

## Representation Form

Please complete a separate Part B Representation Form (this part) for each representation that you would like to make. One Part A Representation Form must be enclosed with your Part B Representation Form(s).

We have also published a separate Guidance Note to explain the terms used and to assist in making effective representations.

### Part B: Representation

Name and Organisation:	Mr Michael Burrow, Savills, on behalf of Messrs Richard and Philip Needs & Family
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#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

#### Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S3"/>	Site:	<input type="text" value="BRD030"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
- (Please tick as appropriate).*

#### Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Proposed site allocation BRD030 (Tasley Garden Village, Bridgnorth) is not considered to be fully justified. It is considered that Shropshire Council has not fully taken the reasonable alternatives into account.

The Preferred Options version of the Local Plan Review (November 2018) proposed to allocate land to the east of Bridgnorth at Stanmore for 850 dwellings (Sites P54, P56, P58a, STC002, STC004, STC005 and STC006). The Regulation 18 Stage consultation document removed this site and instead allocated land to the south west of Bridgnorth for 1,050 dwellings (Site BRD030).

It is noted that the Bridgnorth Development Options Assessment (2020) document identifies that the protection of the Green Belt should be given significant consideration in the overall consideration of alternative options and that this had a direct and important impact on Shropshire Council's consideration of land to the east of Bridgnorth at Stanmore.

A presumption in favour of sustainable development is at the heart of the National Planning Policy Framework ('NPPF') 2019. Appendix D (Stage 2a) of the December 2020 Regulation 19 Pre-Submission Sustainability

Appraisal ('SA'), shows that the sites that comprise the previous proposed allocation at Stanmore to the east of Bridgnorth (Site BRD032) perform more highly than Site BRD030. We understand from the SA that the primary reason that Site BRD030 is now proposed to be allocated is because it is outside of the Green Belt.

Paragraph 136 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are evidenced and justified. Nevertheless the High Court has determined that releasing Green Belt land and allocating it for development in Local Plans does not need to be "a last resort". In 2014, a Judicial Review was brought by IM Properties against a decision by Lichfield District Council to release two strategic sites adjacent to Lichfield City from the Green Belt and allocate them for residential development rather than the land being promoted by IM Properties which was outside of the Green Belt but also adjacent to Lichfield City (IM Properties v Lichfield District Council and Taylor Wimpey and Persimmon Homes [2014] EWHC 2440). Mrs Justice Patterson rejected IM Properties claim that Green Belt could only be used to meet housing needs "as a last resort" and rather it was a matter of planning judgement as to whether exceptional circumstances to release land from the Green Belt have been demonstrated.

The NPPF (paragraph 137) states that before concluding that exceptional circumstances exist, Councils should be able to demonstrate that all other reasonable options for meeting its identified need for development have been examined, which includes: use of brownfield sites; optimising density of development; and neighbouring authority discussions. The Shropshire Strategic Land Availability Assessment (SLAA) has identified that there is insufficient previously developed land / infill opportunities within Bridgnorth to accommodate the development needs for the new plan period. There is also a Greater Birmingham and Black Country Housing Market Area shortfall and Shropshire is required to accommodate some of this shortfall in order to accord with the duty to cooperate (NPPF Paragraph 24).

Furthermore it should not be overlooked that Shropshire Council has a significant need to provide affordable housing. The Shropshire Council Strategic Housing Market Assessment Report Part 2 (September 2020) identifies a need for a net additional 799 affordable dwellings per annum. Policy DP3 proposes on-site affordable housing provision of 20% for new developments of 10 or more dwellings in the south of Shropshire. Applying a broad rate of 20% of the annual proposed Plan requirement of 1,400 homes per annum, in order to provide a very high level 'ballpark' figure, would deliver 280 affordable homes per annum. It is also noted that Policy SP2 estimates that around 7,700 homes affordable homes will be delivered during the Plan period (equating to 350 homes per annum). Both of these comparison figures fall way short of the requirement. It is therefore important that Shropshire Council seeks to plan positively for the delivery of as much affordable housing as it can.

The owners of Site STC003 are willing to promote this site for 100% affordable housing (potentially delivering c.200 dwellings) whilst also delivering low or even zero carbon development. This is a commercial decision that the landowner is prepared to take. This would make a significant contribution to meeting the affordable housing need of Bridgnorth and of the wider Shropshire Council administrative area. This level of affordable housing delivery commitment is not being offered by the promoters of other sites around the edge of Bridgnorth. As identified within the Sustainability Appraisal, the Green Belt Assessment undertaken for Shropshire indicates that this site is located within a Green Belt parcel which performs weakly against purpose 2; moderately against purpose 3; with no contribution against purpose 4. This land also contains existing buildings and other previously-developed elements and the opportunity for Class Q permitted development. The principle for residential use within this site is therefore already established in part. This site on its own therefore offers significant benefits, which are material to the consideration of reasonable alternative sites as part of the Local Plan allocation process.

These benefits would be further enhanced by taking the opportunity provided by STC003 and combining it with the previously proposed BRD032 allocation area to create a single new mixed use settlement to the east of Bridgnorth. This would provide an opportunity to support the delivery of a range of new residential and employment development to meet local needs with the delivery of new infrastructure and community facilities, including enhancement to the quality, quantity and connectivity of public open space, as well as improved access to extensive recreational open space and the wider countryside, which would benefit both new and existing residents. There is an opportunity for the development costs of strategic infrastructure to be shared proportionately across BRD032 and STC003 to enable the fair and comprehensive delivery of development in this location. It is noted that the promoters of BRD032 have proposed 30% affordable housing provision within their land, which will further complement the considerable further additionality in the form of 100% affordable housing provision being proposed by the owners of STC003 within their specific land area.

As identified within previous representations, the allocation of Site STC003 would also enable a robust physical Green Belt edge to be provided to BRD032 in the form of the A458 along the southern edge of STC003 (in compliance with the requirements of NPPF paragraph 139).

Office Use Only	Part A Reference:
	Part B Reference:

The fact remains that Shropshire Council has already acknowledged the presence of exceptional circumstances for altering Green Belt boundaries at Stanmore through proposing to allocate 11.4ha employment land adjacent to the Stanmore Industrial Estate for employment purposes (S3.1(ii) Sites P58a and STC002). There is an therefore a real and tangible opportunity to capitalise on the sustainability benefits of this employment land allocation and the presence of existing employment opportunities through creating a new sustainable community in this location.

It is therefore considered that Shropshire Council can demonstrate that there are exceptional circumstances to remove land from the Green Belt at Stanmore to accommodate the strategic development needs for Bridgnorth. It is considered that the wider proposed Preferred Options allocation at Stanmore and our client's site STC003 can together accommodate both the identified 1,050 allocation apportionment to Bridgnorth and further growth to meet additional future requirements.

When it is established that there are exceptional circumstances to release Green Belt, when reviewing Green Belt boundaries "the need to promote sustainable patterns of development should be taken into account" and consideration should first be given to release Green Belt land which "has been previously developed and/or is well-served by public transport" (NPPF paragraph 138). Mrs Justice Patterson concluded in the IM Properties case that the Lichfield District Council had legitimately had regard to travel patterns and urban focus when deciding to release Green Belt land in preference to other land which it considered performed less well in these respects.

In light of this, we conclude that strategic development in Bridgnorth should be directed to the east of the settlement, as previously proposed. Site BRD032 is shown to be better performing than Site BRD030 in the SA. Comprehensive strategic mixed use development in this location, incorporating Site STC003, will improve connectivity to locally important Stanmore Industrial Estate. Development to the east of Bridgnorth will also assist with rebalancing the growth of Bridgnorth, which has been focused to the west of the settlement during recent decades, whilst also offering good connectivity from new development at Bridgnorth to the Black Country conurbation.

*(Please continue on a separate sheet if necessary)*

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

It is contended that Shropshire Council should allocate land to the east of Bridgnorth at Stanmore, incorporating STC003.

*(Please continue on a separate sheet if necessary)*

*Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

Office Use Only	Part A Reference:
	Part B Reference:

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

These representations relate to strategic development at a Principal Settlement. Attendance at the Hearing is considered to be necessary in order to be able to fully explore the key issues involved.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: Michael Burrow

Date: 26/02/2021

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Part A Reference:

Part B Reference:

26 February 2021  
Messrs Richard and Philip Needs (Site STC003) - Response Covering Letter 26  
February 2021



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Dear Sir / Madam

## **SHROPSHIRE LOCAL PLAN REVIEW – PRE-SUBMISSION DRAFT CONSULTATION REPRESENTATIONS ON BEHALF OF MESSRS RICHARD AND PHILIP NEEDS (SITE STC003)**

Savills (UK) Limited and Land Research & Planning Associates Ltd have been instructed by Messrs Richard and Philip Needs & Family to submit representations to the Shropshire Local Plan Review Regulation 19 Pre-Submission Draft consultation. Our client owns land at Grove Farm, Bridgnorth (Site STC003). These representations focus on the Bridgnorth Place Plan Area and Appendix D of the Sustainability Appraisal. The following documents / plans have been submitted in support of this submission:

- Consultation Response Form Part A;
- Consultation Response Form Part B;
- Heritage Appraisal;
- Green Belt Position Note; and
- Landscape & Visual Position Note

### **Site Context**

As highlighted in the consultation document, Bridgnorth is the third largest town in Shropshire and the second largest Principal Centre in Shropshire, acting as a principal service centre for a sizeable area of eastern Shropshire and beyond. It is therefore considered to be a sustainable location for accommodating a critical mass of new development for the next plan period. As we have set out in Part B of the Consultation Response Form, the proposed allocation of Site BRD030 is not considered to be fully justified. Land to the east of Bridgnorth at Stanmore, which was identified as the preferred location of growth in the Preferred Options consultation document, should still be identified as being the most suitable and sustainable location to accommodate strategic growth for Bridgnorth for the next plan period.

As we previously highlighted in our response to the Preferred Options consultation, our client's site (STC003) should be included as part of any growth directed to the east of Bridgnorth. Site STC003 is approximately 8.5 hectares (21 acres) within a single ownership and is bounded: to the north by Stanmore Country Park, which is set within a mature woodland; to the north-east by a mature tree group, Russell Close and existing residential development; to the south-east by a field hedge and Russell Close; to the south by a mature field hedgerow adjacent to the A458 Stourbridge Road; and to the west by hedgerows, with further dwellings beyond. The site gently slopes from west to east. The interior of the site accommodates existing development, including a commercial nursery with associated infrastructure including polytunnels, a residence, industrial-esque built form and an extensive area of hardstanding. The remainder of the site comprises fields. The site benefits from an existing access to the A458, a further right of way to the estate road to the west (and A454) and the opportunity to access onto Russell Close / form a new access onto the A458.

The Strategic Land Availability Assessment ('SLAA') 2018 identifies Site STC003 as available, achievable and viable. The key constraint identified for Site STC003 is that it is currently located within the Green Belt. The site is located within Green Belt Parcel P60 which performs weakly against Green Belt purpose 2, moderately

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against purpose 3 and no contribution against purpose 4, the release of which would have some moderate level of harm on the Green Belt. As we have set out in Part B of our response, we consider that the release of this site can be justified in accordance with the requirements of the National Planning Policy Framework ('NPPF') 2019 due to: limited brownfield development opportunities; the requirement for Shropshire to accommodate housing towards the Black Country shortfall; the need to direct growth to the most sustainable settlements in Shropshire; the significant affordable housing need in Shropshire; and that the allocation of land to the east of Bridgnorth will improve accessibility to Stanmore Industrial Estate. Furthermore, when compared against the current proposed allocation to the west of Bridgnorth (Site BRD030), land to the east of Bridgnorth at Stanmore has been assessed as having a more favourable sustainability score in Appendix D of the Council's own Sustainability Appraisal evidence base document.

In response to the Preferred Options consultation we submitted a Heritage Appraisal, Green Belt Position Note and Landscape and Visual Position Note to support the promotion of Site STC003. These reports are also included with this submission for ease of reference. The evidence demonstrated that the site is suitable and achievable to be developed without harm to the setting of the listed Stanmore Hall, existing vegetation, landscape and visual considerations and integrity of the wider Green Belt and that there are no other known constraints that might impact on the ability of the site to come forward for residential development. It should also be noted that the site is still available for development and is being promoted by a willing landowner.

A summary of key development opportunities relating to Site STC003 are summarised below:

- We have collaboratively engaged with members of the Stanmore Consortium who are promoting the land to the east of Bridgnorth for development (which was identified as the Preferred Option for growth).
- Allocation of our client's land will create a logical, defensible and permanent Green Belt boundary (A458) if land to the east of Bridgnorth is proposed for development.
- Stanmore Industrial Estate is recognised as locally important and requires land to expand. Site STC003 and the wider east of Bridgnorth land could create enhanced connectivity between the proposed employment allocations at Stanmore Industrial Estate (Sites STC002 and P58a) and Bridgnorth which, in turn, will make Stanmore Industrial Estate more accessible and sustainable.
- Site STC003 is available and owned by a single landowner so it should be able to deliver circa 150 - 200 dwellings within 5 years to meet immediate housing needs in isolation or as an early phase of a wider comprehensive development.
- The site already incorporates previously developed elements and the opportunity to benefit from Class Q permitted development rights.
- Our client is willing for Site STC003 to be considered for the provision of 100% affordable housing, which could include a high proportion of Starter / First Time Buyer Homes, whilst also delivering sustainable design at a higher standard than required by Building Regulations or emerging planning policy in relation to achieving low carbon (or even zero carbon) development.

In light of the above, we consider that this site should be removed from the Green Belt and allocated for residential development along with the land to the east of Bridgnorth previously proposed for allocation in the Preferred Options consultation document.

If you have any queries with our submission then please do not hesitate to contact me.

Yours faithfully

Michael Burrow  
**Associate Director**

## Land to the North of Stourbridge Road, Bridgnorth, Shropshire

### Heritage Appraisal

#### edp5449\_r001a

## 1. Introduction

- 1.1 This Heritage Appraisal has been prepared by The Environmental Dimension Partnership Ltd (EDP) to provide an appraisal of potential archaeological and wider heritage issues with respect to land at Stanmore, Bridgnorth, Shropshire (hereafter referred to as ‘the site’). This appraisal has been undertaken for Messrs Richard and Philip Needs and family (hereafter referred to as ‘the Land Owner’), to contribute to the promotion of the site through the Local Plan. This Heritage Appraisal may be freely assigned to third parties for the stated purposes.
- 1.2 The site is centred on National Grid Reference (NGR) SO 74190, 92560, to the east of Bridgnorth, Shropshire. It encompasses Grove Farm, which incorporates a nursery, associated outbuildings and a substantial area of hard standing; as well as areas of pasture and a large field under arable. The whole encloses 12.73 hectares (ha). Stanmore Country Park, which is extensively wooded, and the residential development of Russell Close, lie to the north of the site. The southern boundary of the site mostly comprises the A458, beyond which is the non-designated parkland, gardens and grounds to Stanmore Hall, which includes Stanmore Hall Touring Caravan Park.
- 1.3 The Client is seeking to promote the site for removal from the Green Belt for the purposes of residential development.
- 1.4 This appraisal identifies: (1) the potential for the site to contain hitherto unrecorded archaeological remains; and (2) the potential for the development of the site to result in changes to the ‘setting’ of designated heritage assets in the wider area (i.e. the surroundings in which they are experienced) and whether this would result in harm to their heritage significance. This is particularly relevant to listed buildings in relatively close proximity to the site; namely the Grade II listed *Stanmore Hall* (**1367568**), some 95m to the south of the site.

## 2. Methodology

- 2.1 The appraisal has principally involved consultation of readily available archaeological and historical information, including:
- The National Heritage List for England (NHLE), curated by Historic England (HE);
  - Shropshire Historic Environment Record (HER);
  - Readily available historic mapping; and

- National and Local Planning Policy.

- 2.2 Data were requested for a study area extending 1km from the site, and an overview of recorded heritage assets and features of interest is presented at **Plan EDP H1**.
- 2.3 The site and its environs were also visited in January 2019 in order to identify any visible features of interest and inform an appraisal of the settings of nearby listed buildings and the likely implications of the allocation and development of land within the site.

### **Legislative Context**

- 2.4 Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (1990 Act) set out the duties of a Local Planning Authority (LPA) in respect of the treatment of listed buildings and conservation areas through the planning process. This sets out the statutory duty of the decision maker, where proposed development would affect a listed building or its setting.
- 2.5 The “*special regard*” duty of the 1990 Act has been tested in the Courts and confirmed to require that “*considerable importance and weight*” is afforded by the decision maker to the desirability of preserving a listed building along with its setting. It is up to the decision maker (such as an LPA) to assess whether the proposal which is before them would result in “*acceptable change*”.

### **Planning Context**

- 2.6 The appraisal is undertaken in the context of national and local planning policy, including the *National Planning Policy Framework* (NPPF); *Shropshire Council Core Strategy* (2011); and *Shropshire Council Site Allocations and Management of Development Plan* (‘SAMDev Plan’ - 2015).
- 2.7 Paragraph 134 of the NPPF sets out five purposes served by Green Belt, which includes the following in relation to heritage:
- “d) to preserve the setting and special character of historic towns”.*
- 2.8 Paragraph 194 of the NPPF transposes S66(1) and S72(1) of the 1990 Act into national planning policy.
- 2.9 The balancing exercise to be performed – between the harm arising from a proposal and the benefits which would accrue from its implementation – is then subsequently presented in Paragraphs 195 and 196 of the NPPF.
- 2.10 *Shropshire Council Core Strategy* includes *Policy CS6: Sustainable Design and Development Principles*, which includes the requirement that development:



*“Protects, restores, conserves and enhances the natural, built and historic environment and is appropriate in scale, density, pattern and design taking into account the local context and character, and those features which contribute to local character, having regard to national and local design guidance, landscape character assessments and ecological strategies where appropriate; contributes to the health and wellbeing of communities, including safeguarding residential and local amenity and the achievement of local standards for the provision and quality of open space, sport and recreational facilities”.*

2.11 Core Strategy Policy CS17: Environmental Networks states:

*“Development will identify, protect, enhance, expand and connect Shropshire’s environmental assets, to create a multifunctional network of natural and historic resources. This will be achieved by ensuring that all development:*

- Protects and enhances the diversity, high quality and local character of Shropshire’s natural, built and historic environment, and does not adversely affect the visual, ecological, geological, heritage or recreational values and functions of these assets, their immediate surroundings or their connecting corridors;*
- Contributes to local distinctiveness, having regard to the quality of Shropshire’s environment, including landscape, biodiversity and heritage assets...; and*
- Does not have a significant adverse impact on Shropshire’s environmental assets and does not create barriers or sever links between dependant sites”.*

2.12 Shropshire Council SAMDev Plan contains Policy MD13: The Historic Environment, which states:

*“In accordance with Policies CS6 and CS17 and through applying the guidance in the Historic Environment SPD, Shropshire’s heritage assets will be protected, conserved, sympathetically enhanced and restored by:*

- 1. Ensuring that wherever possible, proposals avoid harm or loss of significance to designated or non-designated heritage assets, including their settings;*
- 2. Ensuring that proposals which are likely to affect the significance of a designated or non-designated heritage asset, including its setting, are accompanied by a Heritage Assessment, including a qualitative visual assessment where appropriate; and*
- 3. Ensuring that proposals which are likely to have an adverse effect on the significance of a non-designated heritage asset, including its setting, will only be permitted if it can be clearly demonstrated that the public benefits of the proposal outweigh the adverse effect. In making this assessment, the degree of harm or loss of significance to the asset including its setting, the importance of the asset and any potential beneficial use will be taken into account. Where such proposals are permitted, measures to mitigate and record the loss of*

*significance to the asset including its setting and to advance understanding in a manner proportionate to the asset's importance and the level of impact, will be required....”.*

2.13 SAMDev Plan also includes *Policy MD2: Sustainable Design*, which includes that:

*“Further to Policy CS6, for a development proposal to be considered acceptable it is required to...:*

- *Protecting, conserving and enhancing the historic context and character of heritage assets, their significance and setting, in accordance with MD13; and*
- *Consider design of landscaping and open space holistically as part of the whole development to provide safe, useable and well-connected outdoor spaces which respond to and reinforce the character and context within which it is set, in accordance with Policy CS17 and MD12 and MD13, including:*
  - *Natural and semi-natural features, such as, trees, hedges, woodlands, ponds, wetlands, and watercourses, as well as existing landscape character, geological and heritage assets...”.*

2.14 The site lies outside the proposed development boundary as outlined in the *Shropshire Local Plan Review: Consultation on Preferred Sites* (Shropshire Council, 2018). It is included in a Strategic Land Availability Assessment (SLAA) by Shropshire Council as Grove Farm, Stourbridge Road, Stanmore (Site STC003). The SLAA, in response to SAMDev, states:

*“...The site is located in the Green Belt. As such open market residential development is contrary to policy...The site is also in proximity of a listed building (Stanmore Hall), therefore, development is subject to an assessment of impact on the significance of the setting of these heritage assets. Where this shows that substantial harm or a total loss of significance is likely then development must meet a number of tests set out in national policy. If less than substantial harm is likely, then this should be weighed against the public benefits of development. The relationship between the site and Bridgnorth will require due consideration”.*

### **Guidance**

2.15 The assessment process has given due consideration to Historic England (HE) guidance on conservation areas, which is set out in *Conservation Area Designation, Appraisal and Management* (HE, 2016), and setting, as set out in *Historic Environment Good Practice Advice in Planning, Note 3 (Second Edition), The Setting of Heritage Assets* (HE, 2017).

2.16 When assessing the impact of proposals on designated heritage assets, it is not a question of whether there would be a direct physical impact on that asset, but instead whether change within its ‘setting’ would lead to a loss of ‘significance’.

- 2.17 The HE (2017) guidance observes that: “*The NPPF makes it clear that the extent of the setting of a heritage asset is not fixed and may change as the asset and its surroundings evolve*” and that: “*Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate the significance or may be neutral*”.
- 2.18 On a practical level, the HE (2017) guidance identifies an approach to assessing setting in relation to development management which is based on a five-step procedure, i.e:
- Identify which heritage assets are capable of being affected;
  - Assess whether, how, and to what degree setting makes a contribution to the significance of the heritage asset(s);
  - Assess the effects of the proposed development, whether beneficial or harmful, on that significance;
  - Explore ways of maximising enhancement and avoiding or minimising harm; and
  - Make and document the decision and monitor outcomes.
- 2.19 Those assets not discussed below are considered unlikely to be a determinative issue or to constrain the delivery or capacity of the site for development.

### 3. Designated Heritage Assets

- 3.1 There are no designated heritage assets (as defined in Annex 2 of the NPPF) within the site that would thus represent an ‘in principle’ constraint to development, due to a presumption in favour of their retention *in situ*.
- 3.2 The only designated heritage asset within the 1km study area, is the Grade II listed *Stanmore Hall (1367568)*, which lies c.95m to the south. An appraisal of the potential for development within the site to have an impact on the heritage significance of this asset, through changes to its setting, is given below.
- 3.3 The Grade II listed 19<sup>th</sup> Century Quatford Castle (**1374849**) lies 1km to the south of the site. However, the topographical situation of this asset in relation to the site, with intervening higher ground supporting mature woodland (in the grounds to Stanmore Hall), is such that no potential has been identified for any effect on this building as a result of residential development of land within the site.
- 3.4 There are no other designated heritage assets within the study area and it is considered that none are likely to have any bearing on the suitability of land within the site for development, or to comprise any constraint to such development.

- 3.5 *Shropshire Green Belt Assessment* (Land Use Consultants, 2017) concludes, for land within the site (Land Parcel Ref: P60Parcel), that “...*this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4* [Paragraph 134 of the NPPF]. *The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements*”.
- 3.6 This appraisal concurs with this assessment and therefore, in heritage terms, land within the site does not contribute to the purposes of Green Belt designation.

***Stanmore Hall (1367568)***

- 3.7 This Grade II listed three storey house dates from c.1870. *Stanmore Hall* is built from amalgamation of styles including a French Renaissance roof and Venetian gothic windows in the upper part of the hall. The heritage significance of the asset derives mainly from its primary architectural interest, with some historical interest as a notable country house.
- 3.8 *Stanmore Hall* lies within the associated non-designated Stanmore Grove park and garden, which is recorded in the HER (07549) and extends mostly to the south of the house. The main elevation to the house faces south-east over formal gardens, in the direction of Stanmore Hall Touring Caravan Park, which is now situated in the north-east corner of the former park. The whole is well wooded. The gardens and surrounding park to *Stanmore Hall* provide the elements of its setting which make the strongest positive contribution to its heritage significance.
- 3.9 Land within the site is physically separated from the grounds and former park to *Stanmore Hall* by the A458 and views of the house from within the site are heavily filtered by intervening trees, as well as the hedgerow at the southern edge of the site (**Image EDP 1**); although this can just be made out at close quarters (**Image EDP 2**).



**Image EDP 1:** View looking south towards *Stanmore Hall* from land within the site



**Image EDP 2:** View looking south-east to *Stanmore Hall* from the A458

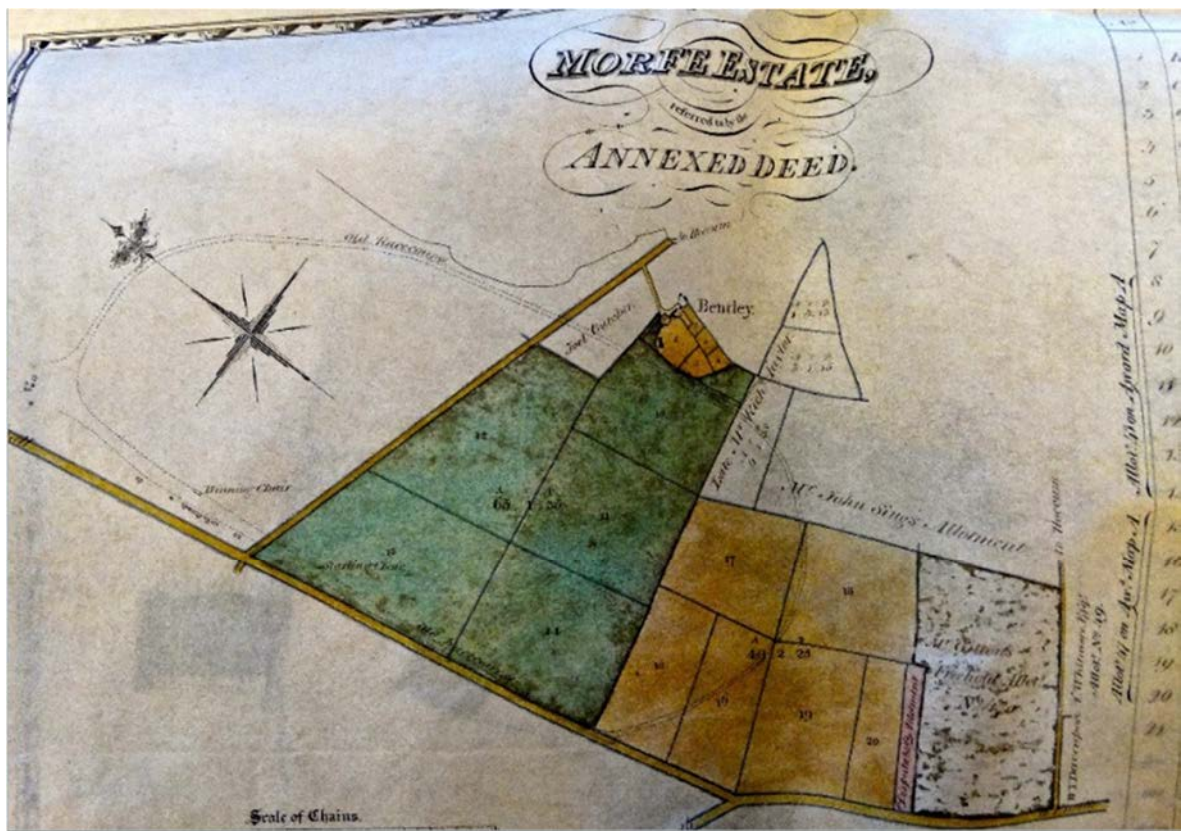
- 3.10 Views of any development within the site from the environs to *Stanmore Hall*, its gardens, grounds and former parkland would be expected to be effectively screened by the existing treescape, other than where the viewer is at the margins of the former parkland, i.e. on the A458.

3.11 There is some possibility for any development within the site to be visible, albeit heavily filtered, in outward views from the upper floors of the northern elevation to *Stanmore Hall*. There is therefore some possibility for a very limited impact on its setting. Further assessment would therefore be required of emerging development proposals (in tandem with a Landscape and Visual Impact Assessment), in order to feed in to positive design measures in response to the setting of the asset. However, land within the site has no apparent historical connection with *Stanmore Hall* and, given the physical separation of the site from the asset, as well as the extensive filtering of views, it is considered that such filtered views would have little bearing on the setting of the asset. Therefore, it is considered that residential led development within the site could be accommodated without causing harm to its heritage significance. Consequently, *Stanmore Hall* would not present an in-principle constraint to the development of the site.

#### 4. Non-designated Heritage Assets

##### *Within the site*

4.1 One HER record intersects the site. This is a record for the site of the former Bridgnorth Racecourse (**32056**), identified on an undated plan of the Morfe Estate (**Image EDP 3**), thought to be early 19<sup>th</sup> Century. No apparent remains for the racecourse were noted within the site at the time of the site visit and none are depicted upon any subsequent cartographic sources including the 1839 Worfield Tithe map (**Image EDP 4**).



**Image EDP 3:** Extract from Morfe Estate map (undated)  
(Image take from: <http://www.greyhoundderby.com/Bridgnorth%20Racecourse.html>)



**Image EDP 4:** Extract from the 1839 Worfield Tithe map

- 4.2 The former RAF Bridgnorth (29127), part of Stanmore Industrial Estate and the settlement along The Hobbins, including The Hobbins House (25950) - a 19<sup>th</sup> Century farmstead identified in the 1939 Tithe Map - have subsequently been built on the former racecourse.
- 4.3 Notwithstanding the former Bridgnorth Racecourse, it is likely that land within the site has been in agricultural use since the medieval period, with the arrangement and form of the fields suggesting fairly late planned enclosure.
- 4.4 In recent times much of the site has been in use as a nursery, including planting beds and areas of hardstanding.

### **1km Study Area**

- 4.5 There are numerous records on the HER within the area surrounding the site, with the majority relating to Iron Age or Roman remains, or 19<sup>th</sup> Century farmsteads (20885, 25913, 25950, 25951). Their locations are recorded on **Plan EDP H1**.
- 4.6 The nearest prehistoric remains to the site are a possible Early Iron Age to Roman enclosure (00205), recorded from aerial photographs; and the findspot of an assemblage of prehistoric worked flints (01341); both of which are some 300m to the west.



- 4.7 In the wider area are cropmarks of a possible Iron Age to Roman field system (00434), further enclosures (02320, 02321, 00205), and possible prehistoric pit alignments (21522, 28738, 28775).
- 4.8 As mentioned above, the site of former RAF Bridgnorth (29127) lies to the north of the site. The camp is now marked with a memorial in Stanmore Country Park. A Cold War era Royal Observer Corps monitoring post (32791) lies to the west of this.

## 5. Past Investigation

- 5.1 The HER 'event record' does not identify any intrusive archaeological investigation within the vicinity of the site. A programme of assessment and fieldwork including a strip, map and record exercise and a watching brief (ESA7945) on the excavation of a cable trench to the west of the site, within close proximity to the Iron Age/Roman enclosure (00205), recorded no finds or features of archaeological significance.
- 5.2 Other previous investigation records include desk-based assessments and field observations, including surveys of archaeological remains and farm buildings in Dudmaston by the National Trust.

## 6. Conclusions

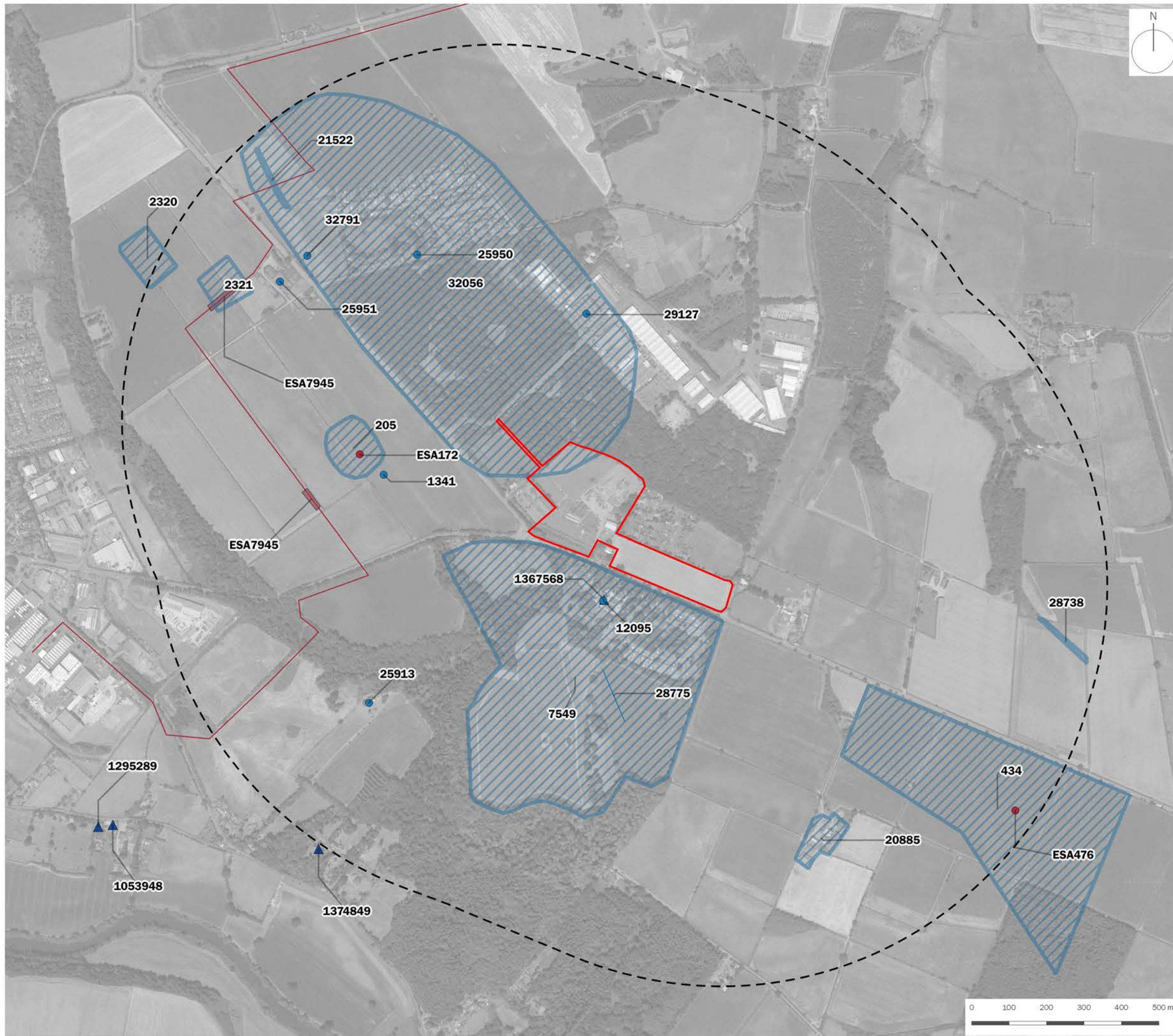
- 6.1 The site does not contain any designated heritage assets, such as scheduled monuments, listed buildings or conservation areas. There is one Grade II listed building within the vicinity of the site: *Stanmore Hall*, c.95m to the south.
- 6.2 There is some potential for development within the site to have a small impact on the Grade II listed *Stanmore Hall*, through changes to its setting. Further assessment would be required of emerging development proposals, in tandem with Landscape and Visual Impact Assessment, in order to feed in to positive design measures in response to the setting of the asset. However, land within the site has little bearing on the heritage significance of the asset and intervisibility between the site and the asset is extensively filtered by mature trees. It is thus considered that residential led development within the site could be accommodated without causing harm to the heritage significance of this designated heritage asset; therefore, this should not be a determinative factor in any planning application.
- 6.3 No potential for any impact has been identified on other designated heritage assets outside the site. The topographical position of the site is such that land within the site does not contribute to the purposes of Green Belt designation, in heritage terms, under item d) of Paragraph 134 of the NPPF.

- 
- 6.4 There is one record within the site on Shropshire HER, which refers to former site of Bridgnorth Racecourse, although there is no evidence for associated remains to survive within the site.
- 6.5 The current baseline suggests some general archaeological potential in the vicinity of the site, particularly for remains of a later prehistoric date, although there is no specific evidence for any remains within the site. Land within the site is likely to have been in agricultural use since at least the medieval period, with subsequent use as a nursery. Associated activities are likely to have impacted on any below ground archaeological remains that may have been present, particularly in those large areas of hardstanding within the site.
- 6.6 However, land within the site has mostly not been previously archaeologically investigated. As with any 'greenfield' site, there is some potential for below ground archaeological remains to survive that are not currently known, albeit with some truncation likely. Notwithstanding this, it is considered unlikely at this stage that any archaeological remains within the site would represent a barrier to its development, or that these would substantially impact on the capacity of the site for such development.



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**Plan EDP H1**  
**Overview of Heritage Assets**  
(edp5449\_d001a 07 February 2019 AG/RJ/JTF)



- Site Boundary
- Study Area
- ▲ Grade II Listed Building
- / / HER Monument
- / / HER Event

<small>client</small>	<b>Messrs Richard and Philip Needs &amp; Family</b>	
<small>project title</small>	<b>Stanmore, Bridgnorth, Shropshire</b>	
<small>drawing title</small>	<b>Plan EDP H1: Overview of Heritage Assets</b>	
<small>date</small>	07 FEBRUARY 2019	<small>drawn by</small> AG
<small>drawing number</small>	edp5449_d001a	<small>checked</small> RJ
<small>scale</small>	1:10,000 @ A3	<small>QA</small> JTF



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## **Land to the North of Stourbridge Road, Bridgnorth, Shropshire**

### **Green Belt Position Note**

#### **edp5449\_r002a**

#### **1. Introduction**

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by Messrs Richard and Philip Needs & Family, (the 'Land Owner') to prepare a Position Note proving a preliminary Green Belt appraisal of the site at Bridgnorth, Shropshire to inform the early consideration of its design and its promotion in the planning process.
- 1.2 This assessment provides technical evidence to the Local Planning Authority (Shropshire Council) that the development of the site would be appropriate, and anticipated effects acceptable. This report will inform the promotion of the appraisal site for the removal of the site from the Green Belt and realise a draft allocation as part of the Local Plan preparation.
- 1.3 This note has been informed by a desk-based review of available data, policy, landscape character publications and mapping, as well as a site visit undertaken by an experienced Chartered Landscape Architect during late January 2019. The site was in 'wintertime' condition during the visit, allowing for a full appreciation of its potential visibility.

#### **2. Site Location and Description**

- 2.1 The site is situated within the administrative authority of Shropshire Council Planning Authority (SC) at Ordnance Survey Grid Reference (OSGR) SO 74303 92410. The entirety of the site is situated within the Shropshire Green Belt. The site adjoins the Stanmore Industrial Estate (see Section 2.3 below), which remains outside of this designation.
- 2.2 The site lies to the north of Stourbridge Road, on the eastern side of Bridgnorth and adjoins the Stanmore Country Park, as well as existing residential development at Russell Close. The site has a predominantly easterly aspect with the south-western corner of the site lying at around 91m AOD and the south eastern corner at around 86m AOD. The eastern edge of the site lies at circa 84m AOD.
- 2.3 The site is abutted by existing development to the north and east, contains existing development and is enclosed by vehicular routes, mature hedgerow vegetation, and a significant woodland plantation to the north. The interior of the site accommodates existing development including a commercial nursery with associated infrastructure including polytunnels and a residence, industrial-esque built form and an extensive area of hard standing.



## 2.4 The site is bounded:

- To the north by Stanmore Country Park, which is set within a mature woodland. The northern edge of the site is extensive enclosed a large woodland;
- The eastern edge is enclosed by a mature tree group, beyond which there is an existing residential development (The Lodge, Russell Close). In winter time, there is scope for views through this tree group; however, there are currently a small number of existing industrial buildings situated along this edge. The combination of these elements screens views towards the site from the east. The physical boundary to the site here is therefore an untidy, unmitigated sequence of industrial buildings and neighbouring built form;
- The southern boundary is enclosed by a mature field hedgerow adjacent to the Stourbridge Road (A458). This hedge contains a small number of mature broadleaf hedgerow trees, and the hedgerow is outgrown. The boundary has minor gaps, however, (more noticeable in wintertime) which allow regular open views from the road corridor across the site;
- The south-western edge of the site is defined by existing residential development; long established two storey dwellings (2 and 4 Stourbridge Road), which have a residential curtilage which is experienced across the southern site area; and
- The western edge of the site is bounded by an arterial road (A452), an existing brick masonry wall (likely to be a former remnant of a kitchen garden wall) and mature woodland (Stanmore Country Park).

## 3. The Purpose of this Position Note

- 3.1 With consideration of SC's Shropshire Green Belt Assessment (SCSGBA), Final Report, September 2017, it is evident that there is substantial pressure within the county for a greater supply of housing, particularly at the main and key settlements of the area.
- 3.2 The Shropshire Green Belt performs an important regional function in keeping land permanently open by preventing the expansion of settlements around the West Midlands conurbation. Consequently, the function of this Position Note is set against the current background of a substantial need for future housing needs.
- 3.3 At a preliminary level, this Position Note will appraise how the site performs in terms of the fulfilment of the Green Belt Purposes, and the guidance in paragraph 134 of the Revised NPPF (July 2018).
- 3.4 Additionally, at this preliminary stage, this Position Note outlines the feasibility of re-aligning the Green Belt designation for the release of the site for future development might be established.



#### **4. Background to the Green Belt Designation**

4.1 The Green Belt was conceived to control urban form, and the purposes of a Green Belt around urban areas were set out in 1955 by the Ministry of Housing and Local Government as being:

- To check the further growth of a large built up area;
- To prevent neighbouring towns from merging into one another; and
- To preserve the special character of a town.

4.2 The Shropshire Green Belt (SGB) (the 'Green Belt' in this review) forms part of the wider West Midlands Green Belt, which was initially planned in the 1950's, with policies developed for a statutory Green Belt in 1980.

4.3 The Government formerly set out its policies and principles towards Green Belts in England and Wales in Planning Policy Guidance Note 2: Green Belts, but this planning guidance was superseded by the National Planning Policy Framework (NPPF) in March 2012, and has been subsequently superseded with the Revised National Planning Policy Framework (July 2018). Planning Authorities are strongly urged to follow the Revised NPPF's detailed advice when considering whether to permit additional development in the Green Belt.

4.4 The NPPF requires land to demonstrate that it contributes towards these two essential characteristics of openness and permanence by meeting one or more of five 'tests' of Green Belt designation, which are set out at Revised NPPF Paragraph 134 as follows:

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

4.5 The Revised NPPF Paragraph 136 (July 2018) says that *"once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period"*. It also provides advice on the definition of Green Belt boundaries in Revised NPPF (July 2018) Paragraph 139, which requires the following to be considered:



- *“a) Ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- *b) Not include land which it is unnecessary to keep permanently open;*
- *c) Where necessary, identify areas of safeguarded land between the urban area and the Green Belt, to meet longer-term development needs stretching well beyond the plan period;*
- *d) Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an up to date plan which proposes the development;*
- *e) Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- *f) Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.*

4.6 Provisionally, this Position Note considers the extent to which the appraisal site fulfils the five green belt purposes in Revised NPPF (July 2018) paragraph 134. In doing so, EDP have been minded to ensure that any revision to the Green Belt provision would ensure that the Local Planning Authority (SC) would “*satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period*”, as well as, ensuring any new boundaries are: “*clearly, using physical features that are readily recognisable and likely to be permanent*” (Revised NPPF (July 2018) paragraph 139 respectively).

#### **Current Green Belt Assessment undertaken by the Local Planning Authority**

##### ***Shropshire Council’s ‘Shropshire Green Belt Assessment – Stage One’, Final Report, September 2017***

- 4.7 Shropshire Council is currently undertaking a Local Plan Partial Review (2016 - 2036), for which this Position Note will be considered as part of the Preferred Sites consultation in February 2019.
- 4.8 Stage 1 Assessment divided all the Green Belt within Shropshire into 85 discrete land areas and assessed the extent to which they serve the Green Belt purposes, as defined in paragraph 134 of the National Planning Policy Framework (NPPF) 2. The aim of this was to assess the relative performance of the Green Belt within the whole of Shropshire.
- 4.9 The site is identified by SC as part of a wider land parcel (referred to as Land Parcel P60) and was appraised in this first stage Green Belt review. The overall land parcel (P60) was appraised





by SC against the then current NPPF 2012 Green Belt functions 1 - 5. The outcome of SC's appraisal is summarised below in **Table EDP 4.1**.

**Table EDP 4.1:** Review of P60 Green Belt Function (as per NPPF para 134) by SC

<b>GB Purpose</b>	<b>Commentary by SC for the whole of P60</b>
<p><b>GB Purpose 1</b>                      To check the unrestricted sprawl of large built-up areas</p>	<p><i>"No contribution. This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1.</i></p> <p><i>No contribution. This parcel does not lie adjacent to a large built up area and therefore makes no contribution to Purpose 1".</i></p>
<p><b>GB Purpose 2</b>                      To prevent neighbouring towns from merging into one another</p>	<p><i>"Weak - Due to the relative size of the parcel and the distance between the settlements, the parcel plays a very limited role in preventing the merging or erosion of the visual or physical gap between these settlements.</i></p> <p><i>Loss of openness would not be perceived as reducing the gap between settlements. It is acknowledged that any new development that took place within the parcel could lead to the narrowing the gap between Bridgnorth and Stanmore Industrial Estate".</i></p>
<p><b>GB Purpose 3</b>                      To assist in safeguarding the countryside from encroachment</p>	<p><i>"Moderate.</i></p> <p><i>There is some sense of encroachment within the parcel as it is bordered to the north by the Stanmore Industrial Estate.</i></p> <p><i>Overall the land parcel does contain the characteristics of countryside and is relatively open. The Green Belt plays a moderate role safeguarding the countryside from encroachment.</i></p> <p><i>The south-eastern corner of this parcel comprises the small hamlet of Stanmore, as well as a small pastoral field and horse paddock. The small pastoral field and horse paddock are contained by Stanmore and woodland to the north and woodland that encloses Stanmore Caravan Park to the south. This provides a degree of separation between it and the wider parcel. This area is considered to be playing a weaker role against purpose 3".</i></p>
<p><b>GB Purpose 4</b>                      To preserve the setting and special character of historic towns</p>	<p><i>"No contribution.</i></p> <p><i>Digital analysis, based on bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements assessed under Purpose 4. The openness of the land within this parcel is not considered to contribute to the setting of these historic settlements".</i></p>
<p><b>GB Purpose 5</b>                      To preserve the setting and special character of historic towns</p>	<p><i>N.B. No rating individual to site.</i></p> <p><i>"All parcels make an equally significant contribution to this purpose".</i></p>

4.10 With consideration of Table 3.1 to 3.4 of SCSGBA 2017, SC defines scoring criteria for each Green Belt purpose. With regard to Land Parcel P60, SC note that the site performs weakly, or



makes no contribution to the intactness and function of the Green Belt, other than for Green Belt Purpose 3 (i.e. 'To assist in safeguarding the countryside from encroachment').

- 4.11 SC defines a Moderate rating against Green Belt Purpose 3 as: *'The land parcel contains the characteristics of countryside, has limited urbanising development, and is relatively open'*. However, SC recognises that the site provides little, or no contribution to the function of the Green Belt in its widest sense.
- 4.12 As noted earlier, the NPPF does not require all the purposes of Green Belt to be met simultaneously and a Strong or Moderate rating against any Green Belt purpose could be sufficient, on its own, to indicate an important contribution. Equally, even if an area of Green Belt scores highly against one or more purposes, the NPPF does not suggest that a review of its boundaries would not be appropriate.

**Shropshire Council's 'Shropshire Green Belt Assessment - Stage Two', Final Report, November 2018**

- 4.13 The Stage Two Green Belt Study assessed the potential harm of releasing areas of potential development opportunity 'Opportunity Areas', from the Green Belt. The Stage 2 Green Belt Study follows on from a Stage 1 Assessment LUC completed in September 2017. Together both studies will inform the Council's Local Plan Partial Review 2016 - 2036 (SCLPPR 2016 - 2036).
- 4.14 In the SCLPPR 2016 - 2036, the site is identified as part of the STC003 (which is broadly reflective of the Land Parcel P60 of the SCSGBA 2017). With reference to page 51 of this document, the site is not considered for a Preferred Site Allocation or a Preferred Area of Safeguarding Land.
- 4.15 As identified within the Site Assessment schedules for the SCLPPR 2016-2036, the issue for not considering this site for inclusion as a preferred site, is its function against Green Belt Role 3, (to assist in safeguarding the countryside from encroachment), for which SC passes the following comment:

*"The Green Belt Review undertaken by Shropshire indicates that this site is located within a Green Belt parcel, the release of which would have a moderate level of harm on the Green Belt due to some encroachment on countryside".*

**5. EDP's Green Belt Review of the Site**

- 5.1 During January 2019, EDP undertook its own preliminary review of the site's Green Belt functionality. This review included an analysis of desk-based material alongside a site visit by a Chartered Landscape Architect, through which local roads and rights of way were walked to gain an understanding of the landscape context of the site and its surroundings.



5.2 The site which we have considered is less than 50% of the overall Land Parcel identified by SC as Land Parcel P60, and this site is the more benign aspect of the wider land parcel. Hence, EDP recognises, that there would be a degree of generality within the comments of SC in this respect, and that this document considers the likely effect of the smaller site area on the function of the Green Belt individually.

5.3 This test is undertaken in accordance with SC's assessment criteria contained within SC's Shropshire Green Belt Assessment, Final Report, November 2017, Section 3 for the assessment criteria.

5.4 EDP considers the site to be a relatively lower functioning Green Belt area. This conclusion differs from that of SC for the following reasons:

***Green Belt Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas***

5.5 Given our field based assessment, EDP agrees with the findings of Shropshire Council that the site makes '*no contribution*' to this Green Belt purpose.

5.6 The site is sandwiched between an existing residential development, a large industrial development, and lies adjacent to two main arterial routes (A452 and A458). The site is peppered with existing built form, and consequently, the site has an equivalence in a spatial sense.

5.7 EDP considers the definition of 'large built up areas' to be a town sized settlement. The site is located approximately 0.82km west Bridgnorth Development Boundary; however, the site is not discernible from this settlement (either Low Town or High Town). Hence, the site is perceived as separate from this settlement.

5.8 Additionally, the site is situated a significant distance from the nearest neighboring towns:

- Telford 12km north of the site (at its closest point);
- Wolverhampton 13.2km north-east of the site (at its closest point);
- Stourbridge 15.5km east of the site (at its closest point); and
- Kidderminster 15.75km south of the site (at its closest point).

5.9 EDP is firmly of the opinion, that given this intervening distance, the site makes no contribution to checking the unrestricted sprawl of large built-up areas. Hence, EDP agrees with the findings of SCSGBA, 2017.



***Green Belt Purpose 2: To Prevent Neighbouring Towns Merging Into One Another***

- 5.10 The site is peppered with existing development including a commercial nursery with associated infrastructure including polytunnels and a residence, industrial-esque built form and an extensive area of hard standing. Whilst new development at the site might be positioned marginally closer to the southern and south-western site boundary, in real world terms this difference would be barely discernible. For instance, Grove Farm is situated approximately 0.95km west of the Bridgnorth Development Boundary, whilst the south-western site boundary is approximately 0.82km west of the same settlement edge. This difference would not be discernible.
- 5.11 Furthermore, and following on from paragraph 5.8 above, the site represents a very small area when one considers the intervening distance between these settlements. The site has a road frontage of approximately 600m which fronts the A458 roadway which leads to Stourbridge (approximately 22.9km by road from Bridgnorth). This linear length represents just over 2.5% of this linear distance. EDP considers that the development of the site would not lead to the perception of coalescence between these two settlements.
- 5.12 Additionally, the site cannot be seen from, and is physically separate from each of the neighbouring towns (including Bridgnorth), and the development of the site would not affect the gateway/arrival to each of these towns.
- 5.13 EDP considers, that the site makes no contribution to this Green Belt purpose, and that Shropshire Council has incorrectly elevated the role of the site for this purpose as the site makes no material contribution.

***Green Belt Purpose 3: To Assist in Safeguarding the Countryside from Encroachment***

- 5.14 With reference to page 51 within SC's SLPR (November 2018), the site is located outside of the defined Development Boundary, albeit adjoining the defined edge of Stanmore.
- 5.15 In their 2018 SLPR, SC are proposing a number of land parcel outside of the Development Boundary around Stanmore; see page 51. These proposals are for Safeguarding Land for development beyond 2036 (Land Parcel P54 and P56), as well as recognising the Stanmore Industrial Park as an Existing Housing Allocation.
- 5.16 Of course, each site is assessed on its own merits and judgements must applied. That judgement can at least be made on the basis of the much more relevant landscape and settlement context. Moreover, the future development of Land Parcel P54 and/or P56 would be of a greater site area, which would give rise to potentially greater impacts.
- 5.17 The site is abutted by existing development to the north and east, contains existing development and is enclosed by vehicular routes, mature hedgerow vegetation, and a significant woodland plantation to the north.



- 5.18 The interior of the site accommodates existing development including a commercial nursery with associated infrastructure including polytunnels and a residence, industrial-esque built form and an extensive area of hardstanding.
- 5.19 The site contains an agricultural field to the north, and a pasture field to the south. These fields have a very small scale (compared to the wider open countryside) and are isolated from each other by intervening development and built form within the site.
- 5.20 EDP is firmly of the opinion that the site demonstrates no characteristics of the countryside, and is perceived as degraded in sensory, as well as qualitative terms. The site is contained by the wider Stanmore Country Park, Stanmore Industrial Park, the existing vintage/retro yard at Wonderland Gardens (approximately 0.2km east), and the Stanmore Hall Touring Caravan Park (opposite the site on the south of the A458). Hence, the site is surrounded and enclosed by existing development, and isolated from open countryside.
- 5.21 In their 2017 SGBA, SC acknowledge that aspect of the site plays a weaker role in this Green Belt purpose:
- “The small pastoral field and horse paddock are contained by Stanmore and woodland to the north and woodland that enclose Stanmore Caravan Park to the south. This provides a degree of separation between it and the wider parcel. This area is playing a weaker role against purpose 3”.*
- 5.22 With consideration, EDP is firmly of the opinion, that the site performs below moderate against Green Belt Purpose 3, and at best, the site could be rated as Weak. A Weak rating for Green Belt Purpose 3 is defined by Shropshire Council as: ‘Land parcel does not contain the characteristics and/or is not connected to land within the characteristics of the countryside or contains urbanising development that compromises openness’. EDP would assert that this is a more fitting and accurate rating for the site area being preliminary appraised.

**Green Belt Purpose 4: To Preserve the Setting and Special Character of Historic Towns**

- 5.23 Through the combined effect of landform and an extensive woodland block, there is no intervisibility between the site and the nearest historic town (Bridgnorth). A ridge line is situated to the east of Bridgnorth, upon which, a mature woodland block runs longitudinally along for nearly 1.5km between the Wolverhampton Road (B4363) and the Stourbridge Road (A458). The combination of these physical features screen views of the site from the highest publicly accessible locations on the eastern edge of Bridgnorth (i.e. Castle Hill Park and Castle Hill/Cannon Steps/Library Steps within High Town, approximately 2.3km west of the site).
- 5.24 This point is confirmed by Shropshire Council in their 2017 SCGBA, which states:
- “Digital analysis, bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements.... the openness of land within this parcel (Labd Parcel P60) is not considered to contribute to the setting of these historic settlements”.*



- 5.25 Consequently, EDP finds that the site makes no contribution to the setting of Low Town or High Town in Bridgnorth. Hence, EDP agrees with SC's SCGBA, 2017 that the site affords 'no contribution' to Green Belt Purpose 4.

**Green Belt Purpose 5: To Assist in Urban Regeneration by Encouraging the Recycling of Derelict and Other Urban Land**

- 5.26 Shropshire Council have made no individual, site specific comment for Green Belt Purpose 5, and have not scored the site's contribution. However, EDP considers that the site makes no contribution to assisting in urban regeneration. In its strictest terms, the site is not a brownfield site and is not situated within an urban setting.
- 5.27 However, the site is situated outward of neighbouring urban areas or towns, and might the development be brought forward, the scheme would not affect the gateway/arrival at these urban areas due to the physical separation from these urban areas.

*Outline Summary*

- 5.28 Given the above preliminary appraisal of the site, EDP finds that the site is a very low functioning area of the Green Belt. Moreover, given, EDP's field-based assessment, it is our professional opinion that the makes a lower contribution that that which is appraised by Shropshire Council previously in 2017.

**Review of Boundary Resilience**

- 5.29 The 'test' for this stems from Revised NPPF (July 2018) paragraph 139 and whether the release of the appraisal site from the Green Belt, and effectively re-drawing the Green Belt boundary, would ensure the new boundary is well defined "*...clearly, using physical features that are readily recognisable and likely to be permanent*".
- 5.30 Given our field-based assessment, EDP considers that the site scores very strongly in this area, having well-defined and defensible boundaries on all four sides; see paragraph 2.3 of this document.
- 5.31 The re-alignment of the Green Belt to outside of the site to align with the existing robust woodland edge to the site's northern edge, residential curtilages to the eastern edge, as well as the strong vegetative boundary along the A452 and A458 arterial routes.
- 5.32 These features would provide a long-term, defensible, development area which serves to contribute to Green Belt functions in line with the Revised NPPF (July 2018) paragraph 139.
- 5.33 This results primarily from the clearly demarcated boundary features, the enclosed nature of the site and the consequential limitation in landscape and visual effects through the utility of permanent and physical features within the site, which can be enhanced and maintained appropriately for longevity.



- 5.34 There is great scope to enhance the robustness of the southern hedgerow further, through the integration of landscaping and green infrastructure interventions within public amenity to create “*physical features that are readily recognisable and likely to be permanent*”. This initiative would ensure that the future development of the site would not be prominent, and that countryside beyond the site’s physical boundaries remained open and in accordance with Revised NPPF (July 2018) paragraph 139.
- 5.35 EDP concludes, that the boundaries of the site are not only demarcated by visible features, but these features are both strong in a visual and perceptual sense and have a high degree of permanence due to their status.

## 6. Comparative Assessment

- 6.1 With consideration of the Shropshire Local Plan Review Consultation of Preferred Sites (November 2018), EDP concluded that many of these wider Green Belt sites around Stanmore are less appropriate for Green Belt release, than the site.
- 6.2 At para 6.20 on the aforementioned document, Shropshire Council identifies the Preferred Site Allocations and Preferred Areas of Safeguard Land, which identifies the following land parcels (see **Appendix EDP 1** of this document):

### ***Proposed Mixed Use Allocations:***

- Land Parcel P56 (eastern half of the land parcel)
- Land Parcel STC002;
- Land Parcel STC004; and
- Land Parcel STC006.

### ***Preferred Areas of Safeguard Land (or development beyond 2036):***

- Land Parcel P54; and
- Land parcel P56 (western half of the land parcel).

- 6.3 Land Parcels 54 and 56 are situated within the Green Belt, and have been appraised within the SCGBA 2017. For the following reasons, EDP considers these land parcels to be less appropriate for Green Belt release and development:

#### *Land Parcel P54*

- 6.4 The Council have designated this area as Proposed Safeguarded Land for Development Beyond 2036. The site is currently managed as agricultural fields and wraps around The Hobbins, a small settlement bounding the southern part of the land parcel.



- 6.5 Within their SCSGBA 2017, Shropshire Council have reviewed a larger land area for P54 (approximately twice the area of the Proposed Safeguarded Land). Therefore, EDP recognises, that there is a degree of generalization within the 2017 assessment.
- 6.6 The Council consider the entirety of this land parcel to have a Moderate rating for Purpose 3 (assisting the countryside from encroachment). Given EDP's field assessment, we note that the western half of the site area occupies higher ground than the eastern half (approximately 75-105m AOD). This quantum of the proposed safeguarded site forms a ridgeline to the east of the A454 and is locally prominent.
- 6.7 The development of this site is likely to be discernible from across the wider countryside; especially from the road system and Public Rights of Way which pass through the site, to north and south of the site and the PRoW at Hermitage Hill (approximately 120m AOD). Hence, the development of this site would substantially extend development into open countryside and significantly influence the gateway into and out of Bridgnorth.
- 6.8 Given the above, the Council's rating of the land parcel as having a Medium Green Belt function (Purpose 3), underestimates the likely visual effects of developing the western half of this land parcel, leading to substantial impacts on the openness of the countryside.
- 6.9 Furthermore, EDP notes that the site is defined by low clipped field hedges with few hedgerow trees. The hedgerows are outgrown and in places degraded. The land parcel has less robust boundaries and is unlikely to legitimately support a new Green Belt edge, which in this case would appear quite arbitrary and incongruous. The eastern part of P54 is defined by stronger site boundaries due to the combination of undulating, lower landform, existing built development and a number of woodland blocks.
- 6.10 The western land area of P54 would less resolutely support a new Green Belt edge, and if developed in isolated of the wider P54 land parcel which would appear quite incongruous.

*Land Parcel P56 (East)*

- 6.11 Land Parcel P56 (eastern half of the land parcel) is situated west of the A454 within a very open landscape. The site is currently managed as agricultural fields with closely cropped field hedges with few mature trees. As recognised by Shropshire Council, the land parcel: *'contains strong characteristics of countryside, has no urbanizing development, and is open.'* To this end, the Council rightly consider the site has a Strong purpose in fulfilling the encroachment of the open countryside.
- 6.12 Additionally, the development of this site would be very discernible from the main arterial road network (A454 and A458), and B4363 which pass the site. This development would strongly prejudice the gateway experience of entering Bridgnorth and has the potential for quite significant impacts to visual amenity, particularly from existing Public Rights of Way which crisscross the land parcel and afford panoramic views from the local ridgeline of Hermitage Hill (approximately 120m aOD).





6.13 Given EDP's field-based assessment, the site has low clipped, degraded hedgerows with few hedgerow trees. Hence, this land parcel has less robust boundaries than those contained within the site and would less resolutely support a new Green Belt edge, which would appear quite arbitrary in the first instance if the land parcel was developed in isolation of the wider Land Parcel P54.

6.14 Given the above, and the Council's rating of the land parcel as having a Strong Green Belt function (Purpose 3), it is EDP's opinion, that this land parcel is not suited to new development.

*Land Parcel P56 (West)*

6.15 The western half of Land Parcel P56 has been designated by Shropshire Council as Proposed Safeguarded land for Development beyond 2036. EDP agrees with Shropshire Council that this land parcel has a Strong Green Belt function (Purpose 3 to safeguard the countryside from encroachment).

6.16 EDP considers the development of this site would be prominent in the open countryside and would fundamentally alter the landscape character and impact visual amenity. Public Rights of Way pass and outside of the western site boundary on Hermitage Hill (approx. 120m aOD).

6.17 Additionally, given the rising landform within this land parcel, there is potential by which new built form could be seen from Bridgnorth, over and above, or only partially screened by the existing woodland along hermitage Hill. Consequently, EDP considers that the development of the site has the potential to adversely affect Green Belt function (Purpose 4), impacting the setting of Bridgnorth town (especially High Town). Hence, it is considered that there is potential for Medium to Strong rating for Purpose 4 dependent on site layout and scale of development.

6.18 If this land parcel came forward for development in isolation of the wider P54 land parcel would result in substantial impacts on the Green Belt. Given the existing field boundaries, its I considered, that the realignment of the Green belt for this land parcel individually would appear quite incongruous.

*Land Parcel STC002, STC004 and STC006*

6.19 Land Parcels STC002, 004 and 006 are situated outside of the Green Belt and are appraised within Shropshire Council's Strategic Land Availability Assessment (November 2018). These land parcels are situated within the geographical area influenced by the Stanmore Industrial Park, which in turn are enclosed by the extensive mature woodland of the Stanmore Country Park.

6.20 These land parcels are limited further by the existing, long established development at The Hobbs to the north (bounding the aforementioned Land Parcel P54). A commercial nursery, Stanmore Gardens is located to the south, beyond which is the site, and the arterial route A454.

6.21 The development of STC002, STC004 and STC006 are well contained, and it is assumed through appropriate masterplanning would continue to be afford visual mitigation to reduce and



offsetting the likely visual and landscape effects of new development. This would limit the likely impact on Green Belt function (Purpose 3 to safeguard the countryside from encroachment).

- 6.22 EDP considers these three smaller land parcels could be delivered in isolation of the wider Green Belt sites, and obviously would not require the realignment of the existing Green Belt. Additionally, given the very low function of the site, its physical enclosure (and disconnect from the open countryside and its character), the site could be brought forward with these land parcels without harming the function of the Green Belt.
- 6.23 In summary, EDP considers that of all the Green Belt site appraised by Shropshire Council around Stanmore, the site has the lowest functioning Green Belt purpose. It is evident, that the site could be brought forward individually, or in combination with the wider non-Green Belt Stanmore sites for future development without harming the function of the Green Belt. However, EDP is of the opinion, that the Green Belt function of Land Parcel P54 and P56 is substantially more significant to the integrity of the Green Belt at this location.
- 6.24 The realisation of the Preferred Site and of Preferred Areas of Safeguarded Land for new mixed use and residential development, either before, or beyond 2036, would cumulatively result in the re-alignment of the existing Green Belt designation. If the wider land parcels came forward without the site, the realignment of the Green Belt would be less defensible without the inclusion of the site for the following reasons:
- (i) In this situation the development would not create a rounding off of built form in line with Russell Close and Stanmore Caravan Park, which would otherwise have realised a strong defensible edge to the east of future development; and
  - (ii) Without the site been development, development would appear to ‘bleed out’ along the A458 with no obvious start and finish, with existing residential development at The Lodge, Yew Tree Cottage and Wonderland Gardens would extend into open countryside. Especially given that the site has no significant characteristics of the open countryside; and
  - (iii) The development of the site, and its release of the Green Belt would facilitate (and enable management for longevity) the protection and enhancement of existing vegetative boundaries, as well as realising appropriate landscape mitigation to soften up the raw, incongruous residential curtilage and commercial land uses which extend across the site and can be experienced in part beyond the edge of the site. This measure would effectively filter and screen the development of wider Green Belt land parcels at Stanmore and reduce the likely impact of development on the openness and integrity of the Green Belt around this location, ensuring a more sustainable Green Belt function with robust defensible boundaries.
- 6.25 Consequently, EDP concludes the development of the wider land parcels, but without the site, would substantially erode the function of the Green Belt at Stanmore.



6.26 Furthermore, given our field-based assessment, EDP would recommend the retention of land west of the A454 within its current Green Belt designation. This provision would ensure openness between the town of Bridgnorth and Stanmore. This would safeguard the wider countryside from encroachment through the perceived, and near physical coalescence of the two settlements into one larger settlement. In turn, this would also ensure the setting and special character of Bridgnorth is not adversely affected by preventing neighbouring urban developments from margining.

## 7. Conclusions

7.1 EDP has undertaken a preliminary Green Belt Review of the site, which forms an aspect of the wider land Parcel (P60) previously appraised by Shropshire Council. Given our most recent field-based assessment, EDP considers that the site performs a less significant Green Belt role than that appraised by Shropshire Council, see below **Table EDP 7.1**.

**Table EDP 7.1:** Comparative Summary of Green Belt Purpose Rating

<b>Green Belt Purpose</b>	<b>Rating by Shropshire Council (SC SGBA 2017)</b>	<b>Rating by EDP (February 2019)</b>
<b>GB Purpose 1</b> To check the unrestricted sprawl of large built-up areas	No Contribution	No Contribution
<b>GB Purpose 2</b> To prevent neighbouring towns from merging into one another	Weak	No Contribution
<b>GB Purpose 3</b> To assist in safeguarding the countryside from encroachment	Moderate	Weak (at best)
<b>GB Purpose 4</b> To preserve the setting and special character of historic towns	No Contribution	No Contribution
<b>GB Purpose 5</b> To preserve the setting and special character of historic towns	No Comment	No Contribution
<b>Most Significant Rating</b>	<b>Moderate</b>	<b>Weak (at best)</b>

7.2 It is EDP’s firm opinion, that site could reasonably be removed from the Green Belt (i.e. ‘Green Belt off’) in isolation without harm to the purposes and functionality of the surrounding Green Belt. Hence, through the appropriate masterplanning of the site, the site could be developed in the future without harm to the integrity of the Green Belt overall.

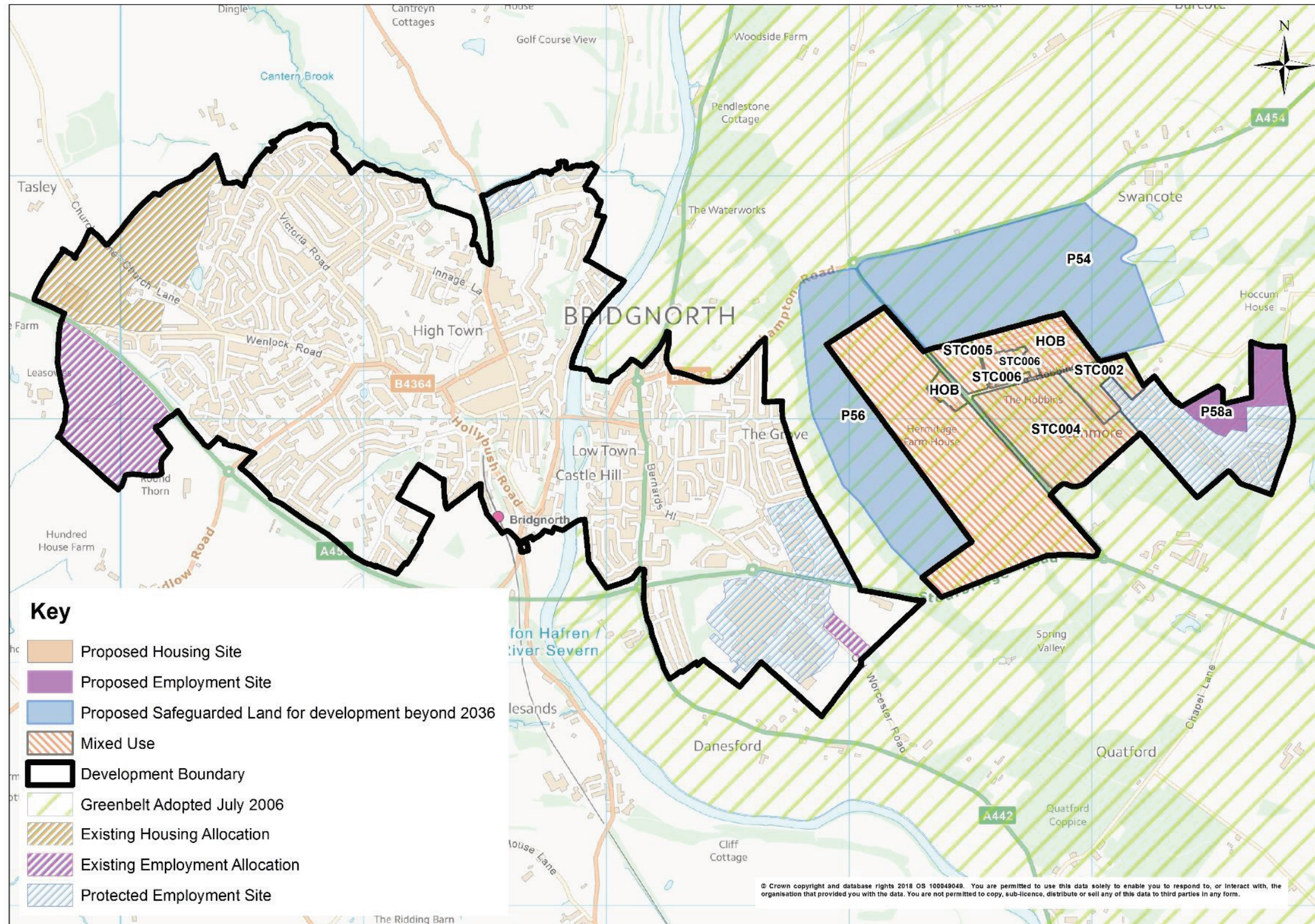


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**Appendix EDP1**  
**Plan of Proposed Development Boundary; Preferred Site Allocation and**  
**Preferred Areas of Safeguard Land (Extract from Shropshire Local Plan:**  
**Consultation on Preferred Site (November 2018))**

**Proposed Development Boundary; Preferred Site Allocations and Preferred Areas of Safeguarded Land**

6.20. The map below identifies the location of the proposed development boundary; preferred allocations; and preferred land safeguarded for future development in Bridgnorth:



## **Land North of Stourbridge Road, Bridgnorth, Shropshire**

### **Landscape and Visual Position Note**

#### **edp5449\_r003a\_080219**

#### **1. Introduction**

- 1.1 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by Messrs Richard and Philip Needs & Family (the 'Land Owner'), to prepare a Position Note to inform the promotion of the site at Bridgnorth, Shropshire for a draft allocation as part of the Local Plan preparation.
- 1.2 This Position Note provides technical evidence to the Local Planning Authority (Shropshire Council) that the development of the site would be appropriate, and anticipated effects acceptable.
- 1.3 This paper has been informed by a desk-based review of available data, policy, landscape character publications and mapping and by a site visit undertaken by an experienced Chartered Landscape Architect during January 2019. The site was in 'wintertime' condition during the visit, allowing for a full appreciation of its potential visibility.

#### **2. Site Location, Context and Description**

##### ***Site Location***

- 2.1 The site is situated within the administrative authority of Shropshire Council Planning Authority (SC) at National Grid Reference (NGR) SO 74190, 92560. The entirety of the site is situated within the Shropshire Green Belt.
- 2.2 The site lies to the north of Stourbridge Road, to the east outside of Bridgnorth and adjoins the Stanmore Country Park, as well as existing residential development at Russell Close. The site has a predominantly easterly aspect with the south-western corner of the site lying at around 91m aOD and the south eastern corner at around 86m aOD. The eastern edge of the site lies at circa 84m aOD.

##### ***Site Context***

- 2.3 Following our desk-based review, EDP finds that the site is not situated within, or adjoining any, national or local landscape designations; for instance, a National Park or Area of Outstanding Natural Beauty or Conservation Area, which might otherwise represent an 'in principle' constraint to development.
- 2.4 There are no Public Rights of Way (PRoW) or permissive routes situated within the site area. However, there is a Public Right of Way which runs outside of the eastern site boundary, which

passes along Russell Close. There are a number of Public Rights of Way situated within Stanmore Country Park.

- 2.5 Stanmore Hall (Grade II Listed Building) and Stanmore Grove park and garden (non-designated) are situated south of the Stourbridge Road. Following our field-based assessment, EDP finds that the northern perimeter of Stanmore Grove and park is enclosed by extensive mature tree planting which does not enable intervisibility between the Hall, grove and park with the site; see **Images EDP 1** and **EDP 2**, which follow in this document.



**Image EDP 1:** Photograph taken from Stourbridge Road looking westwards to the southern site boundary. Photograph was taken in January 2019. Viewpoint location is situated at SO 74600 92195



**Image EDP 2:** Photograph taken from within the site looking south towards Stourbridge Road with Stanmore Hall grove and park beyond. Photograph was taken in January 2019. Viewpoint location is situated at SO 74449 92329

## 2.6 The site is bounded:

- To the north by Stanmore Country Park, which is set with a mature woodland. The northern edge of the site is extensively enclosed by a large mature woodland;
- The eastern edge is enclosed by a mature tree group, beyond which there is an existing residential development (The Lodge, Russell Close); see **Image EDP 3**. There are a small number of existing industrial buildings situated along this edge; see **Image EDP 4**. The combination of these elements screens views towards the site from the east. The physical boundary to the site here is therefore an untidy, unmitigated sequence of industrial buildings and neighbouring built form;





**Image EDP 3:** Photograph taken from within the site looking northwards to the eastern site boundary adjoining Russell Close. Photograph was taken in January 2019. Viewpoint location is situated at SO 74295 92354



**Image EDP 4:** Photograph taken from within the site looking north-west to the eastern site boundary adjoining Russell Close. Photograph was taken in January 2019. Viewpoint location is situated at SO 74295 92354

- The south-eastern edge of the site, which adjoins Russell Close, is demarked by a timber post and wire fence with a degraded field hedge. This affords views across the site south-eastern area towards the neighbouring residential development at Russell Close; see **Image EDP 5**. In part, this hedgerow contains mature trees which help screen views into the site from the Stourbridge Road; see **Image EDP 1** earlier in this document.



**Image EDP 5:** Photograph taken from Russell Close on the south-eastern site boundary looking north-west across the site. Photograph was taken in January 2019. Viewpoint location is situated at SO 74588 92257

- The southern boundary is enclosed by a mature field hedgerow adjacent to the Stourbridge Road (A458). This hedge contains a small number of mature broadleaf hedgerow trees and the hedgerow is outgrown. The boundary has minor gaps, however, (more noticeable in wintertime) which allow regular open views from the road corridor across the site; see **Image EDP 6;**



**Image EDP 6:** Photograph taken from Stourbridge Road westwards to the southern site boundary. Photograph was taken in January 2019. Viewpoint location is situated at SO 74188 92371

- The south-western edge of the site is defined by existing residential development, long established two storey dwellings (2 and 4 Stourbridge Road), which have a residential curtilage which is experienced across the southern site area; see **Image EDP 6**; and
- The south-western and western edge of the site is bounded by an arterial road (A454), an existing brick masonry wall (likely to be a former remnant of a kitchen garden wall) and mature woodland (Stanmore Country Park).

### **Site Description**

- 2.7 The site is abutted by existing development to the north and east, contains existing development and is enclosed by vehicular routes, mature hedgerow vegetation, and a significant woodland plantation to the north. The interior of the site accommodates existing development including a commercial nursery with associated infrastructure including polytunnels and a residence, industrial-esque built form and an extensive area of hard standing.



- 2.8 The site is peppered with existing development including a commercial nursery with associated infrastructure including polytunnels and a residence (Grove Farm), with surrounding industrial-esque built form and an extensive area of hard standing.
- 2.9 The site contains an agricultural field to the north and a pasture field to the south. These fields have a very small scale (compared to the wider open countryside) and are isolated from each other by intervening development and built form within the site.
- 2.10 With consideration of our field-based assessment, the site does not demonstrate any landscape features worthy of absolute protection and retention other than the trees/hedges at its boundaries, many of which would benefit from improved management.
- 2.11 The site demonstrates no characteristics of the open countryside and is perceived as being separate from the wider agricultural environment. Its topography is an interesting characteristic and could inform the layout of any future development.

### 3. Visual Amenity

- 3.1 During the field-based assessment, the zone of visual influence of the site (i.e. those areas of the surrounding landscape which had potential views of the site) was established and these areas were then visited to establish whether ground level views were accessible and, if so, how the site appeared.
- 3.2 The site is contained by the wider Stanmore Country Park, Stanmore Industrial Park, the existing vintage/retro yard at Wonderland Gardens (approximately 0.2km east) and the Stanmore Hall Touring Caravan Park (opposite the site on the south of the A458). Hence, the site is surrounded and enclosed by existing development, and isolated from open countryside, which diminishes the discernibility of the site from the wider landscape.
- 3.3 EDP's field-based assessment found that views of the site are limited to close range and immediate locations (see **Images EDP 1 and EDP 3 to EDP 6** earlier in this document).
- 3.4 The presence of mature woodland to the north (Stanmore Country Park) and south of the site (Stanmore Hall grove and park) effectively screens the site from views from the wider open countryside and sensitive receptors such as Public Rights of Way (PRoW) found within or beyond these landscape features.
- 3.5 The visibility of the site was also considered from receptors to the east and west of the site; see **Images EDP 7 to EDP 10**). EDP selected a further four representative viewpoints:
- **Image EDP 7** is situated at an elevated position in High Town, Bridgnorth;
  - **Image EDP 8** is taken from the PRoW which runs outside of the site's eastern boundary;



- **Image EDP 9** is situated on a PRoW in the wider open countryside to the east; and
- **Image EDP 10** is located on elevated landform situated on the Stourbridge Road (A458) west of the site.

3.6 The broad extent of the view available from each of these areas is described below, which considers **Images EDP 7 to EDP 10**:

- With the greatest degree of elevation locally (circa. 80m aOD), Cannon Hill provides expansive panoramic views over the settlement of Bridgnorth, the River Severn and Severn Valley. The site is situated on elevated landform to the east of this location, approximately 2.35km, and is located at 84 - 91m aOD. Within views towards the site from this location (see **Image EDP 7**) the site is screened by intervening landform of the Severn Valley (Hermitage Hill) which is c.110 - 120m aOD. A mature woodland block (Hermitage Hill Coppice) runs longitudinally along this ridgeline for nearly 1.5km between the Wolverhampton Road (B4363) and the Stourbridge Road (A458). The combination of these physical features screen views of the site. This point is confirmed by Shropshire Council in their November 2017 Shropshire Green Belt Assessment, when they considered the intervisibility of this site with views from High Town, Bridgnorth, which states:

*“Digital analysis, bare earth height data, indicates that this parcel is not theoretically visible from any of the historic settlements.....the openness of land within this parcel (Land Parcel P60) is not considered to contribute to the setting of these historic settlements”.*



**Image EDP 7:** Photograph taken from Castle Hill close to the Library Steps looking eastwards towards the site across Hermitage Hill photograph was taken in January 2019. Viewpoint location is situated at SO 71727 92784

- To the east of the site is a Public Bridleway which runs outside of the site's eastern boundary along Russell Close, see **Image EDP 8**. There are intermittent clear views across much of the southern site between the roadside trees and vegetation along the Stourbridge Road and the existing residential development on Russell Close. There is little discernibility of the site passed residential properties on Stourbridge Road, and the existing industrial-esque built form associated with Grove Farm at the centre of the site.



**Image EDP 8:** Photograph taken from PRow outside of the site's eastern boundary looking north-west across the site. Photograph was taken in January 2019. Viewpoint location is situated at SO 74219 92395

- Further to the east, the landscape is crisscrossed by a number of Public Rights of Way. However, the combination of intervening landform, mature vegetation to field boundaries, built form (Wonderland Gardens) private dwellings and residential curtilages (Yew Tree Cottage and The Lodge) screen the site from view; see **Image EDP 9**. This viewpoint is located on the PRow running north from the Stourbridge Road (A458) passed Little Barnsley Farm and is situated approximately 0.9km south-east of the site (at its closest point).





**Image EDP 9:** Photograph taken from PRow south-east of the site looking northwest across Yew Tree Cottage and Wonderland gardens towards the site. Photograph was taken in January 2019. Viewpoint location is situated at SO 75056 92018

- To the south, the combination of mature field vegetation, mature tree planting and woodland at Stanmore Hall grove and park, coupled with extensive woodland planting south of Stanmore (i.e. Quatford Wood, Bowmanshill and Gatacrehill Planation) screen the site;
- To the west, the effect on undulating landform, as well as the screening effect of Hermitage Hill Coppice and Gatacrehill Planatation screen views of the site. Where there are views towards the site, the built form associated with Stanmore Gardens (including a remnant kitchen garden walled enclosure) screens views into the site's interior; see **Image EDP 10**; and



**Photo EDP 10:** Photograph taken on Stourbridge Road (A458) looking northeast towards the site.

Photograph was taken in January 2019. Viewpoint location is situated at SO 73607 92359

- From the residential properties off Russell Close, which front or back onto the site, there are open views across the site. Though such views are not protected in planning policy terms, the design of any scheme here would benefit from being sensitive to these adjacent residents, ensuring their residential amenity is not significantly degraded.

3.7 Overall, EDP finds, that the enclosed nature of the site, and the screening effect of surrounding woodland blocks (especially to the north and south), and rising landform with extensive woodlands (Hermitage Hill) results in a relatively limited visual envelope. These physical and landscape features contain the site reducing the geographical extent by which the site can be seen.

3.8 With consideration the Shropshire Landscape and Visual Sensitivity Study (SLVS) was prepared by an Independent Consultancy for Shropshire Council and is available on the Council website. Generally, landscape sensitivity combines judgements on landscape susceptibility and landscape value. As a rule, landscapes of lower sensitivity will have more scope to accept a specific development than landscapes of higher sensitivity.

3.9 The assessment considers the sensitivity of the landscape and visual sensitivity of people within the landscape, to the general principle of housing and employment development, without knowing the specific size, type or exact location.



- 3.10 The authors of this study recognise the limitation of this document, in so much as the document provides a framework for further assessment of individual site for their appropriate for accommodating future development:

*“This is a strategic assessment which provides the context for more detailed studies of individual sites. It does not make judgements on the appropriateness of specific developments on individual sites (and does not consider specific development proposals where these might exist). More detailed studies relating to specific site allocations and development proposals will be undertaken at a local authority level as part of the Development Plan and development management process”.*

- 3.11 This study identifies a number of key settlements whereby development might come forward in the future, of which, Bridgnorth is recognised as a secondary settlement, which it refers to as a ‘Principal Centre’. A study area surrounding each settlement is defined, within which a number of landscape areas (or landscape units) are further studied to develop an overall landscape and visual sensitivity rating.

- 3.12 The SLVS finds the site to be located entirely within landscape area O2BDGE. The study describes this landscape area as follow:

*“The area is characterised by an upland plateau which extends into a rolling to flat topography and an area of increasing undulation to the north and east of distinctive drumlin formation. Hermitage Hill Coppice forms a distinctive western boundary connecting to well managed hedgerows and occasional hedgerow trees. Agriculture is a mixture of intensive arable and pasture with strongly regular field patterns”.*

- 3.13 The SLVS considers the landscape sensitivity of landscape area O2BDGE as Medium. Medium landscape sensitivity is defined by the SLVS as follows:

*“This is an intact farming landscape with a robust network of hedgerows and connections to outlying woodland. The parcel contains pockets of residential and industrial development that could to accommodate adjacent development with appropriate planting to aid integration. Overall the sensitivity of the landscape to change arising from new housing and employment is medium”.*

- 3.14 The SLVS considers the visual and landscape sensitivity of landscape area O2BDGE as Medium. Medium visual and landscape sensitivity is defined by the SLVS as follows:

*“Some of the key landscape/visual characteristics and qualities of the Sensitivity Parcel are susceptible to change as a result of the scale and type of development and/or have some landscape value”.*

3.15 In relation to landscape area O2BDGE, the LSVS states the following:

*“The relative number of people within this sensitivity parcel is high. The often elevated and open aspect means that some views experienced are of particular sensitivity to change, however overall throughout the parcel, there is a medium sensitivity to change arising from housing and employment”.*

3.16 Relative to the actual site, the LSVS states the following in terms of susceptibility to change (visual receptors):

*“The covering of hedgerows, trees and woodland contain immediate views in the vicinity of Stanmore and The Hobbins. The gently rolling landscape further limits views at lower level...”.*

3.17 With regard to landscape susceptibility to change, the LSVS states the following, which is applicable in part to the site; however, does generally describe the wider context of the site, particularly around the junctions of the A454 and A458, Stanmore Industrial Park and Russell Close:

*“This is a varied scale.....with concentrated residential development, industrial usage and recreational provision . The landform is flat to gently rolling with strongly defined hedgerow boundaries and distinct woodland blocks.....this is a landscape of activity due to high frequency of road use . The industrial estate is partially integrated within the landscape, however settlement edges of The Hobbins are more abrupt...”.*

3.18 As recognised by the LSVS, the assessment of the landscape area O2BDGE is of a wider area, which is approximately 11.5 square kilometres, of which the site is approximately 0.2 square kilometres (which is less than 1.75% of the total area of O2BDGE. The LSVS acknowledges that this document is: *“...a strategic assessment which provides the context for more detailed studies of individual sites. It does not make judgements on the appropriateness of specific developments on individual sites (and does not consider specific development proposals where these might exist)’. Consequently: ‘more detailed studies relating to specific site allocations and development proposals will be undertaken...”.*

3.19 With consideration of EDP’s field assessment, we would acknowledge, that whilst the wider context of the site area is reflective of the broader summary findings of the LSVS, the site individual is a landscape which is less susceptible to landscape and visual change. As demonstrated in Section 2 of this Position Note, the site demonstrates no characteristics of the countryside, and is perceived as degraded in sensory, as well as qualitative terms. The site is contained by the wider Stanmore Country Park, Stanmore Industrial Park, the existing vintage/retro yard at Wonderland Gardens (approximately 0.2km east), and the Stanmore Hall Touring Caravan Park (opposite the site on the south of the A458). Hence, the site is surrounded and enclosed by existing development, and isolated from open countryside.

3.20 Consequently, subject to the undertaking of a detailed landscape Visual Impact Assessment (LVIA), EDP finds that the site has a lower landscape and visual sensitivity and susceptibility to



change. EDP consider that the site has a Low/Medium visual sensitive and Low/Medium landscape sensitivity. The LSVS defines Low/Medium sensitivity as follows:

*“Few of the key landscape/visual characteristics and qualities of the Sensitivity Parcel are susceptible to change as a result of the scale and type of development and/or have limited landscape value”.*

- 3.21 In summary, EDP is of the opinion, that the landscape and visual sensitivity of the site is not one which would preclude development coming forward, assuming that there is an appropriately designed masterplan that was iteratively developed through the undertaking of an LVIA. Hence, the location and context of the site are not a constraint to development in landscape and visual terms.

#### **4. Shropshire Council’s Strategic Land Availability Assessment (November 2018)**

- 4.1 The Strategic Land Availability Assessment (SLAA) is a technical assessment of the suitability, availability and achievability (including viability) of land for housing and employment development. As such, the SLAA incorporates the process formerly known as the Strategic Housing Land Availability Assessment (SHLAA). The SLAA represents a key component of the evidence base which will support the Shropshire Council Local Plan Review.

- 4.2 In this SLAA, Shropshire Council presents no evidence by which the future development of this site (STC003) might be in appropriate in landscape and visual terms for development. Shropshire Council assert that the site has a ‘Medium’ landscape consideration and a ‘Medium’ visual impact consideration. Overall, the Council then assert that the site is not appropriate for allocation for residential development, and not appropriate as a windfall site.

- 4.3 With consideration of Section 2, 3 and 4 of this document, Shropshire Council do not present a definition of their landscape and visual consideration. Furthermore, there are no landscape and visual specific constraints presented within the supporting Appendix A of the SLAA (which is reliant on the broad, non-site-specific judgements of the SLVS (201x), see Section 3 of this Position Note), rather the SLAA concludes that:

*“...to support this conclusion on the achievability and viability of development, a separate viability assessment will be undertaken.....The site is considered available; achievable; and viable (subject to any further necessary viability assessment). However, the site is not considered suitable for development as it is located within the open countryside and the Green Belt...”.*

- 4.4 The site is sandwiched between an existing residential development, a large industrial development, and lies adjacent to two main arterial routes (A454 and A458). The site is peppered with existing built form, and consequently, the site has an equivalence in a spatial sense.



- 4.5 The interior of the site accommodates existing development including a commercial nursery with associated infrastructure including polytunnels and a residence, industrial-esque built form and an extensive area of hardstanding.
- 4.6 The site contains an agricultural field to the north and a pasture field to the south. These fields have a very small scale (compared to the wider open countryside) and are isolated from each other by intervening development and built form within the site.
- 4.7 EDP is firmly of the opinion, that the site demonstrates no characteristics of the countryside, and is perceived as degraded in sensory, as well as qualitative terms. The site is contained by the wider Stanmore Country Park, Stanmore Industrial Park, the existing vintage/retro yard at Wonderland Gardens (approximately 0.2km east) and the Stanmore Hall Touring Caravan Park (opposite the site on the south of the A458). Hence, the site is surrounded and enclosed by existing development, and isolated from open countryside rather than extending outwards into it.
- 4.8 Hence, EDP considers, that the integrity and visual character of the site does not contribute to the farmed countryside, and that the site is not located within open countryside as asserted by the Council. As such Shropshire Council are elevating the significance of the land parcel, rather than recognising that development at the site and the surrounding woodland physically divorces the site from the open countryside.
- 4.9 As a consequence of our field-based assessment, EDP considers that the site is viable in landscape and visual terms, and the bringing forward of development at the site would not be harmful to landscape and visual receptors. EDP advocates the taking forward of a Landscape Visual Impact Assessment, which would feed into the iterative development of any emerging masterplan in the near future.

## 5. Development Recommendations

- 5.1 Any future development of the site should be informed by a Landscape and Visual Impact Assessment, the findings of which should help shape the scheme design. At this early stage, the preliminary Landscape and Visual Appraisal has identified a series of key principles for the design of future development which would assist in mitigating its landscape and visual effects and ensure it integrates effectively with the existing village form. These are:
- The existing external field boundaries to the eastern and southern edge of the site should be strengthened with additional tree and hedgerow planting. The development should provide (via suitable planning conditions) a long-term management plan for the tree and hedgerow stock to ensure its long-term health and vigor;
  - The site will drain naturally to the eastern edge, with the north-eastern corner being the lowest point. On this basis, the eastern edge of the site should be utilised for sustainable drainage attenuation features designed as attractive landscape components. In the

southernmost corner of the site, a permanently wet feature (with freeboard to allow for attenuation) could provide an attractive focal point in this part of the village, set within a compact 'village green' style open space. This would help create an opportunity for landscape buffering of the site, create a strong, robust defensible edge to the eastern site area;

- Irrespective of how vehicular access is provided (whether from Stourbridge Road or from Russell Close), a strong green link should be provided (if land ownership allows) from within the southern part of the site to the wider landscape including the Stanmore Country Park for leisure and landscape amenity benefits;
- The layout of the site should seek to work with and reflect the site topography;
- There is an opportunity to create a central nodal space which capitalizes on the distant views available to aid the 'sense of place' of the development;
- New development facing the front amenity space at Russell Close should be carefully considered, with the length of garden and height of building proposed to minimise and mitigate the impact on residential views and amenity; and
- Architectural proposals should seek to reflect the vernacular local to the site with cues taken from the dwellings on Stourbridge Road adjoining the site, as well as Yew Tree Cottage and The Lodge on Russell Close.

## **6. Conclusions**

- 6.1 It is EDP's firm opinion, that given appropriate design, this site could be realised for a new residential development, and that the bringing forward of development at the site would not be harmful to landscape and visual receptors. The integrity and visual character of the site does not contribute to the farmed countryside, and that the site is not located within open countryside as asserted by the Council. As such, Shropshire Council are elevating the significance of the land parcel, rather than recognising that development at the site, and the physical barriers enclosing the site divorces it from the open countryside.
- 6.2 With respect to landscape character, the site has limited features of value with its topography probably being its most interesting aspect. The existing boundary and internal vegetation is relatively sparse and poorly managed. Development of the site would provide an opportunity to improve the tree stock of the site and to bring all vegetation into long-term management.
- 6.3 Views of the site are limited to a small number of locations which are in close to immediate range of the site. In addition, views from Bridgnorth are extensively screened by the landform (Hermitage Hill), with further views of the site screened from the north by Stanmore Country Park, and to the south and south-west by the combination of extensive woodland plantations and topography.

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- 6.4 There is potential for views from the small number of residential dwellings which bound the site, and whilst private views are not protected in policy terms, residential amenity is protected. As such, the scheme design should be sensitive to these receptors, buffering neighbouring properties with open space or rear gardens and seeking to provide an attractive, high quality development in architectural terms.
- 6.5 Overall, this preliminary appraisal has identified no issues which suggest the site is undevelopable in landscape and visual terms subject to an appropriate design coming forward.