Technical Note and Analysis of Landscape and Green Belt Evidence Base





North of Limepit Lane, Huntington 10th December 2021

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Contents:

Section 1: Introduction	1
Section 2: Landscape and Visual Baseline	3
Section 3: Analysis of Evidence Base	9
Section 4: Suitability of the Site for Development	16

Appendices:

Appendix 1: Extracts from Sustainability Appraisal

Appendix 2: Extracts from Landscape Sensitivity Assessment

Appendix 3: Extracts from Green Belt Study

Plans:

Plan 1: Viewpoint Location Plan

Photosheets

Plan 2: Opportunities and Constraints Plan



Section 1: Introduction

1.1. The Site (shown in red on Figure 1 below) is situated to the east of Huntington in South Staffordshire District. It has been given a draft allocation for residential development within the South Staffordshire Council Local Plan Preferred Options¹ as part of Locality 1 (page 34).



Figure 1: Indicative extents of Parcel 591, comprising the Site (red) and additional land (blue)

- 1.2. The allocated Site originally formed part of a wider SHELAA site, reference 591 (comprising both the red and blue land in Figure 1) and retains this reference despite its reduced size. Within some evidence base documents, Parcel 591 refers to even larger areas of land, including that to the east. However, within this report, the Site refers to the allocated land outlined in red, and Parcel 591 refers to both the red and blue land, unless specified otherwise.
- 1.3. Tyler Grange Ltd (TG) has previously provided landscape planning services to inform the promotion of a much larger land area to the south and north of Limepit Lane for residential allocation. This was included in a Landscape and Visual Technical Note (reference 10722_R01), produced in 2018.

¹ South Staffordshire Council (2021) Local Plan Preferred Options



- 1.4. In the Preferred Options Sustainability Appraisal² (SA), Parcel 591 was assessed as likely to cause a major negative impact on SA Objective 4: Landscape and Townscape. This was the case for all but one of the Huntington sites included within the SA.
- 1.5. This Technical Note provides a summary of the landscape, visual and Green Belt baseline set out in the 2018 Technical Note previously prepared by TG. This document does not intend to recreate the information in the original technical note but, rather, builds upon it to address specific issues and to reflect the allocated site area.
- 1.6. This note is supported by the following illustrative material:
 - Plan 1: Viewpoint Location Plan;
 - Photosheets; and
 - Plan 2: Opportunities and Constraints Plan.

Field Analysis and Desktop Study

1.7. The evidence base as set out in the 2018 Technical Note has been reviewed to take into account any additional information. A walkover of the Site was conducted on the 2nd December 2021 to undertake an appraisal of the existing landscape character and visual context of the Site and to understand the relationship of the Site to the Cannock Chase Area of Outstanding Natural Beauty (AONB) and the contribution that the Site makes to the Green Belt. Publicly accessible routes in the wider landscape were accessed in addition to the additional land to the north of the Site.

² Lepus Consulting (2021) <u>Sustainability Appraisal of the South Staffordshire Local Plan Review: Preferred Options Place Regulation</u> 18 (III) SA Report



Section 2: Landscape and Visual Baseline

2.1. This Section comprises a summary and update of the information included within the 2018 Technical Note produced to inform earlier stages of promotion for land to the north and south of Limepit Lane.

Landscape Setting

Settlement and Settlement Pattern

2.2. Parcel 591 adjoins the eastern edge of Huntington and lies approximately 400m west of the settlement of Cannock at Hednesford. It is situated immediately to the north of Limepit Lane, which connects the urban areas of Huntington to the west and Cannock to the east. Residential dwellings within Huntington front directly onto the northern and southern sides of Limepit Lane to the immediate west of the Parcel, and existing residential development directly abuts the northern and western edges of Parcel 591.



Photograph 1: View taken from Limepit Lane adjacent to the Site demonstrating its immediate context on the settlement edge

2.3. Huntington was initially a linear settlement along the A34 (Stafford Road); however modern development has resulted in it developing a nucleated settlement pattern comprising large areas of post war residential development (Photograph 1). Huntington has extended southwards to adjoin the settlement of Cannock at Oldfallow but remains separated from Hednesford to the east by a patchwork of fields, including the Site, and a strip of woodland (the Huntington Belt) which connects Cavan's Wood in the south. This woodland provides a strong defensible boundary to the edge of Cannock in this area and provides physical and visual separation between the two settlements.



Transport, Access and Public Rights of Way

2.4. No Public Rights of Way (PRoW) enter or connect to the Site or blue land and the Site is not designated as common land or other use with public access rights. However, there are a number of footpaths that the public use in the wider landscape, including well-trodden paths that extend along the edge of Huntington Belt. For the purposes of this report, and when identifying representative public viewpoints, the well-trodden routes have been considered as Permissive Footpaths.

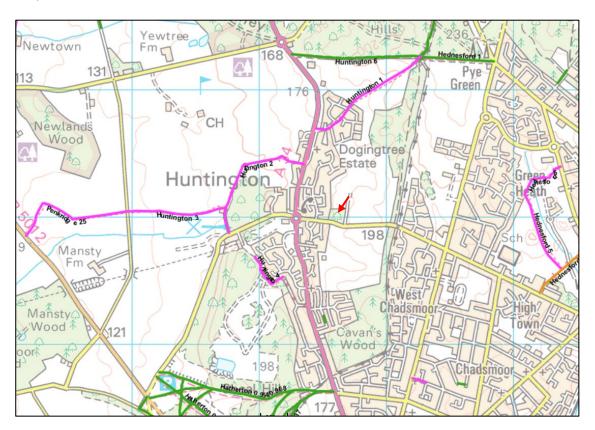


Figure 2: Extract from Staffordshire County Council Definitive Map extract illustrating Public Rights of Way within the vicinity of the Site (red).

Topography and Hydrology

- 2.5. The land rises from the built edge of Huntington in the west to the wooded ridge marked by the Huntington Belt to the east. As such, Parcel 591 is situated on rising land. The lowest point of the Site is at the western edge at c. 165m Above Ordnance Datum (AOD) and the highest point is c. 180mAOD. The blue land rises up to a similar height at its south-eastern corner and falls to c. 160mAOD in the north-west corner.
- 2.6. The eastern edge of the settlement of Huntington rises up to c. 185m AOD around Oak Avenue to the north and to c. 190mAOD to the south at the Ling Road caravan park, higher than the levels in Parcel 591.



Vegetation and Field Pattern

2.7. The Site appears to be unmanaged, and the Preliminary Ecological Appraisal (TG ref: 10722/R03), carried out in 2019, identified that the Site as being vegetated by scrub and scattered trees (Photograph 2). The blue land comprises an area of arable farmland (Photograph 4).



Photograph 2: Scrub and scattered tree habitats within the Site

- 2.8. A hedgerow with trees defines the southern boundary of the Site adjacent to Limepit Lane whilst the northern boundary is marked by a line of scattered trees. The western boundary is defined by a mixture of urban treatments around the curtilages of adjoining residences off Raven Close and Redwing Drive whilst the eastern boundary is demarcated by the edge of the adjacent access track (Plate 1: Photographs 4-7).
- 2.9. The hedgerow along the eastern boundary extends north along the eastern edge of the blue land to where it meets the existing settlement edge at Linnet Close and Foxfields Way.











Photographs 3-6: Clockwise from top left: Southern (Photograph 3), northern (Photograph 4), eastern (Photograph 5) and western (Photograph 6) boundaries of the Site. The farm track (yellow) adjoins the eastern boundary of the Site. Photograph 4 is taken from within the blue land and shows its arable nature.

Designations

- 2.10. Parcel 591 is not covered by any statutory or local landscape-specific designations, but the Site boundary is situated c.46m west of Cannock Chase Area of Outstanding Natural Beauty (AONB) and the blue land is c. 26m west.
- 2.11. The Site is also located within the Green Belt but benefits from a draft housing allocation within the Preferred Options prepared for the Local Plan Review, which would result in its removal from the Green Belt.
- 2.12. The Site does not lie within or adjacent to a Conservation Area and there are no listed buildings or scheduled monuments located within the Site or in close proximity.

Landscape Character

- 2.13. The Site and the additional land to the north is covered by the following published landscape/character studies, Landscape Character Areas (LCAs) and Types (LCTs):
 - National Character Area (NCA):67 Cannock Chase and Cank Wood³;
 - Cannock Chase AONB Landscape Character Framework (August 2017)⁴: Sandstone Hills and Heaths LCT;
 - Staffordshire County Council Planning for Landscape Change SPD (2000)⁵: Sandstone Hills and Heaths LCT;

⁵ Staffordshire County Council (2000) <u>Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and</u> Stoke on Trent Structure Plan 1996-2011



³ Natural England (2015) National Character Area 67: Cannock Chase and Cank Wood

⁴ Ashmead Price (2017) Cannock Chase AONB: Review of AONB Landscape Character Framework

- South Staffordshire Historic Environment Character Assessment January (2011)⁶: The Site is located within the 'Post War Amalgamated Fields' Historic Characterisation Type. The adjoining urban area comprises 'Post 1880s Settlement'.
- 2.14. The 2018 technical note includes further details of these character areas.
- 2.15. A review of the guidance provided for these character areas and types has identified the following priorities for consideration:
 - "Protect and conserve the strong woodland belts within and around the boundaries of this estate landscape;
 - Conserve and strengthen roadside hedgerows and verges as valuable buffers alongside busy roads. Manage hedgerows and verges to maximise landscape and wildlife benefit;
 - Conserve and manage public access via the established footpath network. Take opportunities for improving linkages and access to the AONB from urban areas without creating undue pressures on landowners;
 - Mitigate the impact of any new development on open farmland around the edge of the AONB by encouraging new native broadleaved woodland planting that links with the existing estate woodlands;
 - Planting should reflect the scale of the landscape, from large scale field sized plantations in the more open areas, to no more than small scale field corners or hedgerow planting in the more intimate areas;
 - Planting should be visually linked to existing hedgerows and woodland features; and
 - On the lower ground, planting should be of a smaller scale and reflecting field pattern but increasing in scale on the higher slopes."

Views and Visibility

2.16. Illustrative views and their locaiton are included at the rear of this document.

Extent of Visibility and Composition of Views

- 2.17. The land to the west of Huntington is generally level, rising up to the east in the area of the Site and continuing towards the AONB and the Huntington Belt. There are localised areas of higher ground to the south-west of Huntington at Shoal Hill and to the immediate west at Huntington Farm.
- 2.18. The Site rises up to c. 180mAOD in the south-east, lower than residential development on the eastern edge of Huntington to the north and south at c. 185 and c. 190mAOD respectively. As such, development at this elevation is not out of context for the settlement.
- 2.19. Strong boundary vegetation to the east of the adjoining access track, the topography of the farmland to the east and the Huntington Belt restrict views from Hednesford to the east of the Site.

⁶ Staffordshire County Council (2011) Historic Environment Character Assessment: South Staffordshire



North of Limepit Lane, Huntington Technical Note and Analysis of Landscape and Green Belt Evidence Base

- The visual envelope of the Site extends into Cannock Chase AONB, however, and views are available from permissive paths on elevated land to the east (see Viewpoint 6).
- 2.20. Localised views towards the Site were possible from Shoal Hill, from where the Site forms a minor element within the view, seen in the context of the wider settlement (see Viewpoint 5).
- 2.21. Views towards the Site from Limepit Lane are limited from the east, due to the undulations in the topography and the intervening vegetation (see Viewpoint 1 and 2). From this viewpoint, the Site is seen in the context of the existing edge of Huntington.
- 2.22. No views were possible from Pottal Pool Road, to the north-west of Huntington, or from Mansty Lane to the west.
- 2.23. In general, unobstructed short (0-500m), medium (500m-2km) and long (>2km) distance intervisibility exists as follows:
 - To the north of the Site: Short distance intervisibility
 - To the west of the Site: Short, medium and long distance intervisibility
 - To the south of the Site: Short distance intervisibility
 - To the east of the Site: Short distance intervisibility
- 2.24. Development within the Site will result in the negligible increase in the amount of residential development visible in views towards the Site. The photosheets provide a representative selection of views towards the Site from the surrounding landscape to illustrate the nature of existing views.



North of Limepit Lane, Huntington

Section 3: Analysis of Evidence Base

3.1. This section includes an analysis of the SA, including how the predicted major negative impact was assessed, and the evidence on which it was based, namely the Landscape Sensitivity Assessment and Green Belt Study. These are explored further below.

2021 Sustainability Appraisal

- 3.2. SA Objective 4 is titled 'Landscape and Townscape' but also appears to include Green Belt factors, which are not landscape but, rather, spatial in nature. It is important these elements are not conflated. Paragraph 3.4.1 of the SA states that the assessment has been undertaken from desktop only analysis and not verified in the field and that "the nature of the potential impacts on the landscape are, to an extent, uncertain".
- 3.3. The document sets out the headings against which areas of land were assessed and how they were rated. These include proximity to sensitive receptors, Green Belt assessment, views and landscape character.
- 3.4. The analysis of SA Objective 4 on the Huntington sites is set out in paragraph B.13.4. The Parcel 591 (as shown on Figure 1) is assessed as follows:
 - AONB Situated c. 30m west of the AONB minor negative impact
 - Green Belt Assessed as a causing a high level of harm in the GB Study major negative impact
 - Landscape Sensitivity Assessed within the Landscape Sensitivity Study as being within an area of moderate-high sensitive landscape major negative impact
 - Landscape Character Identified as being within RCA Cannock Chase and Cankwood and LCT Sandstone Hills and Heaths, and that development at 591 would be discordant with the key characteristics of the LCT minor negative
 - Views from PRoW No identified proximity to PRoW
 - Views from Residents Development will potentially alter the views experienced by local residents minor negative impact
 - Urbanisation of the Countryside Located in open countryside minor negative
- 3.5. This Technical Note focusses on the two criteria against which Parcel 591 is assessed as likely to cause major negative impact, i.e., Green Belt and landscape sensitivity.
- 3.6. Paragraph 3.4.6 states that parcels within the Green Belt Study that have been assessed as causing very high, high or moderate-high harm to the Green Belt have been assessed as having a major negative effect on the objective but that parcel of moderate-high or moderate harm would be a minor negative impact.
- 3.7. The document also makes reference to the Landscape Sensitivity Study, with any parcels assessed as having high or moderate high sensitivity as having potentially major negative effects.



- 3.8. Box 3.4 on page 40 sets out criteria for assessment and states that development proposals within partially within or adjacent to the AONB will result in major negative impacts, whereas those in close proximity are likely to result in negative impacts. Box 3.4 also clarifies the position on Green Belt with those parcels assessed as causing very high, high or moderate-high harm being assessed as major negative and those of moderate or low-moderate as being of minor adverse impact. Box 3.4 has been included in Appendix 1.
- 3.9. Major negative impacts are defined as when development is likely to permanently degrade, diminish or destroy a quality receptor, be unable to be mitigated, be discordant with the setting and / or contribute to a cumulative significant effect
- 3.10. Minor negative impacts are defined as when the development proposals will not quite fit in with the existing location or with existing quality receptors and/or affect undesignated yet recognised local receptors.

South Staffordshire Landscape Sensitivity Assessment (July 2019)

3.11. The Council's Landscape Sensitivity Assessment⁷ report identifies the site as situated within Parcel SL86 (see Appendix 2). The Study assesses the wider parcel as having a Moderate-High landscape sensitivity. As illustrated on the extract below, the parcel covers an area substantially greater than the Site or Parcel 591, totalling 132.22 hectares in size and including all of the land between Huntington and Cannock. This includes the AONB, the higher areas of ground and Cavan's Wood and the Huntington Belt. Parcel 591 within the Sensitivity Assessment includes the red and blue land as set out in Figure 1 as well as all the land to the east as far as the Huntington Belt.

⁷ LUC (2019) South Staffordshire Landscape Sensitivity Assessment



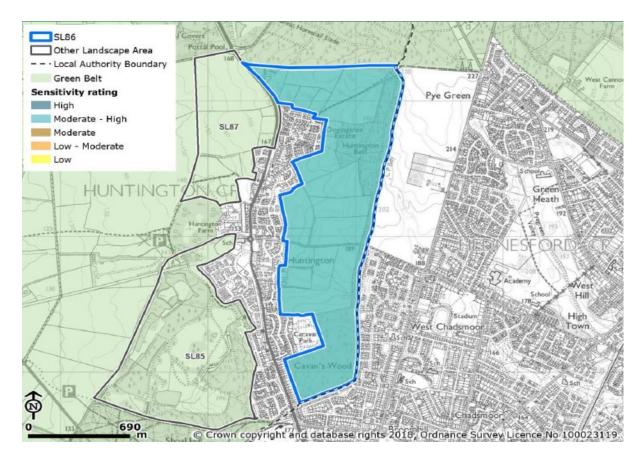


Figure 3: Extract from Landscape Sensitivity Assessment showing extent of Parcel SL86

- 3.12. The analysis of SL86 is included on page 404 of Appendix 1 of the report, which, under the heading of 'Landscape Sensitivity Judgement' states, "This landscape is considered to have a moderate-high overall sensitivity to residential development, as the majority of the criteria score moderate but part of the area's designation as Cannock Chase AONB and its role in separating Huntington and Hednesford increases its sensitivity".
- 3.13. On the analysis table of page 406 and 407, only two elements are assessed as making the landscape of high sensitivity: the role in settlement setting and the intervisibility with adjacent designated landscapes or promoted viewpoints.
- 3.14. Under the heading of 'settlement setting', the document states that "the area provides a rural backdrop to Huntington, including new development along Limepit Lane...The area provides an important role in separating Huntington and Hednesford".
- 3.15. The visual analysis in Section 2 of this report and the associated Photosheets, demonstrate that views in which the Site is visible behind the existing settlement are limited and, within those views, the Site forms a minor element (see Views 5-7). Development within the Site would create a negligible change in the views and would not change their character. As such, the Site doesn't perform anything other than a negligible role as the rural backdrop to Huntington.
- 3.16. The intervening rising land and vegetation, including the Huntington Belt, perform the greatest role in separating Huntington and Hednesford. View 1, 2 and 6 demonstrate the role that the Site plays in views from west of Huntington Belt and from along Limepit Lane, showing that



- development within the Site will still maintain notable physical, visual and perceptual separation between the settlements.
- 3.17. In relation to this attribute, the Site is of **moderate sensitivity** to development, which is defined as "provides some contribution as a backdrop to the adjacent settlement or plays a role in the perception of a gap between settlements. Development would not represent a step-change in settlement form but may adversely affect the existing settlement edge to some extent".
- 3.18. Under the heading of 'inter-visibility with adjacent designated landscapes or promoted view points', the document states that "much of this area is within the Cannock Chase AONB. There is intervisibility with other parts of the AONB including Badger's Hills to the north, and Shoal Hill to the south-west".
- 3.19. The allocated Site and blue land to the north are not situated within the AONB. No views towards the Site were identified from Badger's Hills, with the Site separated from this area by development on Oak Avenue, woodland within the Huntington Belt and the intervening curve of the land. In any case, the Site would be seen set in the context of existing development to the west and north. View 5 is taken from Shoal Hill and demonstrates the Site seen in the context of the existing settlement edge. The proposed development will not change the character of this view. View 6 is taken from the path along the edge of the Huntington Belt within the AONB and demonstrates the Site hidden within the curve of the landform and in the context of the existing settlement edge of Huntington.
- 3.20. In relation to this attribute, the Site is of **moderate sensitivity**, which is defined as *"some intervisibility with surrounding sensitive landscapes or viewpoints"*.
- 3.21. The reduction of the sensitivity of the Site in relation to these two attributes to **medium**, would result in an overall **medium sensitivity** for the Site. This would reduce the assessment in the SA for this criterion to reduce to **minor negative**.

South Staffordshire Green Belt Study - Stage 1 and 2 (July 2019)

- 3.22. The Council's Green Belt Study Stage 1 identifies the Site as being located within Parcel S4 (West of Cannock), a parcel of 1110.4 hectares surrounding the western, northern and eastern extents of Huntington. This area is of a large strategic scale and is of little relevance to the Site and its situation on the eastern edge of Huntington.
- 3.23. The Council's Green Belt Study Stage 2 goes into further detail by dividing the Stage 1 parcels into smaller sub-parcels. The site lies within Sub-parcel S4B; a larger parcel surrounding the northern and eastern extremity of Huntington with a total area of 180.34 hectares. The extents of parcel S4B are illustrated on the extract below:



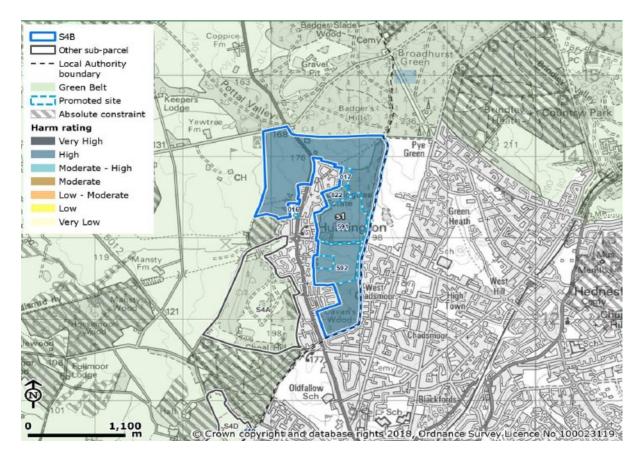


Figure 4: Extract from the Green Belt Study showing extents of Sub-parcel S4B – Huntington (north)

- 3.24. As illustrated on the plan above, the Study identifies parcel 591 as being substantially larger than the Site, extending east beyond the site boundaries to cover the whole width of the Green Belt between Huntington and Hednesford.
- 3.25. The sub-parcel is assessed as making a strong contribution to checking the sprawl of large built up areas and to safeguarding the countryside from encroachment but a weak contribution to the prevention of merger of towns and the preservation of the setting of historic towns. A smaller area, S4Bs1, totalling 180.3ha, has been identified, including all the land west and south of the Huntington Belt and north of Cavan's Wood. Release of this area for development has been assessed as causing high harm to the Green Belt.
- 3.26. S4B and S4Bs1 are both significantly larger than the Site and include all of land between Huntington and Hednesford, including the rising and more visually prominent higher ground to the east. As such, these parcels make a greater contribution to the purposes of the Green Belt than the Site on its own or the blue land to the north.
- 3.27. Tyler Grange has undertaken a site specific assessment of contribution of the Site to the purposes of the Green Belt and its likely resulting harm on the remaining Green Belt overall. Contribution to the recycling of brownfield land is considered to be the same for all greenfield sites and, therefore, this has been scoped out.



Purpose 1 – To check the unrestricted sprawl of large built up areas

- 3.28. The Huntington Belt provides a strongly defensible boundary to sprawl west from Hednesford. The hedgerow at the eastern edge of the Site forms the basis of a potentially defensible boundary to the east of Huntington and forms a continuation of the line of the existing eastern settlement edge to the north. This boundary has the potential to be reinforced through tree planting and open space, to create a defensible boundary to the settlement edge, which could be extended north to meet the edge of development on Linnet Close.
- 3.29. The allocated Site and the blue land are contained to the north and east by existing residential development. The Site makes a **moderate to low** contribution to this purpose due to the lack of a strongly defensible boundary at its eastern extent.

Purpose 2 – To prevent neighbouring towns merging into one another

- 3.30. Parcel S4B was assessed as making a weak/no contribution to this purpose due to the distance between Cannock and Stafford. The allocated Site makes an even smaller contribution.
- 3.31. The allocated Site makes a **weak/no contribution** to this purpose.

Purpose 3 - To assist in safeguarding the countryside from encroachment

- 3.32. The development of any greenfield site will result in some encroachment into the countryside. However, development within the Site, and potentially future development in the blue land to the north, would not extend the settlement edge further east than is currently the case, nor into higher and more visually sensitive ground than the development on Oak Avenue to the north. In addition, the visual analysis has shown that development within the allocated Site will cause little change in views from and to different areas of the countryside, resulting in little visual or perceptual encroachment, and that the Site has a strong relationship with the existing built edge.
- 3.33. The Site makes a **moderate to low** contribution to this purpose.

Purpose 4 - To preserve the setting and special character of historic towns

- 3.34. The Site does not contribute to the setting or special character of a historic town.
- 3.35. The Site makes a **weak/no contribution** to this purpose.

Assessment of Harm

3.36. Using the criteria set out in paragraph 6.23 of the Study, developing the Site would be likely to cause **moderate** harm to the Green Belt. Although the Site was assessed as making a moderate to low contribution to two of the purposes, it was assessed as making no contribution to the other two, and it will not cause a notable weakening in the existing Green Belt boundary. In contrast, development within the Site and the blue land to the north present the opportunity to create a stronger boundary through the addition of new planting. In addition, it would create a logical eastern extent of the settlement edge, bringing it to the same eastern extent as development to the north on Linnet Close and Foxfields Way.



3.37. A reduction of the assessment of Green Belt harm would reduce the assessment of impact on tis criterion of the SA to **minor negative**.

Review of Sustainability Appraisal Assessment

- 3.38. The SA rating of Parcel 591 (comprising the Site and the blue land) has been derived from the assessment of much wider parcels of land, the 132.22ha SL86 within the Sensitivity Assessment, and the 180.4ha S4B within the Green Belt Study Part 2. This has then been referred to as if it were a true assessment of the 2ha Site or the wider 7.4ha Parcel 591 when these assessments of much wider parcels of land do not reflect site specific issues or the true role that smaller sites perform in landscape, visual and Green Belt issues.
- 3.39. As set out above, the larger parcel 591 (comprising the red and blue land) was assessed in the SA, on the basis of the much wider evidence base parcels, as follows:
 - AONB minor negative impact
 - Green Belt major negative impact
 - Landscape Sensitivity major negative impact
 - Landscape Character minor negative
 - Views from PRoW No assessment of impact
 - Views from Residents -minor negative impact
 - Urbanisation of the Countryside -minor negative
- 3.40. Under the criteria set out in section 3.4 of the Sustainability Appraisal, land parcels likely to result in moderate moderate-low harm to the Green Belt are assessed as having a **minor negative** impact. Under the criteria for landscape sensitivity, land parcels assessed as moderate landscape sensitivity are assessed as having a **minor negative** impact.
- 3.41. These revised assessments of likely impact would result in the following results for the Site:
 - AONB minor negative impact
 - Green Belt Assessed as causing moderate level of harm minor negative impact
 - Landscape Sensitivity Assessed as being within an area of moderate sensitive landscape minor negative impact
 - Landscape Character minor negative impact
 - Views from PRoW No identified proximity to PRoW
 - Views from Residents -minor negative impact
 - Urbanisation of the Countryside minor negative impact
- 3.42. As can be seen, development in both the Site and the wider blue land to the north would result in a **minor negative impact** when assessed against the criteria of SA Objective 4.



Section 4: Suitability of the Site for Development

Opportunities and Constraints

- 4.1. The following opportunities and constraints have been identified as part of the baseline analysis as set out within the 2018 Landscape, Visual and Green Belt Technical Note:
 - The hedgerow with trees along the southern boundary of the Site adjoining Limepit Lane be conserved and enhanced;
 - The treatments to the western, northern and eastern boundaries of the Site should be enhanced by planting native hedgerows and through the retention of scattered trees to form hedgerow trees where practicable;
 - The scattered trees within the body of the Site that are of value, subject to tree survey, to be protected through the careful siting of proposed buildings and associated infrastructure where practicable;
 - Limepit Lane provides a gateway approach to Huntington from Cannock Chase AONB. A setback and sensitivity landscaped buffer should be established along the southern edge of the Site to soften people's perceptions of the approach;
 - New dwellings around the edges of the Site should have active frontages to create an attractive settlement edge;
 - Incorporation of new areas of woodland planting, hedgerow tree planting and public open space to filter views will aid in providing a soft transition into the wider countryside and AONB;
 - Development to respect the height, scale and character of the adjacent built edge. Opportunities for single storey houses on the eastern edge of the development to reduce visual prominence when views from the higher land in the AONB.
- 4.2. These are illustrated on Plan 2: Opportunities and Constraints.
- 4.3. In addition, the analysis of Parcel 591, including the allocated Site and blue land to the north has demonstrated that additional development north of the red line would be appropriate and logical and would result in similar effects to development within the allocated Site alone.

Suitability of the Site for Future Development and Conclusions

- 4.4. The re-evaluation of Parcel 591, including the allocated Site, on its own merits, rather than based upon the assessment of significantly larger areas of land, demonstrates that development in this location, either within the allocated Site or within the blue land to the north, would have only **minor negative impacts** upon SA Objective 4: Landscape and Townscape.
- 4.5. In-line with the findings of the site-specific analysis and appraisal undertaken by Tyler Grange, Parcel 591, including the Site, is adjacent to the existing built edge of Huntington and has capacity to accommodate development of a type and scale similar to that to the west and north. It would not be incongruous with its surrounding or an inappropriate development within this location. In addition, the land to the north of the allocated Site, i.e. the blue land, has the capacity to



- accommodate development without causing additional unacceptable effects or changing the revised assessment on SA Objective 4.
- 4.6. There are also opportunities for development to incorporate new boundary planting to provide an improved soft edge to the settlement that is characteristic of the local landscape, contributes positively to the landscape and visual setting of the AONB, including views from the higher ground to the west looking across the site, and which creates a more strongly defined Green Belt boundary than is currently the case.



North of Limepit Lane, Huntington Technical Note and Analysis of Landscape and Green Belt Evidence Base

Appendix 1: Extracts from Sustainability Appraisal



Sustainability Appraisal of the South Staffordshire Local Plan Review

Preferred Options Plan

Regulation 18 (III) SA Report

August 2021





2 Methodology

2.1 Scoping stage

2.1.1 The SA scoping report represented Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.
- 2.1.2 The Scoping report was consulted on with the statutory bodies Natural England, Historic England and the Environment Agency, as well as other relevant parties and the public. Following consultation, the Scoping report was updated in light of the comments received. Each of the reasonable alternatives or options appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**.
- 2.1.3 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Annex 1(f)²⁰ of the SEA Directive. Including the SEA topics in the SA Objectives helps ensure that all of the environmental criteria of the SEA Directive are represented. Consequently, the SA Objectives reflect all subject areas to ensure the assessment process is transparent, robust and thorough.
- 2.1.4 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.

²⁰ Annex 1(f) identifies: 'the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'.

2.2 Assessment of reasonable alternatives

2.2.1 The purpose of this document is to provide an appraisal of the reasonable alternatives, also known as 'options', (those listed in **Table 1.1**) in line with Article 5 Paragraph 1 of the SEA Directive²¹:

"Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I."

- 2.2.2 The SEA Regulations require that the alternative policies and site allocations considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF) or site allocation options that are unavailable or undeliverable.
- 2.2.3 The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.
- 2.2.4 This document also provides information in relation to the likely characteristics of effects, as per the SEA Directive (see **Box 2.1**).

Box 2.1: Annex II of the SEA Directive²²

Criteria for determining the likely significance of effects (Article 3(5) of SEA Directive)

²¹ EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN [Date Accessed: 13/07/18]

²² EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN [Date Accessed: 31/07/18]

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects:
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - o exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

2.3 Impact assessment and determination of significance

2.3.1 Significance of effect is assessed by considering a combination of the sensitivity of a receptor and magnitude of change. The level of impact can be expressed in relative terms, based on the principle that the more sensitive the resource and, the greater the magnitude of the change, as compared with the do-nothing scenario, the greater will be the significance of effect.

2.4 Sensitivity

- 2.4.1 Sensitivity has been measured through consideration as to how the receiving environment is likely to be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and for example, if impacts will affect designated biodiversity sites or nationally important landscapes.
- 2.4.2 A guide to the range of scales used in determining impact sensitivity is presented in **Table 2.1.** For most receptors, sensitivity increases with geographic scale.

Table 2.1: Sensitivity

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

2.5 Magnitude

2.5.1 Magi

Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 2.2**).

Table 2.2: Magnitude

Magnitude	Typical criteria
High	 Likely total loss of or major alteration to the receptor in question; Provision of a new receptor/feature; or The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: Frequent and short-term; Frequent and reversible; Long-term (and frequent) and reversible; Long-term and occasional; or Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: Reversible and short-term; Reversible and occasional; or Short-term and occasional.

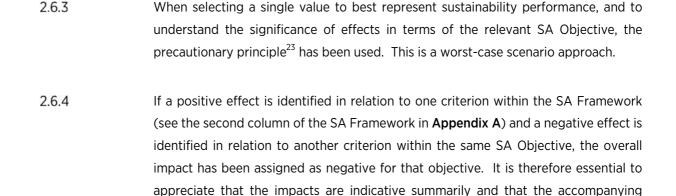
2.6 Significant effects

- 2.6.1 Through a consideration of the sensitivity of receptors and magnitude of change likely to be experienced, the level of impact can be assessed.
- A single value from **Table 2.3** has been allocated to each SA Objective for each assessment. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process. The assessment of impacts and subsequent evaluation of significant effects is in accordance with the footnote of Annex 1(f) of the SEA Directive, where feasible, which states:

"These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects".

Table 2.3: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative 	 The size, nature and location of a development proposal would be likely to: Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; Cause a very high-quality receptor to be permanently diminished; Be unable to be entirely mitigated; Be discordant with the existing setting; and/or Contribute to a cumulative significant effect.
Minor Negative -	The size, nature and location of development proposals would be likely to: Not quite fit into the existing location or with existing receptor qualities; and/or Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	 The size, nature and location of a development proposal would be likely to: Improve undesignated yet recognised receptor qualities at the local scale; Fit into, or with, the existing location and existing receptor qualities; and/or Enable the restoration of valued characteristic features.
Major Positive ++	 The size, nature and location of a development proposal would be likely to: Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; Restore valued receptors which were degraded through previous uses; and/or Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.



2.6.5 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).

assessment text provides a fuller explanation of sustainability performance.

- 2.6.6 The level of impact has been categorised as negligible, minor or major. **Table 2.3** sets out the levels of significance and explains the terms used. The nature of the impact can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 2.6.7 Each reasonable alternative site, preferred site allocation and policy has been assessed for likely significant impacts against each SA Objective in the Framework, as per Table
 2.3. Likely impacts are not intended to be summed.
- 2.6.8 It is important to note that the assessment scores presented in **Table 2.3** are high level indicators. The assessment narrative text should always read alongside the significance scores. Topic specific methods and assumptions in **Boxes 2.1** to **2.12** offer further insight into how each impact was identified.
- 2.6.9 If negligible effects are identified for a specific SA objective for a specific site, these effects are not necessarily described in the summary text for the cluster the site is in, however, all sites are assessed under each SA objective and the findings are illustrated in the accompanying matrices.

²³ The European Commission describes the precautionary principle as follows: "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered".

2.7 Limitations of predicting effects

- 2.7.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 2.7.2 The assessments in this report are based on the best available information, including that provided to us by SSDC and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.
- SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way within the SA process and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.
- 2.7.4 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available for all reasonable alternative sites.
- 2.7.5 All data used is secondary data obtained from SSDC or freely available on the Internet.

3.4 SA Objective 4: Landscape and Townscape

3.4.1

Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.

Cannock Chase Area of Outstanding Natural Beauty (AONB)

3.4.2

The Cannock Chase AONB is a nationally designated landscape, located to the north east of the District. Potential negative impacts on the AONB and its setting have been assessed with regard to the Cannock Chase AONB Management Plan 2019-2024³⁶ and the special qualities it identifies.

Green Belt Boundary Review

3.4.3

SSDC identified the potential need to revise Green Belt boundaries in order to accommodate the identified housing need. A Green Belt Study has been undertaken³⁷ to inform the consideration of revisions to Green Belt boundaries in the district as part of the LPR. The study considered the five purposes of Green Belt, as set out in the NPPF:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and

³⁶ Cannock Chase Area of Outstanding Natural Beauty (2019) Cannock Chase Area of Outstanding Natural Beauty Management Plan 2019 – 2024. Available at: https://cannock-chase.co.uk/wp-content/uploads/2019/10/AONB-Cannock-Chase-Management-Plan-2019-24.pdf [Date Accessed: 01/11/19]

³⁷ LUC (2019) South Staffordshire Green Belt Study: Stage 1 and 2 Report. Available at: https://www.sstaffs.gov.uk/doc/181123/name/South%20Staffs%20GB%20Stage%201%20and%202%20Report%20FINAL%20v1%20-%20web%20copy.pdf/ [Date Accessed: 22/06/21]

 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.4.4 The NPPF states that,

"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

In Stage 1, the Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt. In Stage 2, the study seeks to identify potential harm as a consequence of releasing land parcels from the Green Belt. This second stage resulted in a seven point 'green belt harm' scale based on the Stage 1 assessment:

- Very high;
- High;
- Moderate high;
- Moderate;
- Low-moderate;
- Low; and
- Very low.
- In this SA those land parcels with a Green Belt harm rating of 'very high', 'high' and 'moderate high' have been assessed as having a potential major negative effect on this Objective. 'Moderate high' and 'moderate' harm has been assessed as having minor negative effect on this objective and 'low' and 'very low' are assessed as having a negligible effect.
- 3.4.7 As stated in the Green Belt Study,

"In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.

In light of the above, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate development but identifies the relative variations in the harm to the designation".

3.4.8

Table 8.1 of the study sets out a range of potential measures to mitigate harm to the revised Green Belt. Many of these measures focus on identifying and enhancing strong boundaries to the revised Green Belt and reducing the potential urbanising influences of new development on adjacent areas of Green Belt through the sensitive masterplanning of new development.

Landscape Sensitivity Assessment

3.4.9

Alongside the Green Belt Study, a Landscape Sensitivity Study³⁸ was undertaken, which forms Stage 3 of the Green Belt Study. As stated in the Green Belt Study, there is an interaction between the assessment of how parcels of land fullfil Green Belt purposes and the landscape character of the land,

"There is a relationship between landscape sensitivity and Green Belt contribution/harm in that physical elements which play a role in determining landscape character and sensitivity are also likely to play a role in the spatial relationship between urban areas and the countryside. However there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land".

3.4.10

The Landscape Sensitivity Study considered the landscape and visual aspects of the land parcels using ten criteria which were considered most likely to be affected by development. The criteria included natural features, landform, landscape pattern, recreational value, settlement setting and visual prominence, amongst others. Overall landscape sensitivity was assessed on a five-point scale,

- High;
- Moderate high;
- Moderate;
- Moderate low; and
- Low.

³⁸ LUC (2019) South Staffordshire Landscape Sensitivity Assessment. Available at: https://www.sstaffs.gov.uk/planning-files/Spatial-Housing-Strategy/SHSID-Landscape-Study-2019.pdf [Date Accessed: 22/06/21]

3.4.11

In this SA, sites located in land parcels assessed as 'high' and 'moderate high' landscape sensitivity are considered to have potentially major negative effects on this objective. Sites in land parcels assessed as 'moderate' and 'moderate-low' are assessed as having minor negative effects on this objective. Sites in land parcels assessed as low landscape sensitivity are assessed as having a negligible effect on this objective.

Country Parks

3.4.12

There are several Country Parks located within and around South Staffordshire (see **Figure 3.4**). Potential impacts to Country Parks, including views from Country Parks, have been assessed based on the distance between the development proposal and the Country Park, as well as the landscape within and surrounding the proposal as determined through a desk-based appraisal.

Landscape Character Assessment

3.4.13

Baseline data on Landscape Character Types (LCTs) within the Plan area are derived from the Planning for Landscape Change: Supplementary Planning Guidance³⁹. Key characteristics of each LCT have informed the appraisal of each site proposal against the landscape objective. The assessment of impact is based on the overall landscape character guidelines and key characteristics for each LCT, and the nature of the landscape within the site as determined through a desk-based appraisal.

Views

3.4.14

In order to consider potential visual effects of development, it has been assumed that the development proposals would, broadly, reflect the character of nearby development of the same type.

3.4.15

Potential views from residential properties are identified through the use of aerial photography.

3.4.16

It is anticipated that the SSDC will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) or Landscape and Visual Appraisals (LVAs) to accompany any future proposals, where relevant. The LVIAs or LVAs should seek to provide greater detail in relation to the landscape character of the proposal and its

³⁹ Staffordshire County Council (2000) Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011. Volume 3: Landscape Descriptions. Available at: https://www.staffordbc.gov.uk/landscape-character-assessment1 [Date Accessed: 28/06/21]

surroundings, the views available towards the development proposal, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.

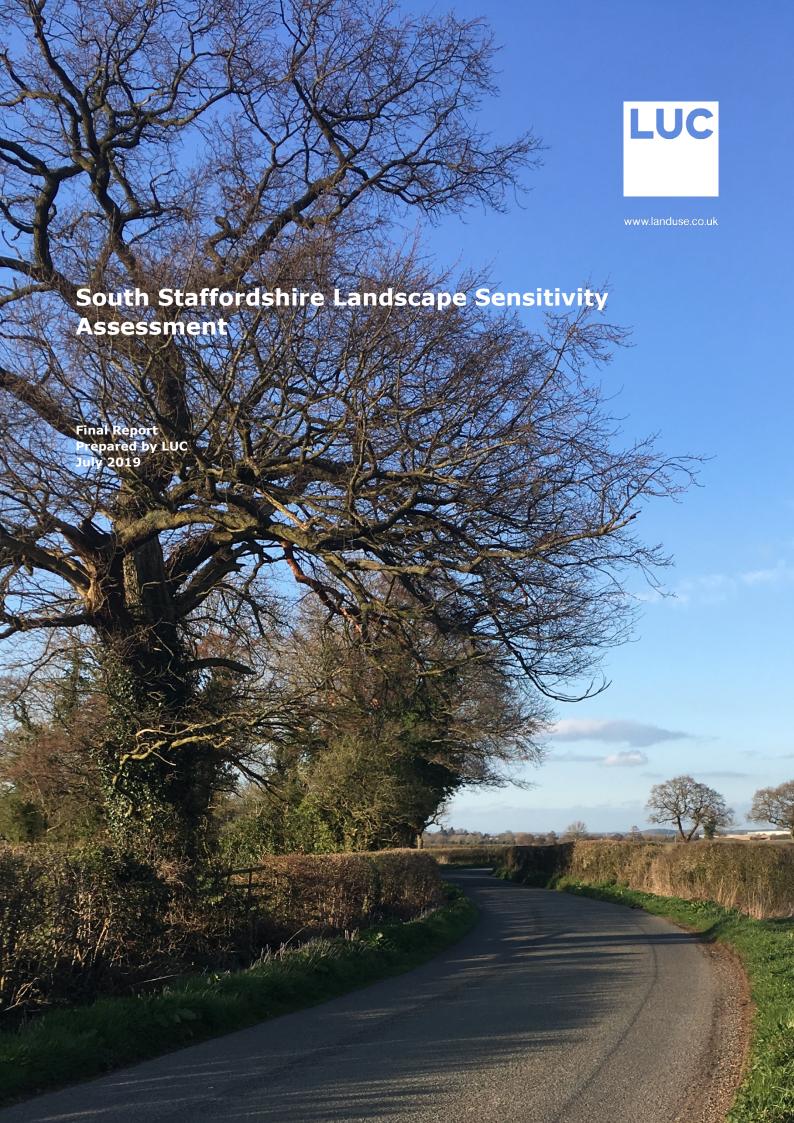
Box 3.4: SA Objective 4: Landscape and Townscape assessment methodology	
Cannock Chase AONB	
Development proposals located within, partially within or adjacent to the AONB are expected to result in major negative impacts on the character and/or setting of the designated landscape.	
Development proposals located in close proximity to the AONB are expected to result in negative impacts on the views experienced from the AONB and/or the setting of the designated landscape.	-
Green Belt Harm	
Development proposals located within areas of 'moderate-high', 'high' or 'very high' Green Belt harm.	
Development proposals located within areas of 'low-moderate' or 'moderate' Green Belt harm.	-
Development proposals located within areas of 'low' sensitivity, or those not assessed in the study.	0
Landscape Sensitivity Study	
Development proposals located within areas of 'moderate-high' or 'high' landscape sensitivity.	
Development proposals located within areas of 'low-moderate' or 'moderate' sensitivity.	-
Development proposals located within areas of 'low' sensitivity, or those not assessed in the study.	0
Landscape Character Assessment	
Development proposals which could potentially be discordant with the guidelines and characteristics provided in the published Supplementary Planning Guidance would be expected to have a minor negative impact on the landscape objective.	-
Development proposals located within areas classed as 'urban' within the Landscape Character Assessment, and therefore comprise built-up areas, would be expected to have a negligible impact on the landscape character.	0
Country Park:	
Development proposals that are located adjacent or in close proximity to a Country Park, and therefore could potentially adversely affect views from Country Parks, are assumed to have a minor negative impact on the landscape objective.	-

Box 3.4: SA Objective 4: Landscape and Townscape assessment methodology	
Views	
Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the Public Rights of Way (PRoW) network and/ or local residents are assumed to have minor negative impacts on the landscape objective.	
Urban Sprawl/ Coalescence	
Development proposals which are considered to increase the risk of future development spreading further into the wider landscape are assessed as having a minor negative impact on the landscape objective.	
Development proposals which are considered to reduce the separation between existing settlements and increase the risk of the coalescence of settlements are assessed as having a potential minor negative impact on the landscape objective.	
Overall	
Where a development proposal would not be anticipated to significantly impact the surrounding landscape, a negligible impact would be expected for this objective.	

	1	2	3	4	5	6	7	8	9	10	11	12
Site Reference	Climate Change Mitigation	Climate Change Adaptation	Biodiversity & Geodiversity	Landscape & Townscape	Pollution & Waste	Natural Resources	Housing	Health & Wellbeing	Cultural Heritage	Transport & Accessibility	Education	Economy & Employment
486a/b	+/-		-		-	-	+	-	-	-		+
486c	+/-		-		-	-	+	-	-	-	-	+
520	+/-		-		-	-	+	-	-	-	++	-
679	+/-		-		-	-	+	-	0	-	-	+
					Feather	rstone						
102	+/-	-	-		-	-	+	-	-	-		+
SAD 168	+/-	+	-	-	-	+	+	-	-	-	-	-
169	+/-	+	-		0	-	+	-	-	-	-	+
170	+/-		-	-	-	-	+	-	-	-	-	-
172	+/-	-	-		-	-	+	-	-	-		-
204	+/-	+	-		-	-	+	-	-	-		+
206	+/-	+	-		-	-	+	-	-	-		+
396	+/-	-	-		-	-	+	-	-	-		-
397	+/-	-	-	-	-	-	+	-	-	-	-	-
527	+/-		-		-	-	+	-	-	-		+
537/537a	+/-		-		-	-	+	-	-	-	-	+
646a/b	+/-		-		-	-	+	-	-	-	-	+
					Huntin	gton						
016	+/-	-	-	-	-	-	+	-	-	-	-	-
017	+/-	+	-		0	-	+	-	-	-		-
022	+/-	+	-		0	-	+	-	-	-		-
591	+/-	+	-		0	-	+	-	-	-	-	-
592	+/-	+	-		0	-	+	-	-	-	-	-
					Kinv	/er						
272	+/-	+	+/-		-	-	+	-	-	-	-	-
273	+/-	+	+/-		-	-	+	-	-	-	-	-
274	+/-	+	+/-	-	-	-	+	-	-	-	-	-
SAD 274	+/-	+	+/-	-	-	-	+	-	-	-	-	-
409	+/-	+	+/-		-	-	+	-	-	-	-	-
546	+/-	+	+/-		-	-	+	-	-	-	-	-
549	+/-	+	+/-		-	-	+	-	-	-	-	-
576	+/-	-	+/-		- Dattin	-	+	-	-	-	-	-
240	. /				Patting							
249	+/-		-		-	-	+	-	-	-	-	-
250	+/-	+	+/-		-	-	+	-	-	-	-	-
251	+/-	+	-		-	-	+	-		-	-	
252	+/-	-	-		-	-	+	-	-	-	-	-

Appendix 2: Extracts from Landscape Sensitivity Assessment





3 Methodology

3.1 This section sets out the methodology for the Landscape Sensitivity Assessment, undertaken alongside but discrete from the Green Belt Assessment for Sandwell, Dudley, Walsall, Wolverhampton (the Black Country) and South Staffordshire. This includes information on the study area and spatial framework, the key sources of evidence used, the assessment criteria and the process followed.

The approach to assessing landscape sensitivity

- 3.2 There is currently no prescribed method for evaluating the sensitivity of landscape to development. However, the approach taken in this study builds on *Landscape Character Assessment Guidance for England and Scotland Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity* (Scottish Heritage and the former Countryside Agency, 2004) as well as LUC's considerable experience from previous and on-going studies of a similar nature.
- 3.3 Paragraph 4.2 of Topic Paper 6 states that:
 - "Judging landscape character sensitivity requires professional judgement about the degree to which the landscape in question is robust, in that it is able to accommodate change without adverse impacts on character. This involves making decisions about whether or not significant characteristic elements of the landscape will be liable to loss... and whether important aesthetic aspects of character will be liable to change."
- 3.4 In this study the following definition of sensitivity has been used, which is based on the principles set out in Topic Paper 6. It is also compliant with the third edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3, 2013) as well as definitions used in other landscape sensitivity studies of this type²:

Landscape sensitivity is the relative extent to which the character and quality of an area (including its visual attributes) is likely to change as a result of introducing a particular type of development.

3.5 This Landscape Sensitivity Assessment is a strategic-level study which considers the landscape and visual sensitivity of each area to the *principle* of built development, without knowing the specific size or exact location of development (as this would be detailed at the planning application level). It was undertaken at a scale of 1:25,000 and does not consider specific development proposals where these might exist (although the location of sites identified by the Councils through their 'call for sites' exercises are overlaid on the relevant maps for information). A more detailed Landscape and Visual Impact Assessment (LVIA) will be required on a site by site basis in relation to proposals for the development of any specific sites and/ or to inform masterplanning.

Study Area

3.6 This assessment considers areas of Green Belt land identified for Stage 2 of the Green Belt Study as set out above and illustrated in **Figure 3.1**. The overall study area for both the Landscape Sensitivity Assessment and the Stage 2 Green Belt Assessment are therefore the same, other than the inclusion within the former of additional areas outside the Green Belt.

 $^{^{2}}$ This definition does not imply any judgement about the type of change that may result from development – it could be positive or negative,

- 3.7 Areas of non-Green Belt Land identified by South Staffordshire Council to be included within the study include:
 - Land outside the Green Belt but located immediately adjacent to selected South Staffordshire settlements (Tier 1-4 settlements from the 2018 Rural Service and Facilities Audit);
 - Land outside the Green Belt in locations away from existing settlement edges that have been identified by South Staffordshire Council as potential sites for new settlements, sustainable urban extensions to Stafford and employment development.
- 3.8 Some areas were automatically scoped out of the Landscape Sensitivity Assessment due to:
 - The presence of known planning constraints (as detailed in the LUC Black Country Green Belt Study methodology³) where development would not be permitted. These 'absolute constraints' were identified as:
 - Cultural Heritage:
 - Scheduled Monuments (SMs).
 - Registered Parks and Gardens (RPGs).
 - Natural Heritage:
 - Special Areas of Conservation (SACs).
 - Sites of Special Scientific Interest (SSSIs).
 - Local Nature Reserves (LNRs).
 - Sites of Importance for Nature Conservation (SINCs) / Sites of Biological Importance (SBIs).
 - Ancient Woodland.
 - Other Constraints:
 - Common Land.
 - Flood Zone 3 Areas.
 - Burial Grounds.
 - The presence of existing development and a consequent lack of any open areas that preclude a 'landscape' assessment.
- 3.9 The key constraints which determined the scoping are also shown on figures in Section 4 below. Large areas of constrained land were excluded from assessment areas. However, the shape and complexity of areas of constraint and unconstrained areas have in some instances meant it was not feasible to exclude small or narrow areas of land subject to these constraints. This process resulted in geographically distinct landscape sensitivity assessment areas being identified. These areas, following the removal of land via the scoping out process are illustrated in **Figure 3.2 and 3.3.**

Definition of Landscape Assessment Areas

- 3.10 This assessment is based on a combination of desktop study and field survey.
- 3.11 The principal source of written information for carrying out the sensitivity assessment in South Staffordshire is the Planning for Landscape Change SPG (a landscape character assessment produced for Staffordshire and Stoke on Trent Structure Plan 2010-26 in 2000), which was subsequently revoked but is still a material consideration. This was updated in 2015 as the Draft Staffordshire Landscape Character Assessment Review but not adopted and is not publically available. Within the Black Country, published landscape character assessments are not available other than at the national level (as detailed in Chapter 2).

³ LUC, Black Country Green Belt Study & South Staffordshire Green Belt Study (2019)

- 3.12 The overall study area has been subdivided into landscape assessment areas, with the aim of identifying areas with similar characteristics which are therefore likely to be broadly consistent in terms of their sensitivity. These areas have been selected to avoid variation and complexities across each landscape area.
- 3.13 Within South Staffordshire, landscape areas were 'nested' within the framework of the Draft Staffordshire Landscape Character Assessment Review (Staffordshire County Council, 2015), so that areas of consistent landscape character are kept within the same unit. However, in some cases it was appropriate to make a finer grain landscape classification, further refining landscape assessment areas into smaller areas, where variations in local landscape character existed and drawing these to physical boundary features.
- 3.14 Within the Black Country, where published landscape character assessments are not available other than at the national level, landscape assessment areas were defined using available data on variations in local landscape character including changes in underlying geology, topography, landscape pattern and land use. Boundaries were drawn to existing features in the landscape i.e. tracing physical features such as field boundaries, roads/railways, watercourses, woodland edges etc. This information was supplemented from mapping, aerial views and other digital and published sources (as listed above Para 2.15).
- 3.15 Landscape areas are defined on a broad character-based framework and not a detailed field by field assessment. A guideline minimum size for landscape assessment areas was set at 20 hectares. This work is not a substitute for detailed Landscape and Visual Impact Assessment (LVIA) at the allocations/ application stage, although it can provide an important baseline for more detailed analysis.
- 3.16 Fieldwork to build on the initial desktop analysis is an essential element of the study. All identified landscape areas were visited, assessed and photographed, and boundaries amended as necessary to reflect findings. The landscape areas were reviewed following site survey and assessment. It is important to note that field survey was undertaken from rights of way and publicly accessible vantage points.

Criteria for Assessment of Landscape Sensitivity

- 3.17 In line with good practice landscape and visual sensitivity is assessed for each landscape area with reference to defined criteria, which are set out in **Table 3.1**, along with examples to illustrate the different levels of sensitivity so that judgements can be clearly traced back to the underlying landscape baseline.
- 3.18 Criteria selection is based on the attributes of the landscape most likely to be affected by development and considered both 'landscape' and 'visual' aspects of sensitivity. The criterion are:
 - Scale (the scale of the landscape);
 - Landform (the topographical complexity of the landscape);
 - Landscape pattern and time depth (the complexity of landscape pattern and the extent to which
 the landscape has 'time depth' a sense of being a historic landscape);
 - Natural character (the presence of natural or semi-natural features that are important to landscape character);
 - Built character (the extent that built character contributes to landscape character);
 - Recreational value (the value of the area for recreation in which experience of the landscape is important);
 - Perceptual aspects (qualities such as rurality, traditional land uses with few modern, human influences, sense of remoteness or tranquillity);
 - Settlement setting (the extent to which the area relates or contributes to the form and pattern of existing adjacent settlement, and the character of the adjacent settlement edge);

- Visual prominence (visual prominence of the area and the character of skylines); and
- Inter-visibility (the degree of inter-visibility with surrounding designated landscapes and the role the area plays in contributing to valued views).

Table 3.1 Criteria to determine landscape sensitivity

The individual criteria are set out in the table below. Note that the overall rating is based on professional judgement and in some cases one criterion alone may be sufficient to result in a judgement of high sensitivity but more often it is the interaction of factors.

Landscape Sensitivity Assessment Criteria

Scale

This considers the scale within the landscape area. Intricate smaller scale landscapes are likely to be more sensitive to the introduction of built development than uniform large scale landscapes because of the risk of development appearing out of scale with the underlying landscape pattern. Field boundaries that are intact (with strong hedgerows and mature trees) increase the sense of intimacy, whereas boundaries that are lost or degraded increase the perceived scale of the landscape.

Low	Moderate	High
Large scale field pattern or land divisions (generally over 20 ha).	Medium scale field pattern or land divisions or a mixture of small scale and large scale fields or land divisions.	Small scale field pattern or land divisions (generally under 5 ha).

Landform

This considers the shape of the landscape. Smooth, gently undulating or flat landforms are likely to be less sensitive to development than a landscape with a dramatic landform, distinct landform features as development may mask distinctive topographical features that contribute to landscape character.

Low	Moderate	High
Absence of strong topographical variety. Featureless, smooth, very gently undulating or flat landform.	Undulating landform or some distinct landform features.	Presence of strong topographical variety or distinctive landform features e.g. incised valley with prominent slopes.

Landscape pattern and time depths

This considers the historic origin of the landscape area including field pattern. Landscapes with more irregular field patterns, particularly those of historic origin, are likely to more sensitive to the introduction of modern development than landscape with regular scale field patterns because of the risk of losing characteristic landscape patterns.

Low	Moderate	High
Simple. Regular or uniform field patterns (mainly of modern origin).	Mixture of simple and complex landscape field patterns.	Complex. Irregular and varied field patterns (including historic field patterns i.e. piecemeal enclosure with irregular boundaries, ridge and furrow). Landscapes designated for their historic value.

'Natural' character

This considers the 'naturalistic' qualities of the landscape area in terms of the coverage of semi-natural habitats and valued natural features (e.g. trees and hedgerows) which contribute to landscape character and could be vulnerable to loss from development. Areas with frequent natural features (including large areas of designated habitats) result in increased sensitivity to development, while landscape with limited natural features will be less sensitive.

Low	Moderate	High
Lack of semi-natural habitat coverage or valued natural features. e.g. intensively farmed or areas with high levels of existing development or brownfield sites.	Areas of valued semi-natural habitats and features in parts of the landscape, whilst other parts are intensively farmed or developed.	Frequent occurrence of valued natural features (tree, hedgerows, woodland) or areas of semi-natural habitats.

Built character

This considers the built character of the landscape area with particular reference to the presence of heritage assets that contribute to landscape character (i.e. valued features that may be designated as Conservation Areas, Scheduled Monuments, listed buildings, archaeological features or remains or other features). Landscapes with a high density of historic features important to the character of the area is likely to more sensitive to the introduction of modern development than areas where such development already exists.

Low	Moderate	High
Presence or adjacent to modern development or contemporary structures that detract from landscape character, e.g. utility, infrastructure or industrial elements.	Mixture of modern development and historic features important to landscape character.	Presence or adjacent to small scale, historic or vernacular settlement or historic features important to landscape character (e.g. Listed Buildings, archaeological features).

Recreational character

This criterion considers the presence of features and facilities which enable enjoyment of the landscape, and the importance of these. This may include public rights of way, bridleway, open access land and outdoor tourist/ visitor attractions with facilities. Recreation activities such as walking, cycling, horse riding or more formal recreation activities where enjoyment of the landscape is important to the experience. Importance of features may be indicated by designation as long distance footpaths or recreation routes, national cycle routes, proximity to areas of local population (such as local parks) and outdoor tourist attractions often marked on Ordinance Survey maps.

Low	Moderate	High
Publically inaccessible or limited provision of access routes likely to be of community importance. Recreational value limited to community sports facilities (where enjoyment of the landscape is not integral to the activity).	Some Public Rights of Way and footpaths. Landscapes with green spaces or recreation areas valued in the local context.	Landscapes important for access and enjoyment of the landscape e.g. open access land, country parks or outdoor tourist attractions with visitor facilities. Presence of well-connected long distance routes and public rights of way linking centres of population.

Perceptual aspects

This considers qualities such as rurality (traditional land uses with few modern, human influences), sense of remoteness or tranquillity. High scenic value, freedom from human activity/ disturbance and 'dark skies' would add to sensitivity in this criterion. This is because development will introduce new and uncharacteristic features which may detract from a sense of tranquillity and or remoteness.

Low	Moderate	High
Close to visible or audible signs of human activity and modern development.	Some sense of rural character but with some signs of human activity and modern development.	A rural landscape, remote from visible or audible signs of human activity and modern development.

Settlement setting

The extent to which the landscape area contributes to the identity and distinctiveness of a settlement by way of its character and/ or scenic quality, for example by providing an attractive backdrop, or playing an important part in views from a settlement.

The extent to which the landscape area relates to the form and pattern of the existing adjacent settlement and the character of the adjacent settlement edge, for example if it is well integrated by woodland cover or open and exposed to form a 'hard' edge. This includes the role of significant landscape elements in either separating an undeveloped area from a settled area or linking it to it. The criterion also considers the extent to which the area contributes to a perceived gap between settlements⁴ (the loss of which would increase coalescence).

Low	Moderate	High
Does not provide an attractive backdrop to adjacent settlement or play a separation role. Development could provide the opportunity to improve an existing settlement edge.	Provides some contribution as a backdrop to the adjacent settlement or plays a role in the perception of a gap between settlements. Development would not represent a step-change in settlement form but may adversely affect the existing settlement edge to some extent.	Contributes positively as an attractive backdrop to adjacent settlement, providing a distinctive element in views that are key to the character of the settlement or forms an important part in the perception of a gap between settlements. Development would adversely affect settlement edge (which may be historic or distinctive) or would have a poor relationship with it (crossing a boundary feature or extending into an area with a distinctly different landscape).

Visual prominence

This considers the visual prominence of the landscape area, reflecting the extent of openness or enclosure in the landscape (due to landform and land cover), and extent to which potential development would be visible. It also considers the skyline character of the area including whether it forms a visually distinctive skyline (e.g. due to the presence of important landmark features) or an important undeveloped skyline.

Low	Moderate	High
Non-prominent. Visually enclosed landscape screened by landform or land cover. Does not form a visually distinctive skyline, e.g. natural bowls.	A mixture of prominent and non-prominent. Semi-enclosed or has some enclosed and some open areas or visuallly distinctive skylines.	Visually prominent. Very open in views from the wider landscape. e.g. open plains/ plateau with no screening land cover. Forms a visually distinctive skyline, e.g. undeveloped skylines or skylines with important landmarks (might include historic monuments or features).

Inter-visibility with adjacent designated landscapes or promoted viewpoints

This considers the role the landscape area plays in contributing to valued views. These are considered to be views within, towards or from Cannock Chase AONB, Registered Parks and Gardens, and all marked and promoted viewpoints.

Low	Moderate	High
Little inter-visibility with adjacent sensitive landscapes (i.e. Cannock Chase AONB or Registered Parks and Gardens) or marked viewpoints (i.e. viewpoints marked on the OS 1:25,000).	Some inter-visibility with surrounding sensitive landscapes or viewpoints.	Strong inter-visibility with sensitive landscapes (i.e. Cannock Chase AONB or Registered Parks and Gardens) or marked viewpoints (i.e. viewpoints marked on the OS 1:25,000).

⁴ The settlement hierarchy of South Staffordshire is set out in **Appendix 2.**

- 3.19 Landscapes designated both nationally and locally for their historic value, including Historic Landscape Areas and Registered Parks and Gardens are considered under the 'Landscape Pattern and Time Depth' criteria. The presence of built heritage assets that contribute to landscape character are considered under 'Built Heritage' criteria. However, it is worth noting that although the assessment considers the historic character of the landscape, it does not consider specific cultural heritage/archaeological issues associated with individual designated heritage assets and their setting.
- 3.20 Three small areas in South Staffordshire lie within the Cannock Chase AONB. The sensitivity of these areas is considered in the concluding 'Landscape Sensitivity Judgement' with specific reference to the special qualities of the AONB and the value of the protected status of this landscape reflected in the overall judgement.

Sensitivity Judgements

- 3.21 Text is provided for each of the ten sensitivity criteria, reflecting the qualities of the landscape area and the extent to which development could affect these. A three-point rating from 'low' to 'high' landscape sensitivity is used to illustrate levels of landscape sensitivity for each individual criteria i.e. how sensitive the character and quality of the landscape would be to change.
- 3.22 In assessing landscape and visual sensitivity, reference is made to any designations or constraints which influence judgements. Some of the constraints shown may not directly affect landscape character or sensitivity, but often the areas concerned may also have landscape sensitivities associated with landscape elements for example the habitats in designated wildlife sites are often also valued in landscape terms.
- 3.23 The judgement on the **overall** landscape sensitivity of the area is based on consideration of the range of sensitivities identified and the weight attached to any particular criteria in the area in question. An overall rating is given on a five point scale. Guideline definitions of sensitivity levels are given in the table below:

Table 3.2 Overall Landscape Sensitivity

Sensitivity	Definition
High	The landscape has strong character and qualities with notable features which are highly sensitive to change as a result of introducing built development
Moderate- high	
Moderate	The landscape has some distinctive characteristics and valued qualities, with some sensitivity to change as a result of introducing built development.
Low-	
Low	The landscape lacks distinct character and qualities and has few notable features, or is robust with regard to introducing built development.

Landscape	Landscape	Landscape	cape Council / Borough	
area ref	area (ha)	Sensitivity		
SL58	157.01	Low - Moderate	South Staffordshire / City of Wolverhampton	
SL59	89.19	Low - Moderate	South Staffordshire	
SL60	21.36	Low	South Staffordshire	
SL61	31.03	Low	South Staffordshire	
SL62	100.59	Low - Moderate	South Staffordshire / City of Wolverhampton	
SL63	134.24	Low - Moderate	South Staffordshire	
SL64	101.11	Moderate	South Staffordshire	
SL64 s2	12.98	Moderate - High	South Staffordshire	
SL65	157.33	Moderate	South Staffordshire	
SL66	103.51	Moderate	South Staffordshire	
SL67	87.58	Low - Moderate	South Staffordshire	
SL68	57.51	Low	South Staffordshire	
SL69	64.48	Low - Moderate	South Staffordshire	
SL70	67.18	Moderate	South Staffordshire	
SL71	99.83	Moderate	South Staffordshire	
SL72	22.68	High	South Staffordshire	
SL73	344.13	Low - Moderate	South Staffordshire	
SL74	231.91	Low - Moderate	South Staffordshire	
SL75	96.21	High	South Staffordshire	
SL76	94.13	Moderate - High	South Staffordshire	
SL77	83.75	High	South Staffordshire	
SL78	28.37	Moderate - High	South Staffordshire	
SL79	39.09	Moderate - High	South Staffordshire	
SL80	49.65	Moderate - High	South Staffordshire	
SL80 s2	16.06	Moderate	South Staffordshire	
SL81	219.39	Moderate - High	South Staffordshire	
SL82	59.13	Moderate	South Staffordshire	
SL83	138.14	Moderate	South Staffordshire	
SL84	82.89	Moderate - High	South Staffordshire	
SL84 s2	23.08	Moderate	South Staffordshire	
SL85	91.35	High	South Staffordshire	
SL86	132.22	Moderate - High	South Staffordshire	
SL87	48.17	Moderate	South Staffordshire	
SL88	28.77	High	South Staffordshire	
SL89	12.92	High	South Staffordshire	
SL90	22.12	Moderate - High	South Staffordshire	
SL91	77.97	Low - Moderate	South Staffordshire	
SL92	125.09	Moderate	South Staffordshire	
SL93	54.72	Moderate	South Staffordshire	
SL94	47.84	Low - Moderate	South Staffordshire	
SL94 s2	23.88	Moderate	South Staffordshire	
SL95	20.83	Low	South Staffordshire	
SL96	225.14	High	South Staffordshire	
		-	· · · · · · · ·	

Landscape Area Reference SL86

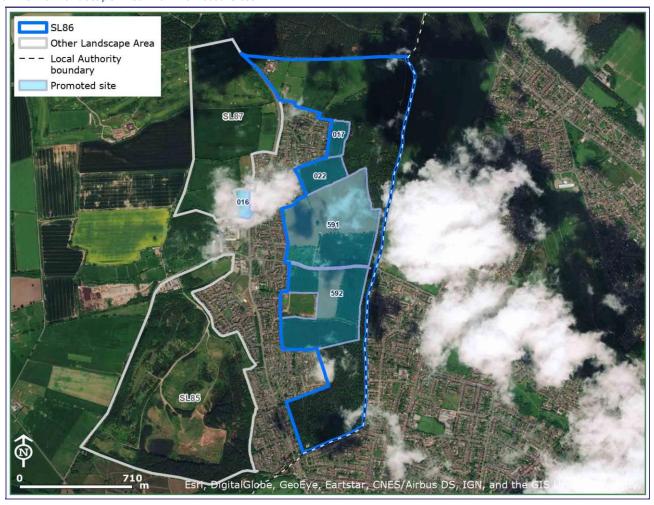
Area Size (ha): 132.2ha

Location and Landscape Character Context

The area falls within the following Landscape Character Type: Sandstone Hills and Heaths.

The area is located east of Huntington and north of Cannock. The eastern boundary is formed by the district boundary. The southern boundary is the settlement edge of Cannock, and the settlement edge of Huntington forms the western boundary. The northern boundary follows a footpath along Badger's Hills. The majority of the area is within the Cannock Chase AONB.

Aerial View of Landscape Area with Promoted Sites

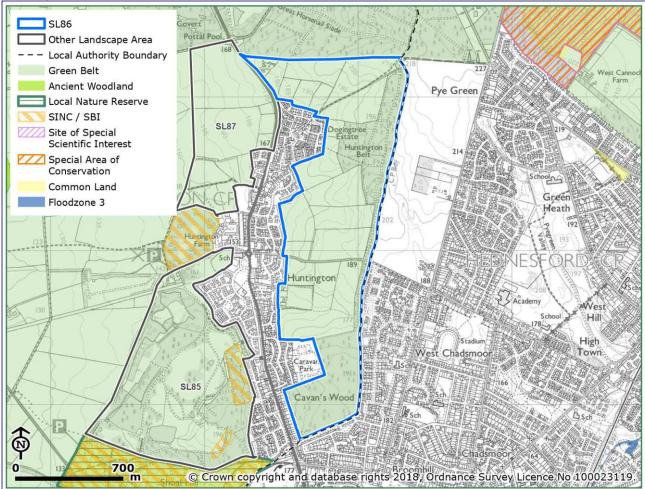


Representative Views

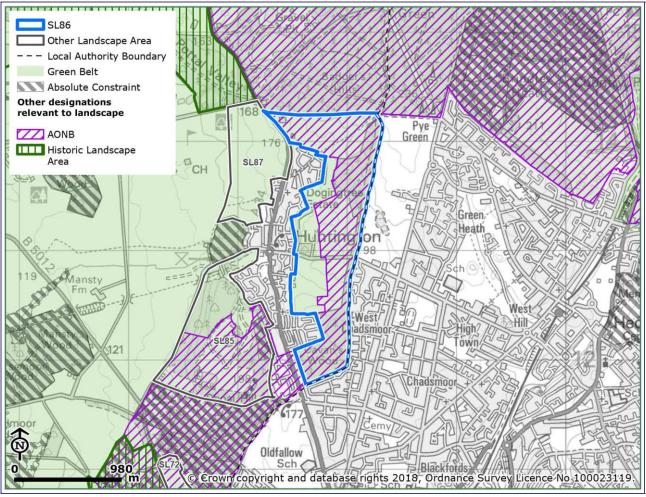




Landscape Assessment Area with Absolute Constraints



Landscape Assessment Area with Absolute Constraints and Other Designations



Wood provides a wooded backdrop to the settlement edge of Cannock and the southern part

Appraisal of Landscape Sensitivity

Characteristic / Attribute	Lower Sensitivity to Development	Moderate Sensitivity to Development	Higher Sensitivity to Development
Scale		Small to medium scale fields, in mixed pastoral and arable use. Hedgerow field boundaries are sometimes degraded.	
Landform		An elevated undulating landscape, generally rising gently to the east from 175m to 215m AOD.	
Landscape pattern and time depth		A predominance of 18th/19th century planned enclosures, with some post-war amalgamation. The HER identifies a number of cropmarks indicating post-medieval field boundaries. Chad's Ditch is a Norman to post-medieval earthwork which runs north-south, possibly marking the parish boundary.	
'Natural' character		Semi-natural habitats are largely absent and there are no natural heritage designations or priority habitats. However, an extensive coniferous woodland at Cavan's Wood extends as Huntington Belt along the eastern edge of this area, connecting to Badger's Hills in Cannock Chase. Other natural valued features include hedgerows and some mature hedgerows and in-field trees.	
Built character		Built development is limited to a community hub south of Limepit Lane and a farm in the north west.	
Recreational character		Informal tracks extend along Huntington Belt connecting to routes within the Badger's Hill area of Cannock Chase and a PRoW links Huntington to the same area.	
Perceptual aspects		The rural character of this narrow area is impacted by surrounding settlement at Huntington. However, an extensive woodland belt separates the area from the settlement edge of Cannock in the east.	
Settlement setting			The area provides a rural backdrop to Huntington, including new development along Limepit Lane, although most properties are inward looking. Cavan's Wood provides a wooded

of Huntington. The area provides an important role in separating Huntington and Hednesford.

Visual prominence

Mature vegetation along the Huntington Belt and at Cavan's Wood provide visual containment, particularly to the south and to some extent to the north.

The area is more prominent in views from the west and from higher elevations to the north

Inter-visibility with adjacent designated landscapes or promoted view points

Much of this area is within Cannock Chase AONB. There is inter-visibility with other parts of the AONB including Badger's Hills to the north, and Shoal Hill to the south west.

Landscape Assessment Area	Size (ha)	Rating
SL86s1	132.22	Moderate - High

Landscape Sensitivity Judgement

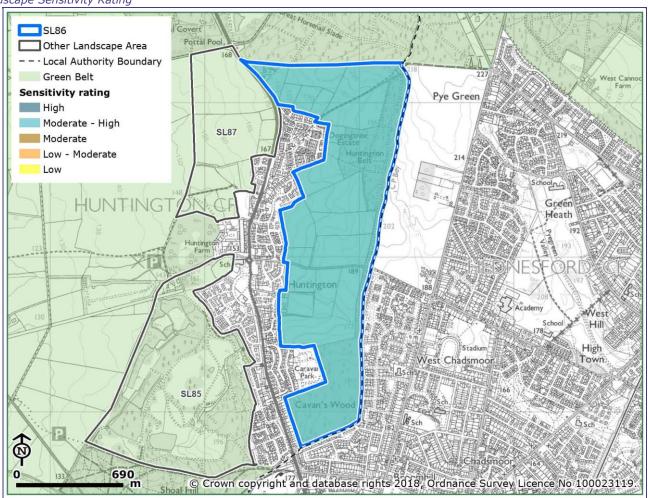
This landscape is considered to have a moderate-high overall sensitivity to residential development, as the majority of the criteria score moderate but part of the the area's designation as Cannock Chase AONB and its role in separating Huntington and Hednesford increases its sensitivity.

Anomalies to the Overall Landscape Sensitivity Rating

List of Promoted Sites within Scenario

Ref: 017 (Housing); Ref: 022 (Housing); Ref: 591 (Housing); Ref: 592 (Housing)

Landscape Sensitivity Rating



Appendix 3: Extracts from Green Belt Study





4 Stage 1 Methodology

Introduction

4.1 The following chapter sets out the methodology for the Stage 1 Green Belt Assessment. The primary aim of the Stage 1 assessment was to establish the variation in the contribution of land to achieving the Green Belt purposes as defined by the NPPF. Based on the assessment criteria outlined below, a strategic review of the contribution of all Green Belt land within the Council areas to each of the five Green Belt purposes was undertaken. This drew out spatial variations in the contribution of Green Belt land to each Green Belt purpose.

Strategic Assessment Process

- 4.2 Prior to any detailed assessment work, an initial visit was made to the area, to gain an overview of the spatial relationships between the settlements and the countryside in South Staffordshire.
- 4.3 The first main step then involved identifying any Green Belt locations where sufficient urbanising development has occurred which has had a significant impact on Green Belt openness (as defined in **Chapter 3** above). Distinctions were made between development which is rural enough in character, or small enough in size, or low enough in density, not to affect to its designation as Green Belt.
- 4.4 The second step assessed the fragility of gaps between the settlements identified in **Chapter 3** as 'towns' under Green Belt Purpose 2.
- 4.5 The assessment then proceeded on a settlement by settlement basis, starting with the largest areas of development i.e. in the first instance the Wolverhampton-Walsall conurbation –through to the smaller inset⁴³ villages. If any significant areas of washed-over⁴⁴ urbanising development were identified in the initial stage, these too formed a focus for analysis. Recognising the common factors that influence the role of Green Belt land in the relationship between urban settlement and countryside (as described in **Paragraph 4.3** above), the analysis:
 - assessed the strength of relationship between the Green Belt and the urban area, considering the extent and form of development, land use characteristics and separating and connecting features;
 - identified changes in the strength of relationship between settlement and countryside, again considering the extent and form of development, land use characteristics and separating and connecting features; and
 - considered how these spatial relationships affect contribution to each of the Green Belt purposes, and mapped lines to mark these changes.
- 4.6 The analysis progressed outwards from each settlement until it was determined that land:
 - ceases to play a significant role in preventing sprawl of a large built-up area;
 - either makes a consistent contribution to settlement separation, or makes no contribution to this purpose;
 - is strongly distinct from urban settlement and has a strong relationship with the wider countryside; and
 - makes no contribution to the setting or special character of a historic town.

 $^{^{43}}$ 'Inset' development is development that is surrounded by Green Belt land but is not itself located within the Green Belt designation.

 $^{^{44}}$ Development 'washed-over' by the Green Belt is development that is located within the Green Belt designation.

Criteria for Assessment of Green Belt Contribution

4.7 To draw out clear variations in contribution to each Green Belt purpose the three point scale set out in **Table 4.1** was used.

Table 4.1: Green Belt Contribution Ratings

Strong Contribution	Green Belt performs well against the purpose.
Moderate Contribution	Green Belt performs moderately well against the purpose.
Weak/No Contribution	Green Belt makes weak or no contribution to the purpose.

Purpose 1 Assessment Criteria

- 4.8 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with existing large built-up area(s). **Figure 3.1** indicates which settlements lie within large built-up areas. All of the development forms noted in the RTPI note (see **para 3.17**) have been considered when judging the extent to which sprawl has already occurred. Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence. It does not include development which is classed as appropriate development, or not inappropriate development in the Green Belt (as defined in paras 143-147 of the NPPF⁴⁵).
- 4.9 To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development or the strength of physical separation from the wider countryside, makes a weaker contribution to this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it makes a stronger contribution.
- 4.10 Land which is more clearly associated with a settlement that is not a large built-up area can be considered to make no direct contribution to Purpose 1.
- 4.11 In summary, key questions asked in assessing Purpose 1, the prevention of sprawl of large, built-up areas, include:
 - Does the land lie in, adjacent to, or in close proximity to the large built-up area?
 - To what extent is the land open or does it contain existing urban development?
 - Does the land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
 - Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, for development to be regarded more as infill than sprawl?
 - What is the degree of containment by existing built development or other features (e.g. by landform)?

⁴⁵ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be "urban sprawl" and cannot have an "urbanising influence".

4.12 **Table 4.2** summarises the criteria that were used for the assessment of Purpose 1.

Table 4.2: Purpose 1 assessment criteria

Purpose 1: Check the unrestricted sprawl of large built-up areas

Development/land-use: where there is less existing development, the Green Belt makes a stronger contribution.

Location: land closer to the large, built-up area generally makes a stronger contribution.

Separating features: land that has a stronger relationship with the countryside than the large built-up area makes a stronger contribution.

Connecting features: where there are no connecting features between the large built-up area and the countryside, land makes a stronger contribution.

Strong Contribution	Land adjacent or close to the large built-up area that contains no or very limited urban development and has strong openness. It retains a relatively strong relationship with the wider countryside.
Moderate Contribution	Land adjacent or close to the large built-up area that contains some urban development and/or is to an extent contained by urban development, but retains openness and some relationship with the wider countryside.
Weak/No Contribution	Land adjacent or close to the large built-up area that is already fully urbanised; or land that is too contained by development to have any relationship with the wider countryside; or
	land that is sufficiently separated or distant from a large built-up area for there to be no significant potential for urban sprawl from the large built-up area.

Purpose 2 assessment criteria

- 4.13 The role land plays in preventing the merging of towns is more than a product of the size of the gap between towns. The assessment considered both the physical and visual role that Green Belt land plays in preventing the merging of settlements. This approach accords with PAS guidance which states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Settlements identified as towns are listed in **Table 3.1** and indicated on **Figure 3.2**.
- 4.14 Land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns the more fragile the gap the stronger the contribution of any intervening open land. Physical proximity was the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, makes a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. However, where settlements are very close, a judgement was made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. the characteristics of the open land relate more to the urban areas themselves than to the open land in between. Where this is the case, the contribution to Purpose 2 may be reduced.
- 4.15 Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation. Smaller inset settlements also reduce the amount of countryside between towns, particularly as perceived from connecting roads.

- 4.16 In summary, key questions asked in assessing Purpose 2, preventing the coalescence of towns, include:
 - Does the land lie directly between two settlements being considered under Purpose 2?
 - How far apart are the towns being considered?
 - Is there strong intervisibility between the towns?
 - How do the gaps between smaller settlements affect the perceived gaps between towns?
 - Are there any separating features between the towns including e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
 - Are there any connecting features between the towns including e.g. roads, railways which reduce the sense of separation between the settlements?
 - What is the overall fragility/ robustness of the gap taking the above into account?
- 4.17 **Table 4.3** summarises the criteria that were used for the assessment of Purpose 2 in the study.

Table 4.3: Purpose 2 assessment criteria

Purpose 2: Prevent neighbouring towns from merging

Development/land-use: less developed land will make a stronger contribution – a 'gap' which contains a significant amount of development is likely to be weaker than one in which the distinction between settlement and countryside is clearer.

Location: land juxtaposed between towns makes a stronger contribution.

Size: where the gap between settlements is wide, the Green Belt makes a weaker contribution.

Separating features: the presence of physical features that separate towns such as substantial watercourses, landform e.g. hills, or forested areas, can compensate for a narrower gap (in terms of distance). However loss of such features would consequently have a greater adverse impact on settlement separation.

Connecting features: where physical features strengthen the relationship between towns, e.g. where they are directly linked by a major road or have a strong visual connection, or where smaller urban settlements lie in between, the gap can be considered more fragile, and the Green Belt consequently makes a greater contribution to maintaining separation.

Strong Contribution	Land that forms a narrow gap between towns, essential to maintaining a sense of separation between them.	
<i>Moderate</i> Contribution	Land that lies between towns which are near each other, but where there is sufficient physical or visual separation for each town to retain its own distinct setting; or	
	land that retains separation between parts of two towns, but where development elsewhere has significantly compromised the sense of distinction between the two settlements.	
Weak/No Contribution	Land which is not located within a gap between towns; or land which plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns; or land which plays no significant role due to the extent of development; or land forming a gap that is too narrow to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another).	

Purpose 3 assessment criteria

- 4.18 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of:
 - i) the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising uses; and
 - ii) the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. whether it has a stronger relationship to urban area than with the wider countryside).
- 4.19 Physical landscape elements (or a lack of them), may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence: the urban area would need to be a dominating influence either through: i) the scale of development; or ii) the degree of containment of the open land by development. Also the presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may give land a strong relationship with a visible urban area even if buildings are not particularly dominant.
- 4.20 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape/visual character. For example, land that displays a strong landscape character in terms of sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape/visual point of view. However the same land in Green Belt terms may well make as equal a contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.
- 4.21 In summary, key questions asked in assessing Purpose 3: safeguarding the countryside from encroachment include:
 - To what extent does the land exhibit the characteristics of the countryside i.e. an absence of built or otherwise urbanising development?
 - Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
 - Does land relate more strongly to the settlement(s), or to the wider countryside?
- 4.22 **Table 4.4** summarises the criteria that were used for the assessment of Purpose 3 in the study.

Table 4.4: Purpose 3 assessment criteria

Purpose 3: Assist in safeguarding the countryside from encroachment

Development/land-use: where there is less urbanising land use and more openness, land makes a stronger contribution.

Separating features: land that has a stronger relationship with countryside than with the settlement makes a stronger contribution.

Connecting features: an absence of physical features to link settlement and countryside means that land makes a stronger contribution.

Strong
Contribution

Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms 46) and which does not have a stronger relationship with the urban area than with the wider countryside.

 $^{^{46}}$ This does not include development which is deemed to be appropriate, or not inappropriate within the Green Belt as set out in Paragraphs 145 and 146 of the NPPF.

Moderate Contribution	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), and which has a stronger relationship with the urban area than with the wider countryside (i.e. it is contained in some way by urbanising and or other features); or Land which retains some degree of openness and has some relationship with the wider countryside but which is compromised by urbanising development or uses within it.
Weak/No Contribution	Land that contains urbanising development of a scale, density or form that significantly compromises openness; or
	Land which is too influenced and contained by urban development to retain any significant relationship with the wider countryside.

Purpose 4 assessment criteria

- 4.23 The connection between a historic town's historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement. It should also be noted that the connection is not always visual, for example where the wider open countryside surrounding a historic town contributes to its setting and special character collectively as a whole.
- 4.24 In summary, key questions asked in assessing Purpose 4 include:
 - What is the relationship of the land with the historic town?
 - Does the land form part of the setting and/or special character of an historic town?
 - What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
- 4.25 Consideration of the setting of individual heritage assets extends only to their contribution to the character and legibility of the historic towns.
- 4.26 **Table 4.5** summarises the criteria that were used for the assessment of Purpose 4 in the study.

Table 4.5: Purpose 4 assessment criteria

Purpose 4: Preserve the setting and special character of historic towns Development/land-use: less developed land makes a stronger contribution. Location: an area that contains key characteristics, or important in views to or from them, makes a stronger contribution. Separating features: land that lacks physical features to create separation from a historic town – i.e. land where the Green Belt provides a visual setting for the historic town – makes a stronger contribution. Connecting features: where there is stronger relationship between historic town and countryside the contribution to this purpose is stronger. Strong Contribution The land and its openness makes a key contribution to the characteristics identified as contributing to a historic town's setting or special character.

Moderate

Weak/No

Contribution

Contribution

contribute to its special character.

The land and its openness makes some contribution to the characteristics

identified as contributing to a historic town's setting or special character.

Land forms little or no part of the setting of an historic town and does not

Purpose 5 assessment criteria

4.28 As set out in **Chapter 3** above, it was not considered possible to reasonably differentiate between the contribution of different parts of the Green Belt to Purpose 5. Given the historic and continued strategy to recycle brownfield land in the adjoining Black Country authorities, as set out in the Black Country Core Strategy and targeted through identified regeneration areas, the significant area of brownfield land within the Black Country, the presence of brownfield land within South Staffordshire, and the location of South Staffordshire and the Black Country authorities within the same Housing Market Area, it is concluded that all Green Belt land within South Staffordshire makes a strong contribution to urban regeneration by encouraging the recycling of derelict and other urban land.

Stage 1 Strategic Assessment Outputs

Analysis of variations in contribution to Green Belt purposes

- 4.29 The Stage 1 outputs are discussed in **Chapter 5**. Maps illustrating the assessed variations in contribution for each purpose across South Staffordshire are also set out in **Chapter 5**. Each map is accompanied by supporting text describing the pattern of variation and the reasoning behind its definition.
- 4.30 By combining the lines marking variations in contribution to Green Belt purposes, a list of land parcels was generated, each of which has a reference number and a rating for contribution to each purpose. The parcels are the product of the assessment rather than a precursor to it. The reasoning behind this approach was to draw out variations in contribution to inform the site-specific assessments undertaken at Stage 2, avoiding broad variations in contribution within prematurely and more arbitrarily defined parcels. Avoiding significant variations in contribution within defined parcels prevents the need for ratings to be generalised to reflect the strongest or average level of contribution within a defined area.

5 Stage 1 Findings

Introduction

5.1 The primary aim of the Stage 1 assessment was to establish the variation in the contribution of designated land to achieving Green Belt purposes. Based on the assessment definitions and criteria outlined in **Chapters 3** and **4**, a review of the contribution of Green Belt land to each of the Green Belt purposes was undertaken, drawing out spatial variations in the contribution of Green Belt land to each Green Belt purpose. This chapter summarises the findings of the Stage 1 assessment.

Key Findings

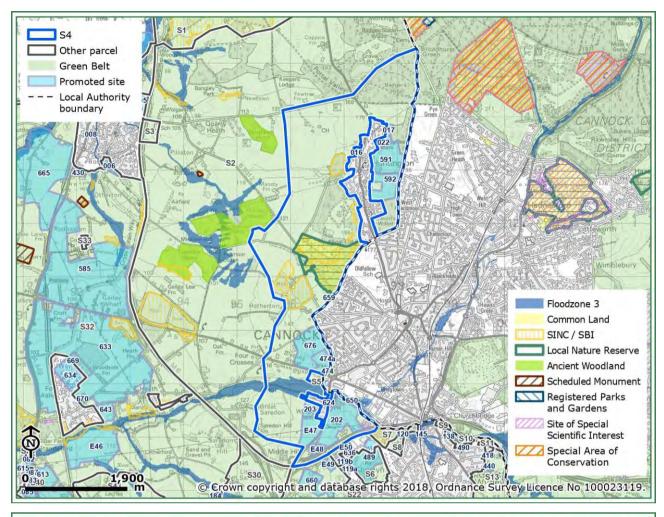
- Figure 5.1 Figure 5.4 (a-b) illustrate the assessed variations in contribution across the Study Area for each of the first four purposes. The colours used in the figures correspond with the rating colours used in Table 4.2-Table 4.5 in Chapter 4. The four maps were overlaid so that the resulting boundaries reflect changes in contribution to any of those Green Belt purposes, and therefore distinguish parcels of land in which the contribution to the four purposes is the same. This process has resulted in the definition of 82 parcels of varying sizes, which are illustrated in Figure 5.5 (a-b). Table 5.1 provides a summary of the contribution ratings for each parcel to each of the first four NPPF Green Belt purposes.
- 5.3 **Appendix 2** sets out the justification for the Stage 1 ratings in relation to each of the Stage 1 assessment parcels, for each of the NPPF purposes. As explained in **Chapter 4**, all parcels are considered to perform strongly against purpose 5.

Table 5.1: Assessment of Contribution Ratings for Each Parcel

Parcel No	Parcel Area (ha)	Purpose 1 Rating Checking unrestricted sprawl	Purpose 2 Rating Preventing merging towns	Purpose 3 Rating Safeguarding countryside from encroachment	Purpose 4 Rating Preserving setting and special character of historic towns
S1	972.4	Weak / No contribution	Weak / No contribution	Strong	Weak / No contribution
S2	2,102.6	Moderate	Weak / No contribution	Strong	Weak / No contribution
S3	13.3	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S4	1,110.4	Strong	Weak / No contribution	Strong	Weak / No contribution
S5	4.9	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S6	44.4	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S7	15.5	Weak / No contribution	Moderate	Moderate	Weak / No contribution
S8	8.2	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S9	3.1	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S10	8.2	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S11	4.9	Moderate	Moderate	Moderate	Weak / No contribution
S12	2.0	Weak / No contribution	Weak / No contribution	Moderate	Weak / No contribution
S13	155.1	Strong	Moderate	Strong	Weak / No contribution
S14	2.1	Weak / No contribution	Weak / No contribution	Weak / No contribution	Weak / No contribution
S15	53.2	Strong	Strong	Strong	Weak / No contribution
S16	650.5	Strong	Strong	Strong	Weak / No contribution
S17	3.6	Moderate	Weak / No contribution	Moderate	Weak / No contribution
S18	0.6	Weak / No contribution	Weak / No contribution	Strong	Weak / No contribution
S19	3.8	Moderate	Strong	Moderate	Weak / No contribution
S20	1,221.2	Strong	Moderate	Strong	Weak / No contribution
S21	39.9	Strong	Weak / No contribution	Strong	Weak / No contribution
S22	3.8	Moderate	Weak / No contribution	Moderate	Weak / No contribution

Parcel Ref S4 - West of Cannock

Parcel Size: 1110.4h





Assessment of Parcel Contribution to Green Belt Purposes

GB Purpose	Assessment	Rating
P1: Checking the unrestricted sprawl of large built-up areas	Land is adjacent to the Cannock built-up area, contains no urban development, and has strong openness. Despite containment in some areas, it retains a relatively strong relationship with the wider countryside, helped by the strong boundary provided by areas of woodland and nature-protected areas.	Strong
P2: Preventing the merging of neighbouring towns	Land plays no significant role due to the distance between the Cannock built up area and Stafford, its nearest neighbouring town.	Weak / No contribution
P3: Safeguarding the countryside from encroachment	Land contains the characteristics of open countryside (ie an absence of built or otherwise urbanising uses in Green Belt terms) and does not have a stronger relationship with the urban area than with the wider countryside.	Strong
P4: Preserve the setting and special character of historic towns	Land does not contribute to the setting or special character of a historic town.	Weak / No contribution
P5: Assist urban regeneration, by encouraging recycling of derelict and other urban land	All parcels are considered to make an equal contribution to this purpose.	Strong