

## **DRAFT LOCAL PLAN SUPPLEMENTARY CONSULTATION' RESPONSE**

# **SOLIHULL COUNCIL LOCAL PLAN REVIEW**

## **LAND AT FOUR ASHES ROAD, DORRIDGE**

### **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 Four Ashes Road, Dorridge 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 Four Ashes Road, Dorridge 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

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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

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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"> <li>• IN ACCORDANCE WITH THE SPATIAL STRATEGY.</li> <li>• ANY HARD CONSTRAINTS ONLY AFFECT A SMALL PROPORTION OF THE SITE AND/OR CAN BE MITIGATED.</li> <li>• SITE WOULD NOT BREACH A STRONG DEFENSIBLE BOUNDARY TO THE GREEN BELT.</li> <li>• ANY IDENTIFIED WIDER PLANNING GAIN OVER AND ABOVE WHAT WOULD NORMALLY BE EXPECTED.</li> <li>• SITES THAT WOULD USE OR CREATE A STRONG DEFENSIBLE BOUNDARY TO DEFINE THE EXTENT OF LAND TO BE REMOVED FROM THE GREEN BELT.</li> <li>• IF FINER GRAIN ACCESSIBILITY ANALYSIS<sup>38</sup> SHOWS THE SITE (OR THE PART TO BE INCLUDED) IS ACCESSIBLE.</li> </ul>	<ul style="list-style-type: none"> <li>• NOT IN ACCORDANCE WITH THE SPATIAL STRATEGY.</li> <li>• OVERRIDING HARD CONSTRAINTS<sup>39</sup> THAT CANNOT BE MITIGATED.</li> <li>• SHELAA CATEGORY 340 SITES UNLESS DEMONSTRATED THAT CONCERNS CAN BE OVERCOME.</li> <li>• SITE WOULD BREACH A STRONG DEFENSIBLE BOUNDARY TO THE GREEN BELT.</li> <li>• SITES THAT WOULD NOT USE OR CREATE A STRONG DEFENSIBLE BOUNDARY TO DEFINE THE EXTENT OF LAND TO BE REMOVED FROM THE GREEN BELT.</li> <li>• IF FINER GRAIN ACCESSIBILITY ANALYSIS SHOWS THE SITE (OR THE PART TO BE INCLUDED) IS NOT ACCESSIBLE.</li> <li>• IF THE SITE IS IN A LANDSCAPE CHARACTER AREA THAT HAS A VERY LOW LANDSCAPE CAPACITY RATING.</li> <li>• IF THE SA APPRAISAL IDENTIFIES SIGNIFICANT HARMFUL IMPACTS.</li> </ul>

***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 Four Ashes Road, site 199 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) confirms that site 199 falls within RP47 which has a Green Belt score of 5. For the methodology of the Site selection process to be applied as intended sites with a score of 5 or lower will generally be included in the Priority 5 rating – sites with potential for inclusion. 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.
- 4.12 The Landscape and Visual Statement (Appendix 3) also considers the Strategic Green Belt Assessment (SGBA) approach as leading to inconsistencies when assessing settlement edge sites.
- 4.13 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. For the Knowle, Dorridge and Bentley Heath settlement this includes two amber sites, namely Site reference 104, Land off Blue Lake Road and Site 14, Land off Oak Green, Dorridge.
- 4.14 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 Four Ashes Road, Dorridge (Site 199) should have been included in the Site Selection Assessment as a Green or Amber site as being a suitable site for residential development.
- 4.15 In addition and more concerning is the failure to take sites that fall within Priority Category 5 ‘Greenfield in accessible locations lower performing Green Belt location’ through to the Step 2 Refinement Assessment as is the case for Land at Four Ashes Road, Dorridge.

- 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 9 – KNOWLE, DORRIDGE AND BENTLEY HEATH

5.1 The Borough Council acknowledge that Knowle, Dorridge and Bentley Heath is one of two rural settlements in the Borough that has a full range of facilities including both secondary and primary schools, health services and a range of shops, services and facilities. As such we support the Borough Councils in agreeing that the settlement is well placed to accommodate growth in excess of just its own local needs. It is also noted that Green Belt release around the settlement is required to accommodate new development.

***Question 22: Do you agree with the infrastructure requirements identified for Knowle, Dorridge and Bentley Heath, if not why not; or do you believe there are any matters that should be included?***

5.2 It is agreed that the infrastructure requirements set out are appropriate.

## 6. SECTION 15 – OMITTED SITES

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

### **Amber Sites**

6.2 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.

6.3 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?***

6.4 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 199 Land at Four Ashes Road should be included as a Green or Amber site.



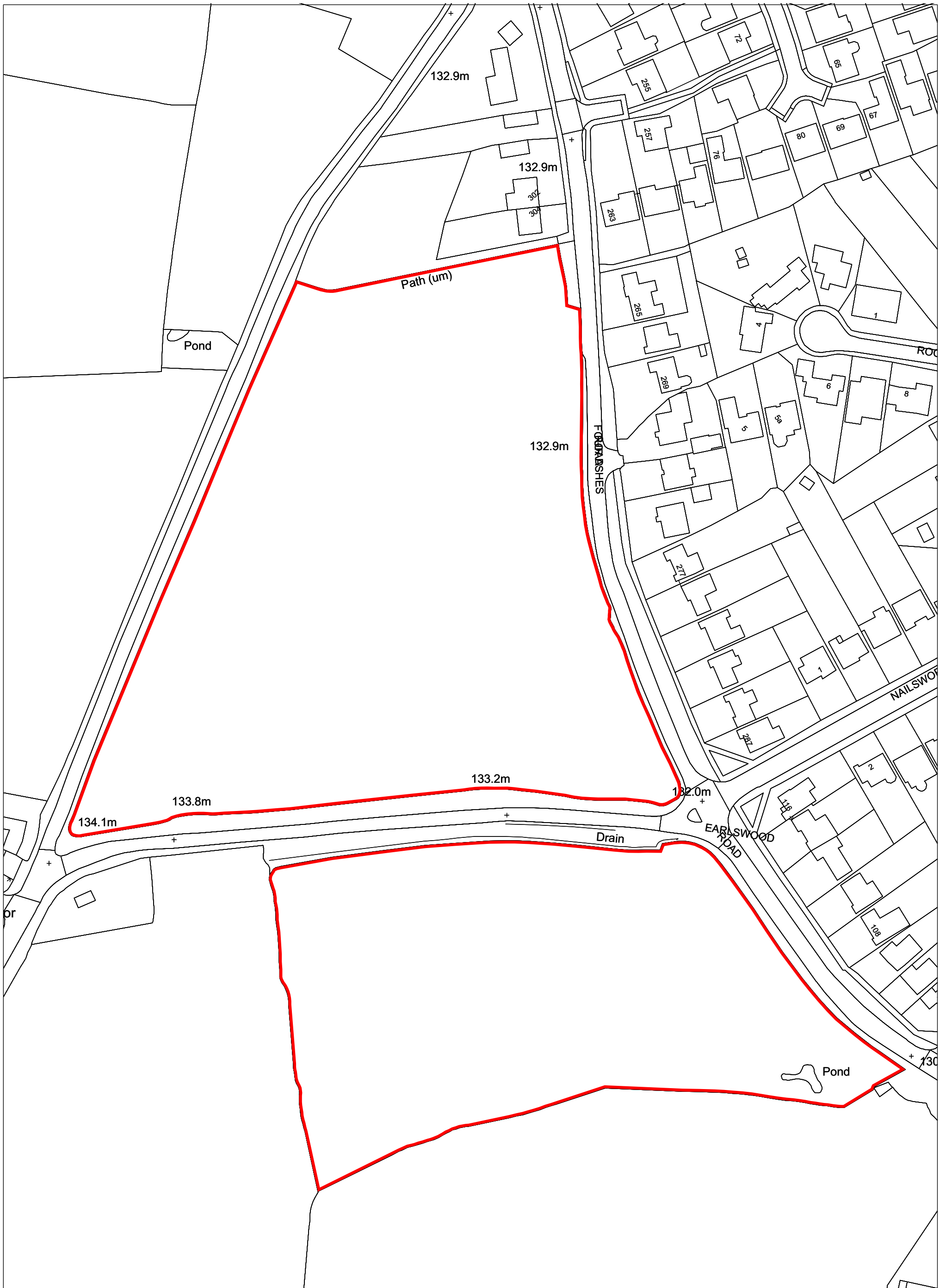
## 7. CONCLUSIONS

- 7.1 L&Q Estates supports the Borough Council's decision to continue with the review of the Solihull Local Plan.
- 7.2 Land at Four Ashes Road, Dorridge is within the control of L&Q Estates. It is developable and would contribute significantly towards meeting housing needs within the Borough, delivering in the region of 111 dwellings. 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.
- 7.3 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 'Green Site' or a 'Amber Site' and should be reassessed objectively by the Council and considered as a suitable site for housing development.
- 7.4 Land at Four Ashes Road, Dorridge would support the delivery of the Council's Preferred Growth Option that focuses development towards the most sustainable locations, including key rural villages.
- 7.5 L&Q Estates 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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# FOUR ASHES ROAD, DORRIDGE - 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)<sup>1</sup> 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 west of Dorridge, at a point where the role and

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

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 by the existing settlement edge of Dorridge to the east; Box Tree Road to the west; Earlswood Road to the North and countryside to the south.

### **3. GREEN BELT AND THE NPPF**

#### **NPPF**

- 3.1. The boundary between Solihull Metropolitan Borough and the adjacent area of Warwick District is broadly aligned with a local watercourse, which flows south of Earlswood Road. 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.
- 3.2. 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.
- 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, namely<sup>2</sup>:
- 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.

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<sup>2</sup> Para 134, NPPF (2019)

- 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 Framework<sup>3</sup>.
- 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 'LCA3, the Knowle and Dorridge Fringe'
- 3.8. 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:
- 3.9. *"There are a few detracting features within the landscape including poor legibility of the canal and some of the sub-urban influences."*
- 3.10. 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.
- 3.11. In relation to landscape sensitivity, the published assessment states that this is a landscape with a strong sense of local connection to the place, defining landscape features and a characteristic pattern including the watercourses and associated willow planting, bracken hedgebanks, creating a balanced landscape in a good to fair condition. The single track roads and winding lanes enhance rural character of the area and the pastoral character in some parts add to local distinctiveness There are a few detracting features within the landscape including poor legibility of the canal and some of the sub-urban influences. Access to public footpaths and bridleways is limited. The Landscape Character Sensitivity of this LCA is considered to be **medium**.

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<sup>3</sup> Para 171, NPPF (2019)

- 3.12. In relation to visual sensitivity, the published assessment states that the general visibility in this LCA is contained, short distance and low level where small scale fields and watercourses add intimacy and close down views across the area. The urban interface with Dorridge is well screened, although some views of the built form play a minor role in terms of visual coalescence in some parts of the character area. Overall the published assessment considered the visual sensitivity of the area to be **low**.
- 3.13. The published character assessment states that the value of the area is considered to be **medium**. It identifies ancient woodlands, wooded watercourses, Grimshaw 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 area would be able to accommodate small areas of new development, which would need to be of an appropriate type, scale and form, in keeping with the existing character and local distinctiveness.
- 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 RP47 'Land to south of Earlswood Road, Dorridge**.



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 RP47, it sets out the following:

GREEN BELT PURPOSE	RP47 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	2
4 - PRESERVE THE SETTING AND SPECIAL CHARACTER OF HISTORIC TOWNS	0
TOTAL	5

3.23. Overall the combined score for parcel RP47 identifies it as a parcel or area that is "lower performing" with an overall score of 5. Moderately performing in terms of purpose 2 and 3.

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 site is visually exposed from the adjacent public footpath network, and views are semi-rural in character due to the exposed urban edge;
- 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 boundary hedgerows, providing opportunities to enhance this through a comprehensive landscape strategy;
  - The site is located within a small scale landscape where the potential for expansive views are limited by the level topography, woodland blocks and established field boundary vegetation;
  - The site is located against the visually exposed, urban edge of Dorridge providing a developed context to the site and providing potential to improve the visual and physical interface between the countryside and urban area; and
  - The opportunity to propose development within LCA 3: Knowle and Dorridge Fringe 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.
- 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 Four Ashes Road and Earlswood Road, to the west.</p> <p>The site makes a contribution to the definition of the boundary of Dorridge 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 Hockley Heath, which is located ca. 1.6 km to the south-west and Monkspath 1.6 km to the north-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 Dorridge and Hockley Heath or Monkspath. 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 south and west is generally characterised by countryside, with occasional built form. To the north and east however, is the existing settlement edge of Dorridge. There are a number of individual properties in the immediate vicinity of the site including the large property to the west of Earlswood Road and the Child Care facility on Box Tree Road.</p> <p>There is some ribbon development to the south along Chessettes Wood Road. The countryside in the vicinity of the site is characterised by mature woodland coppices and mature boundary hedgerow 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</p>

		<p>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?           Are key landmarks or the historic core visible from within the area?           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>

**Table 1: Impacts on Green Belt Purpose**

3.28. This analysis confirms that the scoring of RP47 is consistent with the criteria within the Solihull Strategic Green Belt Assessment.

3.29. However, based on high level field work, the land west of Earlswood Road has inter-visibility to the residential areas that form the western settlement edge of Dorridge. Within the limitations of the objective approach the greater residential influence on the landscape character has not been considered, (refer to **Plate 1**).

**Plate 1: View from Box Tree Road**



3.30. This prominent interface with the settlement edge, including the large property to the west of Earlswood Road and the Bentley Manor Childcare Centre on Box Tree Road, to the west of the site would provide opportunity to reduce the score against Green Belt Purpose 3 from **2** to **1** as there is development present in the immediate area of the site, reducing the overall score to **4**.

3.31. 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.

3.32. This weighting of the scores for Green Belt purposes, and over rating of purpose 3, 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 an 'Amber site'. This is considered further below.

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

- 3.33. The Supplementary Consultation (including Site Assessments) is a non-statutory supplementary consultation to that undertaken previously for the Draft Local Plan (December 2016).
- 3.34. 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.
- 3.35. 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.
- 3.36. 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.
- 3.37. 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).
- 3.38. Sites scoring 8-10 are 'Red' and are considered unsuitable.
- 3.39. 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).
- 3.40. 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"> <li>● IN ACCORDANCE WITH THE SPATIAL STRATEGY .</li> <li>● ANY HARD CONSTRAINTS ONLY AFFECT A SMALL PROPORTION OF THE SITE AND/OR CAN BE MITIGATED.</li> <li>● SITE WOULD NOT BREACH A STRONG DEFENSIBLE BOUNDARY TO THE GREEN BELT.</li> <li>● ANY IDENTIFIED WIDER PLANNING GAIN OVER AND ABOVE WHAT WOULD NORMALLY BE EXPECTED.</li> <li>● SITES THAT WOULD USE OR CREATE A STRONG DEFENSIBLE BOUNDARY TO DEFINE THE EXTENT OF LAND TO BE REMOVED FROM THE GREEN BELT.</li> <li>● IF FINER GRAIN ACCESSIBILITY ANALYSIS<sup>38</sup> SHOWS THE SITE (OR THE PART TO BE INCLUDED) IS ACCESSIBLE.</li> </ul>	<ul style="list-style-type: none"> <li>● NOT IN ACCORDANCE WITH THE SPATIAL STRATEGY.</li> <li>● OVERRIDING HARD CONSTRAINTS<sup>39</sup> THAT CANNOT BE MITIGATED.</li> <li>● SHELAA CATEGORY 340 SITES UNLESS DEMONSTRATED THAT CONCERNS CAN BE OVERCOME.</li> <li>● SITE WOULD BREACH A STRONG DEFENSIBLE BOUNDARY TO THE GREEN BELT.</li> <li>● SITES THAT WOULD NOT USE OR CREATE A STRONG DEFENSIBLE BOUNDARY TO DEFINE THE EXTENT OF LAND TO BE REMOVED FROM THE GREEN BELT.</li> <li>● IF FINER GRAIN ACCESSIBILITY ANALYSIS SHOWS THE SITE (OR THE PART TO BE INCLUDED) IS NOT ACCESSIBLE.</li> <li>● IF THE SITE IS IN A LANDSCAPE CHARACTER AREA THAT HAS A VERY LOW LANDSCAPE CAPACITY RATING.</li> <li>● IF THE SA APPRAISAL IDENTIFIES SIGNIFICANT HARMFUL IMPACTS.</li> </ul>

**Table 2: Step 2 Refinement Criteria**

***Site reference 199 (Land at Four Ashes Road, Dorridge)***

- 3.41. The site is identified as site reference 199 in the Supplementary Consultation Site Assessments. The assessment confirms the SGBA score as lower performing with a score of 5. Additionally, it confirms the LCA3 Landscape character sensitivity as medium and visual sensitivity as low. Further criteria are the sustainability appraisal which is assessed as AECOM 58 17 effects: 4 positive (1 significant); 10 neutral; 3 negative.
- 3.42. The Site Selection Step 1 is assessed as Priority 6 – category Blue (unlikely for inclusion) with Site Selection Step 2 identifying the site as R – “not to be included in the plan”.
- 3.43. Site reference 199 (RP47) has a Green Belt score of 5. Step 1 of the assessment 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. Identifying Site reference 199 as Priority 6 demonstrates an inconsistent approach that draws questions over the robustness of the overall site assessment.
- 3.44. Whether the site was assessed as a Priority 5 or 6 the selection process ought to allow full consideration of the site at step 2 as advocated within the Supplementary Consultation: Summary Illustration of Site Selection Process. However, it would appear

that the Priority 6 rating of the site has influenced Step 2 of the assessment and the commentary states that;

- 3.45. *"Whilst the site is located adjacent to the built up area, it would breach an existing strong Green Belt boundary. The site, which is in a lower performing parcel of Green Belt is in two parts; development of the southern part would result in unacceptable incursion into the countryside, creating an indefensible Green Belt boundary and setting a precedent for the development of surrounding land. The northern part of the site is contained by existing roads, but development would extend the built up area of Dorridge to the west, eroding the narrow gap between Dorridge and Blythe Valley Park. The site has low/medium accessibility in an area with medium landscape character sensitivity, medium landscape value and a low landscape capacity".*
- 3.46. Within this commentary there is no mention is made of the Sustainability Appraisal results that confirm more positive than negative effects, including 1 significant positive effect which is not given any discussion within the commentary, whereas in other site assessments (including site 413 discussed below) it is seemingly weighted as a reason for the scoring outcome.
- 3.47. 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 199 would be a suitable combination of retained mature hedgerow boundaries to the south with Box Tree Road to the west and Earlswood Road to the north as established within the landscape strategy (shown in the Indicative Masterplan provided within the previously submitted Vision Document **Appendix 4**).
- 3.48. The landscape strategy (set out in the Vision Document) advises that the overall development envelope is defined by the visual and physical containment provided by the urban edge of Dorridge and the road network that transects the surrounding countryside. 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. This will also provide a varied and soft edge to not only the development but this urban area of Dorridge.
- 3.49. The development envelope is located to the east of the northern parcel allowing open space to be placed on the more sensitive western edge that lies adjacent to the surrounding countryside. This also provides opportunities for pedestrian routes to travel through this green corridor and connect to the existing PROW network. To the south the



development envelope is pulled back to provide a green gateway to the site when approaching it from the south.

3.50. Additionally, the separation between Dorridge and Blythe Valley Park would remain greater than 1 km and so in terms of the scoring system used in the SGBA for Green Belt purpose 2 would remain in the same scoring bracket, 2, not reducing the overall performance of this area of Green Belt if the site was to come forward.

3.51. Therefore, in light of the inconsistent scoring approach that suggest that site 199 ought to be considered a **Priority 5** site, and assessed at stage 2 when taking into account the landscape strategy, it is clear that the site should be a Green or Amber site as there are no Green Belt issues. This assessment would bring the site in line with a number of other lower performing parcels, outlined below, coupled with a lack of consistency in consideration given to the Sustainability Appraisal it is considered that site 199 should be considered an 'Amber site'.

#### 4. COMPARATIVE SITES

4.1. RP 40 (Land South of Grove Road, west of Norton Green Lane) is located to the east of Dorridge, the SGBA has scored it as follows;

GREEN BELT PURPOSE	RP39 SCORE
1 - CHECK UNRESTRICTED SPRAWL OF LARGE BUILT-UP AREAS	1
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	4

4.2. Overall the site is also lower performing in line with RP47. It is moderately performing in purpose 3.

4.3. The Supplementary Consultation identifies the refined parcel as site references 104 (Land off Blue Lake Road, Dorridge, (Oak Green)) and 413 (Land at Oak Green, Dorridge).

#### ***Site reference 104 (Land off Blue Lake Road, Dorridge, (Oak Green))***

4.4. The Supplementary Consultation Site Assessments for site reference 104 confirms that the site is lower performing in terms of Green Belt Purposes and falls within the same LCA3 as site reference 199 and so has the same sensitivity assessments. Additionally,

the Sustainability Appraisal is assessed as being the same, with the exception of no significant positive effect.

- 4.5. The Site Selection Step 1 is assessed as Priority 5 – “sites for potential inclusion”, with Site Selection Step 2 identifying the site as A – “Not to be included in the plan, but for the purposes of this consultation the sites in this category have been highlighted as such so that residents and others can comment on whether these are ‘less harmful’ than those placed in the red category.” The assessment identified the site as adjacent to settlement edge in a lower performing parcel of Green Belt, which is in essence true of site reference 199. It goes on to state that the site could provide a rounding off of the settlement, has medium accessibility and has fewer negative than positive effects on sustainability, as is the case with site reference 199.

***Site reference 413 (Land at Oak Green, Dorridge)***

- 4.6. The Supplementary Consultation Site Assessments for site reference 413 confirms that the site is lower performing in terms of Green Belt Purposes and falls within the same LCA3 as site reference 199 and so has the same sensitivity assessments. Additionally, the Sustainability Appraisal is assessed as AECOM 146 19 effects: 3 positive (1 significant); 14 neutral; 2 negative. Similar to site reference 199, site 413 has more positives than negatives
- 4.7. The Site Selection Step 1 is assessed as Priority 5 – “sites for potential inclusion”, with Site Selection Step 2 identifying the site as A – “Not to be included in the plan, but for the purposes of this consultation the sites in this category have been highlighted as such so that residents and others can comment on whether these are ‘less harmful’ than those placed in the red category.”
- 4.8. The assessment identified the site as adjacent to settlement edge in a lower performing parcel of Green Belt, which is in essence true of site reference 199. It goes on to state that the site could form part of a wider site area, well related to the settlement contained by defensible Green Belt Boundary if considered in the context of the Arden Triangle (Site 9) and surrounding promoted land including site reference 104 and 109. The sustainability appraisal is also discussed in the commentary pointing out it has more positive than negative effects including 1 significant positive of deliverability of housing within 10 years.

## 5. ANALYSIS OF THE ASSESSMENT

- 5.1. It is considered 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. However, 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 199 that scored 6 (blue category), from inclusion from Amber sites when, overall they perform equally to sites that have been identified as Green or Amber sites.
- 5.5. Moreover, the Site Hierarchy Criteria explains the above scoring system within the additional description. However it is pertinent to site reference 199, with a combined Green Belt score of **5** has been given a **Priority 6** rating, making it unlikely for inclusion, when 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. This demonstrates the inconsistent approach of the use of the objective site selection process. If the site has been assessed at step 2 appropriately, it clearly has potential for inclusion as a Green or Amber site.
- 5.6. 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. This has led to inconsistencies when assessing settlement edge sites demonstrated within the different scoring of RP47 and RP40.
- 5.7. The document includes a separate section addressing 'Amber sites' however this includes little new or additional detailed landscape analysis of these sites over that presented in the summary sheets, including reference to the SGBA score for Refined Parcels.

- 5.8. The Site Assessment for site reference 199 also failed to highlight the Sustainability Appraisal that has been valued in other site assessment commentaries, including site reference 413, demonstrating inconsistencies across the objective process.

## 6. SUMMARY AND CONCLUSION

- 6.1. This landscape and visual statement has been prepared in respect of land at **Four Ashes Road, Dorridge**, and its classification in the Solihull MBC Draft Local Plan Supplementary Consultation (reference 199).
- 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 there are a few detracting features within the landscape including poor legibility of the canal and some of the sub-urban influences.
- 6.5. The 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.
- 6.6. A review of the Strategic Green Belt Assessment (SGBA) has demonstrated how the process of scoring has over-rated the role and function of this part of the landscape, particularly in relation to safeguarding the countryside.
- 6.7. Overall the SGBA concludes a score of 5, whereas additional analysis based on field work demonstrates that the landscape in this area should be scored as 4.
- 6.8. One of the key issues of the SGBA scoring being carried through the Site Hierarchy in the Supplementary Consultation, in the instance of site reference 199, is that the approach

does not appear to have been applied correctly. The current score of 5 should have been graded within **Priority 5** in accordance with the criteria set out within the document. This would mean that the site has potential for inclusion, further assessment at step 2 would likely be a Green or Amber site. However, the site has been identified as Priority 6 and there is no explanation as to how the site is afforded a Red site. There does not appear to be any overriding justification for this outcome. Inconsistency in judgements such as this that move away from an objective process are not considered to be robust.

- 6.9. If the reduced Green Belt score, 4, had been carried forward it seems likely that site 199 would have been identified as a Priority 5 site. This would have allowed it to come forward as an Amber site, as is the case for site refs 104 and 413 that received an overall score of 4 when RP40 was assessed in the SGBA. Irrespective of this the conclusions of the assessment of the site as a priority 6 should still have allowed the site to be assessed as a blue site at step 2, it is not evident that this second assessment has taken place.
- 6.10. The commentary within the Site Assessment document also fails to mention the positive outcomes of the Sustainability Appraisal that has been used as a point of note in other sites, i.e. site refs 104 and 413.
- 6.11. It is considered that the proposed Green Belt boundary (**as shown on Fig 4.2 – Vision Document, February 2017**) would provide a robust and varied edge to the Green Belt with two of the three new boundaries being aligned along ‘durable’ infrastructure.
- 6.12. The inconsistent approach to the use of objective site selection process has led to the land at Four Ashes Road, Dorridge, RP47, site reference 199, being incorrectly excluded for consideration as a green or Amber site.
- 6.13. In conclusion if the criteria had been applied correctly i.e. “lower performing sites with a score of 5 or less will be identified as Priority 5” the site should be graded as Priority 5 – potential for inclusion – leading to its inclusion as an Amber site and consideration as being a potential Green site. Furthermore, the over rating of the Green Belt score has pulled the site out of alignment with similar surrounding sites with a score of 4 have been included as Amber sites.

## **APPENDIX 3**

### **REPRESENTATIONS TO THE DLR**

## **APPENDIX 4**

### **VISION DOCUMENT, FEBRUARY 2017**

## **APPENDIX 5**

### **UN-MET HOUSING NEED AND DUTY-TO-COOPERATE**