

1. LOCAL PLAN REVIEW

- 1.1. Solihull Metropolitan Borough Council (SMBC) adopted their current local plan, the 'Solihull Local Plan', in December 2013. SMBC is undertaking a Local Plan Review (LPR) to ensure that an up to date planning framework is in place that addresses potential issues.
- 1.2. The evidence base to the Local Plan includes several documents related to the strategic selection of sites and the Green Belt context to Solihull. These documents have informed the selection of strategic sites to be brought forward under the draft Local Plan.
- 1.3. Those referred to as part of this landscape and visual statement include:
 - Solihull Strategic Green Belt Assessment, Assessment Report (July 2016);
 - Draft Local Plan Supplementary Consultation (January 2019);
 - Draft Local Plan Supplementary Consultation: Site Assessments (January 2019); and
 - Draft Local Plan Supplementary Consultation: Amber Sites (January 2019).
- 1.4. Reference has also been made to additional sources of data and information, for example (but not limited to) Ordnance Survey mapping, aerial photography and landscape character studies.
- 1.5. Whilst Green Belt is not a 'landscape' policy as such, there is an inherent connection between Green Belt matters and those relating to landscape and visual issues, particularly in respect of considering landscape enclosure and defining the physical attributes of a landscape.
- 1.6. Principles related to the appraisal and assessment of landscape and visual matters are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)¹ and reference is made to this document as necessary.

2. TERMS OF REFERENCE

- 2.1. In respect of the context set out above, Pegasus Group has undertaken a strategic review of an area of landscape located to the west of Dorridge, at a point where the role and

¹ 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, namely²:
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

² 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 Framework³.
- 3.6. Overall the importance of Green Belt is clear, as are the connections to landscape and visual matters in respect of understanding the physical attributes, character and visual amenity of a given landscape.

Solihull MBC Landscape Character Assessment (2016)

- 3.7. The 'Solihull Borough Landscape Character Assessment' (prepared by Watermans on behalf of SMBC) defines the character of the landscape in this area as '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**.

³ 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"> ● 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

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.