.

The site is bound by Wrothesley Park Rd to the western boundary and Pattingham Road to the southern boundary.

It is located directly and immediately adjacent to the southern built boundary of Perton, a large village and civil parish that lies within Staffordshire County yet directly adjacent to Wolverhampton Metropolitan Borough.

The site forms a narrow strip of land which separates the two settlements, however this has been eroded to the east of the site where the two suburbs of Perton and Wightwick have now essentially merged.

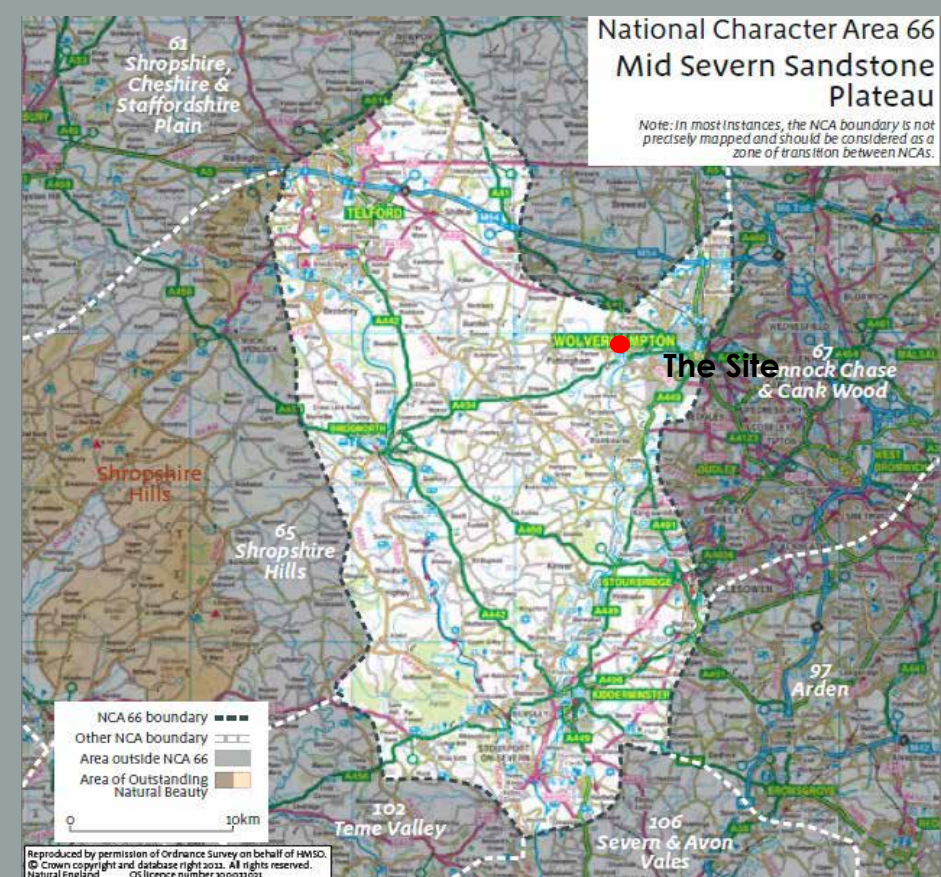
Site's Location to Facilities

The site's location benefits from a wide range of facilities within 400-700m (5 and 10 minute walk) in both Perton (South Staffordshire) and Wightwick. (Wolverhampton Metropolitan Borough). These include:

- Educational facilities
- Community and leisure facilities including library, medical centres, recreation grounds, play, golf course
- Local shops and pubs

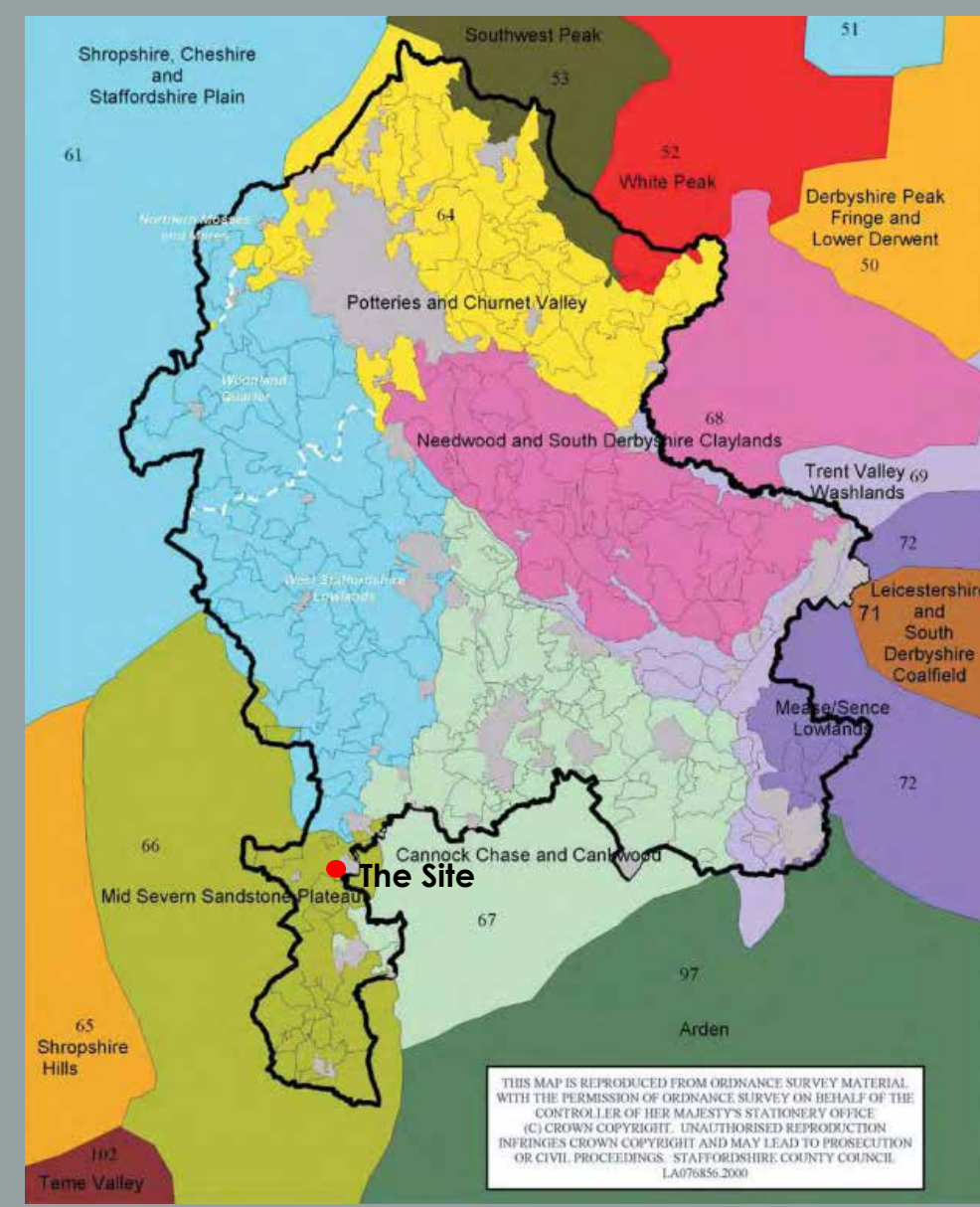
2. The Site

National Character 66: Mid Severn Sandstone Plateau

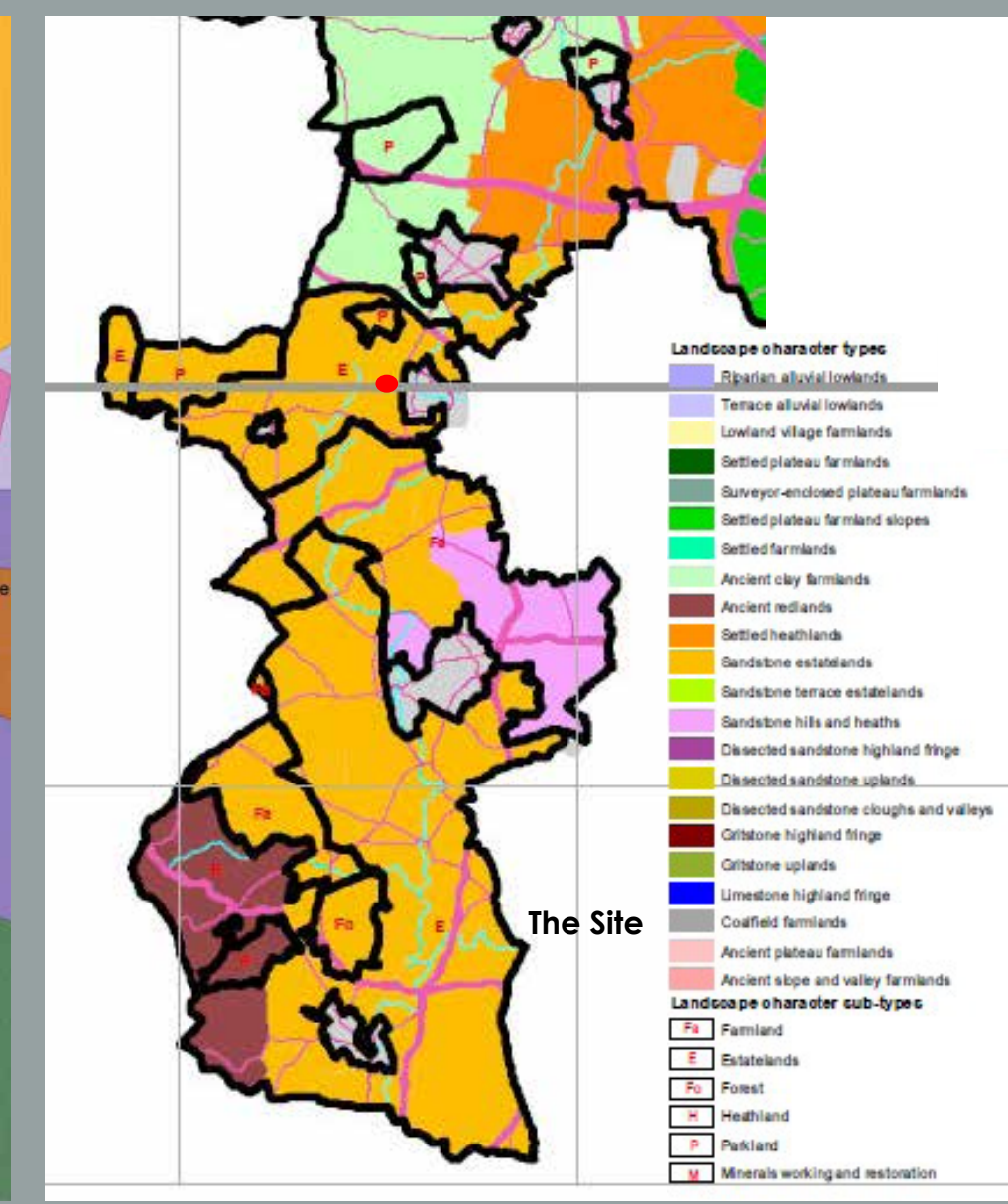


Source: Natural England NCA Profile 66

Landscape Character Type: Sandstone Estatelands



Source: South Staffs: Planning For Change SPG Appendix 1 Maps + Plans



Source: South Staffs: Planning For Change SPG Appendix 1 Maps + Plans 2001

High-Level Landscape and Visual Appraisal

A high level LVA has been carried out that comprises a desk-top study and on-site survey field work and follows the Guidelines for Landscape and Visual Assessment GLVIA3, the 'industry standard'.

It assesses the landscape baseline and visual baseline separately to determine where key potential landscape and visual effects may be experienced, the key mitigation measures required and potential effects of the development.

The extent of the study area covers the site itself and its wider context within which the proposed development may influence it. This has been determined by the 'zone of visual influence' and the existing physical characteristics of the landscape.

The high-level LVA at this stage identifies key issues / constraints and opportunities to inform the initial concept masterplan. The LVA will be used as a basis for developing a full LVIA later in the process.

The methodology for the LVA is appended to the rear of this document in Appendix A.

Landscape Baseline

The components that make up the landscape baseline comprise:

- The **landscape character** of the site and surroundings
- The **landscape components** i.e. topography, land use, vegetation, settlement patterns and the individual elements and aesthetic and perceptual aspects of the landscape that contribute to the character
- The **value** placed upon the landscape - factors that help in the understanding of this include: existing landscape designations; presence of conservation, historical or cultural interest; scenic quality and: recreational value
- The **condition** or the physical state of the landscape - including the condition of elements or features such as buildings, hedgerows or woodland and any evidence of current pressures causing change.

Data Sources

Information has been obtained from a number of sources:

- Natural England's database of National Landscape Character Areas in England
- South Staffordshire Landscape Sensitivity Assessment: 2019
- Green Belt Study, 2019
- South Staffordshire Planning for Landscape Change SPG Landscape Descriptions: 2001
- Adopted South Staffordshire Local Plan: 2018
- MAGIC (DEFRA) interactive GIS dataset
- Historic England (various sources)

Landscape Character

The site lies within the National Character Area Profile 66: Mid Severn Sandstone Plateau and at a local scale lies within Landscape Character Type: Sandstone Estatelands.

National Character Area Profile 66:

The NCA describes the landscape character as predominantly rural and important regionally for food production, with large, open arable fields with a weak hedgerow pattern. Whilst heathland and acid grassland were once widespread in the NCA they now only survive in small discrete areas, particularly in the south near Wyre Forest. Interlocking blocks of mixed woodland and old orchards provide a well-wooded landscape and conifer plantations combine with parklands to evoke an estate character in places.

The plateau is drained by fast-flowing tributaries of the rivers Worfe and Stour which have incised the Permian and Triassic sandstones resulting in many steep-sided, wooded dingles throughout the NCA.

Post industrial sites, disused coal mines are important habitats in the urban areas of the Black Country.

Traditional buildings are constructed of brick varying in colour. The local Kidderminster and Bromsgrove sandstone features extensively and provides local distinctiveness to many towns and villages and estate boundary walls.

Development pressures for land on the urban fringe and commuter villages in the core of the NCA will continue and the demand for water and food provision is likely to increase, presenting challenges for habitat conservation and sustainable recreation, given the proximity of this area to urban populations.

Representative photographs of the site's landscape character type: LCT Sandstone Estatelands



Gently undulating, regularly sized fields of agricultural arable land bound by mature, trimmed field hedgerows with the occasional hedgerow tree. It is relatively flat and featureless. The housing of Perton closely abuts and backs onto the site's northern boundary.



Local LCT Sandstones Estatelands:

Woodlands and parklands of traditional rural estates characterise the more intact parts of this rolling lowland landscape. **Acid sands and brown earths predominate** and, while remnants of the original heathlands survive, the **major land use is arable cropping in large hedged or open fields of a regular pattern.**

Its visual character is described as a **gently rolling, featureless landscape where the increasing intensification of arable farming has led to the almost complete destruction of its fabric**, ensuring that all elements are on view.

Stream corridors in places provide the only intact land cover elements, giving some structure to this **simple landscape.**

Silver birch woodlands, well-treed stream corridors, straight roads, intensive arable agriculture are the key landscape features.

Incongruous features are hedgerow removal along roadsides, field trees, badly designed farm reservoirs, large modern farm buildings and improved commuter properties and power lines.

The critical factors that currently limit landscape quality are the loss of characteristic features, the poor condition of those features that remain, poor survival of historic elements such as field, settlement and road patterns, and the very poor survival of characteristic semi-natural vegetation (heathland and related habitats, meres and mosses).

LCT Sandstone Estatelands Recommendations:

High value of woodland: There is a need for the planting of larger woodlands to restore the landscape structure of this open featureless arable land, to screen or direct views away from inappropriate development and to reinforce the remnant heathland character of the landscape.

New planting should tie into existing woodlands or be of sufficiently large scale to be appropriate for the remnant field pattern. Existing tree-lined stream corridors can be consolidated to increase their scale.

Conifers are acceptable in this landscape, but care must be taken with edge treatment. The shape of new woodlands is less important than is fitting them into the existing vegetation pattern. In areas of stronger land form care should be taken.

Value of other habitats:

- **Ancient / semi-natural broadleaved woodland** - maintain, restore, recreate/regenerate; **Ancient diverse hedgerows and hedgerow trees** - maintain manage; **Hedgerows** - plant new species-rich hedges; **Arable field margins** - maintain, improve and restore; **Canals, lakes, ponds** - maintain and enhance water bodies and catchments and increase the number of such features; **Lowland wood pasture** - maintain and safeguard; **Peat bogs, Reed beds** - maintain, enhance and create; **Rivers and streams** - maintain/improve quality of water and all existing channel features.

Landscape Character of the Site + Setting

The site comprises four regularly sized fields of agricultural Grade 3 (northern fields) arable land bound by mature, trimmed field hedgerows with the occasional hedgerow tree. It is relatively featureless with the houses of Perton tightly abutted along the full extent of the site's northern boundary. The site forms a narrow area of farmland essentially bound by development on three sides, between Perton and Wightwick. It is further enclosed by the busy Wrottesley Park Road on its western boundary.

Perton is a modern, purpose-built, high density settlement located on the site of a disused WWII airfield. Developed during the 1970's and 80's with more recent development in the 2000's, the settlement bears little reference to any of the surrounding villages and does not demonstrate best practice design. It is dominated by a main arterial road which all properties back onto with walls fences or hedging and there is very little positive interface. Secondary roads and cul-de-sac's lead off into the housing which is very inward looking. All houses back onto the northern boundary of the site.

Wightwick borders most of the site's southern boundary and

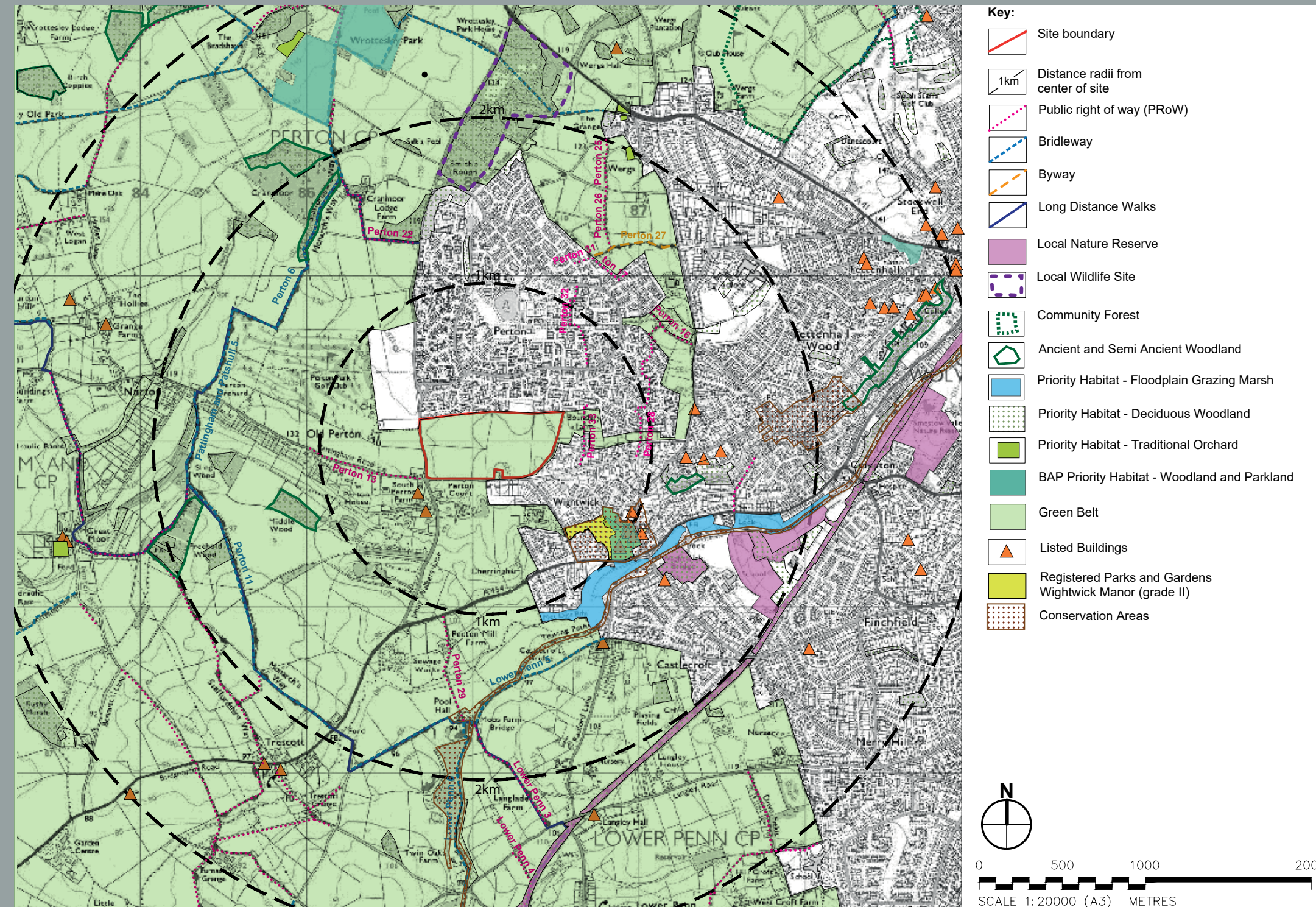
is typified by very large, detached properties dating from the 1930's onwards with large gardens. It is an exclusive, wealthy enclave with narrow leafy lanes, sandstone walls and an abundance of mature trees. The road has characteristics of a rural lane - with no footpaths, no kerbs, grassed verges with native hedgerow on both sides up to the houses on the southern side of Pattingham Rd. At this point the frontages to the lane are of manicured generous front gardens with mature shrubs and hedges. The properties are all large, detached and exclusive and have a frontage outlook to the site. The settlement edge is looser and more suburban in character than the hard settlement edge of Perton.

Landscape Sensitivity Study 2019 by LUC

A landscape sensitivity study was commissioned by Dudley, Sandwell and Walsall MBC (comprising the Black Country) and South Staffs DC - forming one of the supporting studies for South Staffs Spatial Housing Strategy and Infrastructure Delivery. One of the study areas covers the site - notably Landscape Area Reference SL29. There is an inaccuracy in this, since it identifies the site as lying in the Landscape Character Type: Settled Farmlands which is incorrect. The site lies within Sandstone Estatelands. The LCT has been correctly identified in an adjacent Landscape Reference Area SL32 which lies immediately north of SL29.

It identifies the landscape as not being visually prominent within the wider landscape due to its gently undulating topography and large areas of woodland that provides enclosure and that there is no inter-visibility with any designated landscapes or marked viewpoints.

This identifies the landscape area as having a moderate overall landscape sensitivity to residential development with the site in particular as having a particular sensitivity due to its role in preventing coalescence between settlements. We would dispute this as the settlements have all but coalesced along a large proportion of the eastern and southern boundaries of Perton.



Landscape Planning Designations

Landscape Planning Constraints

Other than lying with the Green Belt the site is not subject to any landscape planning constraints.

The site is unaffected by any of the 'closed list' of Footnote 6 designations included in the Framework.

Landscape Planning Designations

Green Belt:

The site is currently located in the Green Belt, where there is a general presumption against inappropriate development. However it has been recognised that there will need to be some green belt release in the next plan period. The South Staffordshire Green Belt Study published in 2019 considered the potential for a number of sites to be released from the Green Belt in order to meet the future development needs of the District. Within the study, the site falls within assessment parcel 59D.

Purpose 1 Rating: Checking unrestricted sprawl - Strong contribution

Purpose 2 Rating: Preventing merging towns - Weak / No contribution

Purpose 3 Rating: Safeguarding countryside from encroachment - Strong contribution

Purpose 4 Rating: Preserving setting and special character of historic towns - Weak / No contribution

Purpose 5 Rating: To assist in urban regeneration by encouraging the recycling of derelict land - All the parcels were considered to perform equally against purpose 5.

With a 5 point scale of: Very High; High; Moderate-High; Moderate, and; low, it assessed that the harm to the Green Belt was a median scale of **Moderate-High**.

The Green Belt is currently not performing as intended since the suburbs of Perton and Wightwick have now essentially merged to the east of the site where the gap is less than 20m. The case has already been made for Green Belt release in the District.

We would urge continuation of the approach that is underway - to secure sustainable patterns and achieve sustainable development objectives such as walk-able neighbourhoods; maximising sustainable transport, and; connectivity with employment, education, leisure use and activities.

Public Rights of Way:

There are no public rights of way within the site. Public Right of Way (PRoW) Perton 33 lies approximately 135m to the east of the site at Boundary Farm linking Perton and Wightwick. A further PRoW Perton 28 lies approximately 360m east of PRoW 33 also connecting Perton and Wightwick. Monarchs Way long-distance footpath lies approximately 1.2km west of the site.

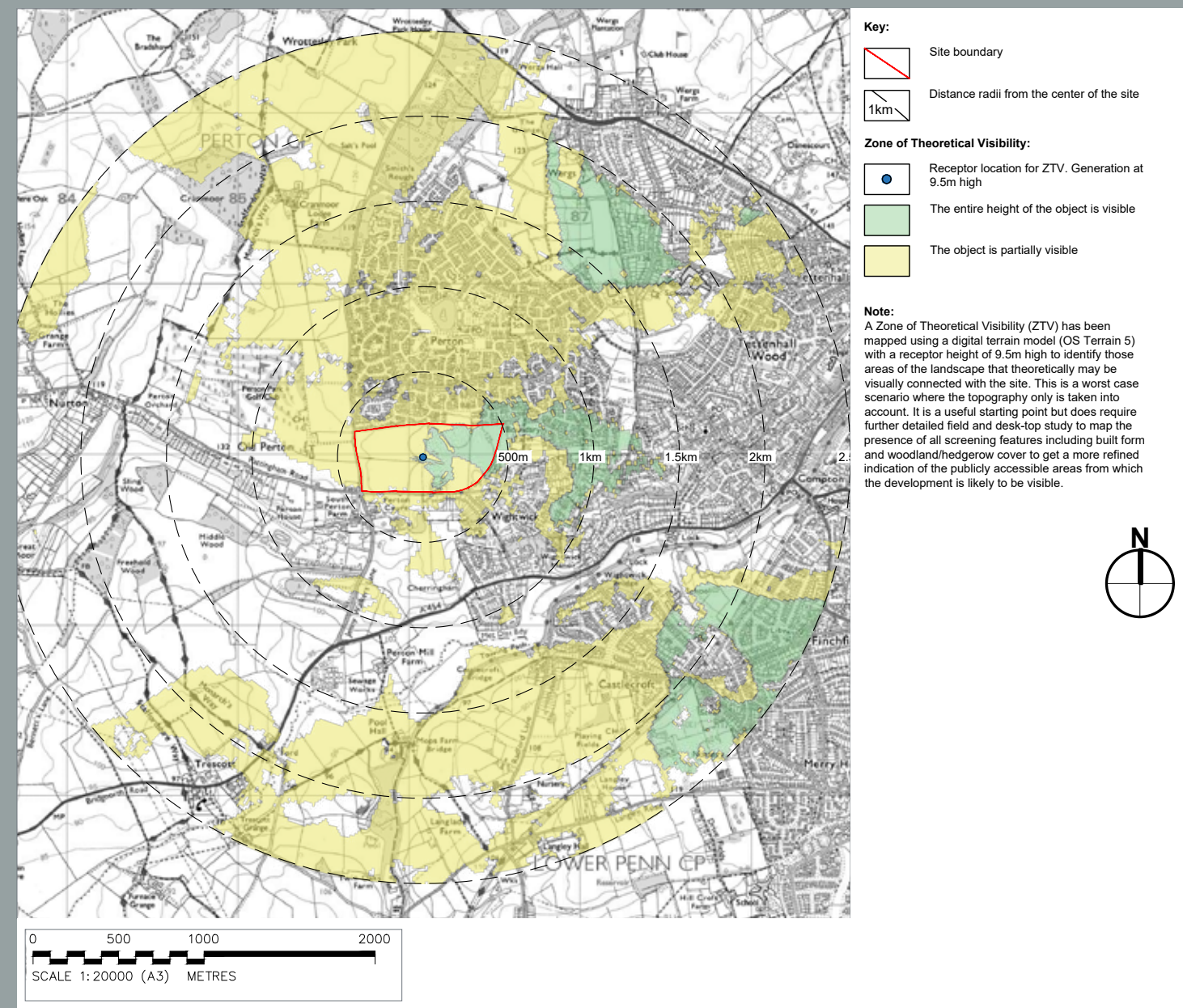
There is a public open space in Perton abutting the sites northern boundary that connects to Edge Hill Road where a dedicated footpath connects to Perton Local Centre in a north south direction. This is a dedicated, safe footpath connection from the site to Perton Centre - with an underpass crossing the Parkway, ensuring safe pedestrian movement without the need to negotiate traffic. This provides an ideal opportunity to extend a central green route through the site for shared pedestrian and cycle connections between Perton and Pittingham Road.

Heritage + Nature Designations

There are no listed buildings or Conservation Areas on or adjacent to the site. There are no statutory or non-statutory nature conservation designations on or within 0.5km the site. The nearest listed buildings are 100 - 200m south west of the site, in the vicinity of South Perton Farmhouse, notably: Trinity Cottage - Grade II and Dovecote - Grade II.

These are enclosed by mature trees and have no inter-visibility with the site. Wightwick Manor, renowned for its Arts and Crafts interiors by William Morris and gardens designed by Thomas Mawson - lies approximately 600m south east of the site. It is owned by the National Trust and is a Conservation Area, Grade II listed Park and Garden containing many listed buildings and structures of Grade I, II* and II and Priority Woodland Habitat. Situated within a well-wooded setting there is no inter-visibility with the site.

Recommendations: Review the valued building vernacular to appraise its potential influence on the proposed development.



Zone of Theoretic Visibility

Visual Baseline

A high-level review of the site and surroundings was carried out to understand the visual context of the site and establish its visibility within the wider landscape.

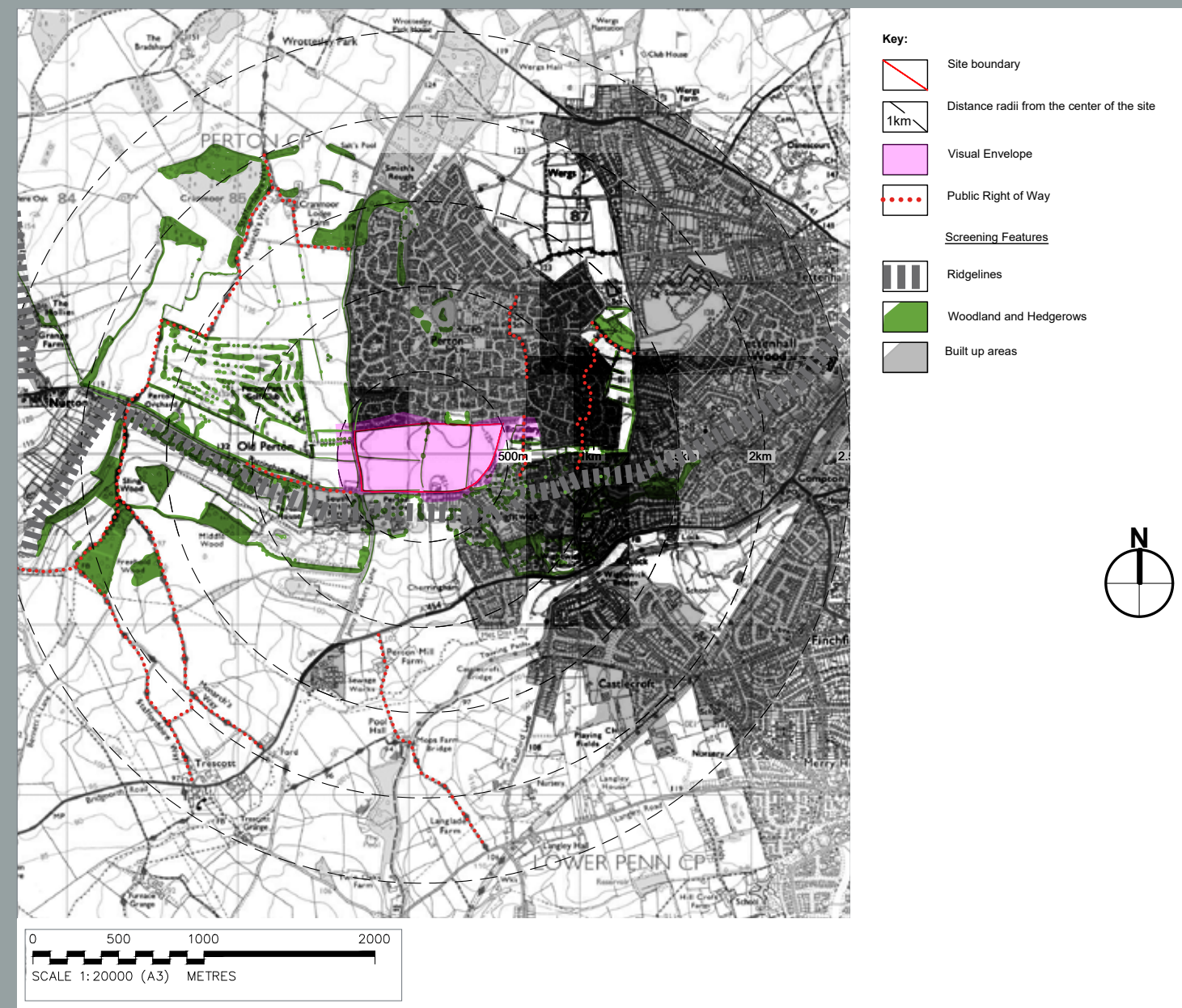
Zone of Theoretic Visibility (ZTV)

The starting point for assessing potential visual effects is to identify the extent of area from which the site and proposed development is potentially visible. A ZTV was mapped using a digital terrain model (OS Terrain 5) to identify those areas of the landscape that theoretically are visually connected with the proposed development. The model is based on topography only (known as a 'bare-earth topographical model').

It does not include other vertical screening features within the landscape and built environment such as buildings or vegetation and is therefore a 'worst-case scenario'.

The ZTV shows where an object cannot be seen which is of great help when validating our assessment to the planners and in carrying out fieldwork because the surveyor knows where there is no need for a "ground truth" check and can focus efforts where there may be views.

The areas of yellow are where the "object" is partially visible and areas of green are where the "object" is visible.



Zone of Visual Influence

Zone of Visual Influence (ZVI)

The ZTV forms the basis for a more refined assessment process which considers the screening elements in the landscape such as built form, woodland blocks and hedgerows.

This provides a more realistic indication of the Zone of Visual Influence (ZVI) of the areas from which the development is likely to be visible.

The ZVI, or Visual Envelope as it is sometimes referred to, provides an immediate and easily understood indication of the area within which the proposed development may be visible and potential visual effects experienced.

Visual Receptors (VR's)

Visual receptors are people and comprise individuals or groups of people who are likely to be affected by the proposed development at specific public viewpoints i.e. public rights of way, scenic viewpoints, roads, communal recreation areas and heritage assets where people visit.

In some instances it may be appropriate to consider private viewpoints mainly from residential properties or representing a community group of residents. It should be noted that in English law no individual has the private right to a particular view and it is not the role of planning to protect private interest. The main issue with regard to private residents is that of amenity and this is normally addressed through standard separation distances. However, a judgement on the visual component of residential amenity is often needed and it is important to recognise that residents may be particularly susceptible to changes in their visual amenity – residents at home are likely to experience views for longer than those briefly passing through an area. Views from private residences can be tested and should be representative of the front of the house from rooms normally occupied in waking or daylight hours i.e. the ground floor.

Summary of the Site Visibility

The Zone of Visual Influence (ZVI) identifies that the areas of publicly accessible locations from which the development is likely to be visible are limited to a very small area of visual influence due to the nature of the relatively flat landscape character.

The horizon is low, and together with intervening screening from low ridge lines, the scarp slope south of Pattingham Road, large woodland blocks and tall hedgerows, views of the site are restricted to a very small visual envelope, predominantly contained to immediately adjacent to the site.

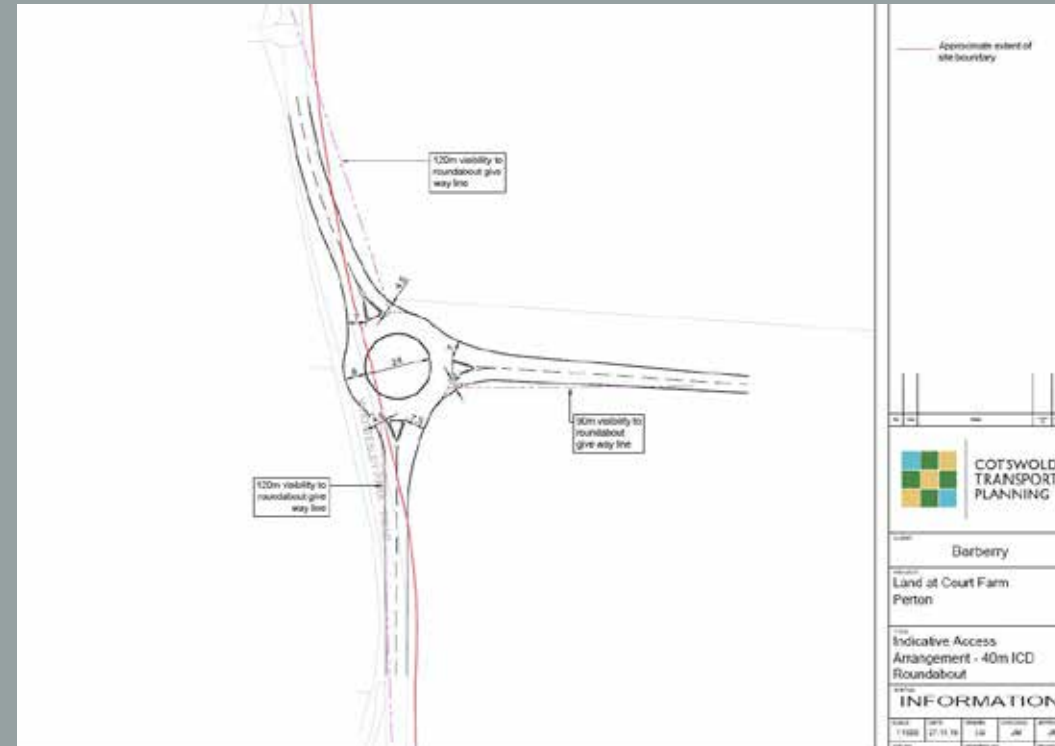
The area of greatest visual sensitivity is Pattingham Road and the short row of residential properties along it directly opposite the south eastern end of the site.

Views are very limited from residential properties on the settlement edge of Perton immediately abutting the northern site boundary. Most dwellings either back onto the site or are side on with blank gable ends. There may be some oblique views possible.

Views from drivers along Wrottesley Park Road are largely contained to the road due to the high, dense hedgerow to the site's western boundary. However there will be some oblique views when driving north, at the junction with Pattingham Rd.

Transport + Flood Risk

Transport - A Highways Transportation Representation Document has been prepared by Cotswold Transport Planning who have identified two potential vehicular access arrangements off Wrottesley Park Road. The preferred option is primary access via a 3-arm roundabout and internal loop arrangement - with secondary access onto Paffingham Road via a priority T junction, which could be restricted to emergency access only if deemed necessary. The benefits of the roundabout include reducing vehicle speeds along Wrottesley Park Road and providing a strong gateway to the development.



Indicative Access Arrangement off Wrottesley Park Rd : CTP

Sustainable Access Strategy - The provision of sustainable, green pedestrian and cycle connections are proposed throughout the site. There is the opportunity to provide a strong north to south 'green route' connecting to the open space north of the site, that links up to Edge Hill Rd, where an existing footway connects to Perton Local Centre. This would also provide a 'Safe Route to School' connecting Perton to South Staffs Wightwick Hall School 250m south of the site on Tinacre Hill, off Paffingham Rd.

Flood Risk + Drainage - The site lies outside the flood zone.

Sustainable Urban Drainage Strategy (SuDS) - A co-ordinated SuDS Strategy is proposed within the green infrastructure to provide a range of attractive and multi-functional source and site control features such as; permeable paving, swales and naturalised attenuation basins. These will provide biodiversity, amenity, water quality and cost benefits.



Fluvial Flood Risk: Source Environment Agency

Planning Policy

The key planning context is set out in:

- National Planning Policy Framework (NPPF)
- South Staffordshire's current adopted Local Plan comprising the Core Strategy (adopted 2012) and Site Allocations Document (SAD) (adopted in 2018)
- Local Plan Review

The Local Plan, comprising the Core Strategy and Site Allocations Document (SAD) provides the blueprint for future development in the district. The SAD commits South Staffordshire to carrying out an early review of the Local Plan in order to respond to the increasing need for development, both within South Staffordshire and in the neighbouring authorities.

Agreeing to an early review of the Local Plan was an essential requirement of the Government's Planning Inspector who examined the SAD, largely in response to unmet housing needs in both South Staffordshire and the wider region.

This means that the LPA have to submit a reviewed Local Plan by 2021, which is earlier than previously anticipated (because the current Local Plan was originally intended to run until 2028).

The Local Plan review

The new Local Plan will set out how much development is required in the district up until 2037. This will include residential (including Gypsy, Traveller and Travelling Show people accommodation), retail and employment uses. The Local Plan will allocate the sites required to deliver the identified level of development needed.

The Local Plan is now at the Spatial Housing Strategy + Infrastructure Delivery Options Stage, notably the second stage of the Local Plan review. This stage is now out to consultation.

The Preferred Housing Target

Taking both the district's own housing needs and a contribution towards the Greater Birmingham Housing Market Area, the Local Plan review needs to plan for a target of **8,845 dwellings** between 2018 and 2037 to deliver the preferred approach set out in the 2018 Issues and Options document.

South Staffordshire are therefore consulting on how the 8,845 dwelling housing target could be best planned for and seeking views on a variety of Spatial Housing Options to distributing housing growth across the district.

This document is part of a package of information prepared to support the promotion of the site as a strategic housing allocation to the South Staffordshire 'Spatial Housing Strategy and Infrastructure Delivery Consultation'.

Planning Policy Guidance

The following policies/documents have informed our design approach:

The National Design Guide 2019

SPD's

- South Staffs Design Guide SPD (2018)
- South Staffs Open Space Strategy 2015
- Sustainable Development SPD 2018
- Draft Affordable Housing 2019
- Green Belt and Open Countryside 2014
- Green Belt Study 2019 (inc. Appendices 1 + 2)
- Landscape Sensitivity Study 2019 (inc. Appendix 1)

Local Plan Policies

- Core Policy 1: The Spatial Strategy (GB1: Development in the Green Belt; OC1: : Development in the Open Countryside Beyond the West Midlands Green Belt)
- Core Policy 2: Protecting and Enhancing the Natural and Historic Environment (EQ4: Protecting and Enhancing the Character and Appearance of the Landscape)
- Core Policy 3: Sustainable Development and Climate Change (EQ5: Sustainable Resources and Energy Efficiency; EQ7: Water Quality)
- Core Policy 4: Promoting High Quality Design (Policy EQ11: Wider Design Considerations; Policy EQ12: Landscaping)
- Core Policy 6: Housing Delivery (H1: Achieving a Balanced Housing Market; H2: Provision of Affordable Housing)
- Core Policy 11: Sustainable Transport (EV11: Sustainable Travel EV12)
- Core Policy 13: Community Safety (CS1: Designing Out Crime)
- Core Policy 14: Open Space, Sport and Recreation (HWB1: Protection of Open Space, Sport and Recreation Facilities; HWB2: Green Infrastructure)

Wightwick



Pattingham Road



Pattingham Road/Tinacre Hill



Perton Road

Wightwick

Pattingham Road, Wightwick borders the southern site boundary and is typified by very large, detached properties dating from the 1930's onwards with large gardens.

It is an exclusive, wealthy enclave with narrow leafy lanes, sandstone walls and an abundance of mature trees.

Perton



The Parkway leading from Wrottesley Park Road



Residential street



The Parkway



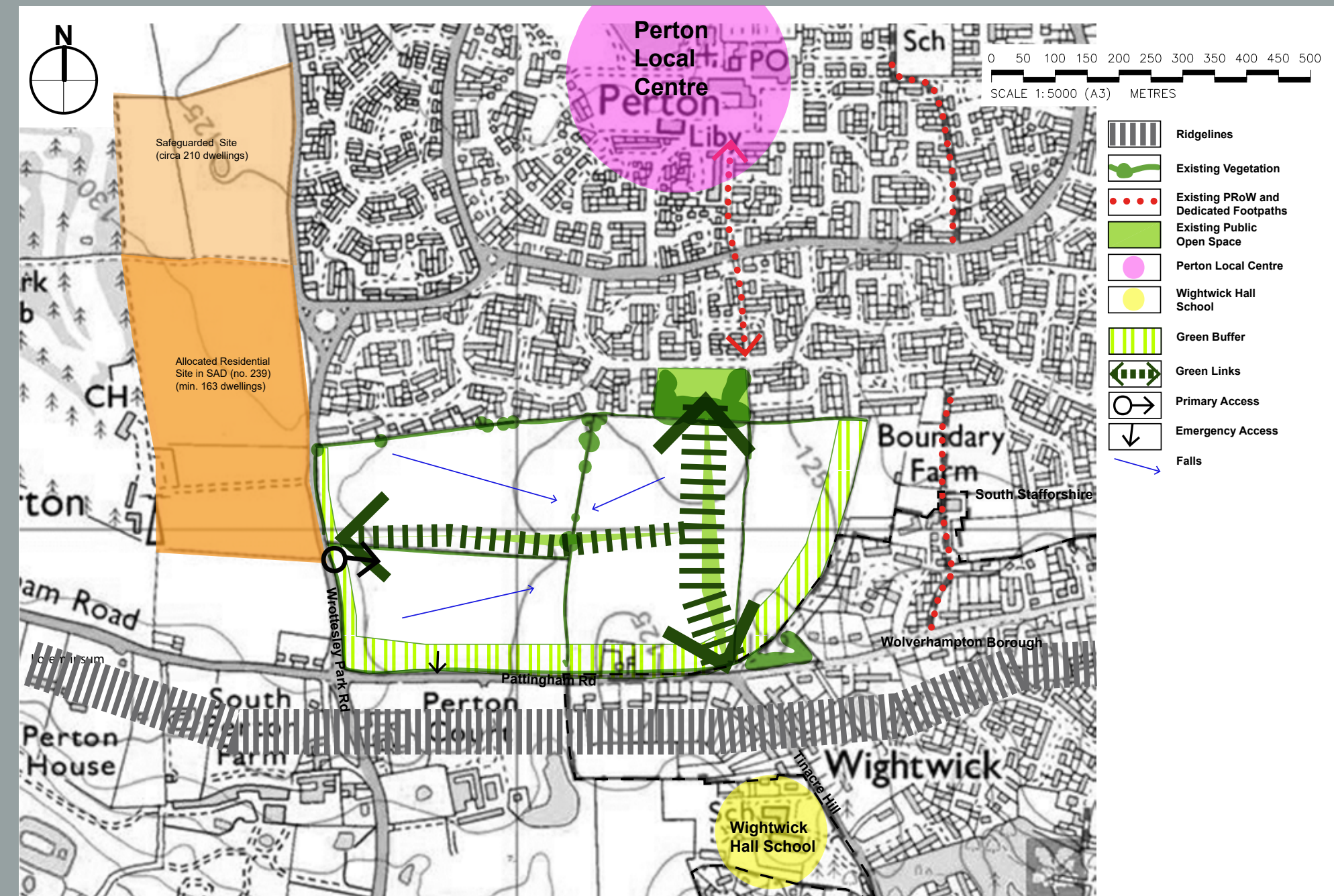
The Parkway - the north / south footpath runs in underpass beneath the road providing direct, safe connections to Perton Centre



Public Open Space on Edge Hill Drive adjacent to the northern boundary of the site

Perton

Perton borders the full extent of the northern boundary. This is a modern, purpose-built settlement located on the site of a disused WWII airfield. Developed during the 1970's and 80's with more recent development in the 2000's. The settlement bears little reference to any of the surrounding villages and does not demonstrate best practice design. It is dominated by a main arterial road which all properties back onto with walls fences or hedging and there is very little positive interface. Secondary roads and cul-de-sacs lead off into the housing which is very inward looking. All houses back onto the northern boundary of the site.



Constraints and Opportunities

The primary constraints and opportunities of the site are identified on the Constraints and Opportunities plan.

These are based on the findings of the High level LVA and site survey by One Creative Environments Ltd. and the findings of surveys carried out by RCA Regeneration and Cotswold Transport Planning.

Constraints + Opportunities

- Visual,
- Landscape, Topography + Ecology
- Access
- Flood Risk + Drainage
- Services + Utilities

Visual

- Views into the site are restricted and limited to a very small visual envelope. The site has a low horizon and is well-screened by existing tall hedgerows, nearby ridgelines and woodland and the surrounding urban areas.
- The site is backed onto by residential properties in Perton on the northern boundary and fronted by properties along part of Pattingham Rd.
- It is recommended that a green buffer runs along the southern boundary to maintain some settlement separation and provide a sensitive interface to Wightwick and respect the suburban lane characteristics of Pattingham Road.
- Well considered, generous green infrastructure / open space is required internally to provide high-quality amenity space and break up the built form. Street tree planting will be important to reinforce the leafy foil of the GI framework.

Landscape, Topography + Ecology

- The ground is relatively flat with gentle undulations - 130m on the western boundary and 125m AOD on the eastern boundary with a gentle fall into the centre of the site.
- The site lies within the Green Belt, however it has been recognised that there will need to be some green belt release in the next plan period. The Green Belt is clearly not performing as intended since the suburbs of Perton and Wightwick have now essentially merged to the east of the site where the gap is less than 20m.
- There are no other landscape, nature conservation or heritage designations attached to the site.
- Vegetation comprises field hedgerows to the north, south and western boundaries with two field hedgerows north to south and one west to east dividing large fields. There is the occasional hedgerow tree but the site is relatively

- featureless. The site is intensively farmed and there is little evidence of much wildlife value.
- There is the opportunity to provide significant new green infrastructure and nature-rich public open spaces for informal recreation and enjoyment by the local community, walking and cycling routes, sustainable drainage, enhanced biodiversity and high visual amenity.
- The character, boundaries, materiality and green setting of the site should consider taking cues from Wightwick.

Access

- Primary access is proposed off Wrottesley Park Road with secondary emergency access onto Pattingham Road.
- There are no PRoW's through the site. There is a public open space in Perton abutting the sites northern boundary that connects to Edge Hill Road where an existing footway connects to Perton Local Centre in a north south direction.
- This provides an ideal opportunity to provide a central, sustainable green route through the site for shared pedestrian and cycle connections between Perton and Pattingham Road in Wightwick - offering a Safe to School' route, linked up to new footpaths and cycleways through the site and connected to Wrottesley Park Road.

Flood Risk, Drainage + Services

- The site lies outside the flood zone. There is the opportunity for Sustainable Urban Drainage features (SuDS) integrated into the green infrastructure at naturally low points of the site. These will also provide enhanced, bio-diverse habitats.
- There are no known service/utility constraints.

3. Vision + Concept

Responds to the surrounding landscape

Draws influence from its surrounding setting with the provision of connected green spaces throughout the development.

These reflect the local landscape character and provide a green framework with good physical and visual connections to the surrounding countryside.



A heart to the place

A focal point or series of features for the community - such as a green, wildlife haven, allotment, orchard or outdoor recreation area - as a social gathering point.

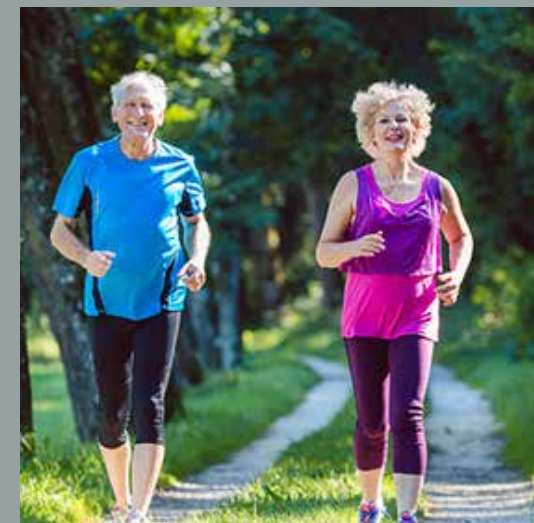
It is essential this is well connected to all other areas of public open space and accessible for all to use and enjoy.



A walk-able and safe neighbourhood

Walk-able and cycle friendly - streets, footpaths and green spaces are well overlooked and contribute to a well-connected, safe place. Shared use of streets to encourage slower vehicle speeds.

A clear street hierarchy and sequence of memorable markers contribute to a 'remembered journey' through the development.



Distinct character and identity

Exceptional quality of design that responds to the local vernacular with a co-ordinated palette of building materials - to create a unique sense of place.

Variations in building types, scale and density establishes interest and identity to avoid the bland and stereotypical housing estate.



Environmental + Social sustainability

Energy efficient, high quality homes offering sustainable living with a well-balanced mix of tenures and sense of community. Providing a setting that encourages a healthy lifestyle with enhanced wildlife habitats and a place where people benefit from the daily enjoyment of nature. Sustainable transport and sustainable drainage systems support the environment.



Place making - what makes a great place to live?

Drawing on national and international research there are key characteristics that contribute to the success of a new sustainable neighbourhood and what makes it a great place to live.

The response to the landscape, its natural topography, views and landscape character are important in terms of how the built form sits within its setting and the visual connections made with the surrounding countryside.

A focal point be it a church, pub, shop, green, common or square are also important in terms of providing a social gathering point and memorable way marker .

Another notable feature is how safe the place feels and that all streets, lanes, footpaths / cycleways and green spaces are overlooked for good natural surveillance. This very much contributes to the sense of a well-connected, walk-able place to live where the shared use of streets encourages slow vehicle speeds.

Creating a distinct character is also highly important where building vernacular, use of local materials and a high quality of design plays a significant role.

Finally, sustainability is a key theme by actively promoting energy efficient buildings, a healthy lifestyle, enhanced wildlife habitats and sustainable movement and drainage to support the environment.

Well-designed places sustain their beauty over the long term, with an emphasis on quality of place and quality of life for the people who live there.

Design Approach + Best Practice

We follow design best practice in line with:

- The NPPF + National Design Guide 2019
- Building for Life 12 (BfL12):The sign of a good place to live (Design Council, CABE, HBF and Design For Homes)
- Manual for Streets Guidance 2010
- The Urban Design Compendium (EP + Housing Corporation)
- Healthy Placemaking (Design Council)
- Making it Home: The Power of Landscape to Create Good Housing (Landscape Institute)
- Homes for People and Wildlife - (Wildlife Trusts 2018)

Housing developments designed with environmental sensitivity and green infrastructure at their heart can deliver multiple social, ecological and economic benefits. Some of these include:

- **Benefits to wildlife** - protecting, enhancing and management of key wildlife sites
- **Much more space for wildlife** - through habitat creation and restoration and improvement of soil and water catchment
- **Daily enjoyment of nature** - people benefit from the pleasure of wildlife and wild places
- **Improved health** - accessible green spaces for fresh air, exercise and quiet contemplation lower levels of heart disease, obesity, stress and depression
- **Safer movement** - networks of natural green spaces provide safe and attractive pedestrian and cycle routes
- **Sense of community** - shared spaces bring people together
- **Space for local food** - be they allotments orchards etc.
- **Reduced health care costs** - due to a healthier lifestyle
- **Attracting higher market values** - as highly desirable places to live

Landscape-led masterplanning

Our design approach is landscape-led from the outset, underpinned by an analysis of the sites constraints and opportunities. The LVA has supported an early understanding of the landscape character and visual amenity of both the site and its context and is an important working tool in guiding the design of the proposed development.

By viewing the site in landscape terms it becomes possible to gain a much wider understanding of its challenges, its special character and the opportunities it offers. It also ensures that mitigation is embedded in an iterative way, influencing the approach to siting and design to minimise possible landscape, ecological, drainage and visual effects early on in the design process.

The design is based around 'place making', responding to the specific character of the site to create an attractive, safe and welcoming development that encourages community pride and is a desirable place to live.

Well designed places that invoke a strong sense of place can bring lasting aesthetic, ecological and economic benefits to a development as well as having positive effects on people's lives.



Landscape, Views + Drainage

- Principally influenced by the sites' natural topography and vegetation
- Visual links to the adjacent residential areas and countryside to the west
- Multi-functional Green Infrastructure - incorporating new public footpaths and cycleways, new and connected public open spaces, children's play, dedicated wildlife areas, community allotments and SuDS drainage features
 - incorporating existing hedgerows and trees with new and enhanced native tree and infrastructure planting; with a sensitive green interface to all site boundaries
- Generous and connected public open spaces - providing accessible communal, social areas for informal recreation, food growing, social gatherings, walking, cycling, exercise trails, natural and formal play
- Co-ordinated SuDS drainage strategy - to provide a range of attractive and multi-functional source and site control SuDS features to reduce runoff /flood risk and provide biodiversity, amenity, water quality and cost benefits.

Movement + Connections

- Clear hierarchy and design of streets - contributing to the place's character to ensure legibility, permeability and pedestrian friendly priority with low vehicle speeds - all streets to adoptable standards
- Movement and connections are easily understood - with a clear sequence of way markers and a 'remembered journey'
- Streets provide a major part of the public realm - and help to create a sense of place with all residential streets and green spaces designed as social spaces with good natural surveillance
- A walk-able/cycle-able, safe and accessible residential neighbourhood - embedding the principles of 'Active Design' with all streets designed as pedestrian and cycle friendly
- A sustainable 'Safe Route to School' route between Perton and Pattingham Road in Wightwick - this connects into the existing public open space adjacent to the on Edge Hill Road, Perton where an existing footway runs to Perton Local Centre.

Character

- A place of character, identity, welcome and quality - to establish a sense of pride and ownership. With communal access to nature-rich spaces for wildlife, informal recreation, health and well being
- Takes cues from the character, materiality, sandstone wall boundaries and green setting of Wightwick.
- Well designed contemporary dwellings - with well-designed variations in building vernacular and use of local materials, to establish interest, character and identity
- Active frontages - all houses to front onto streets and open spaces to create a lively and well-supervised neighbourhood
- Quality street surfaces and consistent plot frontages - contribute to a pedestrian friendly, attractive street scene
- Green front gardens - with convenient, efficient parking that also allows for a use-able front garden which contributes to an attractive street scene and encourages neighbours to chat
- Street trees - to enhance the street scene and provide distinct character areas
- Building Heights - Typically 2 storey (7.5m) with some 2.5/3 storey (9.5m) at key junctions
- Density - Average density of 35dph. Higher density to the northern side and lower density to areas of constraint

Design Framework

The key structuring and spatial design principles:

- Landscape, Views + Drainage
- Movement + Connections
- Character



Precedent images



Footpaths and cycle routes



Green infrastructure + open spaces



Nature rich spaces +SuDS



Street Trees



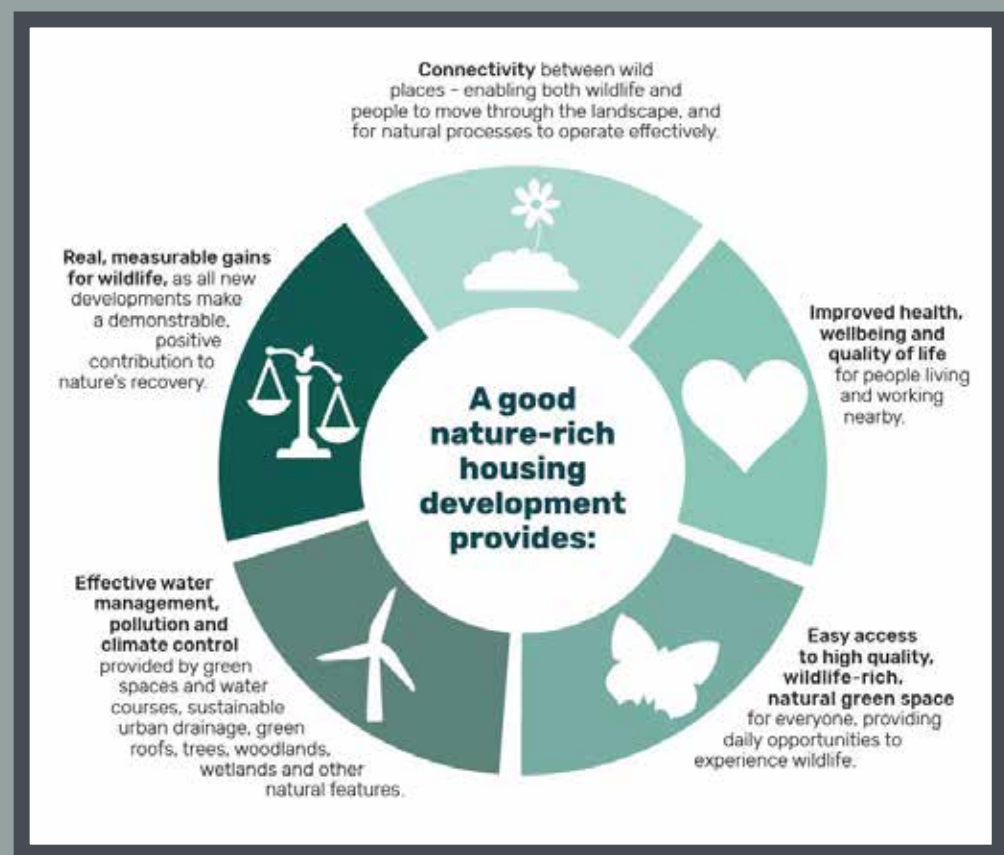
Energy efficient homes



Positive Street frontages



Streets as social spaces



Food growing + community orchards



Natural play, equipped play + exercise trails



Concept masterplan

The concept masterplan illustrates how the site could be developed for residential development - underpinned by the principles of landscape-led masterplanning and place making.

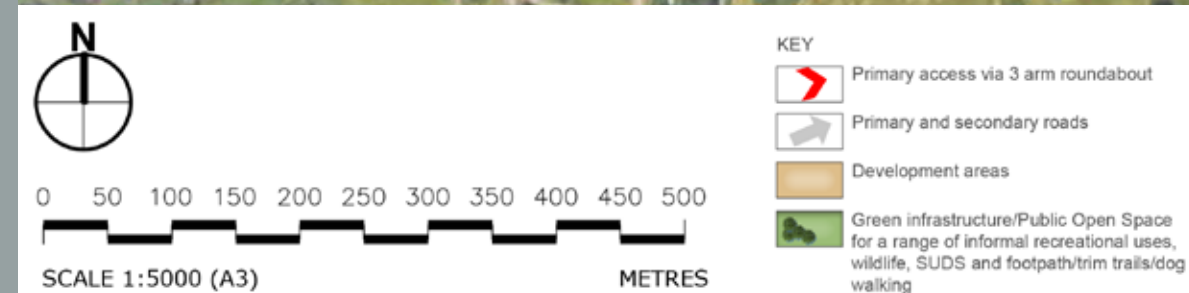
It could deliver up to 600 new homes as well as provide 44% green infrastructure.

- Total site area = 30.1ha
- Development + Infrastructure = 16.8ha
- Green Infrastructure = 13.3ha
- Density - 35dph average
- Higher density development (45dph) to the northern side of the site
- Medium density (35dph) to the central section and eastern edge of the site
- Low density (20dph) to the southern side of the site

The detailed scheme, as it is worked up will follow and fully embrace the principles set out in the recently issued National Design Guide 2019.



Well-designed, manageable allotments with gravel surfaced paths, seating and storage - provide an attractive community facility and social space for food growing.



Concept Masterplan

The Concept Masterplan

Key features of the site

Access

- Primary vehicular access off Wrottesley Park Rd via a 3-arm roundabout provides a green gateway and sense of arrival - with secondary emergency access onto Pattingham Rd
- A walkable/cycle friendly neighbourhood
- Clear street hierarchy with good permeability to ensure ease of movement and connectivity
- Sustainable green route through the site for shared pedestrian and cycle connections between Perton and Pattingham Road in Wightwick - offering a 'Safe route to School'
- Network of footpaths and cycle routes through green spaces with incidental play, trim trails and dog walking routes

Development

- Exemplary housing development with access to nature-rich spaces for wildlife, informal recreation and health and well-being
- A place of character and quality that is safe, welcoming and a desirable place to live
- A clear definition between public and private spaces with streets and green spaces overlooked for good natural surveillance
- Well-considered street tree planting that reinforces the leafy foil of the green infrastructure, provides an enhanced streetscape and brings biodiversity benefits

Landscape

- A well-considered landscape framework that respects the existing hedgerows, maintain a sense of openness, sensitively assimilates the built form and provides a range of

- open space uses
- Generous and connected green infrastructure / public open spaces for informal recreation, children's play, sustainable urban drainage features/attenuation, enhanced and new wildlife areas, allotments/community orchards, enhanced biodiversity and high visual amenity
- A central focus at the core of the site for community gatherings
- A green buffer along the southern boundary with Pattingham Rd to maintain some settlement separation, provide a sensitive, leafy interface to Wightwick and respect the rural 'lane' characteristics of Pattingham Road
- A green buffer to the northern boundary with Perton providing a degree of separation and used as a circular trim trail and dog walking route
- A leafy, treed frontage to Wrottesley Park Road



Summary

This landscape-led masterplanning Representation Report has been prepared by One Creative Environments Ltd. on behalf of Barberry to support the promotion of Land at Perton in the South Staffordshire's Local Plan.

It has been prepared as part of a suite of representation reports and is intended to assist the Council with its consideration of land at Perton and its suitability for removal from the Green Belt and allocation as a strategic residential site. It follows on from previous submissions in respect of the same site at the Issues and Options stage, during late 2018.

The site comprises 30.1 hectares (ha) / 74.35 acres of land.

It is available, deliverable and suitable for residential development for up to 600 dwellings, over 44% green infrastructure/open space with a walk-able neighbourhood and many sustainable credentials - to help meet the growth requirements of South Staffordshire for the plan period 2018 to 2037.

Appendix A - Landscape and Visual Appraisal (LVA) Methodology

LVA Methodology

Guidelines

The High Level Landscape and Visual Assessment (LVIA) has been carried out in accordance with best practice as set out in the following published guidance, which is regarded by the landscape profession as the 'industry standard':

- "Guidelines for Landscape and Visual Impact Assessment" (GLVIA3) -Landscape Institute/Institute of Environmental Management and Assessment, Third Edition, 2013;
- GLVIA 3 Statement of Clarification 1/13 (2013), published by the Landscape institute;
- Landscape Institute Advice Note 01/11 (2011), "Photography and Photomontage in Landscape and Visual Impact Assessment";
- An Approach to Landscape Character Assessment, published by Natural England.

GLVIA3 states that:

"Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and amenity".

The high level LVIA has been based upon the concept plan and has assessed the level of effects on completion only.

Determining the Study Area

When establishing the study area the emphasis is on a reasonable approach which is proportional to the scale and nature of the Proposed Development. The study area for the LVIA has been defined in accordance with GLVIA3 (Landscape Institute and Institute of Environmental Management & Assessment, 2013). This advises that the study area should, "cover the site itself and its wider context, within which the Proposed Development may influence it in a significant manner".

The extent of the study area for the assessment has been determined both through the site's 'theoretical visual envelope' (see Zone of Theoretic Visibility below), the 'zone of visual influence/visual envelope' and the existing physical characteristics of the landscape.

Zone of Theoretical Visibility

A Zone of Theoretical Visibility (ZTV) was mapped for the site using a digital terrain model (OS Terrain 5) to identify those areas of the landscape that theoretically are visually connected with the proposed development. This is based on topography only (known as a 'bare-earth topographical model'); it does not include other vertical screening features within the landscape and built environment such as buildings or vegetation, and is therefore a 'worst-case scenario'.

Zone of Visual Influence

The ZTV forms the basis for a more refined assessment process that considers the main screening elements in the landscape such as ridgelines, built form, woodland blocks and hedgerows. These screening elements often reduce the actual extent of visibility and provides a more realistic indication of the Zone of Visual Influence (ZVI) of the areas from which the development is likely to be visible from.

The ZTV was determined through a combination of desk top study (including OS Survey mapping data at 1:25,000 scale and Google Earth) and an on-site survey where publicly accessible areas within the ZTV were visited. Areas of land from which the proposed development may potentially be seen were initially identified and mapped through a preliminary desktop assessment using Ordnance Survey (OS) maps to establish the extent of the study area and the visual envelope. Potential publicly accessible viewpoints (including roads, public and permissive rights of way, public open spaces and other sensitive visual receptors) were mapped and marked on a base plan to determine the extent of the on-site assessment.

Key illustrative viewpoints identified during the desktop study are visited and recorded. Not all viewpoints have been visited at this stage as this is a time-consuming, lengthy process. It is important that these views are assessed in winter to show the worst-case scenario, since full leaf cover on deciduous vegetation in summer provides greater screening benefit than during the winter period. A number of viewpoints representative of the baseline visual situation has been included in Section 5.0.

These public rights of way were walked, roads driven along, recreational viewpoints checked and representational views from the front of residential properties checked to establish whether the site can be seen, or whether intervening tree cover, topography or built form provides screening.

A panoramic photograph, representative of the human eye, was taken to record each key viewpoint.

Landscape Baseline

In order to gain an understanding of the landscape character and value attached to the landscape within which the site lies, a desktop study of the site and surrounding area was carried out. This identified all relevant landscape, cultural and heritage and nature conservations designations within the study area and included all public rights of way (PROW).

The landscape baseline is an important contributory factor in determining which viewpoints are selected for inclusion in the visual assessment. The information collated is a result of background and baseline desk top studies, on-the-ground surveys and analyses of landscape character.

It includes the landscape planning context for the site, with a review of the key designations and landscape character of the site and surroundings.

The baseline factors that are taken into account include national designations such as AONB; County wide / local designations such as listed buildings, heritage and cultural assets, tree preservation orders, ancient woodlands and wildlife habitats. National and local-level recreational areas and access such as public rights of way (PRoWs) viewpoints, and views from peoples' homes.

Assessment Stages

A description of the methodology for evaluating the landscape and visual effects is set out below. At the outset it is useful to reiterate the definition of the terms 'landscape effects' and 'visual effects':

Landscape effects: Effects on the landscape as a resource in its own right.

Visual effects: Effects on specific views and on the general visual amenity experienced by people.

The initial step in an LVIA is to establish the baseline landscape and visual conditions. The level of detail provided should be that which is reasonably required to determine and assess the likely effects.

The assessment must clearly distinguish between the assessment of landscape effects dealing with changes to the landscape as a resource, and the assessment of visual effects, dealing with changes to views and visual amenity.

Once the landscape baseline and visual baseline are established, the levels of effects are assessed. The landscape effects and visual effects of the proposals are assessed separately at three stages of the development: during construction, on completion and after 15 years. Occasionally, the decommissioning stage may form part of the assessment.

Step-by-step process in assessing the Level of Effects

A step-by-step process is the sequential approach taken to identify both landscape effects and visual effects. The rationale for the overall judgement is intended to be clear and transparent.

Each effect is considered in terms of:

- **Sensitivity of the receptor based on judgments about:**
 - Susceptibility of the receptor to type of change proposed and;
 - Value attached to the receptor
- **Magnitude of the effect based on judgment about:**
 - Size and scale of the effect;
 - Geographical extent of the area affected;
 - Duration of the effect and its reversibility

The next step is to combine the judgements about sensitivity and magnitude of change in order to determine the level of effects. Professional judgement must also be applied. To ensure transparency the rationale is described as narrative and supported by the following summary guidelines:

- **Landscape Effects** - Table A: Guidelines for the Assessment of Landscape Sensitivity and Table B: Guidelines for the Assessment of Magnitude of Landscape Change.
- **Visual Effects** - Table C: Guidelines for the Assessment of Visual Sensitivity and Table D: Guidelines for the Assessment of Magnitude of Visual Change.

Assessment of Landscape Effects

The assessment of Landscape Effects considers how the proposal will affect the components that make up the landscape, often referred to as landscape receptors.

Landscape Receptor

The first step is to identify the components of the landscape that are likely to be affected as part of the existing baseline situation:

- The character of the landscape identifying the components that contribute to it i.e. topography, land use, vegetation, settlement patterns

- Any individual elements and aesthetic and perceptual aspects of the landscape that contribute to the distinctive character of the landscape.
- The condition or the physical state of the landscape, including the condition of elements or features such as buildings, hedgerows or woodland and any evidence of current pressures causing change.
- The value placed upon the landscape.

The second step is to identify interactions between the landscape receptors and different components of the development at all its different stages, including construction, on completion/operation and where relevant decommissioning and restoration/reinstatement.

Landscape Sensitivity

The sensitivity of landscape receptors is assessed by combining judgements on the value attached to the landscap resource and its susceptibility to the type of change proposed, i.e. a judgement about the nature of the proposed development in relation to the ability of the baseline landscape to accept that change. The sensitivity of landscape receptors will vary therefore depending on the type and nature of development proposed.

Landscape value describes the level of value/importance attached to a landscape or feature (that would potentially be affected by the proposed development). Factors considered include: existing landscape, heritage or nature conservation designations and the level of importance that they signify i.e. whether international, national or local); relevant local planning policy and guidance; the status of individual areas or features (e.g. TPO's), the quality, condition and rarity of individual features and / or elements within the landscape; any verifiable local community interest i.e. village greens, allotments, recreational areas; and any particular associations i.e. is the landscape associated with artists, writers or events in history.

Landscape susceptibility describes the ability of a landscape receptor i.e. character or quality/condition of a particular landscape feature or a particular aesthetic and perceptual aspect) to accommodate change (i.e. the proposed development) without undue consequences for maintenance of the baseline situation.

Landscape Susceptibility/Vulnerability to Change + Landscape Value = Landscape Sensitivity

The sensitivity of a landscape receptor is categorised as:

- Very High;
- High;
- Medium;
- Low; or
- Very Low.

The judgements are based upon objectively determined criteria and professional reasoning. These are shown overleaf in Table A: Criteria for determining landscape sensitivity.

Magnitude of Landscape Change

The magnitude change in the landscape is influenced by a number of factors including the extent to which landscape features are lost and/ or altered, the introduction of new features in the landscape, and the resulting change in the physical and/or perceptual characteristics of the landscape. For each of the landscape receptors a clear approach is taken to assess the potential magnitude of impact. It is evaluated in terms of:

- The size and scale of the impact
- The geographical extent of the area which is likely to be affected
- The duration or the impact and its reversibility.

The magnitude of landscape change is described using a five-point word scale. Magnitude is assessed as being: Very High; High; Medium; Low; or Very Low. The judgements based on objectively-determined criteria and professional reasoning. Refer to Table B.

Table A: Guidelines for the Assessment of Landscape Sensitivity

Sensitivity	Description
Very High	<p>Very highly valued with international and national level designated areas (e.g. World Heritage Sites, National Parks, AONB's, Registered Historic Parks and Gardens, Scheduled Monuments, Grade I or II* Listed Buildings, SSSI's etc.) and is experienced by a high number of people where the quality of the landscape is likely to be the primary purpose of the visit. Exceptional aesthetic attributes with significant scenic quality and iconic views.</p> <p>An important component of the country's character with very rare and distinctive elements and features. Landscape condition is very good and maintained to a high standard. The landscape has elevated perceptual qualities and is highly valued for its wildness / remoteness and level of tranquility. No detracting features present. A landscape with a very low capacity to accommodate the type of development proposed, with components that cannot be replaced (e.g. ancient woodland, historic parkland).</p> <p>A landscape or component with a very high susceptibility/vulnerability to change.</p>
High	<p>Highly valued with regional or county level designated areas (e.g. Areas of Great Landscape Value (AGLV), Green Belt, Country Parks, Grade II Listed Buildings and Conservation Areas etc.) and experienced by many people where the quality of the landscape is likely to be one of the main reasons for the visit.</p> <p>High aesthetic attributes with significant scenic quality and views. An important component of the region or county's character with rare or distinctive elements and /or features. Landscape condition is good and is generally well maintained. The landscape has very good perceptual qualities and a high level of tranquility. A landscape with a low capacity to accommodate the type of development proposed, with components that are not easily replaced (e.g. ancient woodland, historic parkland. No detracting features present.</p> <p>A landscape or component with a high susceptibility/vulnerability to change.</p>
Medium	<p>Moderately valued but no designated landscapes present - may be valued locally (e.g. village greens, allotments or public open spaces etc.). The landscape is unlikely to be one of the main reasons for the visit but makes a positive contribution to the experience.</p> <p>Commonplace elements / features present in good to fair condition, some of which could not be replaced but are a good to fair representation of the landscape type, but common. Generally unremarkable character, albeit with some sense of place. The landscape has good to fair perceptual qualities and a moderate level of tranquility. Some detracting features present. A landscape with a moderate capacity to accommodate the type of development proposed with some resilience to, and tolerance of, change.</p> <p>A landscape or component with a moderate susceptibility/vulnerability to change.</p>
Low	<p>Low value – of low importance, low quality and in fair to poor condition, with few features of value or interest. The landscape has little or no amenity value – and is unlikely to be one of the main reasons for the visit</p> <p>Rare or distinctive elements and / or features are not present. Several or many elements / features are discordant, derelict, in decline or lost, resulting in little or no positive contribution to landscape character and / or visual amenity. All landscape elements are easily replaceable. The landscape has few, if any, perceptual qualities and is of low tranquility. Several detractors present. A landscape with a high capacity to accommodate the type of development proposed and relatively resilient to change.</p> <p>A landscape or component with a low susceptibility/vulnerability to change.</p>
Very Low	<p>Very low value – a degraded landscape, likely to be industrial or contaminated land, with no amenity value – and there is unlikely to be a reason to visit for recreational use.</p> <p>A landscape of very low quality and in poor condition, with very low potential for biodiversity. The landscape has no perceptual qualities and is not considered to be tranquil.</p> <p>Widespread detractors present. Most elements / features are discordant, derelict, in decline or lost altogether, resulting in negative effects on character with all intrinsic sense of place lost. Little prospect of improvement. A landscape with a large capacity to accommodate the type of development proposed and very resilient to change.</p> <p>A landscape or component with a very low susceptibility/vulnerability to change.</p>

Table B: Criteria For Determining Magnitude Of Landscape Change

Magnitude of Effect	Landscape
Major	<p>Major alteration to, or complete loss of, key elements, features and characteristics of the baseline condition.</p> <p>The size and scale and/or geographical extents of change are considered large due to the extent and proportion of loss of existing landscape components and extent of alteration of aesthetic and perceptual qualities which are critical to the landscape character.</p> <p>The duration of effect would be considered long term and would either be irreversible or very difficult to reverse in practical terms.</p>
Moderate	<p>Notable alteration to, or significant loss of, key elements, features and characteristics of the baseline condition.</p> <p>The size and scale and/or geographical extents of change are considered medium due to the extent and proportion of loss of existing landscape components and extent of alteration to aesthetic and perceptual qualities and would cause a noticeable difference to the landscape character or existing landscape components.</p> <p>The duration of effect would be considered medium term and / or potentially reversible, although it may not be practical to do so.</p>
Minor	<p>Minor alterations to key elements, features and characteristics of the baseline condition.</p> <p>The size and scale and/or geographical extents of change are considered low due to the extent and proportion of loss of existing landscape components and extent of alteration to aesthetic and perceptual qualities and would cause a very small change to the landscape character and/or existing landscape components.</p> <p>The duration of effect would be considered short term and / or potentially reversible, and in practical terms would easily be achievable.</p>
Negligible	<p>Barely discernible alterations to key elements, features and characteristics of the baseline condition.</p> <p>The proposed scheme would be barely perceptible or entirely appropriate in its context and would cause no perceptible change to its landscape components, aesthetic and perceptual qualities and character.</p>

Assessment of Visual Effects

The assessment of visual effects considers how the proposal will affect specific views and the general visual amenity experienced by people.

Visual Receptors

Visual receptors are people and comprise individuals or groups of people who are likely to be affected by the proposed development at specific viewpoints or series of viewpoints.

Viewpoints selected for inclusion in the assessment and to illustrate the visual effects fall broadly into three groups:

i) Representative viewpoints – selected to represent the experience of different types of visual receptor, where large numbers of viewpoints cannot all be included individually and where the levels of effects are unlikely to differ – e.g. certain points may be chosen to represent the views of users of particular public footpaths and bridleways;

ii) Specific viewpoints – chosen because they are sometimes promoted viewpoints within the landscape e.g. specific local visitor attractions; viewpoints in areas of particularly noteworthy visual and/or recreational amenity such as landscapes with statutory landscape designations or viewpoints with particular cultural landscape associations;

iii) Illustrative viewpoints – chosen specifically to demonstrate a particular effect or specific issues, which might, for example, be the restricted visibility at certain locations.

A photograph from each agreed viewpoint (visual receptor) is taken to record the existing view using a high quality Digital Single Lens Reflex (SLR) camera with the equivalent of a 50mm focal length manual lens, typically with five frames per view, which represents the normal breadth of vision, as advocated by the Landscape Institute - Advice Note 01/11, Photography and photomontage in LVIA.

Photographs are taken at eye level, approximately 1.70m above ground level, from public viewpoints.

Sensitivity of Visual Receptors

Evaluating the sensitivity of each visual receptor requires consideration of both the visual receptor's susceptibility to change arising from the proposal, and the value attached to the view by the receptor:

Susceptibility to Change + Value = Sensitivity.

Table C: Guidelines for the Assessment of Visual Sensitivity

Sensitivity	Description
Very High	<p>A viewer with a very high susceptibility/vulnerability to change; with a specific interest in the view, prolonged viewing opportunities and a very high value placed upon the view. Examples include:</p> <ul style="list-style-type: none"> • Visitors to very high value landscapes and townscapes • Receptors in Internationally or Nationally designated sites such as World Heritage Sites, National Parks, Areas of Outstanding Natural Beauty (AONB), Special Landscape Areas, National Trails, Registered Parks and Gardens, Scheduled Monuments, Grade I and II* listed buildings; • Recognised scenic travel routes and other places where the views are the major contributor to the visit. <p>Internationally / Nationally important visual function (context, setting, gateway, gap, screen, buffer, transition zone, skyline, panorama, vista, focal point, cultural association etc.). Highly visible in the wider area.</p>
High	<p>A viewer with a high susceptibility/vulnerability to change; with a particular interest in the view, prolonged viewing opportunities and a high value placed upon the view. Examples include:</p> <ul style="list-style-type: none"> • Receptors in landscapes of Regional or County importance (e.g. Areas of Great Landscape Value (AGLV), country parks, long distance trails, Grade II listed buildings, Conservation Areas etc.). • Views from other important /valued/well-used visitor destinations and recreation areas, including long distance / themed trails, touring routes, cycle paths, canals, rights of way used by many people where the view is an important reason for the visit; • People in high value landscapes and townscapes where views contribute to the high value landscape setting; • Residents at home using rooms normally occupied during daytime hours and are likely to experience prolonged views. <p>Important wider visual function. Visible in the wider area.</p>
Medium	<p>A viewer with a moderate susceptibility/vulnerability to change; with some interest in their surroundings, a medium period of exposure to the view and a moderate value placed upon the view. Examples include:</p> <ul style="list-style-type: none"> • People whose attention is not solely focused on the view or for short periods of time while passing through the landscape / townscape • People in involved in outdoor recreational facilities where landscape appreciation is unlikely to be a primary motive i.e. fishing or golf • Users of scenic road, rail or waterway corridors not used by many people and where the view is only part of the reason for the visit; • Residents with limited view of the development; • People at their place of work/educational institutions where visual amenity is an important contributor to the setting and quality of working life. <p>Important local visual function. Locally visible but limited influence.</p>
Low	<p>A viewer with a low susceptibility/vulnerability to change; with little or no interest in their surroundings, attention not focused on the landscape and a low value placed on the view. Examples include:</p> <ul style="list-style-type: none"> • People using busy main roads where their view is focused on the road; • People at their place of work where the appreciation of the setting is of limited importance to the quality of working life; • People engaged in outdoor recreation or sport which does not involve or depend upon an appreciation of views; • People using infrequently used / inaccessible public rights of way and likely to be travelling for a purpose other than to enjoy the view. Usually in landscapes / townscapes of low to moderate value. <p>Not important visual function. Limited local visibility.</p>
Very Low	<p>A viewer with a very low susceptibility/vulnerability to change; with no interest in their surroundings, attention not focused on the landscape and a very low value placed on the view. Examples include:</p> <ul style="list-style-type: none"> • People moving past the view often at high speed (e.g. motorways and main line railways); People in degraded landscapes / townscapes of low value. <p>No visual function and no visibility.</p>

Table D: Criteria for Determining Magnitude of Visual Change

Magnitude of Effect	Visual Effect
Major	<p>The size and scale and/or geographical extent of change is considered substantial and would cause a major deterioration in, or change to, a large proportion of the existing view.</p> <p>The duration of effect would be considered long term and would either be irreversible or very difficult to reverse in practical terms.</p>
Moderate	<p>The size and scale and/or geographical extent of change is considered to cause a noticeable change to a large proportion of the existing view, or significant deterioration in or a significant change to a smaller proportion of the existing view.</p> <p>The duration of effect would be considered medium term and / or potentially reversible, although it may not be practical to do so.</p>
Minor	<p>The size and scale and/or geographical extent of change would cause a small change or small deterioration in or change to the existing view.</p> <p>The duration of effect would be considered short term and / or potentially reversible, and in practical terms would easily be achievable.</p>
Negligible	<p>The development is at such a distance as to be barely perceptible and may go unnoticed.</p> <p>The duration of effect would be considered short term / temporary and / or easily reversible, and in practical terms would very easily be achievable.</p>
None	<p>No change to the existing baseline view.</p>

Magnitude of Visual Effects

The magnitude of change on visual receptors is influenced by a number of factors including; the extent to which the view and visual amenity of people arising as a result of the proposed development is lost and/or altered, the introduction of new features in the view, and the resulting change in the view. For each of the visual receptors a clear approach is taken to assess the potential magnitude of impact. It is evaluated in terms of:

- The size and scale of the impact
- The geographical extent of the area which is likely to be affected
- The duration or the impact and its reversibility.

The magnitude of visual impact is described using a five point scale. Magnitude is assessed as being major, moderate, minor, and negligible or none. The judgement made is reliant upon by a clear written rationale and professional judgement.

The susceptibility of different visual receptors to change in their view and visual amenity is mainly a function of:

- The occupation or activity of people experiencing the view at a particular location
- The extent to which the attention or interest is focused on the view and the visual amenity people experience.

A view is valued through formal designation and/or indicators of value attached by people. This takes account of:

- Recognition of the value attached to a view through planning designations and / or in relation to heritage assets and indicators of the value attached to views by visitors e.g. featuring in guidebooks or on tourist maps
- Provision of facilities for their enjoyment i.e. parking places, and interpretive boards

- References to them in literature or art e.g. 'Ruskin's View' over Lunedale.

Sensitivity is recorded as: Very High; High; Medium; Low; or Very Low. Sensitivity is specific to each visual receptor and reflects a balanced judgement on the value attached to the view by the receptor, their visual amenity and susceptibility of the receptor to the type of change proposed. The judgement made is supported by a clear written rationale and supported by the guidelines in Table C: Guidelines for the Assessment of Visual Receptor Sensitivity.

Distance of the receptor from the site boundary

The distance of the receptor is expressed in metres or kilometres and considers the following thresholds in relation to the site boundary:

- Adjacent – next to or in very close proximity to the site
- Near distance – up to 500m
- Middle distance – between 500m and 2km
- Long distance –2km and beyond

The selected viewpoints cover as wide a range of situations as is possible, reasonable and necessary to cover the likely effects. GLVIA3 emphasises that the assessment must be based on proportionality in relation to the scale and nature of the development proposal and its likely level of effects, and ideally, with the agreement of the competent authority and consultation bodies.

Determining the Level of Landscape and Visual Effects

Judging the overall level of landscape and visual effects for each receptor is carried out through a sequential combination of:

Assessment of sensitivity + Assessment of magnitude = Level/nature/duration of effect.

The overall judgment about the nature, level and duration of these effects are based on the sequential combination of each criterion, leading to a balanced justification.

Table E - Matrix for determining the Level of Landscape and Visual Effects illustrates how the effect is determined by a combination of the level of sensitivity of a receptor and the level of magnitude of effect arising from the development.

The matrix is a guide and not an absolute scoring system. It is reliant on clear, written rationale and professional judgement.

GLVIA3 Statement of Clarification 1/13 states that for an LVIA outside the EIA process, it is not necessary to establish whether likely effects are significant, given that the term is enshrined in EIA Regulations. It goes on to note an approach that, "is proportional to the scale of the project that is being assessed and the nature of its likely effects", also applies to LVIA being undertaken outside of the formal requirements of EIA.

In this assessment therefore, judgements are made about the level of effects, referred to by their importance rather than significance, with the assessment then used to determine whether these effects are likely to be relevant to the decision making process.

Determining the effects likely to arise as a result of the proposed development and determining their importance requires the application of professional judgement: the predicted levels of sensitivity of the receptors are considered with the predicted levels of magnitude of effect. Overall effects can be beneficial, adverse or neutral.

Table E: Matrix for Determining Landscape and Visual Effects

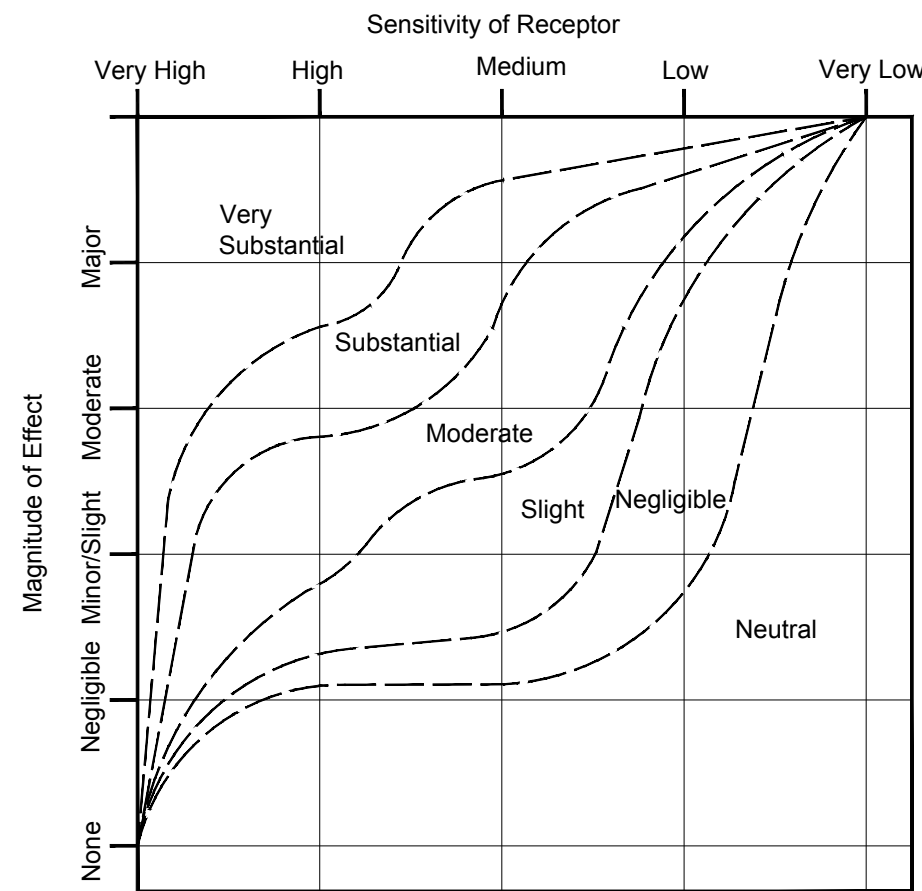


Table F: Criteria for determining the level of landscape and visual effects

Effect	Description. The proposed development would:
Very Substantial Adverse	<ul style="list-style-type: none"> Be at complete variance with the character of the landscape Cause total permanent loss or major alteration to a wide range of characteristic elements and features of the landscape Permanently damage the sense of place Cause a major deterioration to the view of a receptor of very high sensitivity that would constitute a total change in the view and / or introduce a major discordant element into the view
Substantial Adverse	<ul style="list-style-type: none"> Be at considerable variance with the character of the landscape Degrade or diminish the integrity of a wide range of characteristic elements and features of the landscape Substantially damage the sense of place Cause a major deterioration to the view of a receptor of high sensitivity that would constitute a total change in the view or introduce a major discordant element into the view
Moderate Adverse	<ul style="list-style-type: none"> Conflict with the character of the landscape Have an adverse impact on some characteristic elements and features of the landscape Diminish the sense of place Cause an obvious deterioration to the view of a receptor of medium to high sensitivity that would constitute a clear change in the view or introduce a discordant element into the view
Slight Adverse	<ul style="list-style-type: none"> Not quite fit with the character of the landscape Be at odds with some of the characteristic elements and features of the landscape Detract from the sense of place Cause a limited deterioration to the view of a receptor of medium to high sensitivity that would constitute a noticeable change in the view or would introduce uncharacteristic features or elements into the view; or, an obvious deterioration to the view of low sensitivity.
Negligible Adverse	<ul style="list-style-type: none"> Result in a barely perceptible deterioration of landscape character Have a barely perceptible impact on characteristic elements and features of the landscape Barely degrade the sense of place Result in a barely perceptible change in the view, associated with the introduction of uncharacteristic features or elements

Neutral	<ul style="list-style-type: none"> Maintain the existing character of the landscape Blend in with the characteristic elements and features Enable the sense of place to be maintained Not be visible to the receptor and any associated mitigation would represent an indiscernible change to the baseline situation
Negligible Beneficial	<ul style="list-style-type: none"> Result in a barely perceptible improvement in the character of the landscape Provide limited enhancement of characteristic elements and features Barely improve the sense of place Result in a barely perceptual change and improvement to the view, associated with the introduction of characteristic features or elements
Slight Beneficial	<ul style="list-style-type: none"> Complement the character of the landscape Enhance characteristic elements and features Slightly enhance the sense of place Result in a slight improvement to the view of a receptor of medium to high sensitivity; or, an obvious improvement to the view of a receptor of low sensitivity
Moderate Beneficial	<ul style="list-style-type: none"> Slightly enhance the character of the landscape Enable the restoration of characteristic elements and features completely lost or diminished as a result of changes from inappropriate management or development Greatly enhance the sense of place Result in a moderate improvement to the view of a receptor of medium to high sensitivity; or, a major improvement to the view of a receptor of low sensitivity
Substantial Beneficial	<ul style="list-style-type: none"> Enhance the character of the landscape Enable the restoration of characteristic elements and features completely lost or diminished as a result of changes from inappropriate management or development Greatly enhance the sense of place Result in a major improvement to the view of a receptor of high sensitivity
Very Substantial Beneficial	<ul style="list-style-type: none"> Significantly enhance the character of the landscape Enable the restoration of characteristic elements and features of a very high value landscape, completely lost or diminished as a result of changes from inappropriate management or development Significantly enhance the sense of place Result in a major improvement to the view of a receptor of very high sensitivity

