

# REPRESENTATIONS TO SOLIHULL METROPOLITAN BOROUGH COUNCIL

## LANDSCAPE AND VISUAL STATEMENT: REVIEW OF GREEN BELT ISSUES

### LAND WEST OF NORTON GREEN LANE, DORRIDGE

ON BEHALF OF AMBER REI LTD

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

## **CONTENTS**

|  |           |
|--|-----------|
| <b>1. INTRODUCTION</b>                     | <b>2</b>  |
| <b>2. LOCAL PLAN EVIDENCE BASE</b>         | <b>6</b>  |
| <b>3. REVIEW OF SITE SELECTION PROCESS</b> | <b>14</b> |
| <b>4. SUMMARY AND CONCLUSION</b>           | <b>17</b> |

## 1. INTRODUCTION

### Overview

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

### Green Belt and the NPPF

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

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

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

1.5. The Framework goes on to set out the long-established 'five' purposes of Green Belt, namely<sup>1</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>1</sup> Para 134, NPPF (2019)

- 1.6. In respect of conserving and enhancing the natural environment, the NPPF states that plans should 'allocate the land with the least environmental or amenity value', noting the need to be consistent with other policies in the Framework<sup>2</sup>.
- 1.7. Overall the importance of Green Belt is clear, as are the connections to landscape and visual matters in respect of understanding the physical attributes, character and visual amenity of a given landscape.

### **Local Plan Review**

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

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<sup>2</sup> Para 171, NPPF (2019)

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

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

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

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

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

### **Terms of reference**

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

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

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

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

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

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

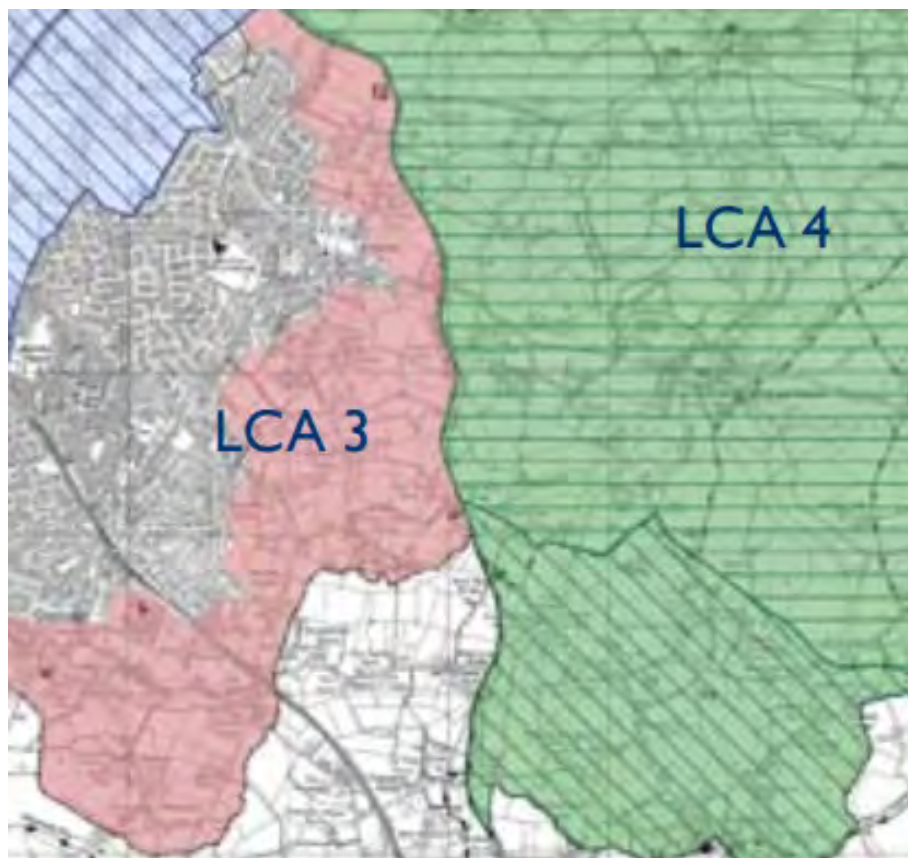
## 2. LOCAL PLAN EVIDENCE BASE

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

### **Solihull MBC Landscape Character Assessment (2016)**

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

**Plate 1: Extract from the Solihull Landscape Character Assessment**



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



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

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

#### **Solihull Strategic Green Belt Assessment (2016)**

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

- Does not make recommendations for amendments to the Green Belt boundary;
- Does not determine whether or not land should be removed from the Green Belt.

2.19. Consequently, in the absence of any connection to development potential within a given landscape, the strategic review is limited to determining the role and function in Green Belt terms.

2.20. The strategic review defines the study area, setting the context of the local landscape character and stating that:

2.21. *"The character of the Green Belt varies greatly across the borough with the eastern portion forming part of the vital strategic Meriden Gap - the area of Green Belt separating Birmingham and Solihull from Coventry in the east. This area of the Green Belt is predominantly rural in nature and generally characterised by countryside with smaller settlements scattered across the area. The area also includes the historic settlements of Knowle, Dorridge, Hampton-in-Arden, Meriden, alongside the smaller historic settlements of Barston, Berkswell and Temple Balsall."* (page 4)

2.22. The strategic review sets out a series of large areas, between settlements, covering wider rural areas that are not located on the edge of settlements (Broad Areas) and also a series of smaller parcels which cover land adjoining or adjacent to built up areas (Refined Parcels).

2.23. The weakness in this approach is that it appears to have been implemented in a two dimensional, desk based approach. Consequently, issues of landscape character and the influence of settlement edges on the rural landscape are not properly considered.

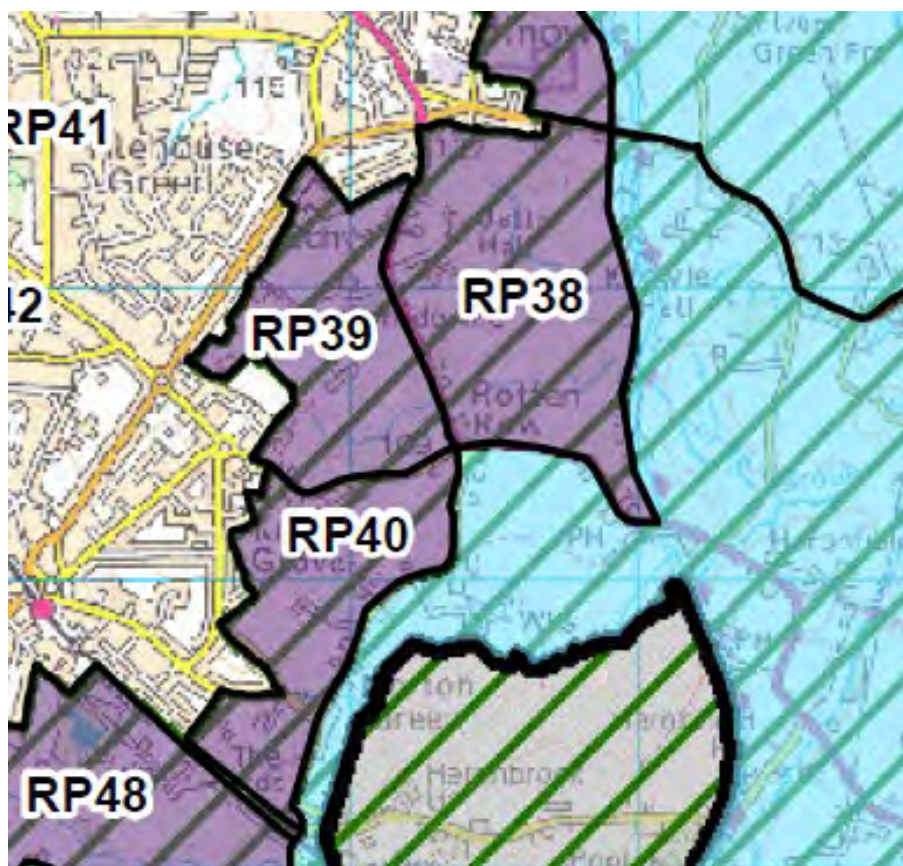
2.24. For example, the boundary of 'Broad Area 3' (relevant to the context of Knowle and Dorridge) appears to have been drawn based on mapping and the local road network. The land between Broad Area 3 and the built settlement edge is included as Refined Parcels 38, 39 and 40.

2.25. However, based on high level field work, the land west of Norton Green Lane remains very distinct from the settlement with little or no inter-visibility to the residential areas that form the settlement edge. Consequently, the character is wholly rural and consistent with the wider Broad Area 3.

2.26. This is reinforced by the landscape character assessment for the District, as discussed above.

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

**Plate 2: Extract from the Solihull Strategic Green Belt Assessment**



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

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

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

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

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

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

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

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

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

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

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

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

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

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



### **3. REVIEW OF SITE SELECTION PROCESS**

#### **Draft Local Plan Supplementary Consultation (January 2019)**

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

#### ***Site Selection Methodology***

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

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

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

### ***Omitted Sites***

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



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

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

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

### ***Site Assessments***

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

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

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

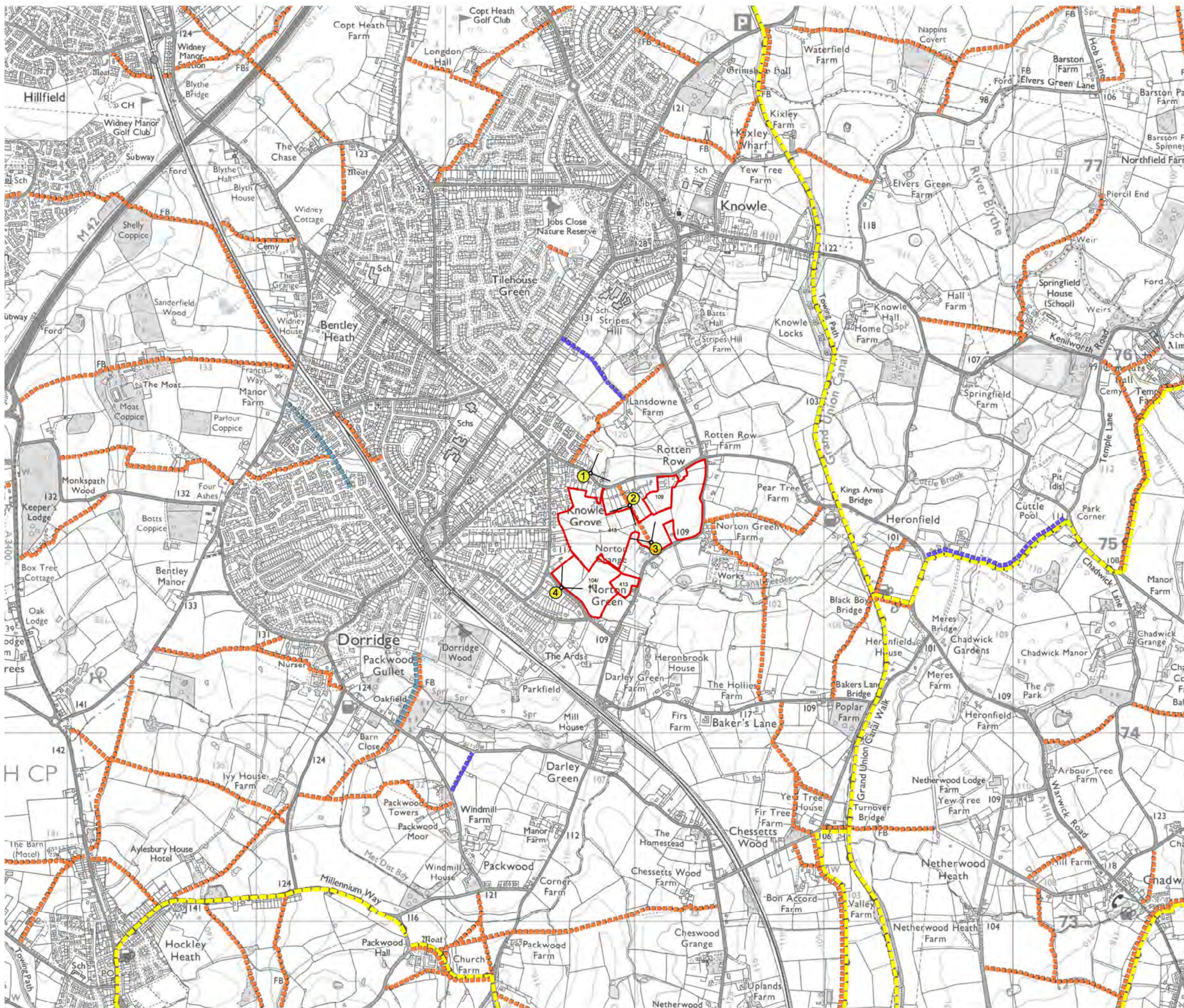
3.20. The document includes a separate section addressing 'Amber sites' however this includes little new or additional analysis over that presented in the summary sheets, including reference to the SGBA score of 4.

#### **4. SUMMARY AND CONCLUSION**



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

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





**KEY**

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

Land West of Norton Green Lane,  
Dorridge  
Client: AMBER REI LTD  
**Fig. 1: Viewpoint Locations and  
Public Rights of Way**

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





Settlement edge heavily filtered

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

Elevated position allows long distance views

Well defined existing settlement edge of Grove Road



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

Route of public footpath

Rural settlement pattern restricted to larger scale scattered properties

Long distance views to the wider landscape and Green Belt

Some enclosure at a local scale



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

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

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

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





Route of public footpath

Settlement edge in close proximity but views are heavily screened



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

Well defined existing settlement edge of Dorridge

More elevated topography forms localised highpoints



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

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

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

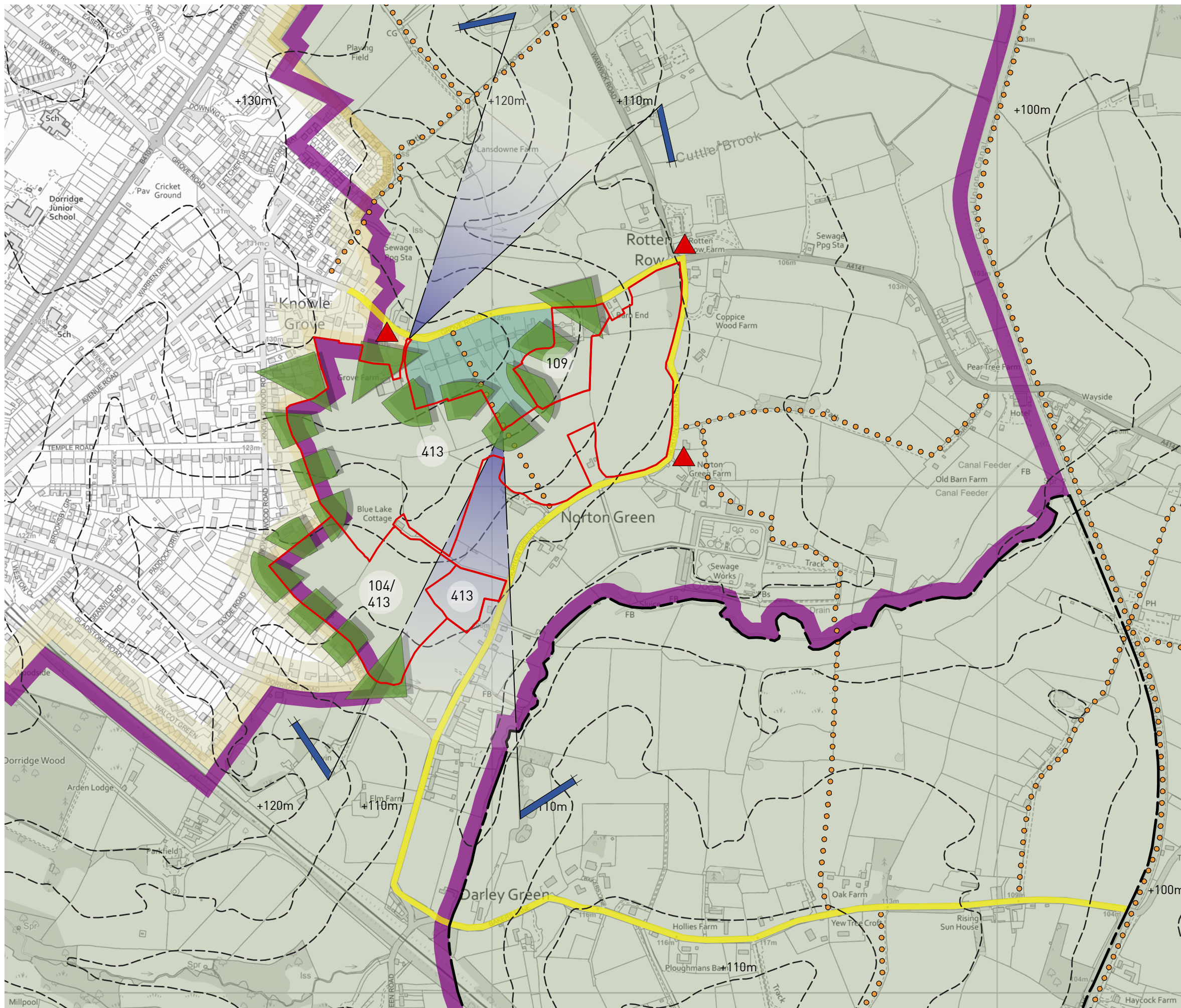
Date : 04/03/2019

Drawn by : JZA

Checked by : JWA







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

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

Land West of Norton Green Lane,  
 Dorridge

Client: AMBER REI LTD

**Fig. 3: Landscape and Visual Analysis**

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

