

'DRAFT LOCAL PLAN SUPPLEMENTARY CONSULTATION' RESPONSE

SOLIHULL COUNCIL LOCAL PLAN REVIEW

LAND AT DAMSON PARKWAY

ON BEHALF OF L&Q ESTATES

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

Prepared by: Pegasus Group

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1. INTRODUCTION

1.1 These representations are made by Pegasus Group, on behalf of L&Q Estates (formerly Gallagher Estates) in response to the Solihull Local Plan Review (2015 - 2028) 'Draft Local Plan Supplementary Consultation' January 2019. This representation relates to land at Damson Parkway where L&Q Estates has an interest (see Site Location Plan at **Appendix 1**). These representations should be read alongside the accompanying:

- Site Location Plan (**Appendix 1**)
- Landscape and Visual Statement with Green Belt Review (**Appendix 2**)
- Previous duly submitted representations to Draft Local Plan November 2016 by Gallagher Estates comprising of:
 - Representations Report, February 2017 (**Appendix 3**)
 - Vision Document, dated Feb 2017 (**Appendix 4**)
 - Un-met Housing Need and Duty to Cooperate (**Appendix 5**)

1.2 This evidence is provided, in association with previous representations to the previous consultation of the Draft Local Plan that took place between November 2016 and February 2017, namely as set out above as **Appendices 3, 4 and 5**. It is requested that the February 2017 Representations which at the time were submitted on behalf of Gallagher Estates, now L&Q Estates continue to constitute duly submitted representations to promote the allocation of land at Damson Parkway for residential development.

1.3 These representations respond to the 'Draft Local Plan Supplementary Consultation Preferred Options & Policy Directions' consultation document and accompanying published evidence, having regard to the national and local policy context. Where appropriate, these representations provide a response to the specific questions set out within this document.

1.4 The representations are framed in the context of the requirements of Local Plans, including the Allocations document, to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a development plan to be sound it must:

Positively Prepared – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with

other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.

- 1.5 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2. SECTION 2 – BACKGROUND

Duty to Cooperate

- 2.1 The Supplementary Consultation notes acknowledges that planning for an areas need should be taken at the 'Housing Market Area' level, and it is noted further that in this respect Solihull is one of 14 local planning authorities that is within (in whole or in part) the HMA that includes Birmingham and surrounding Authorities. It is also recognised that the housing shortfall for the HMA will be one of the key issues to be addressed through the on-going and legal obligation under the duty to cooperate (DtC).
- 2.2 Paragraph 26 of the Supplementary Consultation acknowledges that the Draft Local Plan tested a contribution of 2,000 dwellings towards accommodating the shortfall occurring beyond the Borough.
- 2.3 Paragraph 27 of the Supplementary Consultation sets out that the representations to the Draft Local Plan in 2017 demonstrated a clear expectation from other HMA authorities (and other interested parties) that (a) there is no clear justification why 2,000 was chosen as the figure Solihull would make towards the HMA shortfall and (b) there is opportunity to make a greater contribution.
- 2.4 Paragraph 28 of the Supplementary Consultation acknowledges that to inform the Duty to Cooperate the 14 HMA authorities commissioned the Strategic Growth Study undertaken by GL Hearn (SGS). It is noted that one of the aims of the study was to look at options that may be required however it is more pertinent to note that the SGS concluded that on the basis of the current evidence, provision of between 205,000-246,000 homes is needed across the Birmingham HMA to 2031; and of between 256,000-310,000 homes to 2036 (from a 2011 baseline) to meet the Birmingham HMA's housing needs. This is out with that two authorities, namely North Warwickshire and Stratford on Avon which fall within the Coventry HMA, have agreed to make proviso for Coventry's unmet needs.
- 2.5 In considering the supply of the Birmingham HMA as a whole the SGS set out that this needs to be added on top of the figures above which would result in a **minimum provision taking account of Coventry's unmet need of 208,000 dwellings to 2031 and 258,500 homes to 2036.**

- 2.6 The work undertaken as part of the SGS in considering Housing Land Supply across the HMA has concluded that there is a deliverable land supply of 180,000 dwellings across the HMA to 2031, and 198,000 dwellings to 2036 based on sites and supply currently identified. Paragraph 1.23 of the SGS sets out that **“Based on current supply assumptions and taking into account proposed allocations in the emerging plans, there is an outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across the Birmingham HMA”**.
- 2.7 In order to accommodate the shortfall, the further work undertaken by GL Hearn established that even with increasing densities there remains a need to identify sites capable of supporting the delivery of **over 15,000 homes to 2031, and a total of over 47,800 homes to 2036**. Given the scale of the unmet need and the strategic nature of the Study, the SGS focused on considering a number of strategic options. The SGS considered a number of Growth Options with the identification of Areas of Search for strategic development which can be considered and assessed in more detail by individual councils though the preparation of Local Plans alongside further small and medium sized sites.
- 2.8 The SGS identified 24 Areas of Search for strategic development which include for the Solihull Borough Site 19 Land around Balsall Common for a New Settlement of around 10,000 to 15,000 homes and Site 22 Land South of Birmingham Airport & NEC for an Employment Led Growth Option. The 24 Areas of Search for strategic development are appraised within the SGS.
- 2.9 The results of the assessment concluded that each of the 3 Employment Led Strategic Allocations (namely North of Wolverhampton/i54; East of Birmingham and South of Birmingham Airport/NEC) perform strongly in terms of the assessment criteria and offer the opportunity for some residential development alongside employment.
- 2.10 In relation to the work that is undertaken to assess the New Settlements, the SGS concludes that new settlements should also form part of the solution to meeting the housing shortfall, recognising that whilst they will require significant infrastructure, they can contribute positively to meeting longer-term development needs against a context whereby a significant proportion of the HMA housing need shortfall relates to the period beyond 2031; and they provide the

opportunity to secure significant funding support from the Government given their scale and impact.

- 2.11 The Area of Search for South of Birmingham Airport/NEC – Site 21, is one of the 4 Areas of Search that the SGS considers perform the strongest and is recommended to be taken forward for future assessment as a New Settlement. Paragraph 10.30 of the SGS sets out that there are clear choices to be made regarding what weight in decision making is attributed to different factors which warrant joint consideration by HMA partners.
- 2.12 It is of note that paragraph 10.49 of the SGS sets out that due to the significant lead in time to deliver large strategic sites, given the requirement for technical work, masterplanning, establishing the policy framework, progressing planning applications, and bringing forward development and infrastructure which can take 10years +, there is a need to progress further technical and feasibility studies considering the potential for strategic development in these areas now.
- 2.13 The need to bring forward a mix in size and types of sites is therefore key to meeting local housing needs.

3. SECTION 3 - HOUSING REQUIREMENT AND CURRENT LAND SUPPLY

Establishing the Local Housing Need

- 3.1 It is noted that the Borough Council set out at paragraph 45 that it is prudent for the present consultation that the 2014 based household projections are used and that this is on the basis that the current consultation will confirm this position in early 2019. The publication of the revised NPPF has confirmed this position and accordingly we agree with the approach that Solihull have applied to establishing the Local Housing Need Figure.
- 3.2 We also agree with the manner in which the Borough Council has applied the 40% cap from the 621 dwellings per year based on the 2014 household-based projections.
- 3.3 Reference is given at paragraph 47 of the Supplementary Consultation to paragraph 60 of the NPPF which indicates that the standard methodology should be used to arrive at the Local Housing Need "***unless exceptional circumstances justify an alternative approach***". It is noted at paragraph 48 that in calculating the Borough's own needs, the Council does not believe there are any exceptional circumstances that justify a departure from the methodology. This is dealt with at Question 1.

Question 1: Do you believe that there are exceptional circumstances that would justify the Council using an alternative approach, if so what are the exceptional circumstances and what should the alternative approach be?

- 3.4 it is considered that the Local Housing Need (LHN) figure of 767 dwellings per annum based on the 2014 household projections published in 2016 should be the minimum LHN figure and that there are clear exceptional circumstances to justify an alternative approach which takes into account economic growth as we have previously set out in representations to the November 2016 Draft Local Plan (**Appendix 3**). This is based on the significant economic growth that is to take place at UK Central Hub which includes the release of the Arden Cross land from the Green Belt (140ha of Green Belt land) as part of the HS2 Interchanges; Birmingham Airport and the Councils support for a broad range of ancillary and complementary facilities including hotels, car parks and other appropriate facilities needed to serve the needs of air travellers using the Airport; the NEC

and the Council's support to enable a broad range of developments to enhance visitor offer, diversify facilities and increase international competitiveness; Jaguar Land Rover and its planned expansion with the proposed release of approximately 94 ha of Green Belt land – Proposed Employment Site 20 and the Council's support within the emerging LPR to encourage the development of the Birmingham Business Park within its defined boundaries to support its role as a prime employment location and enhances its important role as a high quality, managed business park.

- 3.5 It is considered that the economic growth associated with the UKC Hub Growth Area should be reflected with a higher level of housing to support this economic growth and hence it is considered that UKC provides the 'exceptional circumstances' to deliver a higher level of growth above the 767 dwellings per annum figure set out in this consultation. The economic growth case has previously been set out in the representations to the Solihull Draft Local Plan (Nov 2016-Feb 2017) consultation as included for completeness as **Appendix 3** and **4**.
- 3.6 In relation to the Housing Market Area the Draft Local Plan (Nov 2016) included a commitment to accommodate 2,000 dwellings from the shortfall that is occurring in the wider Housing Market Area. Paragraph 49 of the Draft Local Plan Supplementary Consultation sets out that using the same contribution, the overall housing requirement to be addressed in the Local Plan Review would, using the standard methodology be 15,039 dwellings over the period 2018 to 2035, or 885 dwellings per year.
- 3.7 Paragraph 50 of the Supplementary Consultation sets out at paragraph 51 that this rate of development represents a doubling of the average rate achieved over the last 10 years which would exceed the highest number of net completions achieved in a single year since 2001. It is noted at paragraph 51 that this Supplementary Consultation has a focus on reviewing the proposed allocations and whilst commentary has been provided on how the standard methodology would be taken into account; this consultation is not seeking views on any potential addition that the Council may take towards the HMA shortfall.
- 3.8 Previous representations to the Draft Local Plan (**Appendix 3**) set out at that time that a range of 20,000 to 24,000 dwellings would be required to be provided

over the plan period to meet the demographic and economic needs of the Borough.

- 3.9 It should be noted that the above figures do not incorporate any additional economic uplift to take into account the UKC initiative as set out above (or the suggested proposal within the SGS for an Employment Led Strategic Allocation in the same vicinity of Birmingham Airport and the NEC) which will deliver additional employment growth to the Borough on top of growth based on past trends.
- 3.10 Within these previous representations concerns were raised in relation to the underestimation of job likely to be created from UKC and accordingly that insufficient homes are provided in the LPR to meet the economic needs which could lead to commuting into the District and/ or business being dissuaded from locating in Solihull due to the lack of workforce available. It has also been set out in previous submissions that in relation to affordability that if all uplifts and proper employment figures are included, it will result in an increased dwelling requirement.
- 3.11 The economic scenario discussed in **Appendix 3** would lead to a significantly higher dwelling requirement than currently planned for in the LPR. Further submissions will be made in relation to this at the next consultation stage when it is hoped the Borough Council's position on Local Housing Need and the HMA will be clearer.

4. SECTION 4 – SITE SELECTION PROCESS

4.1 The Borough Council set out at paragraph 63 that the vast majority of sites that have been put forward through the Call for Sites are sites located in the Green Belt.

Site Selection Process

4.2 The Draft Local Plan set out a sequential approach to direct growth to particular locations. Part of this process included setting an overall hierarchy and how the growth options identified at the earlier issue and options stage could contribute. Paragraph 65 of the Supplementary Consultation sets out that the hierarchy and site selection process have been further refined to support the present consultation and notes that all of the submitted sites have been assessed against it.

4.3 The site selection process is split into two steps, initially based on a 'site hierarchy' and secondly use of 'planning judgment to refine site selection'. The approach notes that it aims to test the appropriateness of sites rather than allocating numbers per settlement.

4.4 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 assessment would not be robust.

4.5 The first step of 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. Sites scoring 8-10 are 'Red' and are considered unsuitable.

4.6 Sites between 5 and 7 however 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).

4.7 These 'potential' (yellow) and 'unlikely' (blue) sites then proceed to Step Two of the site selection process, which assesses against the refining criteria. The analysis in Step 2 is said to be used principally to confirm whether **potential**

allocations (yellow) should be included as green or amber sites in the consultation, and whether 'unlikely' allocations (blue) should be included as amber or red sites in the consultation (emphasis added).

4.8 The factors set out in Table 2 below identify the considerations that have been taken into account at Step 2. It is specifically noted that **higher performing sites in the hierarchy need more significant harmful impacts if they are to be excluded**, (emphasis added) and for sites not performing well in the hierarchy they will need more significant justification to be included.

FACTORS IN FAVOUR	FACTORS AGAINST
<ul style="list-style-type: none"> • IN ACCORDANCE WITH THE SPATIAL STRATEGY. • ANY HARD CONSTRAINTS ONLY AFFECT A SMALL PROPORTION OF THE SITE AND/OR CAN BE MITIGATED. • SITE WOULD NOT BREACH A STRONG DEFENSIBLE BOUNDARY TO THE GREEN BELT. • ANY IDENTIFIED WIDER PLANNING GAIN OVER AND ABOVE WHAT WOULD NORMALLY BE EXPECTED. • SITES THAT WOULD USE OR CREATE A STRONG DEFENSIBLE BOUNDARY TO DEFINE THE EXTENT OF LAND TO BE REMOVED FROM THE GREEN BELT. • IF FINER GRAIN ACCESSIBILITY ANALYSIS³⁸ SHOWS THE SITE (OR THE PART TO BE INCLUDED) IS ACCESSIBLE. 	<ul style="list-style-type: none"> • NOT IN ACCORDANCE WITH THE SPATIAL STRATEGY. • OVERRIDING HARD CONSTRAINTS³⁹ THAT CANNOT BE MITIGATED. • SHELAA CATEGORY 340 SITES UNLESS DEMONSTRATED THAT CONCERNS CAN BE OVERCOME. • SITE WOULD BREACH A STRONG DEFENSIBLE BOUNDARY TO THE GREEN BELT. • SITES THAT WOULD NOT USE OR CREATE A STRONG DEFENSIBLE BOUNDARY TO DEFINE THE EXTENT OF LAND TO BE REMOVED FROM THE GREEN BELT. • IF FINER GRAIN ACCESSIBILITY ANALYSIS SHOWS THE SITE (OR THE PART TO BE INCLUDED) IS NOT ACCESSIBLE. • IF THE SITE IS IN A LANDSCAPE CHARACTER AREA THAT HAS A VERY LOW LANDSCAPE CAPACITY RATING. • IF THE SA APPRAISAL IDENTIFIES SIGNIFICANT HARMFUL IMPACTS.

Question 2: Do you agree with the methodology of the site selection process, if not why not and what alternative/ amendment would you suggest?

4.9 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 2**.

- 4.10 It is considered that there are inconsistencies in the Step 1 Assessment which has led to sites that should have scored lower being given higher scores, namely Land at Damson Parkway, site 195 which has been assessed as Priority 6 – Category Blue (unlikely for inclusion) at Site Selection Step 1 and assessed within Step 2 as R – “not to be included in the plan” hence not going through to the Step 2 refinement exercise.
- 4.11 The Landscape and Visual Statement (**Appendix 2**) demonstrates that the landscape in this area could be scored as a Priority 5 which would mean that the site has potential for consideration at Step 2 of the Site Selection Assessment and based on the proposals for the site as evidenced in the Vision Document (**Appendix 4**) submitted in February 2017, would have the potential to become a Green or Amber site.
- 4.12 No justification is provided within the Site Selection process for the site to be identified as a Priority 6 site which is explored in detail in **Appendix 2**. The analysis based work that has been undertaken by Pegasus Landscape demonstrates that the landscape in the area should be scored 4.
- 4.13 The Landscape and Visual Statement (**Appendix 2**) also considers the Strategic Green Belt Assessment (SGBA) approach as leading to inconsistencies when assessing settlement edge sites.
- 4.14 In addition, the consideration of ‘Amber Sites’ includes little new or additional detailed landscape analysis of the amber sites than presented in the summary sheets and again inconsistencies between the assessment of sites.
- 4.15 On the basis of the evidence contained within the Landscape and Visual Statement which includes a consideration of the landscape strategy for the site, as fully detailed within the Vision Document submitted in response to the Draft LPR in Feb 2017 (**Appendix 4**), it is considered that Land at Damson Parkway (Site 195) should have been included in the Site Selection Assessment as a Green or Amber site as being a suitable site for residential development.
- 4.16 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.

4.17 The Landscape and Visual Statement that have been prepared also provides commentary on the inconsistencies that are evident in relation to the application and interpretation on the site assessment methodology on Green (proposed allocations) and Amber sites (sites currently been consulted on which the Borough Council consider to be the 'least harmful' of the omission sites).

5. SECTION 15 – OMITTED SITES

5.1 The Site Selection chapter explains the process the Borough Council has undertaken to assess submitted sites.

Amber Sites

5.2 In relation to 'Amber Sites' these are set out as being the 'least harmful' sites which the Borough Council is seeking residents and stakeholders' comments on.

5.3 Two 'Amber Sites' are identified for Knowle, Dorridge and Bentley Heath. This includes site 59 (Golden End Farm, Kenilworth Road, Knowle) which is envisaged to have capacity for 250 dwellings and site 413, Land off Blue Lake Road, which is envisaged to have capacity for 340 dwellings.

Question 38: 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?

No comment

Question 39: Are there any red sites omitted which you believe should be included, if so which ones and why?

5.4 Based on the inconsistency with the site selection assessment of sites that has been demonstrated fully within the Landscape and Visual Statements (**Appendix 2**) it is considered that site 195 Land at Damson Parkway should be included as an Amber site if not a Green site, particularly given the neighbouring sites to the south of the Grand Union Canal have been included as a Proposed Housing allocation – Site 16 for development of up to 600 dwellings.

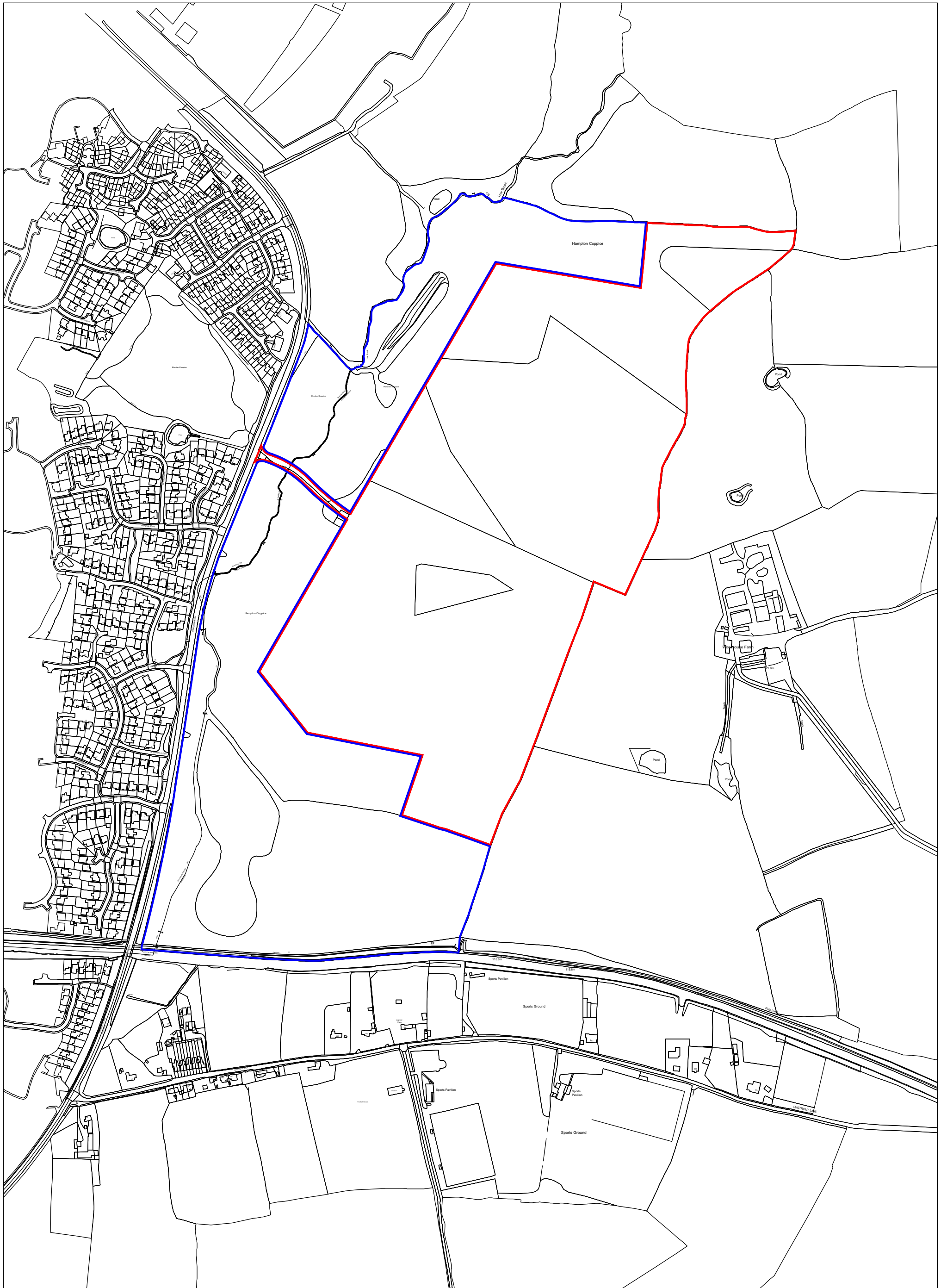
6. CONCLUSIONS

- 6.1 L&Q Estates supports the Borough Council's decision to continue with the review of the Solihull Local Plan.
- 6.2 Land at Damson Parkway is within the control of L&Q Estates and is developable and would contribute significantly towards meeting housing needs within the Borough, delivering in the region of 300 dwellings with a Care Home and local centre. There are no known constraints that would prevent the site coming forward as proposed. The suitability of the site for development is fully detailed within the Vision Document previously submitted in February 2017 (**Appendix 4**) in response to the DLR. The evidence provided within the Landscape and Visual Statement and Green Belt Review (**Appendix 2**) demonstrated that in Green Belt terms the site is suitable for consideration as an 'Amber Site' or a 'Green Site' and should be reassessed objectively by the Council and considered as a suitable site for housing development. Land at Damson Parkway would support the delivery of the Council's Preferred Growth Option that focuses development towards the most sustainable locations, including key rural villages.
- 6.3 L&Q would welcome the opportunity to maintain a dialogue with the Council through the process of reviewing the Solihull District Local Plan.

APPENDIX 1

SITE LOCATION PLAN

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DAMSON PARKWAY, SOLIHULL- SITE LOCATION PLAN

APPENDIX 2

LANDSCAPE AND VISUAL STATEMENT: GREEN BELT REVIEW

1. LOCAL PLAN REVIEW

- 1.1. 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) to ensure that an up to date planning framework is in place that addresses potential issues.
- 1.2. 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.
- 1.3. Those referred to as part of this landscape and visual statement include:
 - 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); and
 - Draft Local Plan Supplementary Consultation: Amber Sites (January 2019).
- 1.4. 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.
- 1.5. 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.
- 1.6. 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)¹ and reference is made to this document as necessary.

2. TERMS OF REFERENCE

- 2.1. In respect of the context set out above, Pegasus Group has undertaken a strategic review of an area of landscape located to the east of Damson Parkway, Solihull at a point where

¹ Landscape Institute and Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment 3rd Edition (April, 2013)

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.

- 2.2. The area of landscape under consideration is defined to the west by the existing woodland, known as Hampton Coppice adjacent to the eastern settlement edge of Solihull, to the north by the continuation of this woodland and mature vegetated hedgerow field boundary, to the south by the Grand Union Canal and to the east by the open countryside.

3. GREEN BELT AND THE NPPF

NPPF

- 3.1. The site is located within the central area of Solihull Metropolitan Borough to the east of the Solihull settlement area. The landscape in this area is washed over by Green Belt from the settlement edge of Solihull, with Hampton-in-Arden, Dorridge and Knowle, and Balsall Common, forming 'islands' of settlement pattern within the wider Green Belt coverage.
- 3.2. The Green Belt area around the site is extensive, extending broadly down toward Leamington Spa. The Green Belt is at its narrowest where it forms a corridor between the settlement edges of Solihull and Knowle/Dorridge. Across this area there is considerable variation in the character of the landscape, including variation in its inherent landscape value, and sensitivity.
- 3.3. 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.
- 3.4. The Framework goes on to set out the long-established 'five' purposes of Green Belt, namely²:
- 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

² Para 134, NPPF (2019)

- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.5. 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 Framework³.
- 3.6. 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.

Solihull MBC Landscape Character Assessment (2016)

- 3.7. The 'Solihull Borough Landscape Character Assessment' (prepared by Watermans on behalf of SMBC) defines the character of the landscape in this area as 'LCA1, the Solihull Fringe'
- 3.8. In respect of LCA1, the character assessment acknowledges that the urban influence of Solihull is prominent in the LCA and states that:
- 3.9. *"Land use in this character area is influenced by the direct proximity of the urban edge to the open countryside."*
- 3.10. LCA 1 is sub-divided into two sub-areas, the site is located within sub-area 1A. The key characteristics of sub-area 1A are as follows:
- *"Medium to large scale fields of supporting both pastoral and arable use. Field boundaries vary from hedgerows to open division with post and wire fencing;*
 - *Strong woodland and tree cover in the area that forms the backdrop in most views;*
 - *A number of highly managed green spaces hosting a variety of sports clubs including football, rugby and rifle shooting;*
 - *Ribbon development along Hampton Lane and Lugtrout Lane are the main concentrations of settlement in the sub-area with other scattered developments including converted farmsteads; and*
 - *Listed Buildings include Grade II* Ravenshaw Hall and its associated farms make the area distinct."*

³ Para 171, NPPF (2019)

- 3.11. In relation to landscape sensitivity, the published assessment notes that this sub-area has some attractive landscape features such as Elmdon Park, various woodlands, open fields and historic buildings. Detracting elements include communication masts, fly-tipping, incongruous metal fencing, electricity pylons and general road and air traffic noise. The landscape in this area is fragmented due to the strong urban influences, road network and varying land uses. Overall, the landscape is considered to be in fair condition. According to the published assessment, the landscape character sensitivity of the sub-area is considered to be **medium**.
- 3.12. In relation to visual sensitivity, the published assessment states that the visibility in the sub-area consists of generally medium to short distance views that are wide - framed and deep, being horizontal in orientation. There are a small number of long distant views encapsulating the spire of St. Peter's Church in Bickenhill and others where the airport infrastructure is visible. The strong tree cover forms a backdrop to most mid-distant views and the vegetation along the lanes provides a tunneled view where trees overhang the highway. Overall the published assessment considered the visual sensitivity of the sub-area to be **medium**.
- 3.13. The published character assessment states that the value of the sub-area is considered to be **medium**. It identifies ancient woodlands, manor houses, fords at Ravenshaw Hall and the Grand Union Canal as assets.
- 3.14. In terms of landscape capacity, the published assessment states that this sub-area would typically have an overall **low** landscape capacity to accommodate change. It states that the sub-area would be able to accommodate some areas of new development, which would need to be of an appropriate type, scale and form and in keeping with the existing character and local distinctiveness of the area.
- 3.15. This forms a clear constraint to development and consequently the land cannot be considered as an area of 'the least environmental or amenity value'.
- 3.16. 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)

- 3.17. This document sets out a strategic review of the Green Belt in Solihull. The document states that:

3.18. "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)

3.19. The Solihull Strategic Green Belt Assessment - Assessment Report (July 2016) (SGBA) identifies a number of Broad Areas of Green Belt land. It also identifies a number of Refined Parcels, which adjoin or lie adjacent to built-up areas. The site is located within **Refined Parcel RP15 'Land to the South of Bickenhill'**.

3.20. 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.

3.21. 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.

3.22. The assessment scores each Refined Parcel against four purposes of the Green Belt and in relation to RP15, it sets out the following:

GREEN BELT PURPOSE	RP15 SCORE
1 - CHECK UNRESTRICTED SPRAWL OF LARGE BUILT-UP AREAS	3
2 - PREVENT NEIGHBOURING TOWNS MERGING INTO ONE ANOTHER	1
3 - ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT	2
4 - PRESERVE THE SETTING AND SPECIAL CHARACTER OF HISTORIC TOWNS	0
TOTAL	6

3.23. Overall the combined score for parcel RP15 identifies it as a parcel or area that is "moderately performing" with an overall score of 6. Higher performing in terms of purpose 1.

3.24. Following both desk and field studies a number of landscape and visual constraints and opportunities have been identified. The constraints are considered to be:

- the designated ancient woodland of Hampton Coppice;

- the local PROW network, including the Grand Union Canal recreational route (providing recreational opportunities for potential high sensitivity visual receptors);
- the location of the site within the Green Belt, which will have some influence on the value of the local landscape; and
- the findings of the Solihull Landscape Character Assessment that identify the LCA within which the site sits as having generally low capacity to accommodate change.

3.25. The opportunities are considered to be:

- There are no overriding statutory landscape planning designations;
- Existing vegetation and green infrastructure throughout the site, including hedgerows, providing opportunities to enhance this through a comprehensive landscape strategy;
- The presence of mature vegetation including the mature woodland of Hampton Coppice and hedgerows around the perimeters and across the site, in combination with the rising landform to the east, which will help to minimise the visual envelope of the site and will contribute to the capacity of the site to accommodate development; and
- The opportunity to propose development within LCA 1: Solihull Fringe - Sub-area 1A in this location which is of an appropriate type, scale and form and in keeping with the existing character and local distinctiveness of the area, as set out in the Solihull Borough Landscape Character Assessment.

3.26. These constraints and opportunities have been used to guide the proposed development and analyse the site in terms of its performance on and potential impact on the purposes of the Green Belt (seen in Figure 4.1 of the Vision Document **Appendix 4**).

3.27. Table 1, below, sets out a summary of the likely impacts on Green Belt purpose, in landscape and visual terms, using the criteria set out by the Solihull Green Belt Strategic Assessment.

Green Belt purpose	Criteria	Summary
To check the unrestricted sprawl of large built-up areas.	<p>Is ribbon or other development present?</p> <p>Is other development detached from the existing large built-up area?</p>	<p>There is limited ribbon development in the vicinity of the site, however the existing settlement edge is located along Damson Parkway, to the west.</p> <p>The site makes a contribution to the definition of the boundary of Solihull in this location through its mature green infrastructure boundaries which serve to contain it both physically and visually.</p> <p>Development of the site will not lead to unrestricted sprawl of the built up area as it will be contained within this framework and remain enclosed by existing and proposed green infrastructure</p>
To prevent neighbouring towns merging into one another.	Does the area represent a 'gap' between major urban areas?	<p>The closest settlement to the edge of Solihull in this location is Catherine-de-Barnes, which is located ca. 800 m to the south-west. Development of the site is proposed where it will be physically and visually contained by the existing and proposed landscape framework and as such is likely to have a minimal influence on the 'gap' between the edge of Solihull and Catherin-de-Barnes. The proposed development would allow the maintenance of an extensive area of agricultural land to the east which will maintain separation. Overall, development of the site will not lead to coalescence ('merging') of neighbouring settlements.</p>
To assist in safeguarding the countryside from encroachment.	<p>Is the area characterised by countryside?</p> <p>Does the area adjoin areas of countryside?</p> <p>Is ribbon or other development present within the area?</p>	<p>The landscape of the site and to the north and east is generally characterised by countryside, with occasional built form. To the south and west however, is the existing settlement edge of Solihull. There is some ribbon development to the south along Lugtrout Lane. The countryside in the vicinity of the site is characterised by mature woodland (Hampton Coppice) which serves to provide visual enclosure and will contain proposed development. However, the majority of the existing vegetation will be retained, and together with a robust green infrastructure strategy, development can be located within a comprehensive landscape setting.</p>

<p>To preserve the setting and special character of historic towns.</p>	<p>Is the area within or adjoining a Conservation Area within a historic town?</p> <p>Are key landmarks or the historic core visible from within the area?</p> <p>Does the area contribute to the setting of the historic town?</p>	<p>The site lies outside of any Conservation Areas and is not located within a historic town.</p>
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Table 1: Impacts on Green Belt Purpose

3.28. This analysis confirms that the scoring of RP15 is generally consistent with the criteria within the Solihull Strategic Green Belt Assessment. However within the Assessment Criteria for purpose 1 there is potential for some refined parcels, including RP15, to fall outside of the specific scoring criteria. For purpose 1 the scoring advises as follows;

- *"Broad Area or Refined Parcel is already developed and/or is within the urban area with no clear boundary = **0 Parcel or Area does not perform against the purpose;***
- *Ribbon/other development is already present and/or other development is detached from the existing built-up area with no clear boundary= **1 Parcel or Area is lower performing;***
- *Refined Parcel or Broad Area boundary is weak but can be identified and there is no development present = **2 Parcel or Area is more moderately performing;** and*
- *Refined Parcel or Broad Area boundary is clearly identifiable/ durable and there is no development present = **3 Parcel or Area is higher performing"***

3.29. However, in this instance, RP15, "development is already present" (1 Parcel or Area is lower performing) along Damson Parkway to the west of the site. To score 1 the RP should have no clear boundary. RP15 has "clearly identifiable/durable" (3 Parcel or Area is higher performing) boundaries in the form of the surrounding boundary vegetation and woodland. Accordingly it may be considered that overall the RP should score 2 lying between the criteria for scoring 1 and 2, however the wording of moderately performing sites also does not apply to the site as it requires weak boundaries and no development present.

3.30. The scoring criteria for purpose 3, where the site has scored 2 (Parcel is more moderately performing) advises that the RP will be "*characterised by countryside, is adjoined by countryside and/ or has limited development present*". Whilst limited, this agrees that development is present within the immediate area of RP15 at the residential edge of Solihull along Damson Parkway (refer to **Plate 1**).

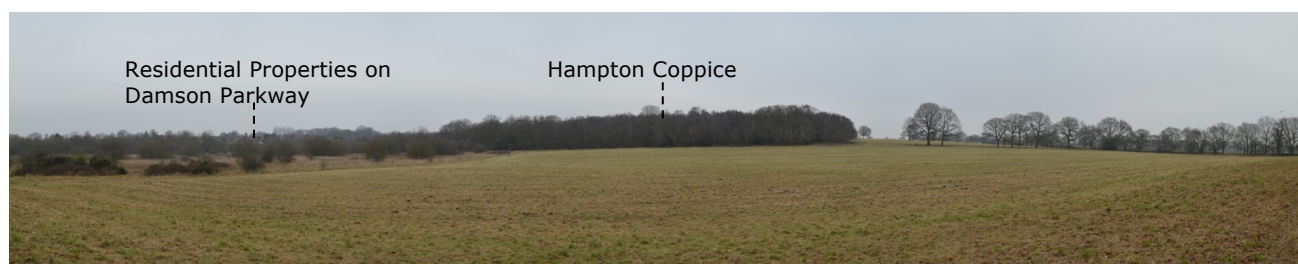


Plate 1: View from public right of way, north of canal corridor, looking north

- 3.31. The identified existence of clear site boundaries site is such that they could equally provide a new robust Green Belt boundary. In accordance with the NPPF, Green Belt boundaries should be defined clearly, using physical features that are readily recognised and likely to be permanent. It is considered that the southern, northern and eastern boundaries of the site, led by existing and proposed woodland cover, could form a clearly defined Green Belt boundary (as seen in Figure 4.1 of the Vision Document **Appendix 4**). The landscape and green infrastructure strategy for the site also proposes new planting which extends Hampton Coppice to provide further containment. These mitigation measure will help to establish and enhance a robust landscaped edge to the proposed development, a definitive boundary to the future Green Belt.
- 3.32. This parcel combined with a number of additional parcels across this area of landscape have been identified as Green sites in the Draft Local Plan Supplementary Consultation document (these will be discussed later in this statement). The proposed extension of the Jaguar Land Rover site to the north of the area on the western side of Damson Parkway provides opportunities to create an extended robust Green Belt boundary to the east using a holistic approach across the sites.
- 3.33. The Solihull Strategic Green Belt Assessment 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.
- 3.34. This weighting of the scores for Green Belt purposes, and over rating of purpose 1, 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 land as a Green or Amber site. This is considered further below.

The Solihull Local Plan Review, Draft Local Plan Supplementary Consultation document (January 2019)

- 3.35. The Supplementary Consultation (including Site Assessments) is a non-statutory supplementary consultation to that undertaken previously for the Draft Local Plan (December 2016).
- 3.36. 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.
- 3.37. 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.
- 3.38. 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.
- 3.39. 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).
- 3.40. Sites scoring 8-10 are 'Red' and are considered unsuitable.
- 3.41. These 'potential' (yellow) and 'unlikely' (blue) sites then proceed to Step Two of the site selection process, which assesses against the refining criteria. The analysis in step 2 is said to be used principally to confirm whether **'potential' allocations (yellow) should be included as green or amber sites in the consultation, and whether 'unlikely' allocations (blue) should be included as amber or red sites in the consultation** (emphasis added).
- 3.42. The factors set out in Table 2 below identify the considerations that have apparently been taken into account at Step 2. It is specifically noted that **higher performing sites in the hierarchy need more significant harmful impacts if they are to be excluded,** (emphasis added) and for sites not performing well in the hierarchy they will need more significant justification to be included.

FACTORS IN FAVOUR	FACTORS AGAINST
<ul style="list-style-type: none"> ● IN ACCORDANCE WITH THE SPATIAL STRATEGY . ● ANY HARD CONSTRAINTS ONLY AFFECT A SMALL PROPORTION OF THE SITE AND/OR CAN BE MITIGATED. ● SITE WOULD NOT BREACH A STRONG DEFENSIBLE BOUNDARY TO THE GREEN BELT. ● ANY IDENTIFIED WIDER PLANNING GAIN OVER AND ABOVE WHAT WOULD NORMALLY BE EXPECTED. ● SITES THAT WOULD USE OR CREATE A STRONG DEFENSIBLE BOUNDARY TO DEFINE THE EXTENT OF LAND TO BE REMOVED FROM THE GREEN BELT. ● IF FINER GRAIN ACCESSIBILITY ANALYSIS³⁸ SHOWS THE SITE (OR THE PART TO BE INCLUDED) IS ACCESSIBLE. 	<ul style="list-style-type: none"> ● NOT IN ACCORDANCE WITH THE SPATIAL STRATEGY. ● OVERRIDING HARD CONSTRAINTS³⁹ THAT CANNOT BE MITIGATED. ● SHELAA CATEGORY 340 SITES UNLESS DEMONSTRATED THAT CONCERNS CAN BE OVERCOME. ● SITE WOULD BREACH A STRONG DEFENSIBLE BOUNDARY TO THE GREEN BELT. ● SITES THAT WOULD NOT USE OR CREATE A STRONG DEFENSIBLE BOUNDARY TO DEFINE THE EXTENT OF LAND TO BE REMOVED FROM THE GREEN BELT. ● IF FINER GRAIN ACCESSIBILITY ANALYSIS SHOWS THE SITE (OR THE PART TO BE INCLUDED) IS NOT ACCESSIBLE. ● IF THE SITE IS IN A LANDSCAPE CHARACTER AREA THAT HAS A VERY LOW LANDSCAPE CAPACITY RATING. ● IF THE SA APPRAISAL IDENTIFIES SIGNIFICANT HARMFUL IMPACTS.

Table 2: Step 2 Refinement Criteria

Site reference 195 (Land at Damson Parkway)

- 3.43. The site is identified as site reference 195 in the Supplementary Consultation Site Assessments. The assessment confirms the SGBA score as moderately performing with a score of 6. Additionally, it confirms the LCA1 Landscape character sensitivity as medium and visual sensitivity as medium. Further criteria are the Sustainability Appraisal (SA), which assesses the site as AECOM 109 having 18 effects: 10 positive (2 significant); 5 neutral; 3 negative (1 significant).
- 3.44. The Site Selection Step 1 is assessed as Priority 6, Blue Category – “unlikely for inclusion” and as such should be given consideration at Step 2. Site Selection Step 2 identifies the site as R – “not to be included in the plan”. The commentary for this site refers to the Broad Area (BA) 05 assessed in the SGBA as higher performing. The proposals for Land at Damson Parkway are not within BA05 and sit wholly within the moderately performing RP15.
- 3.45. The site selection topic, referring to the Spatial Strategy advises the site is identified as part of Growth Option G – Area B: East of Solihull between the A45 and the canal. Considered suitable for growth around northern section (to meet JLR needs).

- 3.46. The commentary in relation to Step 2, the refinement criteria, states that;
- 3.47. *"Site is part within moderately performing and part higher performing parcel in the Green Belt Assessment and lacks defensible boundaries. The site has a low level of accessibility, is within a area of medium landscape sensitivity with low capacity for change, and is subject to significant constraints being a Local Wildlife Site and important woodland on the edge of the urban area. The SA identifies 10 positive 3 negative effects, although the loss of agricultural land is a significant negative. Whilst the site is on the edge of the urban area, it would have a detrimental impact on the green belt and suffers from significant constraint."*
- 3.48. With a Green Belt score of 6, site reference 195 has been given a Priority 6 (blue) rating, and then through step 2 afforded a Red site. Previous discussion around the scoring of purpose 1 opens the potential for the SGBA score for the site to have been 5, in which case the criteria states that sites with a score of **5 or lower** will generally be included in the **Priority 5** rating - sites with potential for inclusion. Irrespective of this, based on the Priority 6 (Blue) rating, the site should be fully assessed at step 2. A Vision Document has been submitted to the DLP in February 2017, which details the landscape strategy for the site. A Landscape led approach has resulted in a small proportion of the site being proposed for development. This allows for setbacks to the Ancient Woodland, the Grand Union Canal and listed buildings and as such should be afforded a Green or Amber site.
- 3.49. Furthermore, no mention is made of the Sustainability Appraisal results that confirm more positive than negative effects, including 2 significant positive effects which is not detailed within the commentary.
- 3.50. Whilst there may be some evidence that the use of hedgerow field boundaries are less durable than more permeant infrastructure, the proposed new Green Belt boundary for site 195 would be a combination of mature hedgerow boundaries including a number of mature hedgerow trees (as has been shown in Figure 4.1 Indicative Masterplan provided within the previously submitted Vision Document **Appendix 4**).
- 3.51. Therefore, in light of the potential for site 195 to have scored lower within the SGBA leading to the potential for the site to be identified as a **Priority 5** site, a lack of consideration of the proposals and a lack of consideration given to the Sustainability Appraisal, when we look at the approach to surrounding site (considered below) site 195 could be considered an 'Amber site'.

4. NEIGHBOURING SITES

4.1. RP 27 and 29 (Land between Grand Union Canal And Lugtrout Lane and Land between the B4102 Hampton Lane and Lugtrout Lane to the west of field Lane) are located to the east of Solihull, south of the Grand Union Canal. The SGBA has scored both sites the same, they are as follows;

GREEN BELT PURPOSE	RP27&29 SCORE
1 - CHECK UNRESTRICTED SPRAWL OF LARGE BUILT-UP AREAS	1
2 - PREVENT NEIGHBOURING TOWNS MERGING INTO ONE ANOTHER	2
3 - ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT	1
4 - PRESERVE THE SETTING AND SPECIAL CHARACTER OF HISTORIC TOWNS	0
TOTAL	4

4.2. Overall the site is also lower performing. It is moderately performing in purpose 2.

4.3. The Supplementary Consultation identifies the refined parcels as a number of sites all of which have been identified as Green sites with the exception of site ref 143, identified as amber (refer to **Plate 2**).

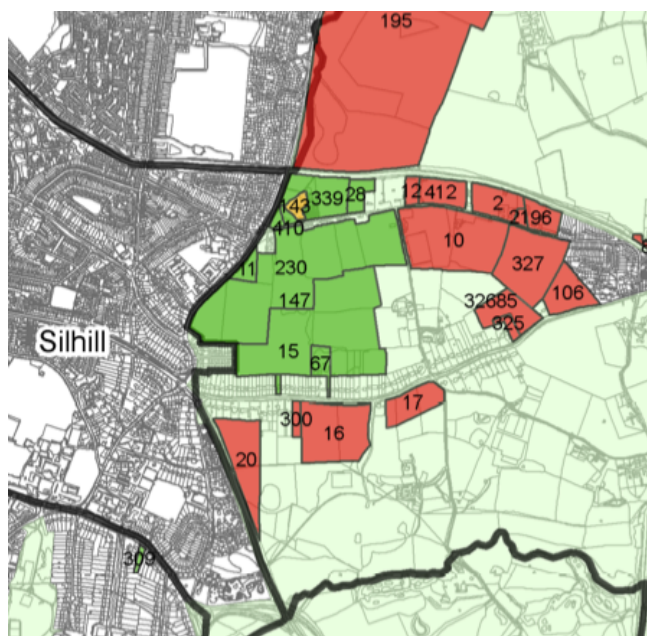


Plate 2: Extract from the Solihull Local Plan Review, Draft Local Plan Supplementary Consultation: Site Assessments document (January 2019)

Site reference 339 (Land adj. 161 Lugtrout Lane)

- 4.4. Site reference 339 is the closest neighbouring site within those assessed as Green to Site ref 195. The Supplementary Consultation Site Assessments confirms that the site is lower performing in terms of Green Belt Purposes and falls within the same LCA1 as site reference 195 and so has the same sensitivity assessments. Additionally, the Sustainability Appraisal is assessed in AECOM 139 as having 19 effects: 5 positive (2 significant); 12 neutral; 2 negative.
- 4.5. The Site Selection Step 1 is assessed as Priority 5 – “sites for potential inclusion”, with Site Selection Step 2 following the refinement criteria, primarily that the site is part brown field on the edge of the urban area and so is identified the site as G – “suitable for inclusion in the plan”.
- 4.6. Commentary of Step 2 advises;
- 4.7. *“Site is part brownfield on the edge of the urban area within a lower performing parcel in the Green Belt Assessment, and would result in an indefensible boundary to the east. The site has a medium level of accessibility, is within a area of medium landscape sensitivity with low capacity for change, and is suitable for development, subject to some constraints. The SA identifies 5 positive and 2 negative effects. The site could form part of an urban extension in area identified in the spatial strategy as suitable for growth.”*
- 4.8. This site forms part of the proposed draft housing Site 16, East of Solihull, which is to allow for up to 600 dwellings.

Site reference 230 (Land at Lugtrout Lane)

- 4.9. The Supplementary Consultation Site Assessments for site reference 230 confirms that the site is lower performing (scoring 4 in the SGBA) in terms of Green Belt Purposes and falls within the same LCA1 as site reference 195 and so has the same sensitivity assessments.
- 4.10. The Site Selection Step 1 is assessed as Priority 5 – “sites for potential inclusion”, with Site Selection Step 2 identifying the site as G – “suitable for inclusion in the plan.”
- 4.11. The Site Selection Step 2 commentary advises that:
- 4.12. *“Site is within a lower performing parcel in the Green Belt Assessment and would result in an indefensible boundary to the south. The site has a high level of accessibility, and is in close proximity to Solihull town centre, is within an area of medium landscape*

sensitivity with low capacity for change, and is suitable for development. The SA identifies 8 positive and 3 negative effects, of which impact on heritage assets and loss of agricultural land are significant. The site could form part of an urban extension in area identified in the spatial strategy as suitable for growth.”

- 4.13. This site forms part of the proposed draft housing Site 16, East of Solihull, which is to allow for up to 600 dwellings.

Site reference 15 (Former Pinfold Nursery (Inc.67 Hampton Lane)

- 4.14. The Supplementary Consultation Site Assessments for site reference 15 confirms that the site is lower performing (scoring 5 in the SGBA) in terms of Green Belt Purposes and falls within the same LCA1 as site reference 195 and so has the same sensitivity assessments.
- 4.15. The Site Selection Step 1 is assessed as Priority 5 – “sites for potential inclusion”, with Site Selection Step 2 identifying the site as G – “suitable for inclusion in the plan.”
- 4.16. The Site Selection Step 2 assessment identified the site being within a lower performing parcel in the Green Belt Assessment and the commentary states that;
- 4.17. *“Site is within a lower performing parcel in the Green Belt Assessment, although it is too small in isolation and would result in an indefensible boundary. The site has a high level of accessibility, is within a area of medium landscape sensitivity with low capacity for change, and is suitable for development. The SA identifies 8 positive and 3 negative effects, of which impact on heritage assets and loss of agricultural land are significant. The site could form part of an urban extension in area identified in the spatial strategy as suitable for growth.”*
- 4.18. This site forms the southern part of the proposed draft housing Site 16, East of Solihull, which is to allow for up to 600 dwellings.
- 4.19. These sites have been given a Priority 5 rating. With the potential for site 195 to have been mis-scored allowing it to also be Priority 5, the sites ought to have been assessed in the same manner. Regardless of this Priority 5 and 6 sites ought to be assessed through step 2 equally to allow for the objective site assessment to be achieved, this would allow for site 195 to be assessed as a Green or Amber site in line with these similar sites.

Jaguar Land Rover

- 4.20. To the north-west of site reference 195 on the western side of Damson Parkway is the existing Jaguar Land Rover site set within an area of large scale industrial development

at the eastern edge of Solihull. Proposals to extend the site further north-east are addressed within RP14 and RP15 Of the SGBA. RP14 score 4, lower performing parcel in the SGBA, and RP15 score 6, moderately performing, however it has already been noted that there is potential for this score to be reduced.

- 4.21. Within the Supplementary Consultation Site Assessments these parcels are again divided into a number of sites (refer to **Plate 3**). Site reference 189, for example, is located within the same landscape character area, LCA1, as site reference 195, it has been assessed within the same moderately performing RP15 of the SGBA as site reference 195 and is included within the Spatial Strategy Growth Option G – Area B “*East of Solihull between the A45 and the canal. Considered suitable for growth around northern section (to meet JLR needs)*” the same area as site reference 195.
- 4.22. Site Selection Step 2 has not been completed as the site is not proposed for residential use. It is worth noting however that the overall site is assessed as having the same function and sensitivity as site reference 195, Land at Four Ashes Road, Dorridge.

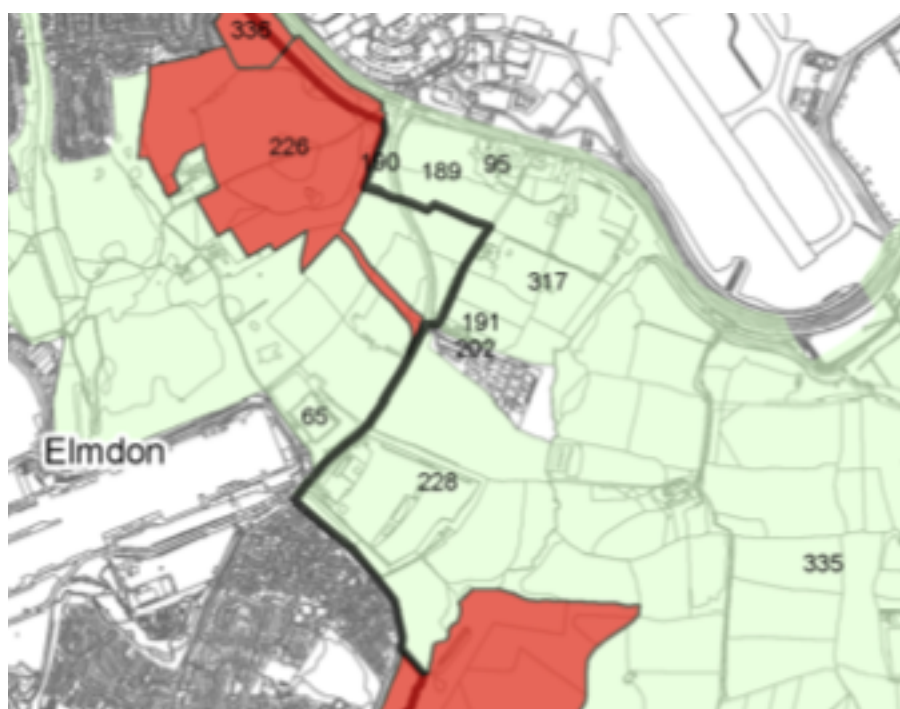


Plate 3: Extract from the Solihull Local Plan Review, Draft Local Plan Supplementary Consultation: Site Assessments document (January 2019)

- 4.23. These neighbouring green sites and the employment site to the north-east, fall within the same area of landscape character and spatial strategy as site reference 195. Whilst there are likely to be some differences in the landscape and visual constraints and opportunities of these sites, overall there are no notable or significant differences in the assessed

landscape and visual sensitivity. Therefore, site reference 195 assessed as a Priority 5 sites should be assessed at stage 2 and afforded the potential to become a Green or Amber site in line with the sites discussed above within the Land to the East of Solihull (draft proposed Housing Site: Site 16).

5. ANALYSIS OF THE ASSESSMENT

- 5.1. It is considered that a weakness in the approach to the Site Hierarchy Criteria is the reference to the scoring of Green Belt purposes.
- 5.2. 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).
- 5.3. It is considered that the Site Hierarchy Criteria within the Supplementary Consultation 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.
- 5.4. The artificial moderation of score excludes a number of sites, including site reference 195 that was identified as a Priority 6 (Blue), from inclusion from Amber sites. This is despite site 195 performing equally to sites that have been identified as the 'least harmful' Amber sites that Solihull Council are also consulting on through the Supplementary Consultation. Irrespective of this, even with a Priority 6 rating, the site should be assessed at step 2 of which there is little evidence as the commentary does not draw on the sites potential for inclusion.
- 5.5. The indicative masterplan has been guided by a robust landscape strategy that includes the following elements;
 - The overall development envelope is defined by the visual and physical containment provided by Hampton Coppice, which wraps around the extent of development and is proposed to be retained and enhanced where appropriate. The extent of woodland will be increased, effectively extending Hampton Coppice to the north and south of the site, in reference to the sites history as a complete woodland.

- The development envelope is located away from the higher elevations of the site, including the 'plateau' to the south, this will reduce visual prominence of any new built form.
 - Consideration should be given to the existing vegetation (including trees, hedgerows, hedgerow trees and woodland areas). Where possible these landscape elements should be retained and integrated into the layout of both developable areas and open space. The proposed landscape strategy utilises an existing access point through Hampton Coppice.
 - The location and extent of green infrastructure and open space within the site should influence the formation and extent of the development envelope. The retained areas of vegetation (as described above) would ensure that the built form of a proposal would be contained in a robust and diverse framework of green infrastructure and open space. A strategy for retaining existing vegetation combined with proposals for extensive landscaping would result in a landscape context for future proposals which show a variety of stages of establishment and maturity. This would enhance the quality of a proposal and also help to integrate the site with the local landscape character.
 - The layout of proposals for the site should incorporate substantial areas of private garden space as well as the proposed publicly accessible areas of green infrastructure as these would have the capacity to hold a substantial number of street and garden trees which will, over time, contribute to a network of green infrastructure and help to integrate the character of the site with the surrounding landscape.
 - All landscape mitigation which forms part of a proposal should be subject to a high quality detailed landscape scheme so as to ensure that the functions of the landscape components will be delivered; this would also reflect positively on the design quality of a proposal as a whole.
- 5.6. As this strategy has led the design of the development envelope and overall site, it is not considered that there is any conflict with the Green Belt.
- 5.7. Further concerns in the SGBA approach are 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 and semi-rural landscape are not properly considered. As seen in the assessment of purpose 1, where RP15 falls between the criteria for scoring 1 or 3 points, without being identified as scoring 2, this however has not been addressed within the assessment.

- 5.8. The Site Assessment for site reference 195 also failed to highlight the Sustainability Appraisal that appears to hold value within step 2 of the assessment, however only significant negative effects are noted.

6. SUMMARY AND CONCLUSION

- 6.1. This landscape and visual statement has been prepared in respect of land at **Damson Parkway**, Solihull and its classification in the Solihull MBC Draft Local Plan Supplementary Consultation (reference 195).
- 6.2. 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'.
- 6.3. 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.
- 6.4. 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 land use in this character area is influenced by the direct proximity of the urban edge to the open countryside.
- 6.5. The filtered visual connection to the settlement edge and adjacency to the countryside are matters that are clearly evident from field work undertaken in the local landscape. 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. These also provide opportunities to create an area of contained urban extension within a mature framework of existing vegetation.
- 6.6. A review of the Strategic Green Belt Assessment (SGBA) has demonstrated how the process of scoring has potentially over-rated the role and function of this part of the landscape, particularly in relation to check unrestricted sprawl of large built up areas.
- 6.7. Overall the SGBA concludes a score of Priority 6, whereas additional analysis based on field work demonstrates that the landscape in this area could be scored as Priority 5. This would follow on to the site being assessed as a Priority 5 site within the Supplementary Consultation site assessment document, which would mean that the site has potential for

inclusion and would have potential through step 2 of the assessment process to become a Green or Amber site.

- 6.8. The commentary within the Site Assessment document also fails to mention the positive outcomes of the Sustainability Appraisal that should have been used within step 2 of the assessment demonstrating inconsistencies to assessing the sites in the immediate vicinity which are proposed draft allocations within the LPR.
- 6.9. The proposed Green Belt boundary (**as shown on Fig 4.1 – Vision Document, February 2017 – Appendix 4**) would provide a robust and varied edge to the Green Belt including existing mature vegetation corridors.
- 6.10. Additionally, the neighbouring sites to the south have been included as Green sites with the proposed allocation of Land to the East of Solihull Housing Allocation Site 16 for development for up to 600 dwellings. This collection of sites and the proposed extension to the JLR employment development to the north-east, fall within the same area of landscape character and spatial strategy as site 195. Whilst there are likely to be some differences in overall landscape and visual constraints and opportunities between these sites, there are no notable or significant differences in the assessed landscape and visual sensitivity. Therefore, inclusion of Land at Damson Parkway/ site 195 as a Green or Amber site would provide the opportunity for a coherent and holistic approach to be used across an urban extension to the east of Solihull.

APPENDIX 3

REPRESENTATIONS TO THE DLR

APPENDIX 4

VISION DOCUMENT, FEBRUARY 2017

APPENDIX 5

UN-MET HOUSING NEED AND DUTY-TO-COOPERATE