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Shropshire Hills AONB Partnership
Unit 9 Drivers House, The Auction Yard, CRAVEN ARMS, SY7 9BZ
Tel (VOIP): 01743 254740 Email: shropshirehillsaonb@shropshire.gov.uk

Grahame French
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Email:
Your Ref: 19/05560/OUT
Our Ref: ph_240320_19_05560_Ironbridge houses

24th March 2020

Dear Grahame

19/05560/OUT Outline application (access for consideration comprising formation of two vehicular accesses off A4169 road) for the development of (up to) 1,000 dwellings; retirement village; employment land comprising classes B1(A), B1(C), B2 and B8; retail and other uses comprising classes A1, A2, A3, A4, A5, D1 and D2; allotments, sports pitches, a railway link, leisure uses, primary/nursery school, a park and ride facility, walking and cycling routes, and associated landscaping, drainage and infrastructure works. Ironbridge Power Station, Buildwas Road, Ironbridge, Telford, Shropshire, TF8 7BL

The AONB Partnership objects to this application and the proposed development, in its current form. This is principally on the basis of the scale and proximity of this major development in the immediate setting of the AONB. We are not opposed to the principle of development on the former power station site, but the importance of the AONB has been downplayed by the Landscape & Visual Impact Assessment (LVIA) to reach a conclusion of not significant harm, with which we disagree, and planning policies regarding the setting of the AONB have not been addressed. We expect the rectification of these issues to result in actual change to the proposed development to reduce its impact on the setting of the AONB, mainly by reduction in scale at the western edge.

The Planning Statement

The Planning Statement misrepresents the nature of the site in order to make the development sound more acceptable e.g. at Para 1.3 *"The application site comprises the former Ironbridge Power Station"* – it does not mention the large part of the site which is greenfield development.

The significant section of the Planning Statement is the assessment of the development proposals against the Site Guidelines in the Shropshire Local Plan Review: Consultation on Strategic Sites (July 2019) document. This document unfortunately omitted consideration of the Shropshire Hills AONB, as highlighted in our response to that consultation. It is apparent also that the assessment of the development within the Planning Statement does not address issues relating to the setting of the AONB and the policy issues relating to this (the consideration of the AONB within the LVIA sections of the Environmental Statement do not compensate for this shortfall). It is disappointing that the need to address AONB setting policies has not been highlighted to the

developers through an additional Site Guideline, and we ask that the Council request amendment of the Planning Statement to address this.

Environmental Statement

The following section of the Environmental Statement Proposed Development and Alternatives Paper further illustrates the oversight of proper consideration of the AONB and its setting:

4.4.8 The constraints and opportunities presented by the Application Site have been used to inform the design principles, which in turn have helped refine and structure the Proposed Development. The key constraints and opportunities at the Application Site were identified as:

- Existing power station buildings to be retained
- Site topography
- Proposed sand and gravel extraction
- River Severn
- Existing site accesses
- Ironbridge Gorge World Heritage Site
- Existing vegetation
- Severn Gorge Conservation Area
- Ancient Woodland
- Brownfield/Greenfield nature
- Public Rights of Way network

Relevant policy not taken into consideration

The recently revised National Planning Practice Guidance for the Natural Environment stresses the importance of the setting of AONBs:

“How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with?”

Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.”

Paragraph: 042 Reference ID: 8-042-20190721

Revision date: 21/07/2019

In addition, the National Planning Policy Framework requires considerable weight to be given to the setting of heritage assets – in this case Buildwas Abbey: (NPPF para 194 and associated sections, also not referenced in the Planning Statement):

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

The Shropshire Hills AONB Management Plan 2020-24 has the following policy on setting:

viii) Setting of the AONB

Development in the area around the AONB should be assessed for its impacts on the AONB itself, and also take account of the landscape quality of the setting of the AONB. Measures to consider and mitigate such impacts should include where required Landscape and Visual Impact Assessments; care over orientation, site layout, height and scale of structures and buildings; consideration of the landscape, land uses and heritage assets around and beyond the

development site; careful use of colours, materials and non-reflective surfaces; restraint and care in the and use of lighting.

Landscape & Visual Impact Assessment (LVIA)

We have concerns about the consideration of the AONB in the Landscape and Visual Impact Assessment. For example:

"The Shropshire Hills AONB is an extensive area and the part of this within the study area is limited. In the context of this scale, it is not considered that any effects on the landscape character of the AONB would be significant."

This is a spurious argument which could be used to justify any development affecting only part of a relatively large AONB. It has no basis in policy, which gives protection to all of an AONB – harmful impacts do not need to affect the whole AONB to be significant or unacceptable.

And:

"Physical changes to the Shropshire Hills AONB are limited to the changes in the highway on its boundary. Otherwise, inter-visibility between the proposed development and locations within the AONB (i.e. from where the character and appearance can be interpreted and appreciated) is very limited. Consequently, the lack of direct impacts, transitional nature of landscape character overall, strength of the AONB boundary in the local landscape, and the limited opportunity to experience both the proposed development and character of the AONB landscape simultaneously all serve to limit the impact on this part of the Shropshire Hills AONB and effects are not considered to be significant."

This section does not adequately address the setting of the AONB as required by National Planning Practice Guidance.

Appended to our response is a report commissioned by the AONB Partnership from Carly Tinkler, a landscape, environment and colour consultant. This highlights further issues with the LVIA, including inadequate baseline assessment of the current condition of the greenfield land in the immediate setting of the AONB. The report also makes an independent assessment of the landscape and visual impact of the proposed development, and concludes that these are greater and of more significance than set out in the applicant's LVIA.

Shropshire Council Policy

We do not consider that the proposed development gives adequate weight to the Shropshire Council Core Strategy and SAMDev policies reflecting the AONB, CS17: Environmental Networks and MD12 The Natural Environment, nor the AONB Management Plan policy P1 - Protection of the AONB.

Indirect impacts from the development including increased traffic and reduced tranquillity

There will be indirect impacts on the AONB from traffic which will have an adverse effect on tranquillity. These will be felt around the two routes that impact the AONB – the B4380 Buildwas-Shrewsbury road running through the AONB, and the road to Much Wenlock running along the AONB boundary.

Conclusion

We believe the impacts on both the AONB and on Buildwas Abbey and their settings, could be resolved by reduction in scale of the residential development at the west of the site (and the corresponding sand and gravel extraction area subject to a separate application) through restricting the developments to the power station brownfield land east of the bridleway which divides the site.

The current greenfield agricultural land is of fundamentally different character to the previously developed land – its baseline value is much higher, and this is also the land in the closest part of the setting of the AONB and of Buildwas Abbey. Restricting development to the brownfield land would also ameliorate the scale-related overall impacts of the proposed development, such as traffic and reduced tranquillity affecting parts of the AONB and adjacent settlements and countryside. The inclusion of land in the greenfield part of the site needs to be fully justified in the applicant’s viability assessment. If the inclusion of some of this land is found to be justified, we recommend further work to ameliorate impact on the AONB through buffering at the western edge of the site. We would be happy to provide input to this process.

Yours sincerely

James Williamson, Chairman
On behalf of the Shropshire Hills AONB Partnership

Appendix - 19/05560/OUT Ironbridge Landscape & Visual Review prepared by Carly Tinkler BA
CMLI FRSA MIALE Landscape, Environmental and Colour Consultancy on behalf of the AONB
Partnership

Planning Application Ref. 19/05560/OUT
Development at Former Ironbridge Power Station
Landscape and Visual Review
for the Shropshire Hills AONB Partnership
March 2020

1. Introduction and Background

- 1.1 In January 2020, I was commissioned by the Shropshire Hills Area of Outstanding Beauty (AONB) Partnership (SHAONBP) to carry out an independent review of landscape and visual matters relating to an outline planning application for *'the mixed-use redevelopment of the former Ironbridge Power Station'*. The planning application reference is 19/05560/OUT.
- 1.2 Due to factors such as the proposed development's nature, size and location, and the potential for it to give rise to 'significant' effects, an Environmental Impact Assessment (EIA) was required. An Environmental Statement has been submitted with the application.
- 1.3 The large majority of the application site is located within the administrative boundaries of Shropshire Council; a small part lies within the boundaries of Telford and Wrekin Council.
- 1.4 The proposed development and the site / its landscape context are described further below; in summary, the application is for a large-scale mixed-use scheme on c. 144ha of land south of the River Severn where it runs through the Ironbridge Gorge. The site lies close to (south east of) Buildwas village, c. 5km south west of Telford town centre, and c. 1km west of Ironbridge.
- 1.5 The site lies adjacent to, and within the setting of, the Shropshire Hills AONB, the eastern boundary of which is contiguous with the site's western boundary along sections of the A4169 Much Wenlock Road. At its eastern end, the site is adjacent to the Ironbridge Gorge World Heritage Site (WHS).
- 1.6 Parts of the site are categorised as previously-developed or 'brownfield' land, as they are currently occupied by buildings / structures / surfaces associated with the former power station¹.
- 1.7 Other parts of the site - mainly in the western sector - are previously-undeveloped 'greenfield' land comprising predominantly arable and pasture fields, with some woodland / tree belts / scrub, and a dismantled railway²; there are also 'redundant' sports pitches at the site's north-western end (Ironbridge Playing Field).
- 1.8 In July 2019, as part of its local plan review, Shropshire Council consulted on its proposals to allocate certain 'strategic' development sites in the revised plan. Associated 'site-specific

¹ Construction of the first power station ('Ironbridge A') began in 1929. 'Ironbridge B' was built in 1969. Ironbridge A was demolished in 1982 / 3. Ironbridge B ceased generating electricity in 2015, and was subsequently decommissioned. Approval to demolish the power station was granted in 2017; the four cooling towers were demolished on 6th December 2019.

² The dismantled railway runs south west - north east through the western / north-western sectors of the site, and forms the distinctive curved boundary line between the site and Buildwas Quarry. It was part of the Wenlock Branch of the Great Western Railway that ran between Much Wenlock and Buildwas, which opened in 1862 and closed in 1964.

guidelines' were also drawn up for consultation purposes. The application site is one of the Council's 'preferred' candidates.

- 1.9 SHAONBP responded to the Council's strategic sites consultation in a note dated 9th September 2019, with reference to an earlier response issued in June 2019. The response stated that the Partnership had *'no objection overall to the allocation of the former power station site for some redevelopment, but we do have comments in relation to the designated AONB about how development may be done'*.
- 1.10 The response noted that *'The [site] guidelines and the consultation document overall do not mention the Shropshire Hills AONB, and it is not apparent that potential impacts on the AONB have been considered in the proposed allocation of this strategic site (including landscape and visual impacts but also other aspects of the AONB's special qualities)'*.
- 1.11 The 'main concern' expressed by SHAONBP related to effects on the AONB arising particularly from the proposal to build on greenfield land (currently arable fields) in the western sector of the site, very close to the AONB's eastern boundary.

2. Scope of Study

- 2.1 This review considers the potential for effects on landscape character and visual / social amenity which are likely to arise as a result of the proposed scheme being implemented in its current form, the focus being on the Shropshire Hills AONB and its special qualities.
- 2.2 It considers the landscape and visual sensitivity of the site and its surrounding landscape context / areas of interinfluence, and in the light of this, the area's capacity to accommodate change in the form proposed without undue consequences for the maintenance of the baseline situation and / or the achievement of landscape planning policies and strategies.
- 2.3 The brief from SHAONBP also asked for comments on issues highlighted by the Partnership in its response to the July 2019 strategic sites consultation, including those relating to the applicant's Landscape and Visual Impact Assessment (LVIA). A review of the LVIA was therefore also required.
- 2.4 The brief did not require an assessment of the planning policy context and whether or not the proposed development is likely to be compliant, as this is dealt with in SHAONBP's response; however, where of relevance to this review, it is noted below.

3. Method and Process

- 3.1 For commissions such as these I follow the methods, processes and techniques set out in relevant published guidance and 'topic papers'³.
- 3.2 In this case, the approach was as follows:
 - i) Carry out a high-level desktop study to identify the key landscape and visual issues, reinforced with on-the-ground surveys.
 - ii) Analyse findings, establish overall levels of effects / capacity.
 - iii) Review SHAONBP's response to the strategic sites consultation.
 - iv) Review the landscape-related information submitted with the application.

³ *Landscape Character Assessment Guidance for England and Scotland* The Countryside Agency and Scottish Natural Heritage (2002); *Topic Paper 5: Understanding Historic Landscape Character* (ditto); *Guidelines for Landscape and Visual Impact Assessment 3rd Edition* (2013) Landscape Institute / Institute of Environmental Management and Assessment (usually referred to as 'GLVIA3'); and *An Approach to Landscape Character Assessment* (October 2014) Natural England. In June 2019, Natural England published *An Approach to Landscape Sensitivity Assessment* which is said to 'replace' The Countryside Agency and Scottish Natural Heritage's 2002 *Topic Paper 6: Techniques and criteria for judging sensitivity and capacity*; however, the former does not deal with capacity. Topic Paper 6 is still a useful source of reference, but many LSCA practitioners including myself now follow the principles set out in GLVIA3 to draw conclusions about both sensitivity and capacity.

- v) Compare and test my findings with a) SHAONBP's, and b) the applicant's.
- vi) Write advice note in the form of a brief report, with recommendations if required.

4. Proposed Development

- 4.1 The application is for the construction of up to 1,000 dwellings, a retirement village, offices, light and general industrial buildings, storage and distribution facilities, a local centre, allotments, sports pitches, a railway link, leisure uses, a new primary school and a park and ride facility, together with new walking and cycling routes, and associated landscaping, drainage and infrastructure works.
- 4.2 All matters are reserved for future approval except for access (two new vehicular accesses into the site are proposed, both from the A4169 Much Wenlock Road).
- 4.3 The application site's northern boundary broadly follows the line of the River Severn, although some land on the north bank is included, presumably to facilitate the creation of new, and improvements to existing, river crossings.
- 4.4 At its eastern end, the site boundary is just beyond the point where the easternmost cooling tower used to be. It is also contiguous with the western boundary of the WHS.
- 4.5 The site's southern boundary zig-zags from east to west. For much of its length it follows the northern edge of dense woodland covering the ridges and slopes to the south of the site; however, for some reason, parts of Benthall Wood at the site's south-eastern corner are included, along with a small section of Tick Wood further west (I could not find any reference to proposed works / enhancements in these areas).
- 4.6 Two arable fields between the A4169 and the westernmost edge of the proposed 'developed' areas are also included within the site. It is not clear why these fields are included or what is proposed there, but the Proposed Masterplan suggests that the existing agricultural use would continue.
- 4.7 From the site's far-western end, the site boundary runs north-eastwards along the A4169 for c. 400m, at which point a new roundabout is proposed with an arm leading eastwards into and through the site. This section of the site boundary is contiguous with the AONB boundary. From the proposed roundabout, the site boundary is contiguous with the boundary of Buildwas Quarry, turning westwards along the line of the old railway (a restricted byway⁴) to rejoin the A4169 and northwards as far as the river. The second access into the site would be at the junction of the old railway and the A4169, opposite Buildwas Abbey.
- 4.8 The existing power station building and a few smaller ones to the north east of it are excluded from the application site, and would be retained / restored.
- 4.9 The application is in outline: the scheme shown on the applicant's Proposed Masterplan is only an indication of where any future development / landuses would be located, and how these might be laid out.
- 4.10 Notwithstanding this, it is evident that the proposal is not just for '*the mixed-use redevelopment of the former Ironbridge Power Station*', but also to develop greenfield land in rural, open countryside.
- 4.11 This is discussed further in the sections below, but in summary, the applicant's April 2019 Scoping Report states that the 'majority' of the c. 144ha site, and the land that would be 'redeveloped', comprises the former power station (and presumably, land associated with it). In fact, the 'dividing line' between the brownfield power station land and greenfield farmland is along the track / bridleway that bisects the site from north to south. According to my calculations, *excluding* the

⁴ A restricted byway cannot be used by mechanically-propelled vehicles

- existing woodland areas within the site boundary to the south (c. 14ha), but *including* the old playing fields (c. 5ha), approximately 58ha of the site are 'greenfield', and c. 72ha are 'brownfield'.
- 4.12 The proposed masterplan shows perhaps 50% of the residential development on the arable fields; the remainder is in 'clusters' around the retained former power station building.
- 4.13 West and north west of the former power station building, a 'community hub' is proposed, with community / heritage centres, a primary school, retail outlets, business units, park and ride and so on.
- 4.14 Within the site, much of the periphery is shown as what would presumably be multi-functional green open spaces, with footpaths / cycleways running through them, connecting north / south via the existing trackway / bridleway and in some cases, linking to the wider footpath network; however, at the south-eastern end of the site, residential development is shown closer to the river, and hard-up against the mature woodland to the south.
- 4.15 It is of relevance to note here that recently, an application was submitted to Shropshire Council (ref 19/05509/MAW), requesting permission for the phased extraction and processing of sand and gravel within arable fields in the western sector of the site. The application also includes the associated establishment of a new plant site and mineral stocking area (located within the coal storage area of the former power station, east of the arable fields); a new rail loading facility; creation of a new access road onto Much Wenlock Road (at the same location as that proposed for the mixed-use development, i.e. at the junction of the old railway and the A4169, opposite Buildwas Abbey); and potential areas for soils / silt placement (on the two arable fields between the A4169 - also the AONB boundary - and the proposed extraction areas).
- 4.16 SHAONBP **objected** to the application, *'principally on the basis of the scale and proximity of this major development in the immediate setting of the AONB'*. The consultation response goes on to explain that *'The development substantially and permanently affects the landform of the site, and in the upper part this is in a visually prominent location high on the hill. It also affects the historic environment'*.
- 4.17 SHAONBP recommended that *'both the overall impacts of the proposed development, and specifically the impacts on both the AONB and on Buildwas Abbey and their settings, could be substantially ameliorated by reduction in scale of the sand and gravel extraction through drawing in the western development boundary'*.
- 4.18 In the light of the findings of my own high-level assessment and review of the submitted information, I agree with SHAONBP's comments.
- 4.19 In terms of the proposed restoration of the land following completion of the extraction and processing works, the Block Phasing Plan submitted with the application states that there would be *'... **restoration works to create the enabling residential platform'*** (my emphasis). This appears to assume that there will be future residential development on the arable fields, despite the note on the drawing going on to say that *'the site will be made available for either restoration or residential development'*.
- 4.20 Indeed, para. 6.1.13 of the LVIA submitted with the mixed-use application states: *'For the purposes of the LVIA, it is **assumed that both scenarios have been completed in accordance with their respective planning consents**, in that demolition of the power station is complete (for example cooling towers and infrastructure removed) and the mineral extraction process is complete (**including the formation of a restoration land profile**)'* (my emphases).
- 4.21 The implications of embedding this assumption into the LVIA are discussed in the sections below, but normally, the sand and gravel extraction proposals would be considered as a stand-alone scheme. The proposed 'residential platforms' are surely not a 'requirement' of the extraction proposals, and of course there is no certainty that the development currently proposed on the fields will be granted permission.

- 4.22 The LVIA submitted with the mixed-use application describes the post-extraction 'restored' landscape. The works would leave the northern parts of the extracted area at a lower level than exists at present. In order to accommodate this change of level, there would have to be *'a drop of between ca. -12 to -20m, creating a short and relatively steep face'*. Looking at the existing and proposed contours, this appears to equate to a gradient of between 1:2 and 1:3.
- 4.23 The creation of artificial, engineered embankments and platforms on the former extraction areas would be highly uncharacteristic in this place. The photograph below shows the existing situation: good quality, rural open countryside, with distinctive, naturally-flowing topography and a backdrop of ancient woodland. Even if grassed / cultivated, the works as proposed would leave a permanent visible scar.

Arable fields in western part of site, looking south west from bridleway bisecting site



- 4.24 In my opinion, if the LPA was minded to approve the sand and gravel extraction application in its current form, a planning condition should be imposed that requires all the existing 'greenfield' land to be restored to its original form / use (or an acceptable 'natural' / locally-characteristic alternative). Of course, in the event that the current proposal for residential development on the arable fields was approved prior to the sand and gravel extraction application being determined, then such a condition would not be necessary.

5. Landscape and Visual Baseline

- 5.1 The applicant's LVIA is contained in Chapter 6 of the ES. On the whole, it provides a comprehensive description of the landscape and visual baseline situation within the study area, and appears to have identified most of the key landscape and visual receptors. Those of relevance to this review are noted in the following section on landscape and visual effects.
- 5.2 Unfortunately, what the LVIA does not describe is the existing baseline situation on the western sector of the site, having assumed that the proposed sand and gravel extraction restoration works are complete, and that mitigation / enhancement measures have become effective. For example, LVIA Table 6.15 records the 'imaginary future baseline scenario' as follows: *'Parts of the site subject to mineral extraction are in fair condition but are formed as a 'young' landscape due to the recent restoration'*; crucially, Table 6.18 states: *'In the most part, **land uses across the site are***

'brownfield' including the former power station complex and the restoration profile of the former mineral extraction area'.

- 5.3 I fundamentally disagree with this approach. It is misleading, and it is not in line with GLVIA3: the baseline studies must identify and record 'what is there', not 'what might be there in the future'. Furthermore, there is no certainty that the proposed extraction scheme will be approved, or if approved, that it will end up as shown on the drawings.
- 5.4 Without knowing what is there, it is not possible to identify 'what is important / valuable, to whom and why', nor to know how it would be affected, and to what degree (see effects below).
- 5.5 What is actually there is gently-sloping / undulating landform characterised by an intact, well-managed, regular pattern of hedged arable fields which are categorised as 'planned enclosure' on Shropshire's Historic Landscape Characterisation map and thus almost certainly date from the mid-19th century. As such, they make valuable contributions to local landscape character, heritage, visual amenity, and probably, biodiversity.

6. Landscape and Visual Effects

- 6.1 This section summarises the likely effects to which the proposed development would give rise when operational, comparing the findings of the applicant's LVIA with those of my own assessment.
- 6.2 In LVIA, once the baseline studies are complete, the information is analysed. Judgements are then made about levels of landscape value and susceptibility to change, from which conclusions are drawn about levels of landscape and visual receptor sensitivity. Judgements are also made about the 'magnitude' of each of the different types of effects that would arise, from 'whole scheme' effects - for example on landscape / settlement pattern, to effects on individual features such as trees / hedgerows.
- 6.3 The level of receptor sensitivity combined with the magnitude of effect provides the theoretical overall level of effect; at this point, professional judgement is applied, the results are tested and compared, and final conclusions are drawn.
- 6.4 Problems arise when the baseline information gathered is insufficient, and / or when the analysis fails to include certain key factors. Clearly, if levels of value and susceptibility to change are judged to be lower than they actually are, then the overall levels of effects will be reported as lower than they should be.
- 6.5 In this case, the LVIA has not reported or factored in the existing baseline situation on the western sector of the site; instead, the LVIA's judgements and conclusions are based on an imagined future baseline scenario, i.e. the assumption that the proposed sand and gravel extraction restoration works are complete, and that mitigation / enhancement measures have become effective. The implications of this are explained below.

LANDSCAPE VALUE

- 6.6 The LVIA considers the value of '**the site and local landscape context**'. The areas which form the site's 'local landscape context' do not appear to have been defined; however, given the very large (144ha) site area, the 'local context' is clearly extensive. Although interinfluence between the site and the wider landscapes is often restricted by local topography, especially to the south, the local context certainly includes parts of the Shropshire Hills AONB which is adjacent to the site at its western end, and the WHS at its eastern end.
- 6.7 Furthermore, because the site is so large, its landscape context varies considerably from one part of the site to another.

6.8 The LVIA concludes (para. 6. 4.13) that the level of value of 'the site and local landscape context' is **Medium** (albeit only using a three-point scale, which is not ideal for granular assessments such as these).

6.9 The LVIA's criteria for 'Medium' include '**a distinctive component of the region/county character experienced by a large proportion of its population**'. Notwithstanding this, in my opinion, the level of value of the site itself is higher than 'Medium':

- i) The LVIA uses GLVIA3's Box 5.1 as a guide to determining levels of value. In all of the categories, the 'future' scenario's landscapes are inevitably judged as being of lower value than those which currently exist, due to the works having degraded them.
- ii) Even if the sand and gravel extraction plans were approved, and it could safely be assumed that the 'new' post-restoration baseline situation was the appropriate starting point for the mixed-use application's LVIA, the western and eastern halves of the site would still be very different.

Despite the engineered banks and platforms disrupting organic landform, and the loss of locally-valuable hedgerows, the extracted areas would have been restored to agricultural use, so would still present a rural / 'greenfield' appearance. The current contrast between greenfield and brownfield land would remain evident.

Thus, regardless of its starting point, in my opinion the level of value of the western sector of the site is higher than that of the eastern sector.

Ideally, the LVIA should have 'split' the site into two parcels to reflect the intrinsic differences, as other published studies for the area have done, for example Shropshire's Landscape and Visual Sensitivity Study (2018).

- iii) The hedgerows and flowing topography in the western sector of the site make a small but important contribution to levels of landscape value, but this is excluded from the LVIA's judgements.
- iv) The landscape character type (LCT) of the western parts of the site is categorised as Wooded Estatelands. The LVIA concludes that '*in the context of the site and wider study area, the Wooded Estatelands LCT is of **medium to high value** in landscape terms*'.

LVIA Table 6.13 notes that '*large parts of [the Wooded Estatelands LCT] are concurrent with the Shropshire Hills AONB designation, **highlighting its quality at a national scale***' (my emphasis).

LVIA 6.4.72 states: '*prior to the mineral extraction (and restoration) the defined LCT of the Wooded Estatelands LCT extended further east, to include the area of the former power station, incorporating the former agricultural land. This suggests that **prior to mineral extraction there was consistency in landscape character between the AONB and non-AONB landscape***' (my emphasis).

On this basis, the value of the western sector of the site should also be Medium - High, if not higher.

- v) LVIA Table 6.15: Determining the value of the site and local landscape context is based on GLVIA3 Box 5.1. In the category 'Recreational value', the entry states: '*Opportunities for recreation are available around the site context, albeit not across the site itself (other than parts of the river corridor)*'.

In fact, there are several footpaths / bridleways crossing the site which make contributions to landscape value. A bridleway bisects the site, there is another bridleway along the old railway line south of the river, two public footpaths cross the arable fields, and three long-distance trails (the Shropshire, Cross Britain and Severn Ways) converge within the site at its eastern end.

The north - south bridleway is particularly important: a) it is along an old, possibly ancient trackway connecting Buildwas and Benthall / Broseley, and b) it links the Shropshire and Cross Britain Ways to the Severn Way at the point where the latter enters the AONB.

- 6.10 My assessment concluded that the level of value of the greenfield western sectors of the site is **Medium - High** (using the applicant's LVIA's criteria).

LANDSCAPE SUSCEPTIBILITY TO CHANGE:

- 6.11 The LVIA concludes that the level of susceptibility to change of the 'site and local landscape context' is **Low - Medium**.
- 6.12 Again, this assumes that the sand and gravel extraction areas are restored to 'platforms', stating, *'In the most part, **land uses across the site are 'brownfield' including the former power station complex and the restoration profile of the former mineral extraction area***. Clearly in that scenario, levels of susceptibility to change will be lower than in the existing baseline scenario.
- 6.13 The LVIA also concludes that the level of susceptibility to change of the LCT which covers the site (Wooded Estatelands) is **Medium - High**.
- 6.14 In my opinion, this realistically reflects the current level of susceptibility to change of the greenfield western sectors of the site.

LANDSCAPE SENSITIVITY

- 6.15 On the basis of the predicted levels of value (Medium) and susceptibility to change (Low - Medium), the LVIA concludes that the site and local landscape context's level of sensitivity is **Low - Medium**.
- 6.16 In my opinion, in the greenfield western sectors of the site, the level is at least **Medium - High**. The LVIA carried out for the sand and gravel extraction application concluded that it was **Medium - High**.
- 6.17 In the 2018 *Shropshire Landscape and Visual Sensitivity Assessment*, the greenfield western sectors of the site (parcel 631-BGA) were assessed as being of '**Medium**' landscape sensitivity to change in the form of both housing and employment use, of '**Medium-High**' visual sensitivity in terms of housing, and of '**High**' visual sensitivity in terms of employment. The brownfield land (parcel 631-BGB) was categorised as being of '**Low**' sensitivity in all categories.

MAGNITUDES OF EFFECT

- 6.18 The LVIA predicts that the overall magnitude of effect arising from the proposed development would be '**Medium** (**adverse**)'; however, in reality, the magnitude of the impact and resultant effects on the greenfield western sectors of the site will inevitably be considerably higher than those on the brownfield sectors. In my opinion, and based on the LVIA's criteria, the magnitude would be **High Adverse**.

OVERALL LEVELS OF EFFECTS ON LANDSCAPE CHARACTER

- 6.19 The LVIA's conclusion is that the combination of the Low - Medium sensitivity landscape receptor with the Medium adverse magnitude of effect would give rise to a **Minor to Moderate Adverse** level of effect on 'the site in its local landscape context'.
- 6.20 In addition, the LVIA has mistakenly conflated 'character' and 'visual', assuming that new planting proposed to reduce levels of effects on visual receptors by screening views would also reduce effects on landscape character (and that existing screen planting assists in this regard).
- 6.21 For example, para. 6.6.40 states that the planting proposed as part of the GI strategy would *'Optimise protection and screening for landscape character (in respect of the Shropshire Hills AONB and other nearby heritage designations) as well as visual amenity receptors'*; para. 6.4.75 notes *'the limited opportunity to experience both the proposed development and character of the AONB*

landscape simultaneously'; para. 6.4.56 states: *'In the western parts of the site, the proposed development would introduce built form into a more open part of the landscape, mitigated by the reduction in levels (cutting the development cells into the slope, with consequent reduced visibility) but this will still remain perceptible from elevated locations to the north and north-west'.*

6.22 However, as GLVIA3 clearly explains, effects on landscape character and visual amenity must be dealt with separately; this is because the character of the landscape as a resource in its own right can be affected by change, even if no-one can see it.

6.23 My assessment's conclusion is that the combination of the at least Medium - High sensitivity landscape receptor with the High adverse magnitude of effect would give rise to a level of effect of **at least Moderate to Major Adverse** on the greenfield western sectors of the site. The majority of the effects could not be mitigated.

6.24 This conclusion takes into account the following:

- i) The presence of several high value / high sensitivity receptors including AONB, SAM, two Grade I listed buildings, SSSI and other valuable habitats, ancient woodland, and long distance trails.
- ii) On the western sector, the proposals would involve the permanent loss of good quality, locally-characteristic, very sparsely-settled rural landscapes, and their replacement with large-scale, urbanising residential development.
- iii) What is proposed constitutes 'major development' within the setting of the AONB, and it cannot be conceived as 'enhancement'. In fact, only one 'enhancement measure' is proposed in the LVIA, that being *'the adoption of a landscape management plan for the proposed development'*.

Were it not for the land's proximity to the former power station, in my opinion it would not be considered suitable for development - the site is c. 1.5km from Ironbridge in open countryside, and has little or no association / relationship with the settlement.

- iv) The proposed development would directly / indirectly adversely affect several of the AONB's special qualities, and many associated landscape functions. The special qualities / functions include:

Diversity and Contrast

... The key components of the Shropshire Hills landscape are the hills, farmed countryside, woodlands, rivers and river valleys.

Farmed Countryside

The patchwork of fields bounded by hedges results from generations of farming. Pasture grazed by livestock is the largest land use, but arable cultivation is also significant, mainly on lower ground. Hedgerow and field trees, including many veteran trees, give the landscape a maturity. Remnants of valuable grassland and hay meadow habitats survive.

Woodlands

The area has higher than the national average cover of ancient and semi-natural woodland.

Scenic and environmental quality

Panoramic views extend from, across and into the AONB, which abounds in both wide open spaces and intimate corners. There are contrasts from relatively wild hills and valleys to softer, settled landscapes...

Tranquillity

Off the beaten track and remote in the context of this part of England, the Shropshire Hills are a haven of tranquillity – peace and quiet, dark skies and unspoilt views. Relatively low levels of noise and development are coupled with modest visitor numbers to create an unspoilt quality that is greatly valued.

Culture and Opportunities for Enjoyment

The Shropshire Hills span a wide spectrum of cultural settings. These range from the urban fringes of Telford and Ironbridge... Opportunities for enjoyment and wellbeing are open to both locals and visitors for walks and outdoor activities respecting the area's qualities.

- v) With regards to tranquillity, the increase in numbers of people living in the area would inevitably increase use of local roads and public footpaths, with associated increases in noise. In addition, there would be more movement in the landscape, unnatural odours.
- vi) Increased use of roads and footpaths can cause erosion / loss of vulnerable but valuable landscape elements, features and habitats, giving rise to adverse effects on landscape character, visual amenity and biodiversity.

EFFECTS ON VIEWS AND VISUAL / SOCIAL AMENITY

- 6.25 As the application is outline and the layout is only indicative at the stage, it is difficult to accurately predict likely levels of visual / social amenity effects (for example, it was not entirely clear to me what would happen to the existing public rights of way crossing the site, and whether / how new routes would connect to the wider network).
- 6.26 However, the proposed development would certainly be highly visible from several locations, including viewpoints within the AONB - for example the Wrekin which, according to SHAONBP, is one of the most visited countryside locations in the AONB and the county (see photograph below).
- 6.27 As noted above, there are several footpaths / bridleways / long-distance trails crossing / in the vicinity of the site, and the bridleway which bisects the site links the Shropshire and Cross Britain Ways to the Severn Way at the point where the latter enters the AONB.
- 6.28 Many of the visual receptors in the area are of very high sensitivity, being people visiting the AONB for the purpose of enjoying its outstanding natural beauty.

View from the Wrekin summit with greenfield land shown in the masterplan for housing development shown approximately in dashed yellow line (photo courtesy of SHAONBP)

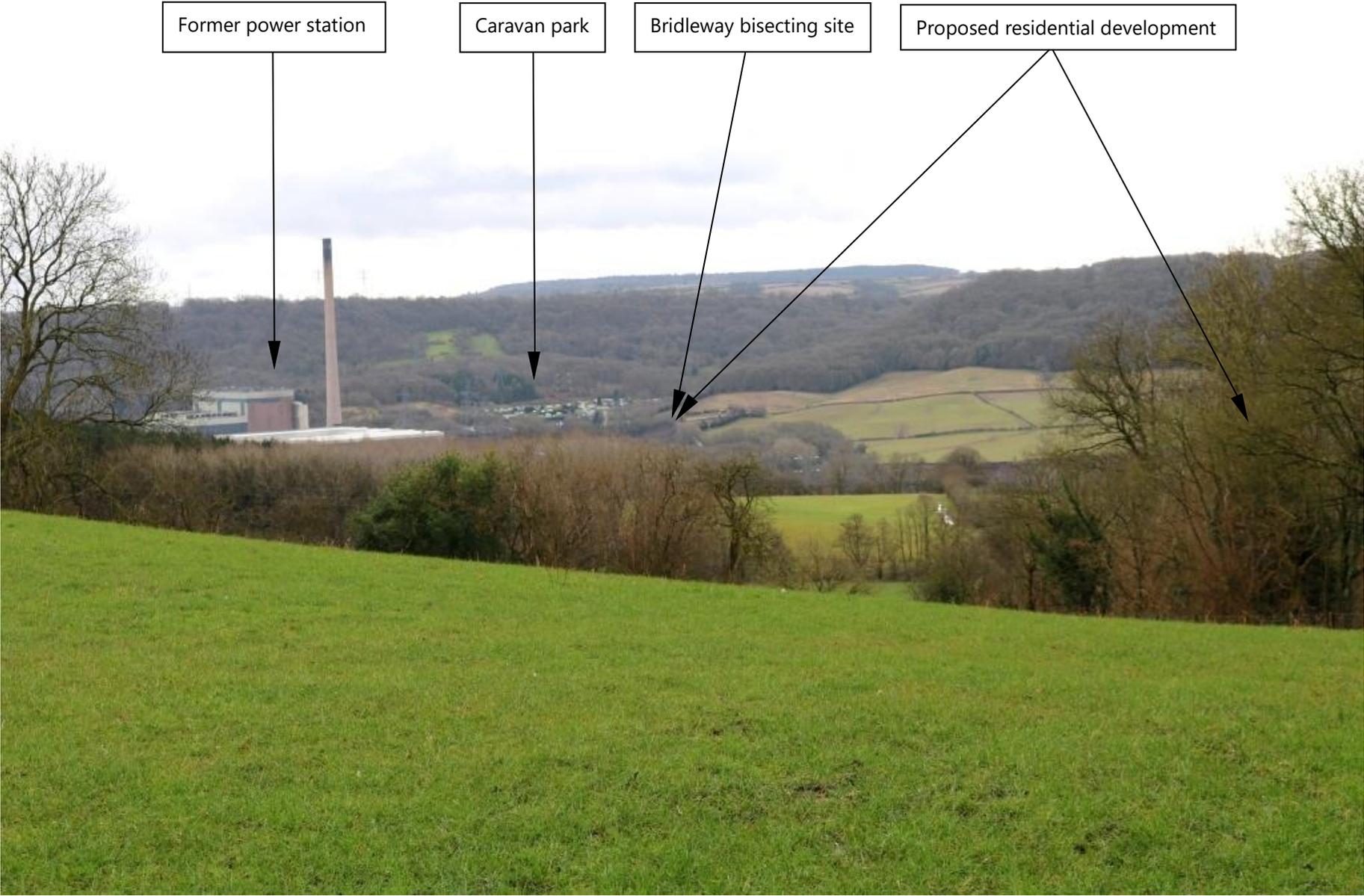


- 6.29 The above photograph (taken before the cooling towers were demolished) clearly illustrates the very sparsely-settled nature and high quality of the majority of the wider landscapes, both within and adjacent to the AONB. Very few of the existing settlement clusters are visible in the view: the

conurbations south of Telford - including Ironbridge - are well-screened even in winter by the network of dense blocks and belts of woodland.

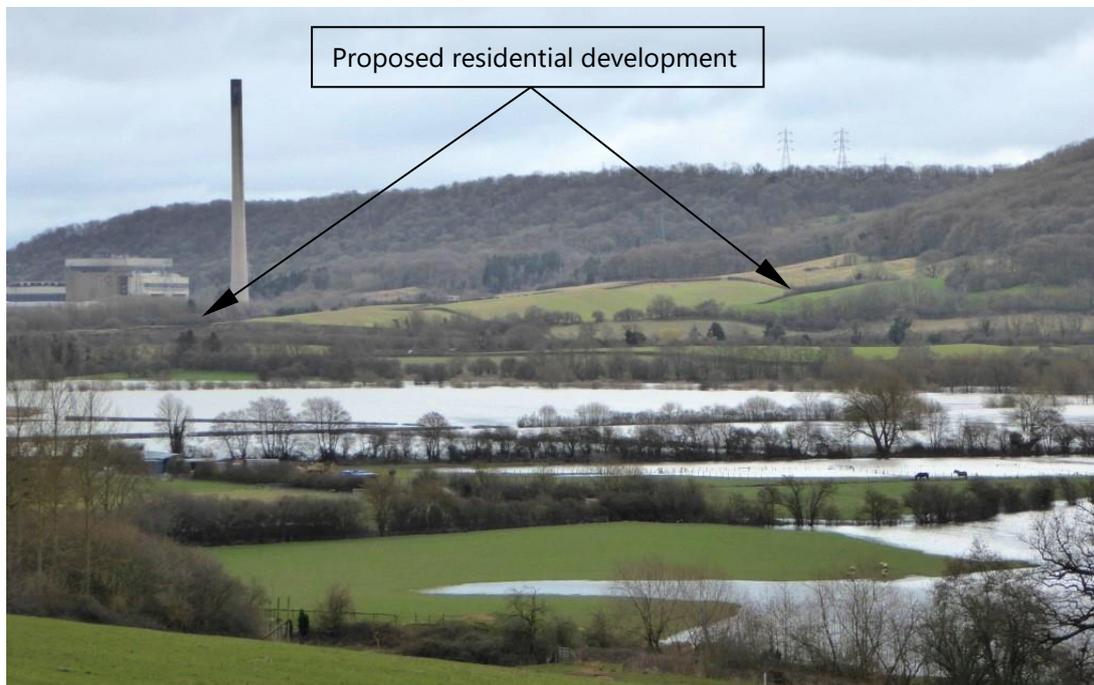
- 6.30 The LVIA predicts that from this viewpoint (LVIA VP1), the magnitude of effect would be Low to Medium, and the overall level of effect (on the highest sensitivity receptors), **Moderate Adverse**.
- 6.31 In my opinion, even the presence of the power station cannot justify the proposal to insert such a large 'island' of houses within the 'sea' of the very sensitive landscape context. Furthermore, although the former power station buildings which are proposed to be retained would still appear as an 'anomaly' in the landscape, they could be better-integrated or even camouflaged through the careful selection of external colours and materials - see recommendations below.
- 6.32 My assessment concluded that at LVIA VP1, residential development on the western greenfield sector of the site would give rise to a level of visual effect of **Moderate to Major Adverse**.
- 6.33 Similarly, at LVIA VP5 (within the AONB, just west of Buildwas Abbey), in my opinion the **Minor to Moderate Adverse** level of effect predicted in the LVIA is likely to be **Moderate to Major Adverse**.
- 6.34 The location of LVIA VP8 is along a track c. 1.5km north west of the site. The track forms part of an old, probably ancient routeway running south east - north west via the bridleway bisecting the site, and Buildwas Abbey.
- 6.35 The LVIA predicts that effects on receptors at this point would be **Negligible**, partly due to the angle of view and it being '*heavily enclosed by dense mature hedgerows*' (note the LVIA illustrates a summer view with full leaf cover). However, the LVIA did not consider effects on views from key viewpoints along the nearby Shropshire Way long-distance trail (many visual receptors using it are of High sensitivity).
- 6.36 The photograph overleaf (zoomed-in) was taken from a point on the Trail c. 100m north east of VP8.
- 6.37 This viewpoint is c. 1.9km due north of the residential development proposed on the western greenfield sector of the site. From here, the difference in character and quality between the brownfield land to the east of the bridleway through the site, and the greenfield land to the west, is very clear - as is the considerable extent of the adverse landscape and visual effects that would arise if the arable fields were developed.
- 6.38 My assessment concluded that here, residential development on the western greenfield sector of the site would give rise to a **Major Adverse** level of visual effect.

View from Shropshire Way looking south



- 6.39 Another key view that was not identified or assessed in the LVIA is from a viewpoint along the B4380, c. 2.4km north west of the site.
- 6.40 As with the previous example, the difference in character and quality between brownfield and greenfield land, and the unsettled nature of the surrounding landscape context, are very clear from this point, as are the extent and likely degree of adverse landscape and visual effects.

View from B4380 looking south east (zoom lens, photo courtesy of SHAONBP)



- 6.41 In the LVIA, effects on views experienced by people walking along the rights of way through the site are predicted to be **Moderate to Major Adverse**; however, in some cases there would be total loss of high quality and value views, resulting in **Major Adverse** effects, for example, along the bridleway (see photo overleaf).

View looking north west along bridleway bisecting site



- 6.42 An important point to bear in mind when considering effects on views is the role played by both existing and proposed vegetation, and whether it is 'safe' to rely on its screening properties.
- 6.43 The long-term future of trees and hedgerows cannot be guaranteed. Plantation woodlands may be nearing the ends of their useful lives. Several native and ornamental species are suffering from pests and diseases - there are currently concerns about the potentially devastating effects of 'acute oak decline' and oak processionary moth, ash dieback, horse chestnut canker, the Asian longhorn beetle and Phytophthora amongst others. Old age, deliberate (authorised / unauthorised) removal, pollution and accidents can also result in the loss of vegetation.
- 6.44 Potential effects arising from new development should therefore be considered in the light of the fact that there is no certainty that what is there now, or what is planted in the future, will survive. Landscape and visual assessments should establish whether there is physical 'interinfluence' / association / relationship between one feature / place and another (whether intended / beneficial or otherwise), which is there regardless of any intervening screening vegetation.
- 6.45 Levels of adverse visual effects can be reduced through measures such as good design, especially choice of colour and materials - see recommendations below.

SIGNIFICANCE

- 6.46 When a development is categorised as 'EIA' development, as is the case here, it is necessary for the applicant to state which of the predicted effects - whether positive or negative - are considered to be 'significant'.
- 6.47 The LVIA has considered 'significance', but has not adopted the correct approach: para. 6.2.54 states '*For both landscape and visual effects, the final conclusions on the significance of an effect is based on the combination of sensitivity of receptor and magnitude of change (or impact)*'. Para. 6.6.32 states, '*The overall significance of effect for the site in its local context is judged to be 'minor to moderate' adverse*'.
- 6.48 In 2013, the Landscape Institute published *GLVIA3 Statement of Clarification 1/13 10-06-13*, which explains how significance is derived as follows:

3 Significance

Concerning 'significance', it is for the assessor to define what the assessor considers significant. Members may find the following helpful:

In simple terms, assume an environment (A). Then assume a proposed development (B). B is placed into A and, as a result, gives rise to impacts which permit the identification of effects of various sorts. The level of, or degree of, effect may then be judged. This may be achieved, for example, by determining magnitude and registering it against sensitivity, each as defined in GLVIA3 in Paras 3.23 to 3.30.

Depending on the means of judgement and terminology (which should be explicitly set out), effects of varying degrees of change (or levels of change), may be derived.

The assessor should then establish (and it is for the assessor to decide and explain) the degree or level of change that is considered to be significant.

- 6.49 The 'threshold' above which an effect is deemed to be significant is usually 'set' at the start of the ES and is the same for all topics, although occasionally it is different for each topic. For example, the Archaeology chapter of the applicant's ES states: '*For the purposes of this assessment, any effects with a significance level of minor or less have been concluded to be "not significant" in terms of the EIA Regulations*' (see also associated Table 9.3).
- 6.50 In other words, effects at a level of Moderate or higher are 'significant'.
- 6.51 On that basis, a level of effect of **Moderate to Major Adverse** on 'the site in its local landscape context' would be '**significant**'. Despite the error in the process, unsurprisingly, the LVIA concludes that the **Minor to Moderate Adverse** level of effect it predicts would not be significant.

7. Conclusions and Recommendations

CONCLUSIONS

- 7.1 The applicant's assessment of the landscape and visual effects to which the proposed development would give rise has assumed that the character of the application site is homogenous, i.e. brownfield / previously-developed land. Indeed, throughout the submitted documents, the proposals are called '*the redevelopment of the former Ironbridge power station*', which is described as occupying 'the majority' of the 144ha site.
- 7.2 In fact, excluding the existing woodland areas within the site but including the old playing fields, approximately 58ha of the site are 'greenfield', and c. 72ha are 'brownfield'.
- 7.3 Instead of dividing the site into two distinct character areas as per the actual baseline situation and assessing / reporting effects separately, the LVIA treats the whole site as a brownfield area and reports the results accordingly.
- 7.4 The LVIA justifies the categorisation of the western greenfield sectors of the site as brownfield by assuming that the proposed sand and gravel extraction works in that location, which are the subject of a separate application, are complete, and the land has been restored.
- 7.5 The sand and gravel extraction works entail the creation of 'platforms' and a min. 20m high 1:2 / 1:3 engineered slope. However, the extracted areas would be restored to agricultural use. Therefore, despite the permanent scars, the land would still display rural greenfield characteristics (especially when seen from more distant viewpoints), in contrast to the industrial character of the former power station land in the eastern sector of the site.
- 7.6 With the 'imagined future scenario' of the restored extraction areas as the starting point for the baseline studies for the western sector of the site, inevitably, the LVIA has underestimated current levels of landscape and visual value, sensitivity to change, sensitivity and magnitudes of effect, and thus, levels of overall effects in that area.

- 7.7 In the light of the above, the LVIA's conclusion is that '*Overall, the proposed development will result in some limited impacts at a localised level*' (a **Minor to Moderate Adverse** level of effect on the site and its local landscape context, which includes the Shropshire Hills AONB), and the only 'significant' adverse effects would be on views experienced by people using rights of way crossing the site.
- 7.8 My own assessment took the *existing* baseline situation as the starting point. It found that the traditional rural landscapes in the western sector of the site are at least of **Medium to High** sensitivity, as opposed to the LVIA's **Low to Medium**. They are an important and integral part of the AONB's setting. They provide the context for, and reflect, the special character and qualities of the AONB, contributing to an understanding of, and engendering respect for, the area's natural and cultural history.
- 7.9 I concluded that development of the greenfield western sectors of the site would give rise to a level of effect on the site and its local context of **at least Moderate to Major Adverse**. The majority of the effects on character could not be mitigated.
- 7.10 The western sectors of the site are also an integral part of the high quality panoramas which give views from the Shropshire Hills their iconic status and national importance. At certain key viewpoints, visual effects are likely to be **Major Adverse**.
- 7.11 In my experience, effects of Moderate and higher may be categorised as '**Significant**'.
- 7.12 In summary, in my opinion, the proposed development would have undue consequences for the maintenance of the baseline situation, and would not comply with the relevant landscape planning policies and strategies.

RECOMMENDATIONS

- 7.13 Ideally, the application for the proposed sand and gravel extraction works should be amended to exclude the proposed residential platforms and engineered embankment; the land should be returned to a natural profile.
- 7.14 Unless the sand and gravel extraction application is approved in its current form, a new LVIA for the mixed-use application should be carried out on the basis of the western sector of the site being undisturbed greenfield land. The new LVIA should also factor in comments made by SHAONBP and other consultees / stakeholders. This should result in more objective, evidence-based decisions.
- 7.15 Unless part of the proposed scheme / works / enhancements, the sections of woodland (SSSI) within the southern parts of the site should be excluded from the application site.
- 7.16 The same could apply to the two arable fields at the westernmost end of the site; however, if the development was approved in its current form, it may be worth considering planting them up as new native woodland - within this Wooded Estate lands LCT, '*Large, often prominently located woods of ancient semi-natural character form one of the defining characteristics of this landscape type*'. In the long-term, this could help to screen some views from the south west / west (but see note above about not relying on vegetation to screen).
- 7.17 Also, if the woodland was publicly accessible, it should help to alleviate some of the pressure / disturbance / erosion likely to adversely affect the highly sensitive habitats in the woods (SSSI) to the south.
- 7.18 New tree planting should not only be appropriate, and characteristic of the locality in which it is proposed, but should also be as long-lived and resilient as possible.
- 7.19 If the proposed development was approved, in its current or other form, an Environmental Colour Assessment (ECA) should be carried out to inform the final selection of external colours and materials. Suggested wording for a condition requiring an ECA is provided below.

- 7.20 The proposals include new 'pedestrian and / or cycle connectivity' routes. One is shown running along the line of the dismantled railway which crosses the site from the river to the site's south-western end; however, there is currently no onward connection to existing rights of way from that point. If the scheme was approved, subject to feasibility / negotiation with landowners, it may be possible to create a link from the end of the proposed route to the existing network.

ENVIRONMENTAL COLOUR ASSESSMENT

- 7.21 Ideally, environmental colour assessments⁵ (ECAs) should be carried out at an early stage in the planning process, *alongside* landscape and visual assessments. They should be an integral part of / reference for the design process from conception to completion.
- 7.22 The wording of the condition below is generic, but I note that in Shropshire Council's *Site Allocations and Management of Development (SAMDev) Plan* (Adopted Plan December 2015), Policy MD2: Sustainable Design para. 2ii states that in order for a development proposal to be considered acceptable, it is required to '*contribute to and respect locally-distinctive or valued character and existing amenity value by... reflecting locally-characteristic... colour*'.

Example of ECA Planning Condition (Generic)

Prior to the commencement of development, an Environmental Colour Assessment (ECA) shall be carried out, submitted to, and approved in writing by, the Local Planning Authority.

The ECA shall be carried in accordance with published techniques by a practitioner with proven experience in the field, and the proposed scope and method shall be agreed with the Local Planning Authority before starting the ECA (which may be carried out as a whole or divided into stages and / or landscape 'zones').

The approved ECA/s and associated developed palettes shall be used to inform all stages of the development from inception to completion, and shall determine the selection and application of all external materials including perimeter / boundary treatments, 'street furniture', and hard and soft landscaping.

Samples of the proposed external facings, roofing, surfacing and other materials to be used in the construction of the permitted development shall firstly be assembled together on the site so they can be considered within the established contextual landscape colour palette/s and adjusted if necessary, the process to include consultation with the Local Planning Authority.

Agreed samples, and trade descriptions, shall be submitted to and approved in writing by the Local Planning Authority prior to any construction works taking place.

The development shall be carried out in accordance with the approved detail. Any variations to specifications must be agreed with the Local Planning Authority in advance of construction commencing.

Reason: *To ensure the satisfactory appearance of the development in accordance with Policy ABC of the Local Development Plan.*

Carly Tinkler BA CMLI FRSA MIALE March 2020

⁵ For further information about ECA see <https://www.landscapeinstitute.org/technical-resource/environmental-colour-assessment/>, and the Malvern Hills AONB Partnership's *Guidance on the selection and use of colour in development* https://www.malvernhillsaonb.org.uk/wp-content/uploads/2015/02/guidance_on_colour_use_screen.pdf