

North Warwickshire Borough Council

**Land On The North East of
J10 M42 Dordon/A5
PAP/2021/0663
LVIA Review**

Final report
Prepared by LUC
July 2022



North Warwickshire Borough Council

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PAP/2021/0663
LVIA Review**

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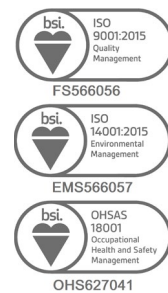
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Chapter 1

Introduction

1.1 LUC was commissioned by North Warwickshire Borough Council (NWBC) in January 2022 to provide a review of the Landscape and Visual Impact Appraisal (LVIA) for the Proposed Development of 'Land North-East of Junction 10 M42, North Warwickshire', produced by WSP for Hodgetts Estates (planning application ref. PAP/2021/0663).

Purpose of the Review

1.2 The purpose of this report is to provide a technical review of the LVIA, considering the scope, methodology, baseline, assessment and mitigation, with reference to the *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition (the GLVIA3)¹.

1.3 In addition, it provides a professional opinion on the robustness of the judgements made in the LVIA based on the experience of Chartered Landscape Architects (CMLI) at LUC and guidance within the GLVIA3, to help inform NWBC's judgement on the Proposed Development with respect to landscape and visual effects, and consideration of the Strategic Gap.

Structure of the Review

1.4 Our approach to undertaking the review was informed by the guidance contained within the Landscape Institute's Technical Guidance Note 1/20². The review in Chapter 2 is structured as follows:

- **Structure and navigability of LVIA** – a summary of the LVIA structure and where key information is set out.
- **Methodology, scope and process.** For example, does the scope of the assessment meet the requirements of the Scoping Opinion? Is the terminology used in the methodology clearly defined? Does the assessment demonstrate comprehensive identification of receptors and of all likely effects?
- **Baseline information.** For example, what is the reviewer's opinion of the scope, content and appropriateness of both the landscape and the visual baseline studies? Has the value of landscape and visual

¹ Guidelines for Landscape and Visual Impact Assessment, Third Edition, Landscape Institute and Institute of Environmental Management & Assessment (2013).

² Landscape Institute's Technical Guidance Note 1/20: Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs) (10 Jan 2020)

resources been appropriately addressed? How appropriate are the viewpoints that have been used?

- **Assessment of effects.** For example, is it clear how the methodology was applied in the assessment? What is the reviewer's opinion of the consistency and objectivity in application of the criteria and thresholds set out in the methodology? Does the document clearly identify landscape and visual effects which need to be considered in the assessment?
- **Mitigation and design.** For example, how appropriate is the proposed mitigation, both measures incorporated into the scheme design and those identified to mitigate further the effects of the scheme, and mechanisms for delivering the mitigation?
- **Visualisations.** For example, are the graphics and/or visualisations effective in communicating the characteristics of the receiving landscape and visual effects of the proposals at agreed representative viewpoints?

1.5 The review also includes consideration of the impact of the Proposed Development on the Strategic Gap, as requested by NWBC.

Approach to the Review

1.6 An initial desk-based review was carried out by landscape architects and planners at LUC. The review in Chapter 2 focuses on examination of the LVIA included within Chapter 10 of the Environmental Statement (ES) (Volume 2). Figures, visualisations and appendices contained within these documents are also examined within this review.

1.7 A high level overview of the Environmental Statement (ES) (Volume 2, December 2021) was carried out to inform this LVIA review, in order to assess the relationship between the LVIA and other chapters of the ES.

The Site and Proposed Development

1.8 The site comprises a total area of 38.87 hectares of arable land, located at the north-eastern quadrant of Junction 10 of the M42 motorway, near Dordon, North Warwickshire.

1.9 The site is split into two areas, as follows:

- The development site (32.36ha); and,
- Off-site areas for potential landscape and visual mitigation, biodiversity enhancements and footpath/cycleway enhancements (circa 6.51ha).

1.10 The site is bounded by the M42 motorway on its western side and the A5 dual carriageway along the southern boundary. Existing large-scale commercial development is

present to the south and west along these main roads. The small settlement of Birchmoor lies to the north of the site, and further open agricultural land is present to the east, towards Dordon.

1.11 The site is generally rectangular in shape and rises up to the north, along the edge of the settlement of Birchmoor. From Birchmoor in the north, and to the east, views towards the site are open with limited screening. From the south and west, along the main roads running adjacent to the site, visibility is reduced due to roadside vegetation. There is also a public bridleway which runs through the site, along its eastern boundary, and a public footpath connects to the bridleway on the eastern boundary.

1.12 Outline approval is being sought for a major mixed employment development, an overnight lorry parking facility and ancillary infrastructure. Detailed approval is sought for the principal means of access, with all other matters reserved.

1.13 The scheme information is provided in the form of a Parameter Plan, which shows areas for development. Plots A1 and A2 will be for employment use (B2/B8/E), and have a maximum height of 21m and 11m, respectively. Plots B1 and B2 are for provision of lorry parking (Sui Generis) and a hub office (F1), respectively. They will have maximum heights of 10m and 8m, respectively.

1.14 The parameters plan also indicates that open space, planting, landscaping, site road and sustainable drainage systems will be incorporated into the Proposed Development. Figure LAJ-3 indicates proposed vegetation along the northern edge of the site, near Birchmoor, and along the eastern boundary, will be 10m in height.

Chapter 2

Review of the Applicant's LVIA

2.1 This section presents a review of ES Chapter 10 Landscape and Visual Impact and its supporting appendices and figures. The review follows the approach set out in the Landscape Institute's Technical Guidance Note 1/20.

Structure and navigability of LVIA

2.2 The LVIA is structured as follows:

- Introduction (page 130);
- Policy Context (page 130 to 131);
- Assessment Methodology and Significance Criteria (page 132);
- Baseline Conditions (page 132 to 138);
- Identification and Valuation of Key Impacts (page 138 to 151);
- Cumulative Effects (page 151 to 154); and
- Residual Effects (page 155).

2.3 The LVIA is supported by a number of appendices including:

- Appendix 10.1 – LVIA Appraisal Plans;
- Appendix 10.2 - LVIA Methodology and Assessment Tables; and,
- Appendix 10.3 – Photomontages.

Methodology, scope and process

2.4 This section identifies whether the methodology, scope and process of undertaking the LVIA is sufficient and complete.

Scoping responses

2.5 An EIA Scoping Report was submitted to NWBC alongside a request for a formal Scoping Opinion, in accordance with Regulation 15(1) of the EIA Regulations 2017. A list of consultees consulted is provided in paragraph 5.3.1 of the ES. The Scoping Opinion from NWBC highlights that a response was received from eight consultees (Highways England; the Warwickshire County Ecologist, Warwickshire County Council as Lead Local Flood Authority, The Environment Agency, HS2 Ltd, Cadent, BPA Pipelines

and Mainline Pipelines). None of these consultees address matters relating to landscape and visual impact.

2.6 The Scoping Opinion outlines that viewpoints to inform the LVIA were agreed with NWBC.

Guidance

2.7 The methodology used to prepare the LVIA is presented in Appendix 10.2 and reference to the other relevant guidance documents including the Third Edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) is made in paragraph 10.3.1 of the main LVIA chapter and throughout Appendix 10.2.

Methodology

2.8 The methodology is summarised in Chapter 10, with a more detailed version set out in Appendix 10.2.

2.9 The methodology acknowledges the relevance of GLVIA3 as guidance for undertaking LVIA's, and the components of the report generally align with the broad principles set out in GLVIA3. It provides separate consideration of landscape and visual effects, and uses terminology consistent with GLVIA3.

2.10 The criteria used to make judgements are clearly set out throughout the methodology. In accordance with GLVIA3, this includes for the sensitivity of landscape and visual receptors (including consideration of both value and susceptibility); and magnitude of change to receptors (with reference to size/scale of change, geographical extent, duration and reversibility). The criteria for determining these aspects are set out in Tables 10.1 to 10.7 for landscape receptors, and tables 10.8 to 10.11 for visual receptors. This is an acceptable approach.

2.11 Figures 10.3 and 10.6 illustrate the overall significance of landscape and visual effects, respectively. The subsequent paragraphs (10.1.28 and 10.1.54) outline that major and major/moderate effects by virtue of the more sensitive receptors and the greater magnitude of effects, are generally considered to be the significant landscape and visual effects, with those falling outside these categories generally considered not significant.

2.12 For landscape and visual receptors, the assessment tables consider size and scale of change under two scenarios: 'at construction' and 'after 15 years' when proposed planting is semi-mature. However, the magnitude of change is assessed 'after construction' and 'after 15 years'. The overall landscape and visual effects are identified 'at construction' and 'after 15 years'.

2.13 The term 'at construction' and 'after construction' appears to be used interchangeably within the assessment

tables. It is unclear whether these represent the same scenario (e.g., during construction and straight after development completion), or if these are separate scenarios.

2.14 If the latter, the assessment of landscape and visual effects tables in Appendix 10.2 should have extra columns to display the size and scale of change and magnitude of change under each of the three scenarios (during construction, after construction, and after 15 years).

2.15 If 'at construction' and 'after construction' represent the same scenario, there appears to be no reasoning or explanation as to why this approach was taken in the methodology. This should be clarified.

Thresholds for significance

2.16 The methodology provides diagrams used to determine significance thresholds, using both magnitude of change and sensitivity.

2.17 Paragraphs 10.1.28 and 10.1.54 outline that major and major/moderate effects by virtue of the more sensitive receptors and the greater magnitude of effects, are generally considered to be the significant landscape and visual effects, which is appropriate. Those falling outside these categories, including moderate effects, are generally considered not significant.

2.18 The methodology acknowledges that professional judgement is an important part of the LVIA, and is applied on a case by case basis in determining the sensitivity of receptors, magnitude of change, and overall significance of effect. This is appropriate and follows advice given in GLVIA3.

2.19 In relation to moderate effects, the methodology states that these are considered on a case-by-case basis, to determine whether each effect is considered to be significant or not significant.

Study area

2.20 The LVIA does not provide a description of the study area or specify its size. Paragraph 10.1.6 of the ES states the study area is illustrated on figures within Appendix 10.1. However, upon examination no defined study area is visible on these figures. In addition, the extents of the maps provided in Appendix 10.1 all vary, making it difficult to determine what the study area extents are.

2.21 Paragraph 10.1.7 of the ES goes on to state that the study area was identified through desk-top analysis and computer modelling of theoretical visibility which was refined by field survey. Whilst overall this is an acceptable approach, it is recommended that a defined study area is provided.

2.22 The lack of defined study area makes it difficult to understand which landscape and visual receptors are being considered, as well as the likely geographical extent of effects.

2.23 Considering the ZTV provided in the Figure LAJ-3 we suggest a study area of 2-3km radius would be appropriate.

Landscape and visual receptors

2.24 The methodology makes a clear distinction between the assessment of landscape and visual effects as recommended in GLVIA3, and this is carried through to the assessment.

2.25 The LVIA identifies landscape and visual receptors that have the potential to be affected by the Proposed Development.

2.26 Landscape receptors include:

- Mixed, native boundary hedgerows and woodland copses within and around the site;
- A single large-scale, irregular, arable field;
- Gently rising landform;
- Influence of large-scale commercial buildings and prominent settlement edge;
- Large scale fields with a moderate sense of enclosure provided by large-scale commercial buildings and a prominent, elevated settlement edge;
- Generally simple forms and colours with diversity and complexity provided by road infrastructure, large-scale commercial buildings and the settlement edge;
- Largely still, but strongly influenced by peripheral road noise and movement; and
- Affected by lighting from adjacent infrastructure and commercial uses.

2.27 Visual receptors include:

- Residential receptors: the views of residents on the edge of Birchmoor, Polesworth, Dordon and Freasley;
- Public Rights of Way: the views of walkers on public rights of way including AE45, AE46, AE48, AE52 and AE55;
- Vehicular Users: the views of vehicular users along Birchmoor Road, the M42 and the A5;
- Open Space: the view of recreational areas of open space including Kitwood Avenue Recreation Ground, Site Allocation OS1 and the services.

Baseline information

2.28 This section identifies whether the baseline information provided for the study area is sufficient and complete.

2.29 The baseline information is provided in Section 10.4 of the main LVIA. The landscape baseline focusses on the site itself, and does not include a description of the baseline for the study area. The visual baseline includes areas within vicinity of the site, focussing on nearby residential receptors, walkers and cyclists, road users, and users of nearby open space.

2.30 The viewpoints were agreed with HWBC at during the Scoping process (as set out in the Scoping Opinion and paragraph 10.4.36 of the LVIA). We feel that most of the viewpoints selected are appropriate, and represent a variety of views from the surrounding area. However, the LVIA does not appear to include any reference as to why the viewpoints included in the LVIA were selected. It is also noted that the ZTV in Figure LAJ-3 appears to have considered existing built form and proposed vegetation (including those off-site), as opposed to bare-earth which is usually considered appropriate. We suggest a ZTV with none of the proposed vegetation planting is provided to show the worst-case scenario, i.e. at year of opening when newly planted vegetation will not serve a screening function because of its immature nature. This may identify other visual receptors and viewpoints which need to be considered in the assessment.

Landscape baseline

2.31 The LVIA provides an overview of the published landscape character assessments relevant to the study area at a National and Local level. It summarises the key characteristics for NCA97 (National Character Assessment), LCT Wooded Estatelands (Warwickshire Landscape Guidance) and LCA 5 Tamworth Fringe Uplands (North Warwickshire Landscape Character Assessment). However, the baseline only includes reference to the local level LCT/LCAs in which the site is located, and does not provide any baseline for the surrounding study area. Whilst the baseline highlights the key characteristics for these various character areas, it does not refer to the recommendations or guidelines for each LCT and LCA, which should inform any proposed landscape and visual related mitigation/design. Maps illustrating the national and local character areas are included in Figures LAJ-2A and LAJ-2B within Appendix 10.1.

2.32 The baseline section includes details on the landscape of the site and its context. This section appears to focus on the landscape of the site, and whilst it references the immediate surroundings in relation to the site, it does not provide a thorough baseline for the study area as a whole. Although the baseline identifies that the site exhibits characteristics of LCA 5, it does not explain how the site fits within the wider context

of the LCT and NCA (i.e. how representative it is of the published LCT and NCA).

2.33 The baseline identifies the key landscape receptors likely to be affected by the development, including individual elements and features, and aesthetic and perceptual aspects.

Visual baseline

2.34 Baseline information in relation to visual receptors is provided in Section 10.4 of the LVIA. The LVIA does not appear to include any reference as to why the viewpoints included in the LVIA were selected, however the types of receptors and value of the view are identified in Table 10-16 along with the overall sensitivity judgements. The viewpoints are also shown in Figure LAJ-4 Viewpoint Location Plan in Appendix 10.1.

2.35 A total of 21 viewpoints are used within the visual assessment and these represent a suitable range of recreational receptors, residential receptors and road users. Generally, they are considered to be appropriate, however it is noted that several of the viewpoints are afforded screening of the Proposed Development site by mature vegetation with viewpoints 12 and 15 having 'no view' at all. These viewpoints should be amended to locations with views.

2.36 The LVIA states overall visibility has been informed by the Zone of Theoretical Visibility (ZTV) map provided in Figure LAJ-3. However, it is noted that this ZTV takes account of the effects of proposed mitigation planting within and around the site. As previously mentioned, we suggest a ZTV with no vegetation planting is provided to show the worst-case scenario. This is considered a more appropriate approach and may identify other visual receptors and viewpoints which need to be considered in the assessment.

2.37 The baseline section provides some basic analysis on the residential, recreational and road receptors in the immediate surroundings of the site.

Assessment of effects

2.38 This section provides a review of the assessment of landscape and visual effects of the Proposed Development.

2.39 The assessment of landscape and visual effects is presented in Appendix 10.2.

Landscape effects

2.40 The assessment of landscape effects is presented in Tables 10.12 to 10.15 of Appendix 10.2.

2.41 In identifying the sensitivity of landscape receptors, Table 10.13 sets out the value attached to the features, aesthetic and perceptual aspects, and character, and identifies their susceptibility to the Proposed Development. It

is noted in relation to some elements that reference is made to the effects of the Proposed Development. For example, in relation to "*mixed, native boundary hedgerows and woodland copse within and around the site*" the table notes that historic field boundaries would be reinstated, woodland copses extended and that large areas of new woodland would be introduced. It concludes that "*a net gain of native hedgerow and woodland would be achieved overall which reduces the susceptibility to change.*"

2.42 Overall sensitivity judgements (based on value and susceptibility) should not be formed based on the proposed effects of the development, which should be assessed as part of the magnitude of change. The LVIA finds that the value of the site and its immediate context is of Community importance overall with an elevated value for the PRoW. This seems appropriate.

2.43 The assessment for each landscape receptor is supported by only limited narrative text ('notes') and would benefit from a more detailed justification of the judgements made, which should align with the methodology. The size and scale of change, and magnitude of change is provided and considers change 'at construction' and 'after 15 year', whilst the overall effect is identified 'at construction' and 'after construction'. Clarity on these three terms/scenarios should be sought.

2.44 We feel that some of the effects during the at/after construction phase have been under reported. For example, construction activities across the 'single largescale, irregular, arable field' are assessed as having a medium magnitude of change and medium/low sensitivity, resulting in a moderate effect overall (not significant). Construction activities across a site of this size which is very open would likely result in a larger magnitude of change, and have an overall moderate/high effect (significant).

2.45 Whilst most of the assessment ratings set out seem reasonable, this section would benefit from a much more detailed and clear narrative text explaining/justifying the ratings in respect to the criteria set out in the methodology.

2.46 It is noted that only the immediate site area was assessed in the landscape assessment, and for example, no adjoining landscape character areas have been assessed.

Visual effects

2.47 The assessment of visual effects is presented in Tables 10.16 to 10.18 of Appendix 10.2.

2.48 In identifying the sensitivity of visual receptors at viewpoints, Table 10.16 sets out the value attached to the view and identifies the receptors and their susceptibility to changes in the view. Whilst some text is provided in the table setting out why certain receptors are more/less susceptible to

changes in the view, no explanation is provided as to why each viewpoint has the value of view it has been assigned. This should be expanded on, as it will help feed through the assessment process and determine the overall level of effect and significance.

2.49 The assessment for each viewpoint is supported by only limited narrative text set out in the 'notes' column and would benefit from a more detailed justification of the judgements made, which should align with the methodology. The size and scale of change, and magnitude of change is provided and considers change 'at construction' (it is uncertain if this is the same as 'after construction') and 'after 15 years' when mitigation planting is semi-mature. It is noted that the 'after 15 years' takes into account off-site planting mitigation, however it is not explained in the LVIA how this will be secured, and therefore a level of uncertainty is attached. This should be clarified.

2.50 Just three viewpoints are assessed as having significant negative effects 'at construction' and this is reduced to zero viewpoints experiencing significant effects 'after 15 years'. Whilst some (relatively basic) commentary was provided in relation to identifying the sensitivity and magnitude of change for each viewpoint, there was no commentary setting out how these elements formed the overall visual effect and significance.

2.51 The methodology sets out how moderate effects will be considered on a case-by-case basis to determine the level of significance, however there is no evidence of this happening, and it is unclear how the judgement was made. Further explanation should be provided to clarify how these judgements were reached, especially as so many viewpoints were identified as having moderate effects 'at construction'.

2.52 It is noted that some of the viewpoints (Viewpoint 12 and 15) have 'no view' at both the construction and after 15 years phase. It is not relevant to include viewpoints in the LVIA assessment which would have no view of the Proposed Development at all. It is suggested these viewpoints are replaced.

2.53 Additionally, uncertainty over the application of the methodology is raised in the significance of effects table, where viewpoints with no view are identified as having negative effects. If the Proposed Development results in no change of view, the effect would be neutral.

LUC judgement on significant visual effects

2.54 Upon review of the LVIA, and through a desk-based review, LUC is of the opinion that some of the visual effects have been underemphasised.

2.55 It is considered very unlikely that a development of this scale would result in zero significant visual effects after 15

years (to include the effects of mitigation planting), and that only three viewpoints would experience significant negative effects at or just after (see query of this above) construction.

2.56 Based on the desk-based review, we would expect the following viewpoints to result in significant negative effects:

- Viewpoint 1;
- Viewpoint 3;
- Viewpoint 4;
- Viewpoint 10; and
- potentially Viewpoint 8.

Cumulative effects

2.57 Section 10.6 of the LVIA chapter outlines the cumulative effects of the Proposed Development alongside six other schemes. The six schemes and their details (site, planning reference, development and status) are provided in Table 10.1 of the main chapter. The LVIA does not explain how or why these schemes were selected to be included in the LVIA, nor does it expand on the methodology for identifying cumulative effects. The LVIA includes no explanation of terminology used (e.g. cumulative sequential effects) in the cumulative assessment.

2.58 It is noted that four of these schemes have already been constructed, one is an allocation and the other has no status. As four of these schemes have already been constructed, they form part of the existing baseline of the study area, and should not be included in the cumulative assessment. Therefore, the approach to the cumulative assessment is not in line with guidance within GLVIA3 (paragraph 7.13).

2.59 Schemes with planning consent and those with a valid planning application should be considered in the cumulative assessment (under different scenarios). As the remaining two sites (E2 and Birch Coppice Industrial Estate in Table 10.1) do not have consent or a valid planning application. They each have a high level of uncertainty and if they are to be included, this needs to be recognised. Overall, the approach to cumulative assessment is not in line with that set out in GLVIA3.

2.60 Unlike the landscape and visual assessment tables, there are no clear tables setting out the process for assessing the cumulative effects. Therefore, it is not clear how the assessor has come to this judgement, as the narrative text to explain this judgement lacks detail and does not consider a sensitivity and magnitude of change, yet has provided a judgement of the overall effect. It is assumed the significance threshold is the same as that for landscape and visual effects, but this is not made clear.

2.61 No figure is provided showing schemes included in the cumulative assessment. This would be useful to understand the relationship between the Proposed Development and the identified cumulative schemes.

2.62 In terms of the findings, the cumulative assessment tends to focus on visual effects, with very little mentioned of the cumulative effects on the landscape. This should be addressed.

Mitigation and Design

2.63 Information on landscape and visual mitigation is provided in Section 10.7 of the main LVIA chapter. The LVIA does not differentiate between primary and secondary mitigation measures, and does not provide an indication of effectiveness of the stated measures.

2.64 Principle landscape mitigation measures are summarised below as follows:

- Siting building in southern end of site to minimise visual effects on residents at Birchmoor and maintain a sense of separation between the settlement and Proposed Development;
- Provision of a local park extending along the eastern boundary of the off-site area;
- Provision of parkland and mixed native trees/ shrubs in the north of the site to filter views from Birchmoor;
- Reinstatement of historic field boundaries to reinforce the rural character of the landscape;
- Provision of publicly accessible landscape along the western edge of Dordon to screen existing housing and to create a soft green edge to the settlement;
- Provide copses of mixed native trees at the corners of existing fields to reinforce the rural character and help to filter views from the settlement and PRoW;
- Creation of earth mounds along the eastern edge of the site which would be densely planted with mixed, native trees to help screen and filter views of the Proposed Development and to reinforce the sense of openness within the remaining arable landscape to the east;
- Reinforcement of existing native tree and shrub planting along the western boundary;
- SuDS to be provided at the southern end of the site, which would be planted.

2.65 Mitigation measures primarily relate to planting of vegetation within and around the site (within the blue line boundary) and are considered appropriate. This will help to screen the Proposed Development, however, is largely dependent on the detailed design of the scheme, and

confirmation of how any off-site mitigation planting will be secured (e.g. by Section 106 agreement). The LVIA and ES does not specify how off-site mitigation planting will be secured, and therefore the certainty surrounding the effectiveness of planting on proposed visibility is reduced. The applicant should confirm how off-site mitigation will be secured, as well as how it will be managed and maintained in the future to ensure it becomes and remains effective.

2.66 The siting of main building (Plot A1) in the south of the site is identified as helping to minimise visual effects on residents at Birchmoor. Given the scale of the building in relation to the site, and the presence of Plot A2 further north, it is uncertain how effective this mitigation measure will be.

Visualisations

2.67 GLVIA3 states that *"The predicted changes must be described in the text but should also be illustrated by means of visualisations from representative viewpoints"* (para 8.16) and *"where the scheme is not fully developed visualisations must be based on clearly stated assumptions"* (para 8.22).

2.68 The LI Technical Guidance Note 06/19 indicates that the intended Purpose of the visualisation; the anticipated Users; the stage in the planning application process; the Sensitivity of the context / host environment, having regard to the landscape and visual receptors; and the likely overall Magnitude of effect of the development in terms of its 'size and scale', 'geographic extent' and 'duration and reversibility' all help determine the appropriate Visualisation Type.

2.69 The LVIA notes that the viewpoints were identified on site, in publicly accessible locations, following a desktop review of baseline data to illustrate the range of views available and in discussion with an NWBC planning officer. The Scoping Opinion confirms viewpoints were agreed with NWBC.

2.70 Viewpoint photography presented in Appendix 10.3. is useful in illustrating the baseline view from each representative viewpoint. It is stated in Appendix 10.3 that the photography is 'Type 3 Photography' taken in summer, when deciduous vegetation was largely in leaf. According to LI Technical Guidance Note 06/19, Type 3 visuals *'encompasses photomontages and photowires which will commonly be produced to accompany planning applications, LVAs and LVIAs'*. Whilst the majority of the baseline photography may have been produced to Type 3 standard, the visualisation itself has not been produced to Type 3 level, as no photowires/ photomontages are included. Furthermore, there should be an acknowledgement that visibility of the Proposed Development will be greater in winter, when trees are not in leaf.

2.71 The illustrative visual material provided in Appendix 10.3 is limited to basic baseline photography, with no annotation which forms the requirement of Type 1 level visualisations. Nonetheless, the baseline photography is helpful in displaying the character and context of each view.

2.72 Given this is an outline application, provision of baseline photography is considered appropriate, however, the lack of visualisations (which could for example extend to simple colour shaded blocks being incorporated into each view, to indicate height and massing) makes it difficult to understand the potential visibility of the parameters for which planning permission is being sought.

2.73 It is recommended that Type 3 visuals (Photomontage/ Photowire) are provided for all the viewpoints where significant effects are identified and notably the more sensitive viewpoints of 1, 3, 4, 8 and 10. Visuals should be provided at years 1 and 15, to show the likely effectiveness of planting. As this is an outline planning application, photomontages/ photowires do not need to be overly comprehensive, however a simple 3D model showing the scale and form of the Proposed Development would assist the decision maker in understanding the nature of the potential changes.

2.74 Annotated photographs are sufficient for the viewpoints from which the changes are anticipated to be minor.

2.75 The baseline photographs presented in Appendix 10.3 are each specified as having a 90-degree horizontal field of view and are for viewing on pages at A1 size. However, it appears that some of the photograph sizes are inconsistent, so we query the accuracy of the of the viewpoint information.

Summary of Requests for Clarification / Regulation 25

2.76 Based on this review of the LVIA, it is suggested that the following requests are made for clarification:

- Clarification as to the methodology of the cumulative assessment, and why the cumulative schemes identified were included;
 - Provide greater detail on the likely landscape and visual cumulative effects;
 - Provide further information on how the judgements of overall landscape and visual effects were undertaken; and,
 - Provide further information on why the viewpoints within the LVIA were selected.
- Clarification as to what the defined study area is, both in the text and on illustrations supplied in Appendix 10.1;
 - Descriptive overview of the extent of the area outside of the Proposed Development site area that is being considered within the LVIA, i.e. the study area;
 - Clarification as to why baseline photography varies in size;
 - Provision of visuals showing the Proposed Development modelled into views (Type 3 visualisation), as opposed to baseline photography only, particularly for viewpoints identified as significant;
 - Further information on how off-site mitigation will be secured (e.g. through S106 agreement, or Planning Conditions);

Chapter 3

Consideration of Strategic Gap

3.1 NWBC asked LUC to consider the impact of the Proposed Development on the 'Strategic Gap'

Purpose of the Strategic Gap

3.2 The Strategic Gap policy is currently defined in Policy LP4 'Strategic Gap' of the Local Plan (adopted 2021) '*...Development proposals will not be permitted where they significantly adversely affect the distinctive, separate characters of Tamworth and Polesworth with Dordon. In assessing whether or not that would occur, consideration will be given to any effects in terms of the physical and visual separation between those settlements*'.

3.3 LUC previously undertook an independent assessment of the land designated in local planning policy as a 'Meaningful Gap' (now superseded by the term 'Strategic Gap' in the recently adopted Local Plan). The 'Assessment of the Value of the Meaningful Gap and Potential Green Belt Alterations'³ assessed each parcel in order to determine how land performs with regards to preventing neighbouring towns merging with one another.

3.4 The study found that all of parcel 8 (in which this site lies) makes a strong contribution because it provides a buffer and sense of separation between the settlements which are very close to each other at this point. The report notes that Parcel 8 plays a crucial role in separating Tamworth and Dordon, as the distance between the settlements is narrow at this point (approximately 830 metres), reducing to 330m between Birchmoor and Dordon.

Applicant's consideration of the Strategic Gap

3.5 The Applicant's Gap Analysis outlines the policy context of the Strategic Gap and sets out the methodology and factors which should be used to define the effectiveness of a gap (Eastleigh Criteria⁴).

3.6 The Eastleigh Criteria relates to the factors set out in Table 3.1, with comments provided by LUC. The effects on the

³ Assessment of the Value of the Meaningful Gap and Potential Green Belt Alterations. LUC (2018)

⁴ The 'Eastleigh Criteria' are derived from the Inspector's report for the Eastleigh Local Plan Inquiry in 1998, and are reproduced in "*Strategic*

Gap and Green Wedge Policies in Structure Plans, Main Report" (ODPM, 2001). The criteria has been applied on numerous Applications and Appeals to determine the effectiveness of an existing strategic gap or wedge.

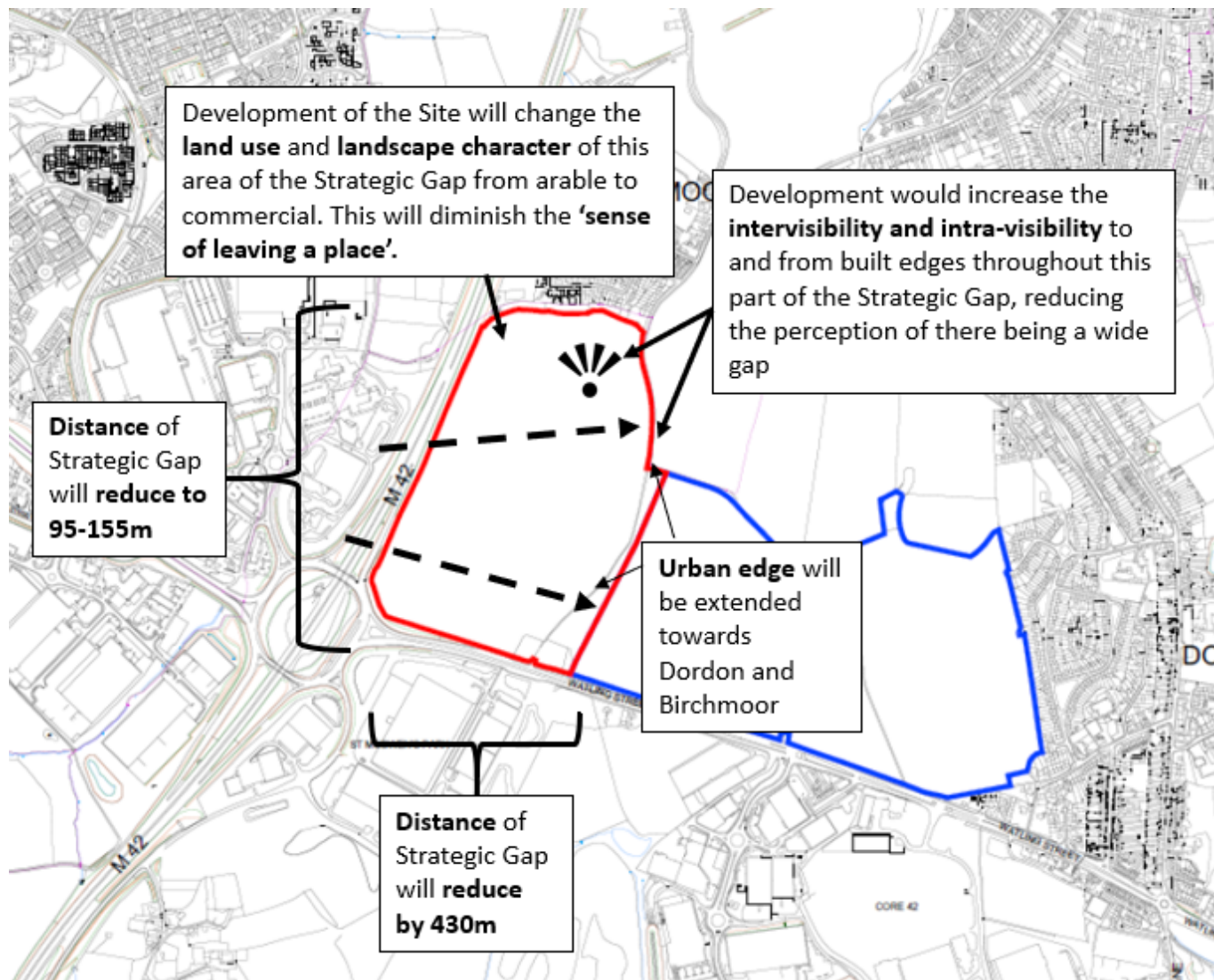
Strategic Gap, with relation to the Eastleigh Criteria are illustrated in Figure 3.1.

Table 3.1: Eastleigh Criteria

Eastleigh Criteria	LUC Comment
Distance	The Strategic Gap will be narrowed to 95-155m between Birchmoor and the commercial development to the south of the Site. The Strategic Gap between Tamworth and Dordon/ Polesworth will reduce by 430m, leaving a 777m gap.
Topography	The Site and the Strategic Gap in which it sits is quite flat and open, although rises slightly in the north. The flat and open nature of the Site emphasises the scale of the Strategic Gap. The Proposed Development of the Site, including creation of earth mounds for screening will alter the topography and openness of the Strategic Gap.
Landscape character/ type	The landscape character of the Site and Strategic Gap is mainly arable in nature with occasional tree belts and hedgerows. The Proposed Development would introduce buildings of a large scale which would fundamentally change the character of the Strategic Gap and reduce the openness which is characteristic of the area.
Vegetation	There is limited vegetation on the Site and in this part of the Strategic Gap. Hedgerows are found around the boundary of the Site, and in adjoining areas of the Strategic Gap, but there is no strong vegetated boundary to extend to or which might provide a sense of separation. Planting of native woodland within the Site, and off-site, could provide greater sense of physical and perceptual separation. New planting would take a long period to mature and to become effective.
Existing uses and density of buildings	The existing use of the Site is arable land. There are no existing buildings on the Site. The Proposed Development would introduce buildings of a large scale which would take up a large proportion of the Site and would introduce woodland belts (for screening purposes) which are not characteristic of the current vegetation found on Site.

Eastleigh Criteria	LUC Comment
Nature of urban edges	Built development is found in all directions around the Strategic Gap. Built development, in the form of main roads and settlements are immediately adjacent to the Site to the north, south and west. However, boundary vegetation largely screens visibility of this built development and softens the boundaries of the Strategic Gap. The Proposed Development would incorporate mitigation planting. However, given its scale, there is no obvious boundary where the Proposed Development could extend up to which might soften a new urban edge to the Strategic Gap.
Inter-visibility (the ability to see one edge from another)	The open and flat nature of the Site and Strategic Gap enables intervisibility from one edge to the other. The Proposed Development will reduce this intervisibility by screening views across the Strategic Gap. Intervisibility from new edges would increase given the narrowing of the gap between the edges.
Intra-visibility (the ability to see both edges from a single point)	The open and flat nature of the Site and Strategic Gap enables intra-visibility from across the Site. The Proposed Development will reduce this intra-visibility by screening views across the Strategic Gap. It will also increase intra-visibility to the new edge, given the narrowing of the gap between the edges.
The sense of leaving a place	Currently, there is a distinct sense of leaving the surrounding areas (Tamworth, Birchmoor, Dordon and the commercial area to the south of the Site) when entering the Strategic Gap area. The Strategic Gap contrasts strongly with the surrounding built development due to its open, agricultural landscape. The Proposed Development would diminish the sense of leaving a place by changing the land use and character of the Strategic Gap. This would be achieved due to extending built development across the Strategic Gap between Birchmoor and the commercial development to the south, and Tamworth and Polesworth.

Figure 3.1: Effects on the Strategic Gap, in relation to the Eastleigh Criteria



3.7 The Applicant's Gap Analysis concludes that the separate identity of Tamworth and Polesworth with Dordon would remain both in relation to their physical separation and in terms of distinctive character, if the proposed development was to go ahead. Furthermore, the Gap Analysis concludes that a sense of separation would remain whether travelling along the A5 or along the Public Right of Way running through the Strategic Gap, with travellers having a clear sense of having left one settlement, travelling through an undeveloped area, and then entering a second settlement.

3.8 Although the Proposed Development would not completely close the gap, it is unquestionable that it would reduce the gap and distance between the edge of Tamworth and Dordon/ Polesworth by 430m, leaving a 777m physical gap. The gap between Birchmoor and the commercial

development to the south would reduce to a length of just 95-155m.

3.9 Considering the size of the site, and the extents to which it would be developed, it is of LUC's opinion that the Proposed Development would result in adverse effects on the Strategic Gap and reduce its effectiveness at maintaining separation between Tamworth and Dordon. The Proposed Development would extend the urban edge to the east of the M42, extensively reduce the gap between Birchmoor and the commercial development to the south, and result in the urbanisation of a currently localised rural area. Additionally, the Proposed Development would fundamentally alter the landscape character of the Site and Strategic Gap, by altering the topography, vegetation and openness of the area. The

land use of the Strategic Gap would also be largely changed from an arable field to commercial development.

3.10 Furthermore, the Proposed Development would in some senses reduce the intervisibility and intravisibility throughout this part of the Strategic Gap by introducing large-scale built development and planting between two areas of development. However, when considering inter and intra-visibility between the proposed new development edge and the existing edges to the north and east, and leaving aside proposed vegetation which would take many years to mature and become effective as a mitigation measure, then intra and intervisibility would increase. This would reduce the perception of the presence of a wide gap separating developed areas. The introduction of the Proposed Development would also affect the sense of leaving a place (e.g. surrounding settlements), by extending built development into an area which is currently open landscape.

Relevant Applications and Decisions

3.11 Appeal decision notices from previous applications within the surrounding area, including within the Strategic Gap were reviewed by LUC to identify issues which arose and may be of relevance to the Proposed Development. Two previous applications were reviewed, including:

- Land south east of the M42 Junction 10, Tamworth, Warwickshire, B78 2EY (Appeal Ref: APP/R3705/W/15/3136495)
- Land to the south of Tamworth Road and to the west of the M42, Tamworth B78 1HU (Appeal Ref: APP/R3705/W/18/3196890)

Land south east of the M42 Junction 10, Tamworth, Warwickshire, B78 2EY

3.12 This application was granted planning permission following appeal in November 2016. The Development is similar to that of PAP/2021/0663, comprising development of land within Use Class B1(c) (light industry), Use Class B2 (general industry), and Use Class B8 (storage and distribution) and demolition and removal of existing structures and associated works. This development is located to the south of the Proposed Development of PAP/2021/0663, on the southern side of the A5 and east of the M42.

3.13 One of the reasons for the Council refusing planning permission was that the proposal would harm the separate identity of Dordon and undermine the meaningful gap between Polesworth and Dordon and Tamworth.

3.14 The Inspector concluded that the proposal would respect the separate identity of Dordon, and, maintain a meaningful gap between Polesworth and Dordon and Tamworth. One of the key reasons for this decision was due to the presence of

"the open farmland to the north of the A5". In stating this, the Inspector confirmed that the area to the north of the A5 (the area of land to be occupied by the Proposed Development of PAP/2021/0663) is a vital component of the Strategic Gap, and the loss of this area to development could subsequently have adverse effects on the Strategic Gap.

Land to the south of Tamworth Road and to the west of the M42, Tamworth B78 1HU

3.15 This application was refused outline planning permission for a residential development of up to 150 dwellings, open space, landscaping, drainage features and associated infrastructure, in April 2019.

3.16 This development is located to the north-west of the Proposed Development of PAP/2021/0663, on the western side of the M42, and to the south of the B5000.

3.17 One of the main reasons in the appeal was whether the proposal would adversely affect the character and function of the planned gap between Tamworth and Polesworth.

3.18 The Inspector concluded that although the development would not significantly affect the identity of Tamworth, it would result in a major reduction in the space between settlements, to the extent that there would no longer be an adequate 'meaningful gap' and the separate rural identity of Polesworth with Dordon would be weakened.

Chapter 4

Summary

4.1 This section summarises the key issues for NWBC to consider when reaching a view on the likely landscape and visual effects, and whether there are additional potential additional mitigation measures to further reduce landscape and visual effects.

4.2 The following is a summary of the notable effects that are identified in the LVIA:

- **Major (significant)** negative effect identified for Viewpoint 3;
- **Major (significant)** negative effect identified for Viewpoint 4; and,
- **Major (significant)** negative effect identified for Viewpoint 10.

4.3 These significant negative effects all relate to the 'at construction' phase, dropping to minor or moderate and not significant after 15 years. The LVIA appears to underplay the overall visual effect and its significance. Whilst sensitivities of receptors appear to be appropriate, the magnitude of change identified for many viewpoints (at construction and after 15 years) seems to be underemphasised with most viewpoints identified as having a slight or negligible magnitude of change.

4.4 No significant effects were identified at all in relation to landscape receptors, including individual elements and features, aesthetic and perceptual aspects, and overall character.

4.5 As with visual receptors, the LVIA appears to underplay the short and long-term effects on the Site and its immediate surrounds from a landscape perspective. Considering the site is currently greenfield and would experience a large scale permanent change due to the Proposed Development, it is considered highly unlikely that no significant negative effects would be identified in relation to landscape receptors.

4.6 There are several points of clarification raised in Chapter 2 of the LVIA review, and as a consequence NWBC may wish to ask the landscape consultant to provide:

- Clarification as to what the defined study area is, both in the text and on illustrations supplied in Appendix 10.1;
- Descriptive overview of the extent of the area outside of the Proposed Development site area that is being considered within the LVIA, i.e. the study area;

- Clarification as to why baseline photography varies in size;
- Visuals showing the Proposed Development modelled into views (Type 3 visualisation), as opposed to baseline photography, particularly for viewpoints identified as significant;
- Further information on how off-site mitigation will be secured (e.g. through S106 agreement, or Planning Conditions);
- Clarification as to the methodology of the cumulative assessment, and why the cumulative schemes identified were included as many have already been constructed and therefore would form the baseline;
- Provide greater detail on the likely landscape and visual cumulative effects;
- Provide further information on how the judgements of overall landscape and visual effects were undertaken; and,
- Provide further information on why the viewpoints within the LVIA were selected.

place (e.g. surrounding settlements), by extending built development into an area which is currently open landscape.

4.7 The Site sits within Parcel 8 as defined in the 'Assessment of the Value of the Meaningful Gap and Potential Green Belt Alterations' ⁵. It therefore forms part of the 'Strategic Gap' separating Tamworth and Dordon.

4.8 The Proposed Development would reduce the gap between Tamworth and Dordon/ Polesworth by 430m, leaving a 777m physical gap. The gap between Birchmoor and the commercial development to the south would reduce to a corridor just 95-155m wide. It is LUC's opinion that the Proposed Development would result in adverse effects on the Strategic Gap and reduce its effectiveness at maintaining separation between Tamworth and Dordon. Additionally, the Proposed Development would extend the urban edge to the east of the M42 and result in the urbanisation of a currently localised rural area. Additionally, the Proposed Development would fundamentally alter the landscape character of the Site and Strategic Gap, by altering the topography, vegetation and openness of the area. The land use of the Strategic Gap would also be changed from an arable field to commercial development.

4.9 Furthermore, the Proposed Development would increase the intervisibility and intra-visibility from built edges throughout this part of the Strategic Gap, reducing the perception of there being a wide gap, and would also affect the sense of leaving a

⁵ Assessment of the Value of the Meaningful Gap and Potential Green Belt Alterations. LUC (2018)

Appendix A

Review of Additional Information

A.1 LUC was commissioned by North Warwickshire Borough Council (NWBC) in June 2022 to provide a review of the response and additional information provided by the applicant. This additional information has been provided in response to LUC's initial review of the LVIA for the Proposed Development of 'Land North-East of Junction 10 M42, North Warwickshire', produced by WSP for Hodgetts Estates (planning application ref. PAP/2021/0663).

Purpose of the Review

A.2 The purpose of this report is to provide a technical review of the additional information provided in the Applicant's response and in the Design and Access Statement and Design Guide.

Applicant Response

A.3 Section 2.0 of the Applicant's response addresses LUC's comments from the initial LVIA review. LUC has reviewed this response, and further comments are provided below.

Study Area

A.4 The Applicant states that drawings LAJ-1 to LAJ-3 illustrate the wider study area, with LAJ-4 illustrating a reduced study area.

A.5 It is maintained that the actual study area is not specifically defined or marked on these maps (i.e. stated quantitatively or in the form of a buffer line around the site). If the entire area visible on the map forms the study area, this should be explained somewhere. Without this information, it is therefore hard to know its extent.

A.6 As such, the initial comments still stand that the LVIA nor Applicant response set out a description of the study area.

Baseline Photography

A.7 The clarifications relating to baseline photography are accepted. However, it is noted that the Applicant states some viewpoints (e.g. Viewpoint 16) are illustrated at less than 90 degree horizontal angle of view, yet the label on the viewpoint sheets states 90 degrees. This is also the case for Viewpoint 15. This should be amended to ensure transparency.

Provision of visualisations showing the Proposed Development

A.8 Although type 3 photography was undertaken, type 3 visualisations (showing photomontages/ photowires) were not provided in the original LVIA, given the application is Outline. The lack of visualisations made it hard to understand the scale of the proposed development, and how it would affect views and landscape character.

A.9 The Applicant has since provided annotated visualisations indicating the extent and scale of the proposed development from three viewpoints (Viewpoints 1, 4 and 5). These also have modelled in the proposed vegetation planting.

A.10 These visualisations are very useful in helping to understand the effects of the proposed development, however it is suggested that visualisations could be provided from more than three of the viewpoints.

Information on how off-site mitigation will be secured

A.11 The Applicant has confirmed that off-site mitigation would be secured via S.106 Agreement, and that the obligations would remain if land is sold or transferred in the future.

Clarifications as to the methodology of the CLVIA

A.12 The Applicant outlines that the cumulative schemes to be included within the CLVIA were agreed with the Council. LUC is content with this.

A.13 In our original response, we set out that the CLVIA should consider consented and proposed schemes, with the existing schemes forming part of the baseline for the LVIA. It is clarified that the constructed schemes included in the CLVIA were also embedded within the LVIA baseline.

A.14 In relation to site allocation E2, we accept that the site allocation has been found to be justified and effective through Examination in Public of the Local Plan and that the principle of development on that site has been agreed. However, that does not necessarily mean the site will be developed and it would still need to go through the planning process. As such, until a development has been constructed on the site, there is still a higher level of uncertainty attached to this site allocation and this should be reflected in the CLVIA.

A.15 With relation to Birch Coppice Industrial Estate, there appears to have been some confusion as to our initial response. As Table 10.1 of the original LVIA did not provide a status for the industrial estate or planning reference, and recognising that the industrial estate as a whole is already constructed, it was assumed that the scheme to be included in

the assessment was a new proposed scheme within/on the edge of the industrial estate.

A.16 It is noted that Appendix A provides an update to the cumulative assessment, separating out the landscape and visual effects. This has helped better define the cumulative effects associated with the proposed development. Whilst it is noted that, existing industrial buildings are present to west and south of the proposed development, it is LUC's opinion that the cumulative effects of the proposed development, particularly when considered with the development immediately south of the site, have been underestimated.

Greater detail on the likely landscape and visual effects

A.17 It is noted that judgements of landscape and visual effects were written by and reviewed by Chartered Landscape Architects. Whilst we do not dispute the methodology leading to identification of effects, we consider that more information could be provided to justify the 'value', 'susceptibility', 'size and scale of change', 'geographical extent' and how they feed through to determining the overall magnitude of change and sensitivity.

A.18 The Applicant has clarified that 'at construction' should be corrected to 'after construction'. The applicant did not consider it necessary to include during construction effects as the assessment of the period immediately after construction is completed provides the worst-case scenario in terms of scale, limited growth of proposed vegetation, and will show the form it will maintain permanently. Whilst it is acknowledged that construction effects are shorter in duration, effects may be different during construction due to elements like cranes (likely to be taller than the proposed building) and lighting etc.

Why viewpoints within the LVIA were selected

A.19 The Applicant has highlighted that viewpoints were identified through desktop assessment of OS mapping, aerial mapping and a review of contour information. They confirmed that the selected viewpoints were submitted to the Planning Officer for agreement, with the Planning Officer suggesting several additional viewpoints which were also considered in the assessment.

A.20 LUC has not been party to any discussions relating to refinement of viewpoints, and the reasoning behind their selection.

A.21 In response to our initial review, the Applicant has provided some reasoning for viewpoints 1, 3, 4, 7, 8, 10, 12, 15 and 21. Ideally, reasoning should be provided for all viewpoints. Tabular formats are useful for displaying this reasoning, along with viewpoint information like distance to the site, and view direction etc.

ZTV

A.22 The Applicant sets out that the ZTV methodology followed (which includes built form and vegetation) has been tested at appeal. The ZTV provided includes modelling of maturing proposed mitigation planting, and the applicant has set out the proposed heights used for modelling. As the proposed vegetation forms part of the proposed development plans, it is not considered that this should be modelled into the ZTV as a screening element, but rather as part of the proposals. The visibility of this proposed planting will change views from the wider landscape, and this should be reflected through the ZTV, rather than including it as if it was part of the baseline.

A.23 That is not to say the ZTV with the proposed planting modelled in is not useful in portraying theoretical visibility of the built form of the development. However, it is suggested that another ZTV is also provided which includes the proposed planting as part of the development and shows the theoretical visibility of development as a whole (including the planting).

Design and Access Statement and Design Guide

A.24 The Design and Access Statement and Design Guide have been submitted to support the outline planning application.

A.25 The purpose of the Design Guide is to:

- *“Provide an overarching design framework and development parameters that development subject to future reserved matters applications must adhere to;*
- *Ensure that any future development of the Site would be brought forward in a cohesive manner that respects the locational context and ensures that high quality, highly sustainable and appropriately designed development comes forward at the Site;*
- *Enable the substantial scheme benefits associated with high-quality design to be realised; and,*
- *Facilitate a more streamlined planning process at reserved matters approval stage.”* (Section 1.2)

A.26 The purpose of the Design and Access Statement *“is to communicate the design process and the proposed development principles clearly, whilst demonstrating how the Site can be developed in accordance with relevant planning policies, planning guidance and design guidance.”* (Section 1.7).

Design Guide

A.27 The Design Guide outlines that the Proposed Development will include a substantial area (>9ha) of green infrastructure on site, and 6.5ha of off-site landscape mitigation and enhancements. This would be located to the north, south, and east of the building plots defined in the parameters plan. This planting is to screen the buildings of the proposed development from the surrounding settlements.

A.28 The proposed green infrastructure would include open space, planting, landscaping, public rights of way, sustainable drainage system (SuDS) and a variety of wildlife habitats. The green infrastructure provided around the edges of the site would vary in width between 35m to 134m.

Tree planting, Field Boundaries, and Other Planting

A.29 The Design Guide outlines out that existing peripheral vegetation to the west of the site will be retained, enhanced and strengthened to provide a robust landscape buffer. Likewise, it is set out that veteran and mature trees and historic hedgerows around the periphery of the Site and in the offsite landscape mitigation areas would be retained and protected. Retaining and enhancing the existing landscape buffer and features are welcomed proposals, so long as the planting is in character with the landscape, in terms of its nature (form) and species (native, local provenance, as noted below).

A.30 The Design Guide sets out that historic field boundaries would be reinstated through the Strategic Gap (off-site), with mixed, native hedgerow and tree planting to reinforce the rural character of the landscape. This proposal is welcomed and would help strengthen and restore the rural character of this landscape.

A.31 The Design Guide highlights that landscape planting will include trees, shrubs, herbaceous plants and wildflower mixes. Approximately 10,000 trees would be planted on- and off-site, as part of landscape mitigation measures. It sets out that these trees would be *“adolescent or semi-mature”* to assist with earlier integration and mitigation of the development with the surroundings. These trees, along with other shrubs, plants and wildflowers would comprise native species typical of the region and locally distinctive to the environs of Dordon. The use of native species is welcomed and encouraged, in line with best practice guidance and advice from the Woodland Trust⁶.

Earth Mounds

A.32 *“Naturalistic”* earth mounds of approximately 5m in height planted with native trees will provide mitigation

⁶ <https://www.woodlandtrust.org.uk/plant-trees/advice/>

screening to the north and east of the proposed development plots. The scale of these mounds is illustrated in the cross-section provided in Section 4.3 of the Design Guide.

A.33 The earth mounds would be of a large scale which are not sympathetic to the shape of the surrounding, gently undulating rural landscape.

Sustainable Urban Drainage System

A.34 The Design Guide sets out that the proposed development will incorporate sustainable urban drainage system (SuDS), including soak-aways, rain gardens, and attenuation ponds. The SuDS would provide wetland environments to enhance biodiversity, notably birds, invertebrates and wetland plant species such as reeds.

A.35 The incorporation of SuDS into the proposed development is welcomed.

Landscape Context

A.36 The Design Guide sets out that new developments should seek to respond to the surrounding context by using similar configurations. Whilst this is the case for nearby employment buildings to the south and west of the main roads bounding the site (Watling Street and M42, respectively), the immediate context of the surroundings to the north of Watling Road comprises rural open land. Therefore, the buildings of the proposed development do not respond to the immediate landscape context.

A.37 The Design Guide states the *“proposals respect the landscape context and the separate identities of the surrounding settlements of Tamworth, Dordon, Birchmoor and Polesworth.”* (Section 4.2). Given the scale of the proposed development compared to the nearby settlements, and that the proposed development of the site would result in the loss of rural agricultural fields, it is considered that the proposals would not *“respect the landscape context”*. Whilst it is acknowledged that the proposal would include extensive native tree planting around the built development, the scale of the earth mounds and extent of the proposed woodland is not reflective of the surrounding rural landscape.

Recreation and Access

A.38 The proposed development will include over 3.5km of new and enhanced public footpaths, bridleways and footway / cycleway routes. These would be throughout the Site and wider land under the control of the Applicant.

A.39 Additional features are proposed to be incorporated into the proposed development to enhance recreational opportunities and enjoyment by the public. This includes provision of heritage and ecological information boards, public art, fitness equipment and an allotment or community garden.

A.40 These are welcomed proposals if designed to fit well within the local landscape context.

Design and Access Statement

A.41 Much of the information provided in the Design Guide is also provided in the Design and Access Statement. However, the Design and Access Statement provides more information in relation to the site context and the context of the wider area.

Site Context

A.42 Chapter 3 of the Design and Access Statement provides more detail on the site and its wider context. This helps provide a better understanding about the area included within the LVIA Study Area, however it should be noted that the detail in the Design and Access Statement is not focussed on the LVIA Study Area. Information on the LVIA Study Area should still be provided within the LVIA itself.

A.43 Chapter 3 provides a history of the site, sets out existing and proposed land uses at a local and regional level, and details existing access and public rights of way across the site and immediate surroundings. It also provides an overview of existing settlement and industrial development.

A.44 It also sets out the landscape context of the site, noting that the site is within the Tamworth Fringe Uplands Landscape Character Type (LCT) and that the site rises gently from the south-west to the north-east.

A.45 and is not within any national landscape designations. However, existing open space designated within the North Warwickshire Local Plan are present to the east of the site.

A.46 This chapter sets out that the urbanising effect of industrial uses will be further intensified as site allocations E2 and E3, to the south of Watling Street, come forward for development. This industrialisation would be further intensified by the introduction of the proposed development to the north of Watling Street, particularly as the landscape immediately north of the road is rural in nature with no industrial buildings.

Appearance and Design

Tree Planting, Field Boundaries and Other Planting

A.47 As with the Design Guide, the Design and Access Statement outlines the proposals for mitigation planting both on and off-site. This includes noting that the existing peripheral vegetation, including mature and veteran trees and hedgerows would be protected and reinforced with native species and planting. It also reiterates that historic field boundaries would be re-instated to reinforce the rural character of the landscape.

A.48 The Design and Access Statement provides additional information in relation to planting, setting out that native and

ornamental planting would be planted amongst the road network to soften the hard façade and connect the larger habitats to the north and south. It also promotes the use of hedges over fencing around site boundaries. This would help maintain a more natural appearance from outside the site, although the scale of planting and increased height due to underlying mounds will not be characteristic of the existing rural landscape.

A.49 Chapter 7 (Section 7.14) of the Design and Access Statement also sets out the minimum requirements for tree planting, wetland planting and hedge planting.

Earth Mounds

A.50 The Design and Access Statement reiterates the proposals for the development of mounds to help screen and filter views. Additional information is provided, stating that it would involve the initial stripping of topsoil from across the site and placing this in strategic bunds to the north and the east of the Site. The Design and Access Statement notes that the mounds would be formed with soft slopes in order to replicate a natural environment and would reinforce the sense of openness within the remaining arable landscape to the east.

A.51 The introduction of a new mound planted with native trees and shrub along the eastern edge of the site will create a notable woodland belt which is higher than the surrounding landscape. This woodland belt would screen westerly views from the east of the site, therefore reducing the sense of openness otherwise present across this rural landscape.

Sustainable Urban Drainage System

A.52 The Design and Access Statement provides additional commentary in relation to water features associated with the proposed SuDS. The Statement notes that water features should be designed to look natural and aesthetically pleasing and highlights that pools of water will be planted with emergent and submerged vegetation on shelves along their shoreline and in shallow, marshy zones.

A.53 The above approach is welcomed in order to create natural and biodiversity-rich wetland habitats.

Landscape Context

A.54 In terms of landscape context, the Design and Access Statement outlines that the buildings of the proposed development have been located in, and close to, the south-western corner of the site. This is to reflect the underlying topography, which is lowest in the south-west, meaning the proposed development “*would not be highly prominent within the landscape*”. The reasoning is to minimise potential visual effects on residents on the edge of Birchmoor and Dordon, and to maintain a sense of separation between the settlements and the proposed commercial units.

A.55 Given the scale of the proposed development, it is unlikely that siting the buildings towards the south-west will notably reduce the prominence of the proposed development, its scale in views or sense of separation from settlements.

Recreation and Access

A.56 The Design and Access Statement reiterates proposals to create and enhance public access across the site and the wider area under the Applicant’s control. The Statement adds that footpaths to be Equalities Act 2010 compliant so suitable for all.

Conclusions

A.57 The Design Guide and Design and Access Statement have helped aid understanding of the Proposed Development by providing more visualisations and CGI images of what the Proposed Development would potentially look like, noting that the Proposed Development is an Outline application and finalised details would be agreed at Reserved Matters.

A.58 The visualisations have helped better understand the scale of the Proposed Development, along with proposed landscaping and enhancements to public access both on- and off-site.

A.59 Whilst proposals for restoring field boundaries, planting new trees and shrubs/plants, and improving access are welcomed, it is still considered that the scale of the proposed development is not sympathetic to the rural landscape in which the site is located.

A.60 Our previous comments in relation to the effect on the Strategic Gap (see Chapter 3 and Chapter 4 of this report) remain.