

1. INTRODUCTION: 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 MBC Landscape Character Assessment (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);
 - 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. This report first summarises the relevant landscape and greenbelt evidence to date in relation to Land at Bickenhill, Marston Green, notably with reference to Solihull MBC Landscape Character Assessment (2016) and Solihull Strategic Green Belt Assessment (2016), given its relevance to the whole site selection process.
- 1.6. **The report then examines the latest evidence base assessment in relation to identifying strategic sites, which is set out in the Council's Draft Local Plan Supplementary Consultation Documents (as listed above), including Site Assessments. This key analysis is provided in Section 5.**
- 1.7. 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.

- 1.8. Principles related to the appraisal and assessment of landscape and visual matters are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)¹ and reference is made to this document as necessary.

2. TERMS OF REFERENCE

- 2.1. In respect of the context set out above, Pegasus Group has undertaken a strategic review of an area of landscape located to the east of Marston Green which currently lies within the West Midlands Green Belt. The Green Belt in this area of the Borough comprises smaller, more refined parcels surrounded by urban areas.
- 2.2. The area of landscape under consideration includes five parcels of land totalling 20.5 ha which lie to the north and south of Bickenhill Road and are further separated by private tracks and well defined hedgerows. The western boundary of the site is defined by Low Brook, with the northern, eastern and southern boundaries defined by field boundaries and/or Bickenhill Road.

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

3. GREEN BELT AND THE NPPF

NPPF

- 3.1. Approximately 12,000 hectares of Solihull MBC is designated as Green Belt land, accounting for approximately two thirds of the Borough's land area. The Green Belt within Solihull MBC forms an integral part of the West Midlands Green Belt stretching between the Birmingham Conurbation, including Solihull, and the surrounding major urban areas.
- 3.2. The Green Belt in the vicinity of Marston Green lies to the east of the settlement's urban edge, separating it from the development of Birmingham Business Park, Birmingham Airport and the National Exhibition Centre. This area of Green Belt does not physical join the more extensive area of the West Midlands Green Belt which extends southwards towards Warwick District, rather it includes smaller, fragmented and more refined areas within the urban areas.
- 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 Belt²:
 - 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.
- 3.5. In respect of conserving and enhancing the natural environment, the NPPF states that plans should 'allocate the land with the least environmental or amenity value', noting the need to be consistent with other policies in the Framework³.
- 3.6. Overall the importance of Green Belt is clear, as are the connections to landscape and visual matters in respect of understanding the physical attributes, character and visual amenity of a given landscape.

² Para 134, NPPF (2019)

³ Para 171, NPPF (2019)

4. RELEVANT EVIDENCE BASE

Solihull MBC Landscape Character Assessment (2016)

4.1. The 'Solihull Borough Landscape Character Assessment' (prepared by Watermans on behalf of SMBC) defines the character of the landscape in this area as 'LCA10, Urban Green Spaces' and notes that this area "largely comprises managed green spaces.....typical of the peri-urban fringe". LCA10 is further sub divided into two areas, of which the site is located within sub-area 10B.

4.2. In respect of LCA10B, the key characters are as follows:

- Green managed spaces, as a result of urban influences. These include playing fields, school grounds, cemetery and Marston Green Park, which is a Local Nature Reserve;
- Small to medium scale arable fields of a regular pattern with two active farms;
- Small pockets of deciduous woodland scattered across the sub-area;
- Limited public footpaths, although where in existence they are well sign posted;
- High hedges along the roads with fast moving traffic towards the east;
- Intimate and enclosed character within the western extent of the sub-area with overhanging trees along some roads;
- Strong tree cover in general across the sub-area;
- Poplar shelterbelts add to the character of the area at Marston Green;
- Constant road and aeroplane noise form background disturbance within the sub-area, which is more prevalent to the eastern extent in contrast to the west.

4.3. The LCA sets out a series of landscape sensitivities, which include reference to:

- a combination of attractive areas including the Marston Green Park;
- the legibility of the landscape pattern in the area is vague although it's character is distinct due to its geographical setting reaching up to the urban edge;
- the landscape is fragmented by the roads and other built influences which results in the unbalanced nature of the landscape.
- some detractors including road and air traffic noise, electricity pylons and litter specifically around Marston Green.
- the landscape condition varies between good to fair with some fields in need of management particularly around the Marston Green cricket ground.

4.4. The Landscape Character Sensitivity of this LCA sub area is considered to be **medium**.

- 4.5. In relation to visual sensitivity, the published assessment states that this sub-area consists of generally short distance views that are wide-framed, shallow and horizontal in orientation. There are some views towards commercial/employment buildings within the landscape and glimpses of the M42 from some parts of the sub-area. Overall the published assessment considered the visual sensitivity of the sub-area to be **low**.
- 4.6. The published character assessment states that the value of the area is considered to be **medium**. Marston Green Park Local Nature Reserve and the other recreational grounds are identified as locally valued characteristics.
- 4.7. In terms of landscape capacity, the published assessment states that this sub-area would typically have an overall **low** landscape capacity to accommodate change. However, it does state that the area would be able to accommodate some 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 of the area.
- 4.8. This forms a clear constraint to development and consequently the land cannot be considered as an area of 'the least environmental or amenity value'.
- 4.9. 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)

- 4.10. This document sets out a strategic review of the Green Belt in Solihull. The document states that:
- 4.11. *"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)
- 4.12. 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 across **Refined Parcels 7 and 10, referred to as RP07 'Land to the south of Coleshill Road' and RP10 'Land to the north of Birmingham International Park' respectively.**

4.13. 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.

4.14. 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.

4.15. The assessment scores each Refined Parcel against four purposes of the Green Belt and in relation to RP07 and RP10, it sets out the following:

GREEN BELT PURPOSE	RP07 SCORE
1 - CHECK UNRESTRICTED SPRAWL OF LARGE BUILT-UP AREAS	2
2 - PREVENT NEIGHBOURING TOWNS MERGING INTO ONE ANOTHER	2
3 - ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT	1
4 - PRESERVE THE SETTING AND SPECIAL CHARACTER OF HISTORIC TOWNS	0
TOTAL	5

4.16. Overall the combined score for parcel RP07 identifies it as a parcel or area that is "lower performing" with an overall score of 5. Moderately performing in terms of purpose 1 and 2.

GREEN BELT PURPOSE	RP10 SCORE
1 - CHECK UNRESTRICTED SPRAWL OF LARGE BUILT-UP AREAS	1
2 - PREVENT NEIGHBOURING TOWNS MERGING INTO ONE ANOTHER	2
3 - ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT	1
4 - PRESERVE THE SETTING AND SPECIAL CHARACTER OF HISTORIC TOWNS	0
TOTAL	4

4.17. Overall the combined score for parcel RP10 identifies it as a parcel or area that is "lower performing" with an overall score of 4. Moderately performing in terms of purpose 2.

4.18. 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 limited local PROW network, (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.

4.19. The opportunities are considered to be:

- There are no overriding statutory landscape planning designations;
- Existing vegetation and green infrastructure throughout the site, including hedgerows, providing opportunities to enhance this through a comprehensive landscape strategy;
- The presence of mature vegetation including the mature woodland of School Rough and hedgerows throughout the various parcels of the site, which will help to minimise the visual envelope of the site and will contribute to the capacity of the site to accommodate development; and
- The opportunity to propose development within LCA Sub-area 10B 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.

4.20. 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.

4.21. 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 some ribbon development present in this location, including along Bickenhill Road.</p> <p>Other development is not detached from the existing large built up area, and forms part of the edge of Solihull.</p> <p>The site's existing physical and visual containment and the decision to concentrate proposed development south of a robust new green belt boundary along Bickenhill Road helps to ensure that the site will not result in the unrestricted sprawl of built up areas.</p>
To prevent neighbouring towns merging into one another.	Does the area represent a 'gap' between major urban areas?	The area does not represent a 'gap' between major urban areas and allows for the retention of land to the north as undeveloped land.
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 area is heavily influenced by the existing urban edge, including buildings associated with Elmdon Trading Estate to the south, existing residential development along Bickenhill Road and other urban fringe land uses such as Marston Green burial ground.</p> <p>There are a number of open agricultural; fields to the north, however the existing urban edge of Solihull, Birmingham Airport and Birmingham Business Park are all in close proximity.</p> <p>There are some areas of ribbon development. It is considered due to the sites location it would not result in any encroachment into the countryside.</p>

To preserve the setting and special character of historic towns.	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?	The site lies outside of any Conservation Areas and is not located within a historic town.
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Table 1: Impacts on Green Belt Purpose

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- 4.22. This analysis broadly confirms that the scoring of RP07 and RP10 is consistent with the criteria within the Solihull Strategic Green Belt Assessment.
- 4.23. However, based on field work, it is clear to note that the Green Belt in this location is fragmented, as opposed to large swathes of open land which is seen in the southern area of the Borough's Green Belt. It should be recognised therefore that given the fragmented landscape within this area of the Green Belt, it is not consistent in its role and function in its entirety, which results in individual parcels performing lower or higher than nearby or even adjacent parcels in relation to the purposes of the Green Belt.
- 4.24. This is clearly seen in relation to the site which is formed of 5 parcels, however the emerging proposals for the site as has been demonstrated with the Vision Document submitted in February 2017 in response to the Draft Local Plan consultation (**Appendix 3, Fig 4.1**) proposes development on only 2 of the parcels which are considered to be suitable for development. The development envelope is purposely located away from the more open parcels of the site to the north, including that near to Marston Green Recreation Ground. This will seek to reduce visual prominence of any new built form and maintain the sense of open space on arrival into Marston Green in this location.
- 4.25. It could therefore be argued that certain parcels of the site may not score as high as those summarised in the above assessment.

5. THE SOLIHULL LOCAL PLAN REVIEW: DRAFT LOCAL PLAN SUPPLEMENTARY CONSULTATION (AND SITE ASSESSMENTS): ANALYSIS OF ASSESSMENT

5.1. This section examines the latest evidence base assessment in relation to identifying strategic sites, which is set out in the Council's Draft Local Plan Supplementary Consultation Documents, including Site Assessments.

Site Selection Process Methodology

5.2. The Supplementary Consultation (including Site Assessments) is a non-statutory supplementary consultation to that undertaken previously for the Draft Local Plan (December 2016).

5.3. 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.

5.4. 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.

5.5. 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.

5.6. 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).

5.7. 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).

5.8. The factors set out in Table 2 below identify the considerations that have been taken into account at Step 2. It is specifically noted that **higher performing sites in the hierarchy**

need more significant harmful impacts if they are to be excluded, (emphasis added) and for sites not performing well in the hierarchy they will need more significant justification to be included.

FACTORS IN FAVOUR	FACTORS AGAINST
<ul style="list-style-type: none"> ● IN ACCORDANCE WITH THE SPATIAL STRATEGY. ● ANY HARD CONSTRAINTS ONLY AFFECT A SMALL PROPORTION OF THE SITE AND/OR CAN BE MITIGATED. ● SITE WOULD NOT BREACH A STRONG DEFENSIBLE BOUNDARY TO THE GREEN BELT. ● ANY IDENTIFIED WIDER PLANNING GAIN OVER AND ABOVE WHAT WOULD NORMALLY BE EXPECTED. ● SITES THAT WOULD USE OR CREATE A STRONG DEFENSIBLE BOUNDARY TO DEFINE THE EXTENT OF LAND TO BE REMOVED FROM THE GREEN BELT. ● IF FINER GRAIN ACCESSIBILITY ANALYSIS³⁸ SHOWS THE SITE (OR THE PART TO BE INCLUDED) IS ACCESSIBLE. 	<ul style="list-style-type: none"> ● NOT IN ACCORDANCE WITH THE SPATIAL STRATEGY. ● OVERRIDING HARD CONSTRAINTS³⁹ THAT CANNOT BE MITIGATED. ● SHELA⁴⁰ CATEGORY 340 SITES UNLESS DEMONSTRATED THAT CONCERNS CAN BE OVERCOME. ● SITE WOULD BREACH A STRONG DEFENSIBLE BOUNDARY TO THE GREEN BELT. ● SITES THAT WOULD NOT USE OR CREATE A STRONG DEFENSIBLE BOUNDARY TO DEFINE THE EXTENT OF LAND TO BE REMOVED FROM THE GREEN BELT. ● IF FINER GRAIN ACCESSIBILITY ANALYSIS SHOWS THE SITE (OR THE PART TO BE INCLUDED) IS NOT ACCESSIBLE. ● IF THE SITE IS IN A LANDSCAPE CHARACTER AREA THAT HAS A VERY LOW LANDSCAPE CAPACITY RATING. ● IF THE SA APPRAISAL IDENTIFIES SIGNIFICANT HARMFUL IMPACTS.

Table 2: Step 2 Refinement Criteria

5.9. The site is identified as site reference 196 in the Supplementary Consultation Site Assessments and is discussed further below.

Application of Methodology in relation to Site Reference 196 (Land at Bickenhill Road, Bickenhill)

5.10. The site is identified as site reference 196 in the Supplementary Consultation Site Assessments. The assessment confirms the SGBA score as lower performing with a score of 5. Additionally, it confirms the LCA10B Landscape character sensitivity as medium and visual sensitivity as low. Further criteria are the Sustainability Appraisal which is assessed as AECOM 62 17 effects: 8 positive (5 significant); 5 neutral; 4 negative (1 significant).

5.11. The Site Selection Step 1 is assessed as **Priority 5 – “potential allocation”** (i.e. yellow) and therefore is a site which is applicable to continue to ‘Step 2’, the assessment against refining criteria. The commentary in relation to the Step 2 criteria is provided within the Site Assessments and states:

"Site is part within lower performing and part moderately performing parcel in the Green Belt Assessment, although it would result in an indefensible boundary. The site has a high level of accessibility, is within an area of medium landscape sensitivity with low capacity for change, and is suitable for development, subject to some constraints. The SA identifies 8 positive and 4 negative effects, with only the loss of agricultural land a significant negative. However, it would have a detrimental impact on the green belt and coalescence"

- 5.12. The assessment then identifies the Site Selection Step 2 as being R (a Red site) which is *"Not to be included in the plan. This means that the development of the site has severe or widespread impacts that are not outweighed by the benefits of the proposal"*. **This conclusion is not agreed.**
- 5.13. On review of the above conclusions against the prescribed methodology, there are 2 clear errors of its application to note as follows. Firstly, The Councils' criteria at paragraph 73 of their Site Selection Process clearly states that ***"The analysis in Step 2 will 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). There is no discussion or mention that a 'potential' allocation (yellow) site at Step 1, could then be concluded to be a 'Red site', which appears to be the case in relation to the Site assessment for Land at Bickenhill Road (reference 196).
- 5.14 Furthermore, there is little justification within the comments provided by the Borough Council which could override this prescribed methodology and justify their conclusion that this is a 'Red Site'. This therefore demonstrates the incorrect application of the criteria and with no further justification on the conclusion reached. It is considered that the site should, by definition, be at least an Amber, if not a Green, Site.
- 5.15 Secondly, in relation to 'Step 2 – Refinement Criteria', the Council identify more site-specific factors which could impact on the performance of the Site (as copied in Table 2 within this report). The methodology then goes on to state in relation to these factors, that ***"higher performing sites in the hierarchy need more significant harmful impacts if they are to be excluded..."***.
- 5.16 To confirm, it is considered that the site is indeed a 'higher performing site', given it is a yellow site, which is the highest performing site that would reach the Stage 2 criteria (with green sites 'skipping' this step). On this basis, according to the Borough Council's criteria, the site therefore needs "more significant harmful impacts" if it is to be excluded.

On review of the Borough Council's assessment of the site (196) there appears to be no robust justification that there are "significant harmful impacts" in relation to the site, with the only significant negative effect identified in the Sustainability Appraisal being the loss of agricultural land. In relation to this point, it is argued that the majority of the sites which are included within this assessment step are also likely to result in similar losses of agricultural land; it should therefore be expected that all sites are scored similarly in this regard.

- 5.17 Looking at the commentary provided against the 'refined criteria', it is not clear what further "significant harmful impacts" the site would have, and certainly there is no indication that a "high number of significant effects" which would be required in order for the site "to be excluded". Furthermore, no mention is made of the Sustainability Appraisal results that confirm more positive than negative effects, including 5 significant positive effects. It is acknowledged that although the commentary states that development of the site "would result in an indefensible boundary" and "would have a detrimental impact on the green belt and coalescence", these are not identified as 'significant' as per the specific methodology.
- 5.18 In relation to this matter, it is recognised that in accordance with the NPPF, Green Belt boundaries should be defined clearly, using physical features that are readily recognised and likely to be permanent. It is considered that the combination of School Rough woodland, the Low Brook, and Bickenhill Road itself could form a clearly defined Green Belt boundary. The landscape and green infrastructure strategy for the site as fully detailed in the Vision Document submitted in February 2017 proposes new planting which will serve to break down the scale of built form and provide further containment. These mitigation measure would help to establish and enhance a robust landscaped edge to any proposed development and a definitive boundary to the future Green Belt. It is therefore disputed that the site would result in an indefensible boundary and "would have a detrimental impact on the Green Belt".
- 5.19 Finally, it is not clear whether this assessment has assumed the development of all the 5 parcels, which is not what is being promoted. Careful consideration has been given to the extent of the development envelope from a landscape (and ecological) perspective, ensuring development is located away from the more open parcels of the site to the north, including that near to Marston Green Recreational Ground. It is this which has resulted in 3 of the 5 parcels of land **not** being proposed for built form.
- 5.20 The Vision Document, which is provided at **Appendix 4** to these Representations, has been produced which demonstrates that the site is suitable for residential development,

and in particular discusses such issues further, including identifying further specific landscape mitigation measures and opportunities.

- 5.21 In light of the above matters, it is considered the site should be, at least, an Amber, if not Green, Site and accordingly considered suitable as a proposed housing allocation.

6. SUMMARY AND CONCLUSION

- 6.1. This landscape and visual statement has been prepared in respect of land at Bickenhill Road, Marston Green, and its classification in the Solihull MBC Draft Local Plan Supplementary Consultation (reference 196).
- 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. This report has summarised the relevant landscape and greenbelt evidence to date in relation to Land at Bickenhill, Marston Green, notably with reference to Solihull MBC Landscape Character Assessment (2016) and Solihull Strategic Green Belt Assessment (2016). The latter document identified the site as lying within 2 'refined parcels', both of which were identified as parcels that are "lower performing" when considered against the 5 purposes of the Green Belt.
- 6.5. This report has then continued to examine the latest evidence base assessment in relation to identifying strategic sites, which is set out in the Council's Draft Local Plan Supplementary Consultation Documents, including Site Assessments. This analysis is provided in full in Section 5 of this report, however in summary identifies 2 clear errors in relation to the application of the council's stipulated methodology/criteria.
- 6.6. Firstly, the Councils' criteria at paragraph 73 of their Site Selection Process clearly states that "*The analysis in step 2 will be used principally to confirm whether 'potential' allocations (yellow) should be included **as green or amber sites in the consultation..***" (emphasis added). The document clearly states that the Land at Bickenhill Road (reference 196) is indeed a 'potential' allocation (yellow), however following Step 2 is then considered to be included as a 'red' site. There is no discussion or mention within the stipulated methodology that a 'potential' allocation (yellow) site at Step 1, could then be concluded to be a 'Red site', as is the case in relation to the Site assessment for Land at Bickenhill Road.
- 6.7. Furthermore, there is little justification within the stipulated comments of the Council's assessment which could override this prescribed methodology and justify their conclusion

that this is a 'Red Site'. This therefore demonstrates the incorrect application of their own criteria and with no further justification on their conclusion, it is considered the site should, by definition, be at least an Amber, if not Green, Site.

- 6.8. Secondly, in relation to 'Step 2 – Refinement Criteria', the Council identify more site-specific factors which could impact on the performance of the Site (as copied in Table 2 within this report). The methodology then goes on to state in relation to these factors, that "higher performing sites in the hierarchy [of which Land at Bickenhill is considered as such] **need more significant harmful impacts if they are to be excluded...**" (emphasis added). On review of the council's assessment of the site there appears to be no robust justification that there are 'significant harmful impacts' in relation to the site, and therefore reasons for its exclusion. Further work and assessment prepared by the team, as set out in the enclosed 'Vision Document', also seeks to provide additional evidence how the site is suitable for development.
- 6.9. In conclusion, the incorrect application of the Council's methodology, and lack of justification in relation to the site selection process has led to the land at Bickenhill Road, Marston Green, site reference 196, being incorrectly excluded from the Amber or Green sites. If the criteria had been applied correctly, particularly in relation to the fact that "potential allocations" (yellow) should be included as either an amber or green sites within the consultation, the site at Bickenhill Road would not have been excluded. It is on this basis the site should, by definition, be a least an Amber, if not Green, site.