

Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

Tasley Garden Village & Stanmore Garden Village

LANDSCAPE AND VISUAL ISSUES

A review for Shropshire Council

by

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Executive summary

1.1 This report considers the potential landscape and visual effects arising from the proposed Tasley Garden Village at and Stanmore Village, Bridgnorth, which are being promoted as part of the Local Plan Review. It reviews the September 2020 revision of a Landscape and Visual Appraisal (LVA) produced by Pegasus Group on behalf of Taylor Wimpey for the Tasley Site, and an LVA produced by EDP Ltd on behalf of the Stanmore Consortium.

1.2 Both LVAs have a detailed methodology which follows best practice set out in GLVIA3, however neither apply the methodology through to conclusion. Neither LVAs consider cumulative effects.

1.3 A number of landscape and visual effects are likely to arise from the proposed developments but at present they are not adequately identified. We therefore recommend that, prior to planning submission, both LVAs be expanded as detailed above.

1.4 We have also reviewed a Landscape and Visual Review of Stanmore Garden Village Proposal by Pegasus Group, and support the judgements made in relation to the assessment of landscape sensitivity at that site.

1.5 We have also reviewed a Site comparison; Landscape and Visual Matters by EDP Ltd, which challenges judgements of landscape and visual issues in the Council's 2018 Strategic Land Availability Assessment (SLAA) and 2020 Sustainability Appraisal (SA) of the Regulation 18 pre-Submission draft of the Shropshire Local Plan.

Introduction

2.1 ESP Ltd were commissioned by Shropshire Council in October 2020 to consider the landscape and visual issues associated with the proposed Garden Villages at Tasley and Stanmore, Bridgnorth, which are being promoted as part of the Local Plan Review. The promotions are supported by Landscape and Visual Appraisals (LVAs), produced by Pegasus Group in March 2020 on behalf of Taylor Wimpey for the Tasley Site, and by The Environmental Design Partnership Ltd (EDP) on behalf of the Stanmore Consortium.

2.2 We have carried out reviews of previous LVAs for these sites in April 2020. Since then the Council has undertaken a consultation on the Regulation 18 Pre-Submission Draft of the Shropshire Local Plan, which included a proposal to allocate land at Tasley Garden Village for development.

Quality Assessment Review Brief

3.1 The Council have requested technical support on the landscape and visual implications of the proposed schemes. The intention is not to undertake a separate LVIA or LVA at this stage. The scope of this review is to advise on whether the landscape and visual issues associated with the proposals have been adequately addressed; whether any identified residual impacts have been properly addressed, and whether the issues raised in our earlier reviews have been adequately addressed.

3.2 We have restricted the scope of this review to landscape and visual matters, and have not considered effects on the Green Belt. Green Belt is a spatial designation and not an environmental one, and in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3), is not is not considered as a factor in the assessment of landscape and visual effects.

3.3 In particular the review looks at the proposal's response to the Shropshire Landscape and Visual Sensitivity Assessment (SLVSS) and the Shropshire Landscape Typology.

3.4 The SLVSS, undertaken by Gillespies in 2018, identifies seven land parcels surrounding Bridgnorth which were assessed for their landscape and visual sensitivity to both housing and employment land uses. Apart from a field to the south-west, the majority of the proposed

Garden Village is in parcel Bridgnorth A (02BDG-A). Part of the Bridgnorth A site to the east, at the fringes of Oldbury, and containing part of Oldbury Conservation Area, is outside this proposed development site.

3.5 The Shropshire Landscape Typology is the local landscape character assessment for Shropshire, and identifies the unique characteristics of Shropshire's 27 different landscape types.

Methodology

4.1 A desktop review of the LVAs was undertaken in order to measure the appropriateness of the methodology, the application of that methodology to the assessment of landscape and visual effects, the reliability of the assessments made, and the clarity of information presented.

4.2 A site visit was undertaken on the 30th April 2020 to the Tasley proposal site to check the findings of the LVA and the desktop review. Previous site visits have also been made by ESP to this area as part of their work for Shropshire Council on the Landscape and Visual Sensitivity Study for Potential Employment Land around Bridgnorth in April 2017, and in reviewing an LVIA prepared in support of a planning application for poultry units at Footbridge Farm which lies within the area of the Garden Village proposal.

4.3 In addition to the review of the assessment of landscape and visual effects for compliance with current best practice set out in the 'Guidelines for Landscape and Visual Impact Assessment' 3rd Edition (GLVIA3) ¹, published by the Institute of Environmental Management and Assessment and the Landscape Institute (Landscape Institute and IEMA, 2013, regard has been given in this review to the content of the Landscape Institute's Technical Guidance Notes on Visual Representation of development proposals ² (TGN 06/19)

¹ *Guidelines for Landscape and Visual Impact Assessment; The Landscape Institute and The Institute for Environmental Management and Assessment; 3rd Edition, 2013*

² *Visual Representation of Development Proposals, Technical Guidance Note 06/19. The Landscape Institute, 17 September 2019*

and Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)³.

Tasley Garden Village - Landscape and Visual Appraisal

5.1 The LVA has been prepared by Pegasus Group, who employ Chartered Members of the Landscape Institute. Appendix A is a methodology which sets out the procedure for the assessment of value, susceptibility, sensitivity, magnitude and overall level of effect for landscape and visual effects. This follows best practice set out in GLVIA3.

5.2 However, as yet the LVA does not follow this methodology to completion. Whilst there is an assessment of the sensitivity of the visual receptors, the landscape sensitivity is not assessed fully and the magnitude of effects and the type, duration, reversibility and level of effects are not assessed. In addition, there is no summary of the overall landscape or visual effects. It is recommended the sensitivity, magnitude, type, duration, reversibility and level of effects for each landscape and visual receptor is identified, and then a summary is provided. This may also help identify the focal points for mitigation. The LVA notes that these matters will be addressed in an LVIA which will be prepared in support of any future planning applications for the proposals.

5.3 Each section of the LVA is headed below with recommendations to ensure clarity and a robust approach.

Introduction

6.1 In para 1.6, the existing adjacent allocated sites are assumed to have been delivered and therefore part of the baseline. The allocated employment and housing sites adjacent to this proposal do not yet have planning consent. GLVIA3 section 7 advises that once a scheme has planning consent it should be considered for its cumulative effect. Section 7 of the LVA recognises the potential for cumulative landscape and visual effects from these sites, and proposes that these be considered in any future planning applications. We would request that because, as rightly identified, these sites may well be delivered prior to the potential garden

³ *Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs), Technical Guidance Note 1/20. The Landscape Institute, 10 January 2020*

settlement being constructed, that these schemes should be considered for their cumulative effects now, despite the lack of detail currently available. Should planning consent for any further residential or employment development schemes lying within 1km of this site be granted prior to this planning application being submitted then the accompanying LVIA should also consider the cumulative effects arising from the consented schemes. Therefore, this assessment should be expanded to include cumulative effects.

Designations and Policy Context

7.1 The SLVSS has been summarised so briefly that the site's unique characteristics are not identified. The site is within Bridgnorth A (O2BDG-A), and the SLVSS notes its '*densely wooded streamsidings*' and that '*hedgerow and hedgerow trees form strong elements in the landscape that define the rural character and are particularly susceptible as they are irreplaceable in the short to medium term*'. This was confirmed at our site visit.

7.2 This proposal does not include Oldbury Conservation Area and surrounding land to the east of Bridgnorth A. Oldbury Conservation Area increases the landscape and visual sensitivity of Bridgnorth A in the SLVSS and would be worth assessing whether the landscape and visual sensitivity of the proposal site would be reduced as a result.

Landscape Baseline and Potential Effects

8.1 The LVA provides a detailed narration on the landscape baseline. The LVA refers to the Shropshire Landscape Typology and correctly identifies the site as within the Timbered Plateau Farmlands Landscape Character Type (LCT) and Estate Farmlands LCT. It identifies the key characteristics of those LCTs. It also describes the main defining characteristics of the site itself and its immediate surroundings

8.2 Paragraph 4.8 states '*however, there are already a number of buildings on or surrounding the site*' which is misleading as they are typical rural properties and farmsteads, which have a very different overall scale and mass to the proposal.

8.3 With regard to the vegetation mitigation, it is highly likely that the proposed development will need to offer a 10% Biodiversity Net Gain to meet the requirements of the Environment Bill 2020, once passed.

8.4 The assessment of effects needs to reflect the given methodology. There is currently a lack of clarity regarding the landscape receptors, their sensitivity and the magnitude, type, duration, reversibility and level of effects for the landscape receptors. There also needs to be a summary of the overall effects. This should then lead to a clear identification of the appropriate mitigation measures for the site's landscape character.

Visual Baseline and Potential Effects

9.1 The baseline visual assessment includes a total of 22 viewpoints being visited to assess the impact from all local receptors, arranged into three groups: residential receptors, recreational receptors (public rights of way), and the local road network. This is a particularly high number of viewpoints which is appropriate to the size of the application. The additional viewpoint from the public footpath adjacent to Tasley Church, which is a Listed Building on a local high point from which Footbridge Farm is just visible, has been included as recommended in our April review. The ZTV appears to indicate that the Registered Park & Garden, Aldenham Park, may have visibility of the site but we are able to confirm from previous site work that this is not the case.

9.2 In accordance with GLVIA3, Figure 8 does not show a ZTV based on a bare earth model. ZTVs that *'treat the world as 'bare earth' and do not take account of potential screening by vegetation or buildings'* are recommended (para 6.8 GLVIA3). GLVIA3 needs to be followed more accurately to ensure a robust assessment. Given the number of viewpoints and the range of orientations it is unlikely that further viewpoints would be required. The viewpoints are generally under 1km of the site for most orientation which is appropriate to the proposal and location. There are a few viewpoints which reach up to 2.2km distance from the ridgeline to the south-west which overlooks the site. Analysis of the photographs would indicate that further, more distant viewpoints are unnecessary as they are unlikely to identify visual effects of high magnitude, due to the local topography and the layering effect of the local tree cover.

9.3 The report needs to clearly identify which receptors are represented by which viewpoint to help with cross-referencing the impacts and the appropriateness of the mitigation measures. Whilst the sensitivity the visual receptors is identified, the magnitude of effects and the type, duration, reversibility and level of effects are not. The magnitude and type, duration, reversibility and level of effects for each landscape and visual receptor should

be identified and a summary provided. For example, for the visual receptors the summary could be a table which shows the sensitivity, magnitude and level of effects for each receptor, using colour-coding so it is easy to identify the highest level of effects.

9.4 Furthermore, a descriptive summary of the visual effects would provide clarity. For example, from our own site work we noted that whilst the higher land to the south appears to offer extensive views of the site, such views are in fact limited due to high hedgerows and relatively limited rights of way so the images presented are 'worst case' where orientation and lack of vegetation afford views.

9.5 The LVA notes that a full assessment of effects will be addressed in an LVIA which will be prepared in support of any future planning applications for the proposals.

9.6 One of the principal visual (and landscape) mitigation measures for this site will be the retention of existing hedgerows and trees due to their level of maturity which will afford a high level of screening, filtering and softening of views that cannot be afforded by new planting for a number of years.

Figures

10.1 Figure 12 Landscape Framework Plan and Mitigation Recommendations. The proposal has a good balance of open space and development, the layout looks appropriate to its surroundings and it integrates well with the existing site features such as the Listed Buildings, the public footpaths and the setting of Tiddle Brook. The existing trees, woodland and hedgerows need to be clearly identified and differentiated from those that are proposed. We are looking to confirm that the majority of the existing structural vegetation would be retained, as a key benefit of the proposal and the right response to the landscape and visual sensitivity of the landscape. An overarching Vision for the Garden Village would help draw on the local characteristics. The background is rather too faded to see how the proposal integrates with its surroundings. For example, it is hard to identify properties on Ludlow Road and therefore how visual mitigation proposals relate to them.

10.2 TGN 06/19 sets out best practice in the preparation and presentation of photographic images and visualisations for landscape and visual impact assessment. Visualisations produced in accordance with this guidance should assist in informed decision-making and communicating effectively with a range of stakeholders. This document is not referenced in the LVA methodology, however the LVA notes that that photography contained in it is not set out in accordance with the TGN, but that this would be included in any subsequent LVIA. We would expect to see compliance with the guidance on photography specifications, image viewing sizes and clear identification of the extent of the proposal site in images.

10.3 Whilst not a landscape and visual issue, it has been noted that the land surrounding Tiddle Brook is within Flood Zone 3 and therefore development should be precluded from this area (it appears allocated for public open space). It would be helpful to mark the limit of the Flood Zone as a design constraint on the Landscape Framework Plan.

Stanmore Village - Landscape and Visual Appraisal

11.1 The LVA has been prepared by EDP, who employ chartered members of the Landscape Institute.

11.2 The LVA has a methodology which follows best practice set out in GLVIA3, and has been prepared in a manner which is proportionate to the outline nature of the proposals. It is silent however on the assessment of cumulative landscape and visual effects. An initial study area of 3km for landscape effects has been identified, refined down to 1km from the site boundary.

11.3 The following landscape receptors are identified for assessment;

- The landscape fabric, including trees, hedgerows and agricultural land in the immediate vicinity of the site; and
- The Enclosed Lowland Heath Landscape Character Type (LCT)

11.4 These receptors have been selected 'in response to the small scale of the proposals'. We would strongly disagree with this assessment of level of scale of the proposals. In addition, although the majority of the proposal site lies within the Enclosed Lowland Heath Landscape

Character Type (LCT), it directly adjoins 2 additional LCTS and the study area includes an additional LCT. These can reasonably be predicted to experience landscape effects and should be included as receptors for assessment. We also consider that the locally valued recreational resource of the Stanmore Country Park should be included as a landscape receptor given the potential for effects on its landscape character.

11.5 Having appropriate regard to the findings of the Shropshire Landscape and Visual Sensitivity Study, long term landscape effects are assessed in accordance with the criteria in the LVA methodology. An additional receptor of the character of the site and its context is added for assessment, with the results as below;

Receptor	Sensitivity	Scale of Change	Nature of Effect	Overall Effect
Enclosed Lowland Heath (LCT)	Medium	Medium	Adverse	Moderate/Minor
Character of the site and its context	Medium	Medium	Adverse	Moderate/Minor
Landscape fabric of the site	Medium	Low	Beneficial	Minor

11.6 With the exception of the Character of the site and its context, we consider that these judgements are appropriately made. We disagree with the assessment of Scale of Change for the Character of the site and its context as *medium*; the scale of change is large across the site on a long term and permanent basis and cannot be the same as is judged at the LCT level. We would also question the assessment of landscape sensitivity of this receptor as medium, and this concern is shared by the Pegasus report on this LVA which is set out in section 6.14 of this review.

11.7 11 locations have been selected for the assessment of visual effects, to cover a range of visual receptors and viewing distances from both within and outside the site. These would appear to be an appropriate sample.

11.8 We disagree with the premise stated in section 5.38 that, for users of the A454 in the vicinity of viewpoints 1, 2 and 6, the surrounding landscape is considered to be urban fringe in nature. The site may be close to the settlement edge of Bridgnorth but visually it reads as a rural landscape. The Stanmore Industrial Estate and existing residential properties referred to

are not visible from this location, with the principle detracting factor being the A454 and associated signage, however these are typical of a rural A-road.

11.9 The visual assessment takes a narrative approach and assesses effects by receptor groups, however only 1 receptor group is subjected to an assessment of effects in accordance with the LVA methodology. The findings are summarised below;

Visual Receptor Type	Viewpoint locations	Sensitivity	Magnitude	Level of effect
Users of main roads	1,2 & 6	Low	Medium	Minor adverse
Users of minor roads	10 & 11	Medium	<i>Not stated</i>	<i>Not stated</i>
Users of PRowS on the site	3, 4 & 5	<i>Not stated</i>	High	<i>Not stated</i>
Users of PRowS outside of the site	8	<i>Not stated</i>	<i>Not stated</i>	<i>Not stated</i>
Residential properties	None	<i>Not stated</i>	<i>Not stated</i>	<i>Not stated</i>

11.10 No assessment of cumulative visual effects has been undertaken.

11.11 By way of a summary, the LVA notes that although landscape and visual effects would be initially high due to the scale of change, they would be lessened due to being in character with the neighbouring residential and industrial land use to the east. We do not agree with this assessment. Firstly, it is at odds with the assessments made for individual receptors, and secondly, the proposal site is effectively separated from the settlement edge by topography and vegetation and reads as a rural site rather than urban fringe. The SLVV describes the landscape of the site as typical rural character and scenic quality and that the rural landscape is generally intact. We agree that the visibility of the site is such that visual effects are limited to locations in close proximity to the site, however we would expect to see visual effects assessed in compliance with the methodology set out in the LVIA.

Mitigation proposals

12.1 The role of the proposed landscape strategy and mitigation is referred to in the assessment of effects, however little information is provided on this or how it relates to

predicted effects. The document 'A Vision for Stanmore Garden Community' sets out the principles of a landscape strategy and green infrastructure proposals, but makes no reference to the mitigation required in response to predicted adverse effects. The LVA has a significant role as a design tool but this opportunity appears to have been missed.

Figures

13.1 Plan EDP 2 *Site Character and Local Context* presents a clear summary of the baseline, however the location of Point 4 (Field parcels are generally large to medium and are enclosed, often by mature hedgerows with trees) appears to be misplaced, being outside the defined study and on the Severn flood plain.

Landscape and Visual Review of Stanmore Garden Village Proposal by Pegasus Group

14.1 This document has been prepared by the Pegasus Group and provides a review of the Stanmore proposal in terms of its potential effects on landscape character and visual amenity, where relevant drawing a comparison with the Tasley Garden Village proposals at land to the west of Bridgnorth. It also addresses the matter of the location of the Stanmore site within the Green Belt, however as noted in Section 3 of this review, this is beyond the scope of this report.

14.2 Aside from comparisons made with Tasley Garden Village relating to that site's preferred option status for development in the Local Plan Review and its location outside of the Green Belt, the report challenges a number of landscape and visual issues. The SLVV assesses the visual and landscape sensitivity of parcel 02BDG-E as medium, however it recognises that sensitivity will vary within parcels. It notes that the elevated land to the west and south west of this parcel, which fall within the Stanmore Village site, leads to views which are particularly sensitive to change. The Pegasus report considers that, given the presence of these elevated areas with greater visibility, albeit over a short to medium distance, the assessment of landscape sensitivity should be increased in the LVA from *medium* to *medium-high*. The Pegasus report does not challenge the SLVV assessment of visual sensitivity parcel 02BDG-E of *medium*.

Site comparison; Landscape and Visual Matters by EDP

15.1 This report has been commissioned by the promoters of the Stanmore site to present a preliminary site comparison of the landscape and visual considerations of the developments at Tasley and Stanmore.

15.2 The report undertakes a review of the landscape and visual matters assessed in undertaken in the Council's 2018 Strategic Land Availability Assessment (SLAA) and 2020 Sustainability Appraisal (SA) of the Regulation 18 pre-Submission draft of the Shropshire Local Plan. It then makes a direct comparison of the 2 sites in order to determine which scores more positively for landscape and visual considerations.

15.3 It is outside of the scope of this review to assess the scores allocated in the SLAA and SA, however it is appropriate to give a commentary on the landscape and visual issues raised by EDP.

15.4 Under landscape character, the report notes that Parcel 56 identified in the Local Plan review, which broadly equates to the Stanmore Village proposal outside of the Stanmore Industrial Estate, is scored negatively in the SA on the basis that it is '*wholly/partly classified as high landscape sensitivity for residential*' whereas the Tasley site scores zero as the '*site is wholly/partly classified as medium low, medium, or medium high landscape sensitivity for residential*'.

15.5 The EDP report challenges the SA assessment of the Stanmore site on the basis that the SLVV judges parcel 02BDG-E to have a *medium* landscape and visual sensitivity to residential and employment development, whereas the SA assessment for the Tasley site is more aligned to the findings of the SLVV. We have noted in Section 6.14 of this report that the assessment of landscape sensitivity of the Stanmore site could justifiably be increased to higher levels.

15.6 The EDP report challenges the SA scores relating to the presence of rights of way in close proximity to all of the assessment parcels on the basis that;

- The Stanmore site is crossed by 2 rights of way, with one passing through the Stanmore Industrial Estate
- The Tasley site is crossed by 6 rights of way, which link to the promoted Jack Mytton Way

15.7 The EDP report argues that there is potential for greater levels of visual effect from rights of way at the Tasley site due to more routes and longer lengths of rights of way, and that as a result the Tasley site should have a negative score. Given that GLVIA3 advises that consideration be given to the numbers of receptors likely to be affected by visual change, this argument has merit. By application of the same approach to residential receptors, the EDP report argues that the greater number of visual receptors at the Tasley site should lead to it having a more negative score than the Stanmore site with regard to adverse visual impacts for residents. We do not agree however with the premise that occupiers of listed buildings should be afforded more sensitivity than those who live in non-listed buildings. GLVIA3 advises that heritage assets may be used as a measure of value for landscape character, but not as a measure of visual receptor sensitivity.

15.8 The EDP report argues that the Tasley site is highly visible, being located on elevated, facing slopes over a substantial area to the west of Bridgnorth, and seeks to evidence this with a series of photographs from minor lanes and rights of way. It goes on to argue that topography and vegetation mean that the Stanmore site is, generally, less visible. We believe however that the level of visibility of the Tasley site is overstated in the EDP report. Whereas the Tasley site appears to be highly visible from the elevated land to the south west, public access to it is very limited. The Jack Mytton Way generally runs along a south facing slope with only occasional views to the north east and the Tasley site; Figure 9 ZTV in the Tasley LVA demonstrates this clearly and this is further confirmed by the assessment in Section 5.15 of this review. There are few public rights of way in the area and views from the minor roads leading to the higher ground from The Lye and Harpswood Bridge are limited to a handful of glimpse views or field openings. To the motorist, there are barely any views of the Tasley site from this area.

15.9 The SA assessment for Parcel 56 include negative scores on the basis that the parcel is wholly or partly within ancient woodland. The EDP report challenges this on the basis that the ancient woodland at Hermitage Hill Coppice is within the adjacent Parcel 55, and that the SA scores for this parcel are excessively adverse as result.

15.10 The EDP report carries out a reassessment of the Stanmore Parcel 56 SA scores based on landscape and visual criteria, however despite the challenges referred to above, the resultant scores remain the same as *Fair*, for housing and employment. EDP compare this assessed level with that of *Poor* for housing development in the SA for Tasley, and finds that the Stanmore site should instead be taken forward for allocation in the Local Plan.

Conclusions

Tasley Garden Village - Landscape and Visual Appraisal

16.1 The LVA has a methodology which follows best practice set out in GLVIA3, however it does not apply this comprehensively to the assessment of effects and no assessment of cumulative effects has been undertaken. We have identified a number of concerns which we recommend be addressed in a revised LVA, comprising; absence of reference to the Oldbury Conservation Area in the assessment of landscape and visual sensitivity; overstating the negative effects of existing buildings on the site, and issues of presentation in the figures.

Stanmore Village - Landscape and Visual Appraisal

16.2 The LVA has a methodology which follows best practice set out in GLVIA3, however it does not apply this comprehensively to the assessment of effects and no assessment of cumulative effects has been undertaken. We have identified a number of concerns which we recommend be addressed in a revised LVA, comprising; the stated level of scale of the proposals; omission of assessments for adjoining Landscape Character Types and the Stanmore Country Park as a landscape receptor, and the description of the site as being urban fringe.

16.3 Limited mitigation information is provided and there are insufficient linkages between predicted effects and proposed mitigation.

Landscape and Visual Review of Stanmore Garden Village Proposal by Pegasus Group

17.1 We agree with the challenge in the Pegasus review that the assessment in the LVA of landscape sensitivity for the site should be increased from *medium* to *medium-high*, based on the judgements and narration set out in the SLVSS.

Site comparison; Landscape and Visual Matters by EDP

18.1 We disagree with the challenges in the EDP review that;

- Residents occupying listed buildings have an enhanced visual sensitivity
- There is extensive visibility of the Tasley site from the elevated land to the south west