

'DRAFT LOCAL PLAN SUPPLEMENTARY CONSULTATION' RESPONSE

SOLIHULL COUNCIL LOCAL PLAN REVIEW

BLUE LAKE ROAD – AMBER SITE

ON BEHALF OF AMBER REI LIMITED

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Prepared by: Pegasus Group

Pegasus Group

5 The Priory | Old London Road | Canwell | Sutton Coldfield | B75 5SH

T 0121 308 9570 | **F** 0121 323 2215 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester
PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

©Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	AMBER SITES- THE CONCEPT	2
3.	SITE SELECTION PROCESS	3
4.	LANDSCAPE AND VISUAL APPRAISAL	4
5.	TRANSPORT CONSIDERATIONS	6
6.	CONCLUSION	7

APPENDICES:

APPENDIX A: LANDSCAPE AND VISUAL STATEMENT WITH GREEN BELT REVIEW

APPENDIX B: TRANSPORT NOTE

1. INTRODUCTION

- 1.1 Pegasus Group are instructed by Amber REI Limited to consider the appropriateness of the proposed 'Amber Sites'. These representations relate to question 38 of the Draft Local Plan Supplementary Consultation. In particular the representations made relate to the land known as Land off Blue Lake Road, Dorridge (Reference A5).
- 1.2 Chapter 15 of the Draft Local Plan Supplementary Consultation identifies the Amber sites. It indicates that during the process where the Council assessed submitted sites:
- 1.3 "in carrying out this assessment it should be noted that of the sites that have not been included, some nevertheless performed better than others. As part of the supplementary consultation the Council believe it is useful to identify these 'less harmful' sites (that are shown as Amber) so that residents and stakeholders are able to comment on their omission, and whether this is justified."
- 1.4 Chapter 15 of the Draft Local Plan identifies seven sites which are classified as Amber.
- 1.5 Question 38 states

Do you have any comments on these Amber sites, i.e. is it right that they should be omitted, or do you believe they should be included, if so why?

2. AMBER SITES- THE CONCEPT

- 2.1 In addition to the specifics of question 38 the Council should also be asking whether it is appropriate to include Amber sites at all. The Amber sites are not identified as having any particular purpose, other than the Council concludes that if developed they are less harmful than others. Notwithstanding the dispute between representations made in this response relative to the site identified as Land off Blue Lake Road, the whole concept of Amber sites is considered to be flawed.
- 2.2 Whilst not explicit, the inference in the document is that the Amber sites would be removed from the Green Belt and identified as reserve sites, to be brought forward if other sites do not deliver the amount of development anticipated or if the Local Plan as a whole is found to under provide for housing. This is not an appropriate way to set out the Council's vision for development within the Borough up to 2035. The Council should be making specific provision for its development requirements and not including a spurious concept such as the Amber designation within the Local Plan. As a result the Amber designation should be removed from the Local Plan as a concept. With regards to the site at Blue Lake Road this should be retained within the Green Belt for the clear reasons set out in the following representation.

3. SITE SELECTION PROCESS

- 3.1 The methodology that has been utilised for the site selection process has been considered in the Landscape and Visual Statement and Green Belt Review Paper included as Appendix A.
- 3.2 It is evident, as detailed within the accompanying Landscape and Visual Statement that the methodology utilised in the site selection process has not been applied consistently and robustly across all of the sites that have been put forward.
- 3.3 In reviewing the Council's approach, concern is raised relative to scoring of sites where ribbon development is present. It would appear that the Council 'mark down' sites where ribbon development is present when considering their role in the landscape and Green Belt. However, it is clear that some areas of ribbon development, such as along Grove Road, are distinctly rural in character and should not be marked down in this way. To distinguish between these differing areas requires a detailed site analysis as has been undertaken in Appendix A.
- 3.4 In particular these representations have demonstrated that the approach of the Council in scoring the Blue Lake Road Amber site with a score of 4 is flawed. Following the detailed on site assessment contained in Appendix A, the site should more appropriately scored as a 9. This would recognise its role in the Green Belt, landscape and setting of the settlement. This is demonstrated in more detail in the subsequent paragraphs.

4. LANDSCAPE AND VISUAL APPRAISAL

4.1 Pegasus Group have prepared a Landscape and Visual Statement which reviews the Green Belt and the landscape and visual character of the site (Appendix A). This has involved a high level of review of the approach taken by the Council on Green Belt matters. In particular it considers how sites have been taken forward through the strategic site selection process and focuses on land to the south of Knowle and east of Dorridge. This assessment is based on the physical consideration of the site following detailed site visits. This would appear to contrast with the approach taken in the Strategic Green Belt Assessment (2016) which would seem to be based upon a two-dimensional, desk-based approach.

4.2 The approach taken in the appraisal was as follows:

4.3 Firstly, a review of the evidence base documents in respect of Green Belt matters, including consideration of the approach and methodology applied in the Green Belt Assessment (2016) and its robustness. This includes a review as to how this has been carried forward to more recent site assessment work (undertaken in 2019);

4.4 Secondly, a more detailed review of the appraisal findings in respect of the 'land parcels' or 'assessment sites' that are defined by the evidence base for the land. This stage considers the subjective nature of the appraisal findings; and

4.5 Thirdly, an appraisal of the proposals to include this part of the landscape as an 'Amber site' considered in the context of the constraints, opportunities and landscape character of this part of the landscape and to what degree these would alter any subjective scoring based on consideration of landscape and visual influences.

4.6 The Pegasus Landscape and Visual Statement has drawn upon the evidence provided by the Council but also undertaken its own independent assessment of the Blue Lake Road site. It notes the following:

- The site is located within an area that is identified by the Council of medium sensitivity, with valued characteristics and low capacity for development
- The Council's landscape character guidance notes that a large proportion of a character area remains unspoilt and distinctly rural in character
- Detailed fieldwork identifies how elevated parts of the landscape present wider reaching views across a boarder landscape

- Overall the nature of the local landscape character suggests that the environmental and amenity value of the area forms a constraint to development
- Characteristics of preventing unrestricted sprawl and safe guarding the countryside are clearly evident

4.7 In view of the above it is clear that the Council's own evidence base has identified that the site fulfils key Green Belt purposes to check the unrestricted sprawl and safeguarding the countryside.

4.8 In addition Pegasus Group have reviewed the Council's appraisal of the site in the Strategic Green Belt Assessment. As set out in section 3 there are considerable concerns over the Council's approach to weighing sites in the assessment where there is ribbon development present such as Grove Road.

4.9 The review of the Strategic Green Belt Assessment (SGBA) for the site by Pegasus Group has shown that rather than a score of 4 provided by the Council, a more realistic score would be 9. If the Pegasus revised score was utilised then the Blue Lake Road site would not fall within the Amber categorisation, as in reality the site would be placed firmly within the Red category. This more realistically reflects the characteristics of the site and would recognise the potential for severe and widespread impacts that would not be outweighed by the benefits. As a consequence the proposal should be retained within the Green Belt, as set out in Appendix A. It clearly performs an important Green Belt function in checking urban sprawl and safeguarding the countryside. It therefore follows that it should not be included within the Amber categorisation.

5. TRANSPORT CONSIDERATIONS

- 5.1 The transport note provided by BWB Consulting identifies that development of both the allocation site at Blue Lake Road Amber site along with the development of the Arden Triangle (which is subject to separate representations) will generate around 500-600 vehicles during peak hour traffic. This level of traffic increase is likely to have implications on the local highway network and will require full assessment and mitigation. The transport note identifies that if the two sites are allocated, a large proportion of generated peak hour traffic will route via Knowle High Street to the M42 and beyond. Knowle High Street is identified as being 6 metres wide and subject to frequent congestion. The High Street has been identified as not being suitable for such increases in traffic.
- 5.2 In addition, as set out in the transport note the level of traffic increase in the location of the Arden Triangle and Amber site will require mitigation. This mitigation inevitably will result in an impact on other considerations including landscape character as a consequence of widening of roads, providing visibility displays and allowing for public transport penetration. All the mitigation required will have a significant impact on the character of the area which is already been identified as being sensitive and which merits retention in the Green Belt. In view of these circumstances, particularly the role that the Blue Lake Road site has in the Green Belt and character of the landscape surrounding Dorridge, there is even less justification for its release from the Green Belt. It would be remiss of the Council to release it from the Green Belt for development, where access constraints are severe and the associated transport mitigation would cause significant harm to landscape character.
- 5.3 In order to provide adequate provision for transport, significant improvements will be required to the road network which will inevitably have adverse consequences on other factors such as landscape character. In view of the sensitive nature of the site and its clear role in Green Belt terms, this further weighs against its categorisation as an Amber site

6. CONCLUSION

- 6.1 In view of the above it is considered that the concept of Amber sites is entirely spurious, and these should be removed from the Local Plan. The plan should focus on providing the appropriate development within the Borough up to 2035 and not include unallocated but nevertheless seemingly targeted sites which could be utilised for new development. This is not an appropriate concept for a Local Plan which in accordance with the NPPF should provide a positive vision for the future of each area.
- 6.2 Pegasus Group have undertaken a specific analysis of the Amber site at Blue Lake Road. This has demonstrated that the site performs an important Green Belt function in checking the unrestricted sprawl of a large built up areas and safeguarding the countryside from encroachment.
- 6.3 In addition, the Pegasus Landscape and Visual Statement has reassessed the Council's scoring of the site in the SGBA and concluded that it should be scored more highly as 9, which would put it firmly in the Red category, which recognises the potential for severe and widespread impacts that would result from development of the Amber site at Blue Lake Road.
- 6.4 In addition, an assessment of the potential development of the site from a transport perspective has also concluded that significant impacts would result from the need to provide for suitable access and this again would compound the harm to what is clearly a sensitive site. In particular the BWB transport note has demonstrated that both access to the site would be difficult due to the nature of surrounding roads, furthermore the improvements which would be required to the local road network would have a very significant impact on the character of the area, resulting in further harm to this sensitive area which has an important role on an edge of Dorridge.
- 6.5 In view of the above it is clear that the Blue Lake Road site is not suitable for inclusion within the Amber category should be retained within the Green Belt.

APPENDIX A

LANDSCAPE AND VISUAL STATEMENT WITH GREEN BELT REVIEW

REPRESENTATIONS TO SOLIHULL METROPOLITAN BOROUGH COUNCIL

LANDSCAPE AND VISUAL STATEMENT: REVIEW OF GREEN BELT ISSUES

LAND WEST OF NORTON GREEN LANE, DORRIDGE

ON BEHALF OF AMBER REI LTD

Pegasus Group

5 The Priory | London Road | Canwell | Sutton Coldfield | West Midlands | B75 5SH

T 0121 308 9570 | **F** 0121 323 2215 | **W** www.pegasuspg.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

CONTENTS

1. INTRODUCTION	2
2. LOCAL PLAN EVIDENCE BASE	6
3. REVIEW OF SITE SELECTION PROCESS	14
4. SUMMARY AND CONCLUSION	17

1. INTRODUCTION

Overview

1.1. Pegasus Group has been instructed by Amber REI Ltd to undertake a high-level review of the approach taken by SMBC on Green Belt matters. This considers how sites have been taken forward to the strategic site selection process, with a particular focus on land to the south of Knowle and east of Dorridge.

Green Belt and the NPPF

1.2. The boundary between Solihull Metropolitan Borough and the adjacent area of Warwick District is broadly aligned with a local watercourse which flows just east of Norton Green Lane. Notwithstanding the administrative boundary, the landscape in this area is washed over by Green Belt, with Dorridge and Knowle together, and Balsall Common further east, forming 'islands' of settlement pattern within the wider Green Belt coverage.

1.3. The Green Belt is at its narrowest where it forms a corridor between the settlement edges of Solihull and Knowle/Dorridge. The remaining Green Belt area is extensive, extending broadly down toward Leamington Spa. Across this area there is considerable variation in the character of the landscape, including variation in its inherent landscape value, and sensitivity.

1.4. The NPPF attaches 'great importance' to Green Belts. Section 13 of the NPPF (2019) addresses Green Belt matters, noting the fundamental aim of preventing urban sprawl by keeping land permanently open. The Framework also notes that the essential characteristics of Green Belts are their openness and their permanence.

1.5. The Framework goes on to set out the long-established 'five' purposes of Green Belt, namely¹:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

¹ Para 134, NPPF (2019)

- 1.6. In respect of conserving and enhancing the natural environment, the NPPF states that plans should 'allocate the land with the least environmental or amenity value', noting the need to be consistent with other policies in the Framework².
- 1.7. Overall the importance of Green Belt is clear, as are the connections to landscape and visual matters in respect of understanding the physical attributes, character and visual amenity of a given landscape.

Local Plan Review

- 1.8. Solihull Metropolitan Borough Council (SMBC) adopted their current local plan, the 'Solihull Local Plan', in December 2013. SMBC is undertaking a Local Plan Review (LPR) so as to ensure that an up to date planning framework is in place that addresses potential issues.
- 1.9. Consultation on a supplementary update to the Draft Local Plan (DLP) commenced at the end of January 2019. SMBC state that the consultation is seeking to:
 - provide an update on local housing need now that national planning policy has changed through the introduction of a standard methodology;
 - assess the 70+ additional call-for-sites submissions that have been submitted since the DLP was published;
 - refine the site selection process for assessing which sites should be included in the plan and reassess all sites (c. 320) to ensure that the preferred sites are the most appropriate when considered against the spatial strategy, and existing/new or updated evidence;
 - publishing concept masterplans for the principal allocations;
 - exploring a different approach to calculating how affordable housing provision should be calculated on an individual site; and
 - setting out the role of the main settlements in the future and seeking views on the existing pressures and future requirements for infrastructure provision.
- 1.10. The evidence base to the Local Plan includes several documents related to the strategic selection of sites and the Green Belt context to Solihull. These documents have informed the selection of strategic sites to be brought forward under the draft Local Plan.
- 1.11. Those referred to as part of this landscape and visual statement include:

² Para 171, NPPF (2019)

- Solihull Borough Landscape Character Assessment (for SMBC) (December 2016);
- Solihull Strategic Green Belt Assessment, Assessment Report (July 2016);
- Draft Local Plan Supplementary Consultation (January 2019);
- Draft Local Plan Supplementary Consultation: Site Assessments (January 2019);
- Draft Local Plan Supplementary Consultation: Amber Sites (January 2019); and
- Solihull Local Plan Review, Draft Concept Masterplans, Site 9 South of Knowle (January 2019).

1.12. Further details of these documents and their content is set out later in this landscape and visual statement.

1.13. Reference has also been made to additional sources of data and information, for example (but not limited to) Ordnance Survey mapping, aerial photography and landscape character studies.

1.14. Whilst Green Belt is not a 'landscape' policy as such, there is an inherent connection between Green Belt matters and those relating to landscape and visual issues, particularly in respect of considering landscape enclosure and defining the physical attributes of a landscape.

1.15. Principles related to the appraisal and assessment of landscape and visual matters are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)³ and reference is made to this document as necessary.

Terms of reference

1.16. In respect of the context set out above, Pegasus Group has undertaken a strategic review of an area of landscape located to the south of Knowle and east of Dorridge, at a point where the role and function of the Green Belt is paramount in protecting the openness of the wider countryside in this area and preventing further encroachment of the urban environment into the wider landscape.

1.17. The area of landscape under consideration is defined by the existing settlement edge of Dorridge to the west; Grove Road to the north; Norton Green Lane to the east; and, Blue Lake Road to the south.

³ Landscape Institute and Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment 3rd Edition (April, 2013)

1.18. This has been undertaken and presented broadly in three stages:

- firstly, comprising a review of the evidence base documents in respect of Green Belt matters, including consideration of the approach and methodology applied in the Green Belt Assessment (2016) and its robustness. This includes a review as to how this has been carried forward to more recent site assessment work (undertaken in 2019);
- secondly, a more detailed review of the appraisal findings in respect of the 'land parcels' or 'assessment sites' that are defined by the evidence base for the land. This stage considers the subjective nature of the appraisal findings; and
- thirdly, an appraisal of the proposals to include this part of the landscape as an 'amber site' considered in the context of the constraints, opportunities and landscape character of this part of the landscape and to what degree these would alter any subjective scoring based on consideration of landscape and visual influences.

1.19. This statement then goes on to present a summary of recommendations related to the 'amber' site and the appropriateness or otherwise of releasing this land from the Green Belt.

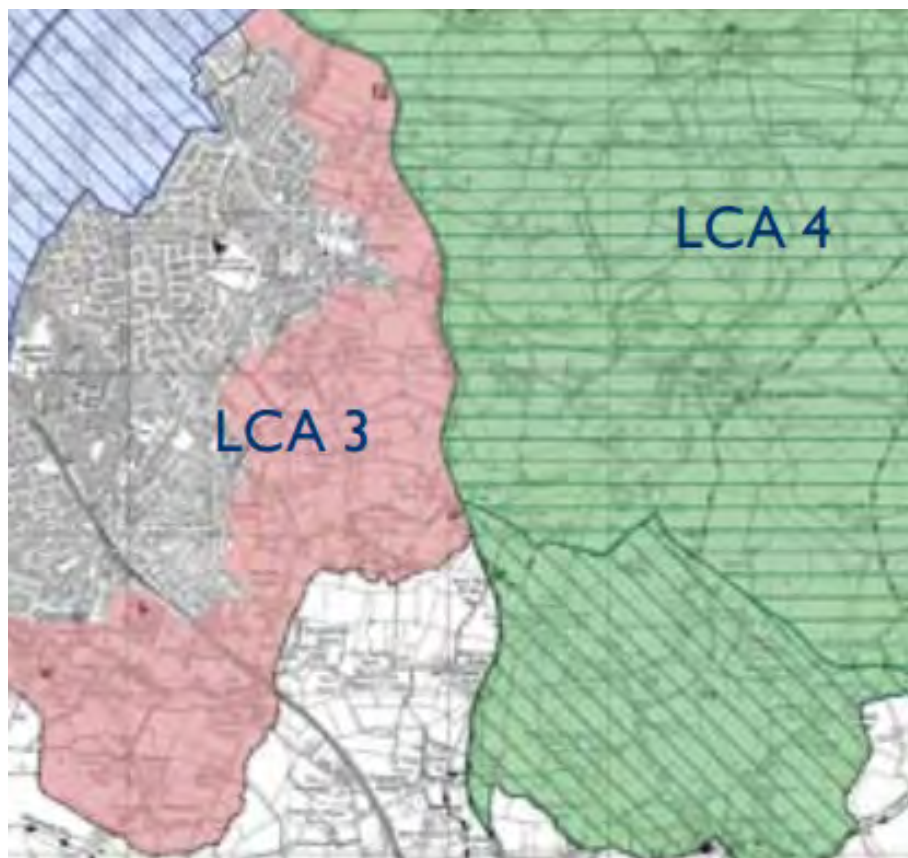
2. LOCAL PLAN EVIDENCE BASE

- 2.1. The evidence base to the Local Plan includes several studies in relation to Landscape Character and Green Belt matters.
- 2.2. A contextual overview of each document is presented below, along with a summary on perceived weaknesses or inconsistencies in the approach, appraisal and/or conclusions.

Solihull MBC Landscape Character Assessment (2016)

- 2.3. This section of the landscape and visual statement considers the landscape and visual baseline by reference to the landscape character area prepared for the Borough.
- 2.4. The 'Solihull Borough Landscape Character Assessment' (prepared by Watermans on behalf of SMBC) defines the character of the landscape in this area as 'LCA3, the Knowle and Dorridge Fringe' with a transition to the east into 'LCA4, the Rural Centre' (refer to **Plate 1**).

Plate 1: Extract from the Solihull Landscape Character Assessment



- 2.5. The boundary between the two character areas is defined based broadly on the physical alignment of the Grand Union Canal. However, on the ground the interplay between other 'layers' of the physical landscape, including the undulating landform, consistent field patterns, tree belts, hedgerows and woodland vegetation (with remnant areas of parkland/estate land) all contribute to a consistent landscape character at a local level. This consistent local character of the rural area extends across the physical alignment of the Grand Union Canal and away from the settlement edge. In this area the presence of settlement pattern is an integral part of the rural character, but limited to scattered properties and farmsteads (with the urban edge of Knowle and Dorridge not generally prominent).
- 2.6. In respect of LCA3, the character assessment acknowledges that the urban influence of Knowle and Dorridge is more prominent in the northern part of the LCA but states that:
- 2.7. *"A large proportion of the character area remains unspoilt and is distinctively rural in character with pastoral fields despite the close proximity of the urban edge."* (page 26)
- 2.8. The LCA sets out a series of sensitivities and pressures, which include reference to:
- Possible increase pressure for access to open countryside from edge of Knowle and Dorridge may impact upon the rural character of the area; and
 - Pressure for development close to the urban edge of Knowle and Dorridge. Further development is likely to result in encroachment into the rural area as evident at the edge of Knowle.
- 2.9. In summarising the character of the LCA, the character assessment notes that: (page 29)
- This is a landscape with a strong sense of local connection to the place, defining landscape features and a characteristic pattern;
 - That single track roads and winding lanes enhance rural character of the area and the pastoral character in some parts add to local distinctiveness;
 - This is a locally distinctive landscape containing valued characteristics;
 - The overall sensitivity of LCA3 is defined as 'medium', with landscape value also being determined as 'medium'.
- 2.10. In respect of visual sensitivity, whilst the character assessment states that the general visibility in this LCA is contained, short distance and low level, it does note that the urban interface with Dorridge is well screened. Furthermore, more recent field work

demonstrates that from elevated positions (such as along Grove Road and from the public footpath near Norton Grange), there are longer distance more extensive views across the wider landscape and valleys with little or no reference to the urban areas (refer to **Figures 1 and 2, including Viewpoints 1 and 2**).

- 2.11. The character assessment includes further analysis on the capacity of the landscape (i.e. its potential for development), which is determined to be 'low'.
- 2.12. As previously noted, in respect of 'conserving and enhancing the natural environment' the NPPF states that land with the least environmental or amenity value should be included in plans.
- 2.13. In summary, and in respect of landscape and visual matters, the published landscape character assessment, which forms part of the Council's own evidence base, suggests that this part of the landscape is of medium sensitivity, with valued characteristics and low capacity for development.
- 2.14. These form a clear constraint to development and consequently the land cannot be considered as an area of 'the least environmental or amenity value', nor as an area that should be incorporated into the emerging plan.
- 2.15. Other parts of the evidence base in relation to Green Belt utilise a 'red-amber-green' scoring system for sites. Further reference is made to the conclusions on landscape character in later stages of this landscape and visual statement when considering the Green Belt scoring system.

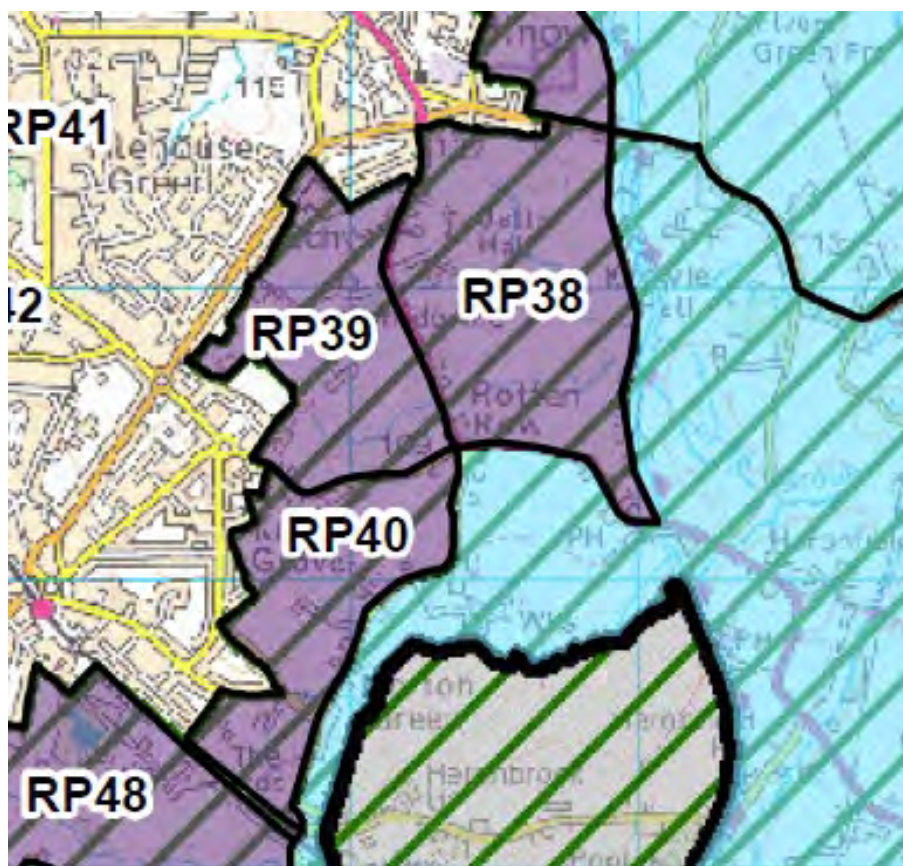
Solihull Strategic Green Belt Assessment (2016)

- 2.16. This document sets out a strategic review of the Green Belt in Solihull. The document states that:
- 2.17. *"Once complete, this Assessment will form the basis for more detailed assessment of Green Belt land within the Borough. This more detailed assessment will include consideration of wider criteria including analysis of constraints, spatial strategy, site selection methodology and other policy considerations."* (Page 1)
- 2.18. The document notes some specific exclusions in relation to its scoping, stating that the strategic review: (page 2)
 - Does not assess the development potential of land designated as Green Belt;

- Does not make recommendations for amendments to the Green Belt boundary;
 - Does not determine whether or not land should be removed from the Green Belt.
- 2.19. Consequently, in the absence of any connection to development potential within a given landscape, the strategic review is limited to determining the role and function in Green Belt terms.
- 2.20. The strategic review defines the study area, setting the context of the local landscape character and stating that:
- 2.21. *“The character of the Green Belt varies greatly across the borough with the eastern portion forming part of the vital strategic Meriden Gap - the area of Green Belt separating Birmingham and Solihull from Coventry in the east. This area of the Green Belt is predominantly rural in nature and generally characterised by countryside with smaller settlements scattered across the area. The area also includes the historic settlements of Knowle, Dorridge, Hampton-in-Arden, Meriden, alongside the smaller historic settlements of Barston, Berkswell and Temple Balsall.” (page 4)*
- 2.22. The strategic review sets out a series of large areas, between settlements, covering wider rural areas that are not located on the edge of settlements (Broad Areas) and also a series of smaller parcels which cover land adjoining or adjacent to built up areas (Refined Parcels).
- 2.23. The weakness in this approach is that it appears to have been implemented in a two dimensional, desk based approach. Consequently, issues of landscape character and the influence of settlement edges on the rural landscape are not properly considered.
- 2.24. For example, the boundary of ‘Broad Area 3’ (relevant to the context of Knowle and Dorridge) appears to have been drawn based on mapping and the local road network. The land between Broad Area 3 and the built settlement edge is included as Refined Parcels 38, 39 and 40.
- 2.25. However, based on high level field work, the land west of Norton Green Lane remains very distinct from the settlement with little or no inter-visibility to the residential areas that form the settlement edge. Consequently, the character is wholly rural and consistent with the wider Broad Area 3.
- 2.26. This is reinforced by the landscape character assessment for the District, as discussed above.

2.27. Notwithstanding this issue, the following sections go on to review the Refined Parcels, particularly RP40 which incorporates the land subject of this landscape and visual statement, but also RP39 which is located to the north (refer to **Plate 2**).

Plate 2: Extract from the Solihull Strategic Green Belt Assessment



2.28. The Strategic Green Belt Assessment (SGBA) states that:

2.29. *"Each Refined Parcel and Broad Area has been subject to an assessment against the first four purposes of Green Belt, not assessed against the fifth purpose of Green Belt 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land' as the study notes that '...all Green Belt land makes an equal contribution to this purpose and therefore inclusion of this purpose would add no value to the Assessment...'"*

2.30. The numerical scoring applied in the SGBA is defined as follows:

- 0 - **does not** perform against the purpose;
- 1 – is **lower performing** against the purpose;
- 2 – is **more moderately performing** against the purpose; and
- 3 – is **higher performing** against the purpose.

- 2.31. A brief written justification for each scoring criteria against the four purposes of the Green Belt is set out in the Appendices to the SGBA. Notwithstanding this, there remains an inherent subjectivity to the process, applied at a relatively coarse grade of assessment.
- 2.32. It is considered that the SGBA scoring for RP40 has under-rated some of the scores. The scoring, SGBA justification, critique of this statement and suggested moderation of the score is set out in the following table. The moderation of the scores is based on a more detailed appraisal of the landscape and visual constraints of the site and its context.

Table 1: Re-evaluation of Strategic Green Belt Assessment for RP40

Green Belt Purpose	SGBA Score	SGBA Commentary	Scoring Issues	Adjusted Score
1. Check unrestricted sprawl	1	Ribbon development is present along Grove Road, Norton Green Lane and Blue Lake Road. Development is also present along Darley Green Road.	Although development is present along Grove Road and the eastern edge of Dorridge, the large scale of properties combined with strong vegetation patterns creates a clear and durable settlement boundary with only limited reference to development, particularly in the eastern extent of the RP, and as recorded in published character guidance.	3
2. Prevent merging	1	Refined Parcel RP40 forms part of the gap between Knowle and Balsall Common. (more than 5km)	Eastern parts of the RP (east of the public footpath) are less than 5km from Balsall Common. Potential for visual coalescence from development on higher ground, adjacent to the settlement edge.	2
3. Safeguarding from encroachment	2	Refined Parcel RP40 is partially adjoined by the Dorridge village, however it is characterised by countryside and only very limited development is present.	The settlement edge is well defined and the RP excludes development other than some large scale dwellings and farmsteads, which are characteristic of the wider rural landscape. The RP is entirely consistent with the wider countryside, as acknowledged by	3

			published landscape character guidance.	
4. Preserve setting and special character	0	Refined Parcel RP40 is not within or adjacent to a Conservation Area or historic town.	Published landscape character guidance states that LCA3 forms part of the setting to the Knowle Conservation Area. Three Grade II Listed Buildings are present on the northern and eastern edges of the RP.	1

2.33. The conclusions of the SGBA suggest that they demonstrated that the performance and character of Green Belt land within Solihull MBC varies greatly across the borough when considered against the first four purposes of including land in the Green Belt. (Page 17)

2.34. The highest scoring purpose as assessed by the SGBA was purpose 3 (Scoring 2). Having considered the RP in the context of landscape and visual matters, the SGBA scoring has clearly underrated the role and function of this part of the landscape in the Green Belt. The SGBA concludes a total score of 4 (out of a possible maximum 12).

2.35. Re-considering the four purposes, including justification and reference to other published parts of the evidence base, results in an increase score for the RP, based on a balanced and considered approach to the landscape and visual constraints.

2.36. Such landscape and visual constraints and opportunities for this area include (refer also to **Figure 3, Landscape and Visual Analysis**):

- Landform – with elevated parts of the site being more prominent in the wider landscape, whereby any proposals for built form would be more visible in views across the Green Belt;
- Land use and field patterns – consistent landscape character of the slopes and valleys with an intricate and intact network of field enclosures and well-formed hedgerow boundaries;
- Vegetation – including a strong network of hedgerows, some remnant estate trees;
- Settlement patterns – limited in the rural context to scattered dwellings and with the nearby ‘urban’ edge of Dorridge strongly defined and well screened from the wider landscape, even in close proximity; and
- Access – including public rights of way across the rural landscape with good levels of tranquillity and little or no perception of the nearby settlement areas.

-
- 2.37. Consequently, considering these matters, the total score for RP40 should be increased to 9 (out of a possible maximum of 12).
- 2.38. The under-rating of the score for RP40 is carried through to later documents, including the Draft Local Plan Supplementary Consultation (Site Selection) and the accompanying site assessments.
- 2.39. Furthermore, the SGBA states that 'all purposes considered equal weight and consequently not able to rank against each other'. This suggests that, of the maximum 12 point scoring available, any sub-division of this should be weighted equally.
- 2.40. This weighting of the scores for Green Belt purposes, and under-rating of the RP has relevance in respect of later studies and the site selection process and is a consistent issue in respect of the conclusions drawn within those documents, particularly the inclusion of the land as an 'amber site'. This is considered further in the following sections.

3. REVIEW OF SITE SELECTION PROCESS

Draft Local Plan Supplementary Consultation (January 2019)

- 3.1. The Supplementary Consultation (including Site Assessments) is a non-statutory supplementary consultation to that undertaken previously for the Draft Local Plan (December 2016). The aims of the consultation vary and include updates to housing need, assessment of additional call for sites submissions and refining the site selection process. The consultation draws on the previous evidence base and sets out the site selection process. The document notes that much of the landscape in the area is included in the Green Belt.
- 3.2. This section addresses the approach and methodology taken for the site selection process before considering the conclusion drawn in respect of specific site issues.

Site Selection Methodology

- 3.3. The site selection process of the Draft Local Plan (DLP) Supplementary Consultation is split into two steps, initially based on a 'site hierarchy' and secondly use of 'planning judgement to refine site selections'. The approach notes that it aims to test the appropriateness of sites rather than allocating numbers per settlement.
- 3.4. Clearly any 'judgement' in respect of selecting sites needs to be objective, based on a clear and transparent methodology and applied consistently through the process. Any inconsistent judgements moving away from an objective process would be not be robust.
- 3.5. The approach sets out a site hierarchy, using a scoring system of 1-10. Sites falling within 1-4 are considered 'Green' and should generally be considered suitable for inclusion in the plan.
- 3.6. Sites between 5 and 7 are considered to have potential, but the document notes that these are not 'impact free', and also notes that there is potential for these to impact on the purposes of the Green Belt. These potential sites are sub-divided as scoring 5 (potential inclusion – yellow) and 6 or 7 (unlikely inclusion – blue).
- 3.7. Sites scoring 8-10 are 'Red' and are considered unsuitable.
- 3.8. Notwithstanding this objective criteria based approach, the document states that there may be 'exceptional reasons' why a site should or should not be included, effectively setting out a provision to take Red sites forward, or knock Green sites out, despite their

respective suitability or constraints. This is considered to some extent by the 'Step 2 Site Refinement' process and various considerations which are considered as part of that process, however there is little to support a consistent approach in this process.

- 3.9. A key weakness in the approach to the Site Hierarchy Criteria is the reference to the scoring of Green Belt purposes.
- 3.10. As previously noted, the SGBA scores RP's against the purposes of Green Belt, utilising potential scores of 0 to 3, with no weighting applied between the respective Green Belt purposes. Objectively, the maximum potential score of a RP could be 12. Based on the use of a three step criteria (i.e. lower performing, moderately performing, or highly performing) the objective approach to the maximum score would be to divide this equally (e.g. low 0-4, moderate 5-8, high 9-12).
- 3.11. However, the Site Hierarchy Criteria has artificially moderated these scores, increasing the scoring base to 5 for lower performing Green Belt sites, condensing moderately performing sites to just 6 or 7, and increasing the range for higher performing sites to 8 or more. A lower score in the GBA falls into the 'green' category, whereas all Green Belt issues (i.e. whether lower, moderately or higher performing) fall within the central blue/yellow (or amber) range. This has little purpose in sifting Green Belt sites between the red, amber green categories, relying instead on planning judgement.
- 3.12. The sites falling within the central scoring range are defined as 'Amber' sites. The document states that these will not be included in the plan, but that they are included for comment in relation to their potential harm and appropriateness. Essentially, introducing a subjective stage toward the end of an objective selection process.

Omitted Sites

- 3.13. The DLP Supplementary Consultation proceeds to set out more detail on each settlement area, with reference to proposed allocations and omitted (Amber) sites.
- 3.14. The Site Assessments documents schedules out c. 426 Sites in total, of which 15 are scored (in Step 2, i.e. following refinement criteria based) as 'Amber'. However only seven are included in the separate 'Amber Sites' consultation document, including:
 - Land r/o 575A to 587 Tanworth Lane, Cheswick Green (ref A1)
 - Land at Mount Dairy Farm, Cheswick Green (ref A2)
 - Land r/o of 146 to 152 Tilehouse Lane, Whitlock's End, Tidbury Green (ref A3)

- Golden End Farm, Kenilworth Road, Knowle (ref A4)
- Land off Blue Lake Road, Dorridge (ref A5)
- Rowood Drive, Solihull (ref A6)
- Land r/o 114 to 118 Widney Manor Road, Solihull (ref A7)

3.15. 'Land off Blue Lake Road, Dorridge' is included as an amber site (reference A5) with the documents noting that additional submissions have extended this land further eastwards, and including land at the rear of properties fronting Grove Road and a parcel fronting Norton Green Lane.

3.16. Reference is made to the SGBA scoring of Green Belt purposes, noting that the study defined it as 'lower performing' with an overall score of 4.

Site Assessments

3.17. Further detail on the site assessments is set out in a separate document to the main supplementary consultation. This is presented as a high-level summary of various constraints with a commentary and conclusion that this site (reference 413) is included as Amber.

3.18. This section also refers to the SGBA score of 4.

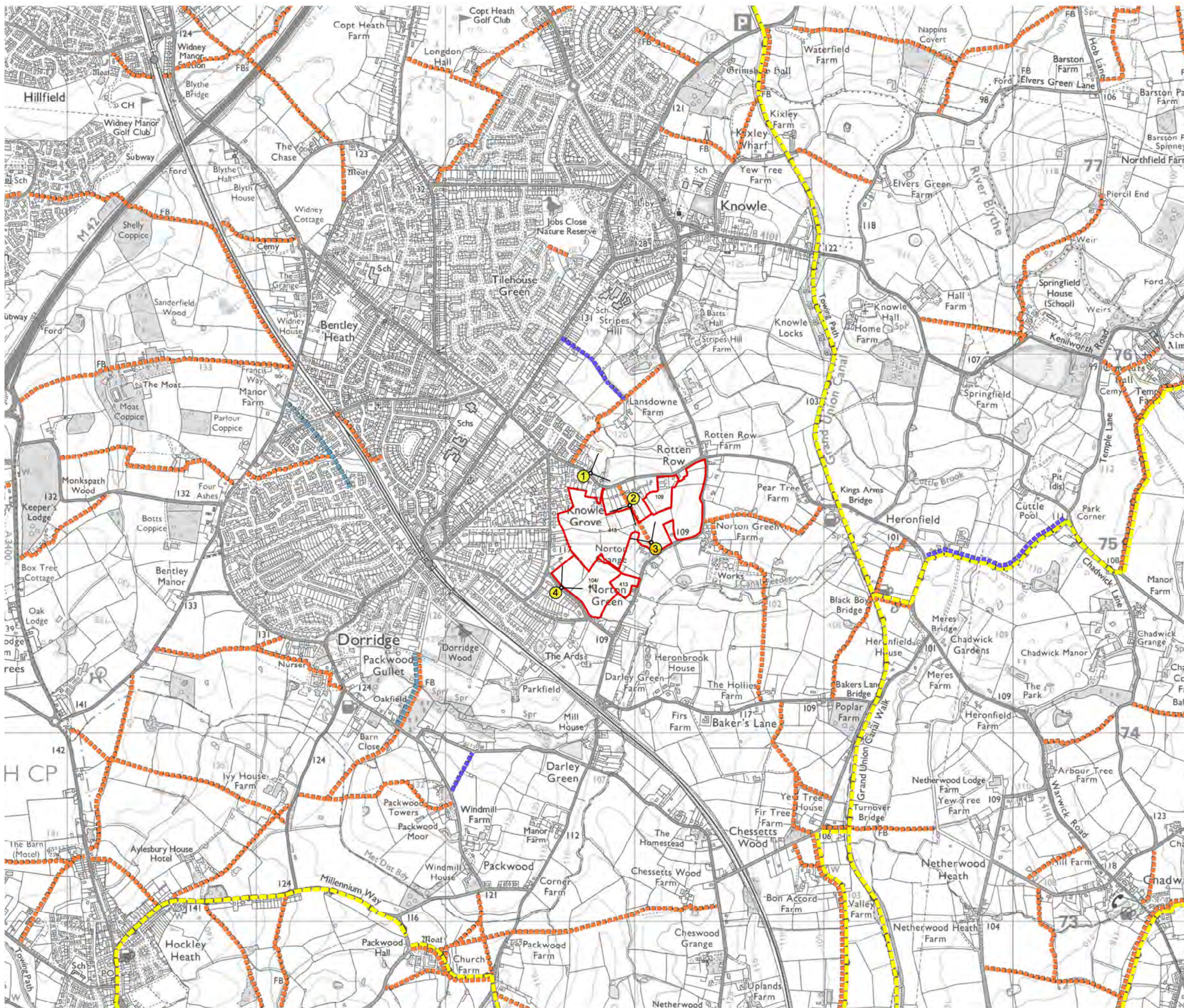
3.19. The summary includes reference to the conclusions of the published Landscape Character Assessment, noting that its landscape character sensitivity and landscape value are each determined to be 'medium' and that the capacity to accommodate change is 'low'.

3.20. The document includes a separate section addressing 'Amber sites' however this includes little new or additional analysis over that presented in the summary sheets, including reference to the SGBA score of 4.







4. SUMMARY AND CONCLUSION

- 4.1. This landscape and visual statement has been prepared in respect of land to the west of Norton Green Lane, Dorridge, and its inclusion on the Solihull MBC Draft Local Plan Supplementary Consultation as an 'Amber' site (reference 413).
- 4.2. The site is located in the Green Belt, a matter which the NPPF attaches 'great importance' to, aiming to prevent urban sprawl by keeping land permanently open. In respect of conserving and enhancing the natural environment, the NPPF states that plans should 'allocate the land with the least environmental or amenity value'.
- 4.3. As such there is an inherent connection between landscape and visual matters and Green Belt and a consequent need to give due consideration to matters of landscape character, sensitivity and value.
- 4.4. The published landscape character guidance for the Borough notes that the site is located within an area that is of medium sensitivity, with valued characteristics and low capacity for development. The character guidance also notes that, notwithstanding its proximity to the urban edge, a large proportion of the character area remains unspoilt and is distinctively rural in character with pastoral fields.
- 4.5. The rural nature of the countryside and lack of visual connection to the settlement edge (despite its proximity) are matters that are clearly evident from field work undertaken in the local landscape, including rights of way which connect Dorridge and Knowle to the surrounding countryside. More detailed field work also identifies how the elevated parts of the landscape present wider reaching views across a broader landscape.
- 4.6. Overall the nature of the local landscape character suggests that the environmental and amenity value of the area form a constraint to development that should be considered in any evaluation of the site.
- 4.7. The evidence base includes an assessment of the landscape and its role and function in relation to the purposes of Green Belt. Whilst this process has made some reference to landscape character, it remains a relatively high level study.
- 4.8. A review of the Strategic Green Belt Assessment (SGBA) has demonstrated how the process of scoring has under-rated the role and function of this part of the landscape, particularly in relation to preventing unrestricted sprawl and safeguarding the countryside.

- 4.9. Overall the SGBA concludes a score of 4, whereas additional analysis based on the published landscape character guidance and supplementary field work demonstrates that the landscape in this area should be scored more highly, as 9.
- 4.10. The key issue of the SGBA scoring is that the lower score of 4 is subsequently carried through to later documents, including the Draft Local Plan Supplementary Consultation (Site Selection) and the accompanying site assessments.
- 4.11. The Supplementary Consultation and Site Assessment documents are also necessarily high level and strategic, including only limited reference back to the evidence base with little new or detailed analysis presented on each site.
- 4.12. The conclusion of these documents are consequently flawed in that they rely on the lower score of 4, subsequently recommending the site as an 'Amber' site, whereas with a high score of 9, the site would be placed firmly in the 'Red' category.
- 4.13. The inclusion of the site in the Red category of the hierarchy would recognise the potential for severe and widespread impacts that would not be outweighed by the benefits and that the site should not come forward in the plan.



KEY

-  Site boundary
-  Representative viewpoints
-  Public footpath
-  Byway open to all traffic
-  Other routes with public access
-  Recreational route

Land West of Norton Green Lane,
Dorridge

Client: AMBER REI LTD

Fig. 1: Viewpoint Locations and Public Rights of Way

Drawing no. : P19-0081_02
 Date : 06/03/2019
 Drawn by : JZA
 Checked by : JWA
 Scale : 1 : 20000 @ A3



Settlement edge heavily filtered

Development on elevated ground would be prominent from the wider Green Belt

Elevated position allows long distance views

Well defined existing settlement edge of Grove Road



Viewpoint 1 | View looking north-east, from high point along Grove Road

Route of public footpath

Rural settlement pattern restricted to larger scale scattered properties

Long distance views to the wider landscape and Green Belt

Some enclosure at a local scale



Viewpoint 2 | View looking south-west from elevated vantage point on the public footpath, south of Grove Road

Land West of Norton Green Lane, Dorridge
Fig. 2: Viewpoint Photographs

Drawing Ref: P19-0081_01
Client: AMBER REI LTD

Date : 04/03/2019
Drawn by : JZA
Checked by : JWA



Route of public footpath

Settlement edge in close proximity but views are heavily screened



Viewpoint 3 | View looking north-west from the public footpath, just west from Norton Green Lane

Well defined existing settlement edge of Dorridge

More elevated topography forms localised highpoints



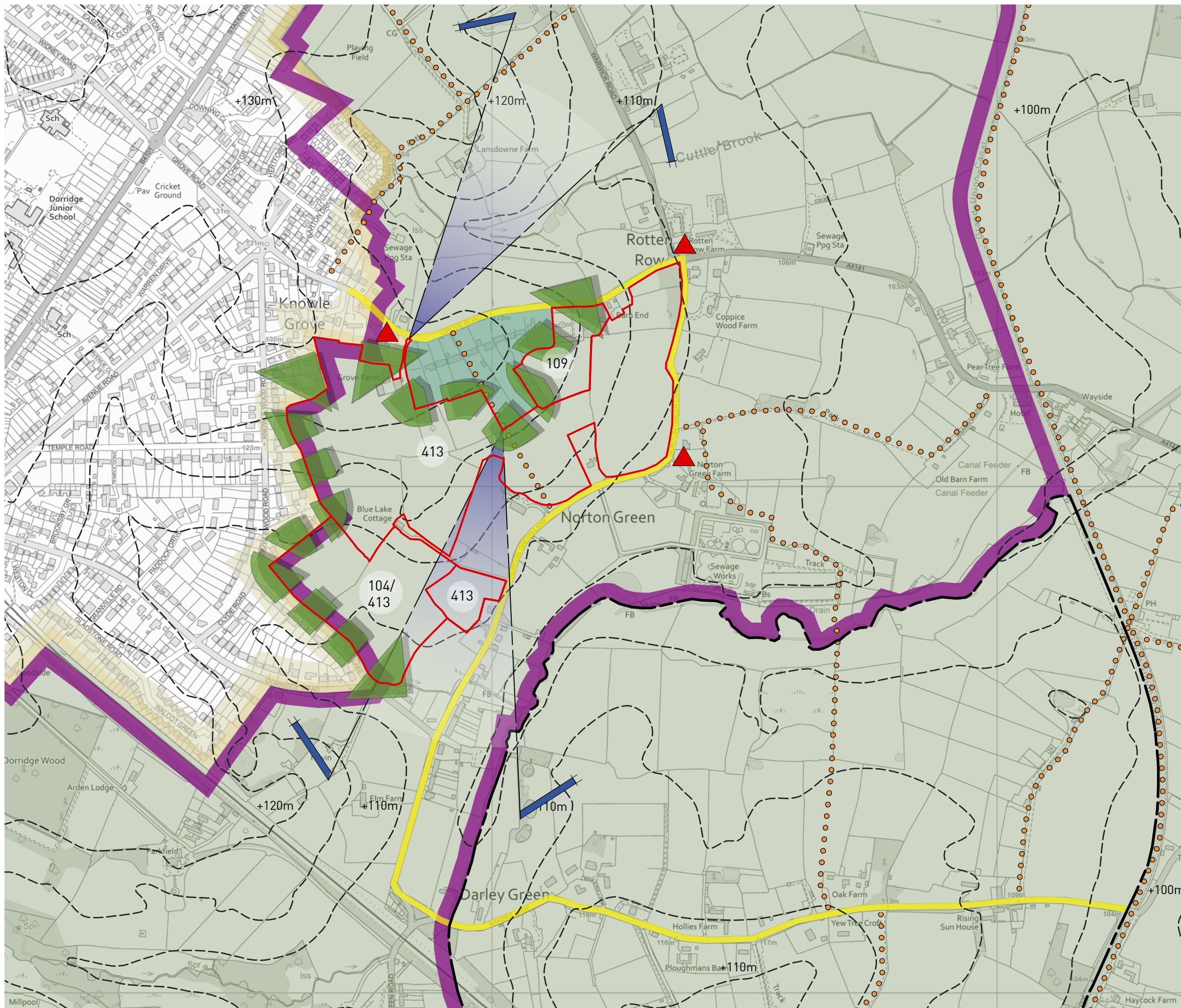
Viewpoint 4 | View looking north-east from Blue Lake Road

Land West of Norton Green Lane, Dorridge
Fig. 2: Viewpoint Photographs

Drawing Ref: P19-0081_01
 Client: AMBER REI LTD

Date : 04/03/2019
 Drawn by : JZA
 Checked by : JWA





- KEY**
-  Site assessment parcels***
 -  LPA boundary**
 -  Contours
 -  Public rights of way
 -  Landscape character area boundary*
 -  Consistent local landscape character
 -  Lane with rural character
 -  Grade II listed buildings**
 -  Settlement edge strongly defined by green infrastructure
 -  Exposed residential edge
 -  Soft residential edge
 -  Low density dwellings in extensive green context
 -  Longer distance views from elevated positions in the landscape

Sources:
 * Solihull Borough Landscape Character Assessment (December 2016)
 ** www.magic.gov.uk
 *** Solihull Local Plan Review - Draft Local Plan Supplementary Consultation: Amber sites (January 2019)

Land West of Norton Green Lane,
 Dorridge

Client: AMBER REI LTD

Fig. 3: Landscape and Visual Analysis

Drawing no. : P19-0081_03
 Date : 07/03/2019
 Drawn by : CW
 Checked by : JWA
 Scale : 1 : 7500 @ A3



APPENDIX B

TRANSPORT NOTE

David Onions
Pegasus Group
Unit 5
The Priory
London Road
Sutton Coldfield
B75 5SH

Our Ref: 190315/AP/BMT2329
Contact: Andy Passmore
Direct Dial: 0121 2333322

Date: 15 March 2019

Dear David

ARDEN TRIANGLE, KNOWLE & LAND AT OAK GREEN, DORRIDGE

BWB has been instructed to undertake a preliminary transport review of the proposed Arden Triangle (Allocation Site 9) and the amber site known as Land off Blue Lake Road, Dorridge from the Solihull Metropolitan Borough Council's (SMBC) Draft Solihull Local Plan Review. The review is intended to inform the Draft Local Plan Supplement Consultation.

Background

The Arden Triangle comprises 46 hectares of predominately greenfield land to the southeast of Knowle town centre. The site is bounded by Warwick Road to the east; Grove Road to the south and existing development including the Arden Academy to the north and west. The SHELAA estimates the capacity of the site to be 1,158 dwellings, but SMBC's Solihull Local Plan Site Allocations – Masterplans (Jan 2019) document indicates 750 dwellings.

The amber site comprises 24 hectares of predominately greenfield land to the southeast of Knowle town centre. The site is bounded by Norton Green Lane to the east; Blue Lake Road to the south and residential development fronting onto Grove Road and Knowle Wood Road to the north and west. The SHELAA estimates the capacity of the site to be 602 dwellings, but the proposed Vision Document by Heyford Developments indicates 320 dwellings.

Location

SMBC' Draft Local Plan Supplementary Consultation document highlights Knowle's easy access to the Motorway network and a lack of local employment opportunities. 2011 Census data from the Solihull 26 Middle Super Output Area (MSOA) indicates that approximately 70% of Knowle residents commute to/from the north during peak periods.

Whilst the SMBC Site Assessments refer to their sustainable locations, it should be noted that the 2011 Census data also indicates that 81% of existing Knowle residents commute by car. This is significantly higher than would be expected in such a location and conflicts with the stated

5th Floor
Waterfront House
Station Street
Nottingham
NG2 3DQ

Tel: 0115 924 1100

manchester@bwbconsulting.com
www.bwbconsulting.com

sustainability credentials of the sites. Consequently, significant investment will be required if travel by sustainable modes is to be encouraged and traffic impact minimised.

Even in a sustainable location, 1,080 houses (based on the proposed allocation and the developer's masterplan involved in the amber site) will typically generate between 500 to 600 vehicles during peak hour traffic. This level of traffic increase will have implications on the local highway network and will require full assessment and mitigation. Dispersing the allocations to smaller sites would reduce local transport impact.

If the two sites are allocated, a large proportion of generated peak hour traffic will route via Knowle High Street to the M42 and beyond. Knowle High Street is approximately 6 metres wide and congestion is frequently caused when traffic is delayed by the high levels of pedestrian activity at the three zebra crossings within the main village shopping area.

The High Street is not currently suitable for the such increases in traffic. Consequently, careful consideration will need to be given to improving the highway environment to better balance the competing needs of pedestrians and traffic on this section of road.

Site Accesses

The B4101 Station Road is the main route through Knowle and Dorridge. It is a bus route, approximately 6 metres wide and fronted by private dwellings for most of its length. Congestion has been observed during peak times on this route and whilst it has coincided with the start and end of the Arden College school day, the limited carriageway width and numerous sources of conflicting activity means that congestion can occur at any time.

Consequently, it is considered that vehicular accesses to either site should be avoided from roads to the east, such as Station Road, Grove Road and Knowle Wood Road. Rather, these roads should be used to provide traffic-free pedestrian and cycle routes to enable residents to access local facilities including public transport services.

The Arden Triangle Draft Concept Masterplan Option 2 currently shows vehicular access onto Station Road and Grove Road, whilst the amber site vision document shows access onto Knowle Wood Road. These access locations are considered inappropriate and contrary to encouraging sustainable travel

These vehicular access locations should be amended and focused to the east on Warwick Road and Norton Green Lane, with highway improvements provided as necessary. For the amber site, it is likely that Norton Green Lane would need to be widened at existing pinch points and both the Warwick Road/Grove Road and Warwick Road/Norton Green Lane junctions improved to safely accommodate additional traffic. For both sites, it is considered that the Warwick Road/Station Road junction will also require improvement.

The Arden Triangle Concept Masterplan shows two potential access locations on Warwick Road in the northern portion of the site. These will require careful consideration, as the vertical and horizontal alignment of the carriageway could make it difficult to achieve the required visibility standards.

Pedestrian/cycle facilities are generally poor on the frontages to the sites, with little or no footway provision or crossing facilities. These will need to be provided to accord with identified desire lines if travel by these modes is to be encouraged.

Consideration will have to be given to other non-transport related factors such as landscape and countryside character, as the transport improvements necessary to allow for development on either the Arden Triangle or amber sites could have significant impacts on these considerations. These will need separate assessment.

I trust that this preliminary transport review is acceptable for your purposes. However, please do not hesitate to contact me should you require any further information.

Yours sincerely



Andy Passmore
Director