

## **1. LOCAL PLAN REVIEW**

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

## **2. TERMS OF REFERENCE**

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

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

the role and function of the Green Belt is paramount in protecting the openness of the wider countryside in this area and preventing further encroachment of the urban environment into the wider landscape.

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

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

#### **NPPF**

- 3.1. The site is located within the central area of Solihull Metropolitan Borough to the east of the Solihull settlement area. The landscape in this area is washed over by Green Belt from the settlement edge of Solihull, with Hampton-in-Arden, Dorridge and Knowle, and Balsall Common, forming 'islands' of settlement pattern within the wider Green Belt coverage.
- 3.2. The Green Belt area around the site is extensive, extending broadly down toward Leamington Spa. The Green Belt is at its narrowest where it forms a corridor between the settlement edges of Solihull and Knowle/Dorridge. Across this area there is considerable variation in the character of the landscape, including variation in its inherent landscape value, and sensitivity.
- 3.3. The NPPF attaches 'great importance' to Green Belts. Section 13 of the NPPF (2019) addresses Green Belt matters, noting the fundamental aim of preventing urban sprawl by keeping land permanently open. The Framework also notes that the essential characteristics of Green Belts are their openness and their permanence.
- 3.4. The Framework goes on to set out the long-established 'five' purposes of Green Belt, namely<sup>2</sup>:
- to check the unrestricted sprawl of large built-up areas;
  - to prevent neighbouring towns merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and

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

- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.5. In respect of conserving and enhancing the natural environment, the NPPF states that plans should 'allocate the land with the least environmental or amenity value', noting the need to be consistent with other policies in the Framework<sup>3</sup>.
- 3.6. Overall the importance of Green Belt is clear, as are the connections to landscape and visual matters in respect of understanding the physical attributes, character and visual amenity of a given landscape.

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

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

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

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

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

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

3.18. "Once complete, this Assessment will form the basis for more detailed assessment of Green Belt land within the Borough. This more detailed assessment will include consideration of wider criteria including analysis of constraints, spatial strategy, site selection methodology and other policy considerations." (Page 1)

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

3.20. The SGBA scores RP's against the purposes of Green Belt, utilising potential scores of 0 to 3, with no weighting applied between the respective Green Belt purposes.

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

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

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

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

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

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

- the designated ancient woodland of Hampton Coppice;

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

3.25. The opportunities are considered to be:

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

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

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

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

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

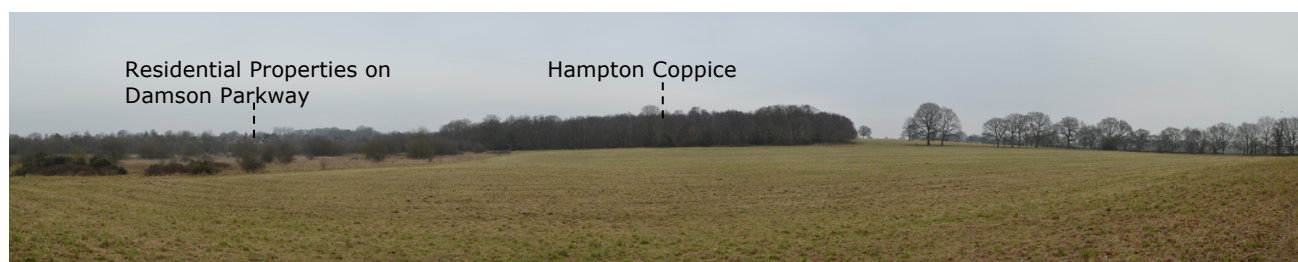


3.28. This analysis confirms that the scoring of RP15 is generally consistent with the criteria within the Solihull Strategic Green Belt Assessment. However within the Assessment Criteria for purpose 1 there is potential for some refined parcels, including RP15, to fall outside of the specific scoring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

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

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

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



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

- 3.31. The identified existence of clear site boundaries site is such that they could equally provide a new robust Green Belt boundary. In accordance with the NPPF, Green Belt boundaries should be defined clearly, using physical features that are readily recognised and likely to be permanent. It is considered that the southern, northern and eastern boundaries of the site, led by existing and proposed woodland cover, could form a clearly defined Green Belt boundary (as seen in Figure 4.1 of the Vision Document **Appendix 4**). The landscape and green infrastructure strategy for the site also proposes new planting which extends Hampton Coppice to provide further containment. These mitigation measure will help to establish and enhance a robust landscaped edge to the proposed development, a definitive boundary to the future Green Belt.
- 3.32. This parcel combined with a number of additional parcels across this area of landscape have been identified as Green sites in the Draft Local Plan Supplementary Consultation document (these will be discussed later in this statement). The proposed extension of the Jaguar Land Rover site to the north of the area on the western side of Damson Parkway provides opportunities to create an extended robust Green Belt boundary to the east using a holistic approach across the sites.
- 3.33. The Solihull Strategic Green Belt Assessment states that 'all purposes considered equal weight and consequently not able to rank against each other'. This suggests that, of the maximum 12 point scoring available, any sub-division of this should be weighted equally.
- 3.34. This weighting of the scores for Green Belt purposes, and over rating of purpose 1, has relevance in respect of later studies and the site selection process and is a consistent issue in respect of the conclusions drawn within those documents, particularly the inclusion of land as a Green or Amber site. This is considered further below.

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

- 3.35. The Supplementary Consultation (including Site Assessments) is a non-statutory supplementary consultation to that undertaken previously for the Draft Local Plan (December 2016).
- 3.36. The site selection process of the Draft Local Plan (DLP) Supplementary Consultation is split into two steps, initially based on a 'site hierarchy' and secondly use of 'planning judgement to refine site selections'. The approach notes that it aims to test the appropriateness of sites rather than allocating numbers per settlement.
- 3.37. Clearly any 'judgement' in respect of selecting sites needs to be objective, based on a clear and transparent methodology and applied consistently through the process. Any inconsistent judgements moving away from an objective process would be not be robust.
- 3.38. The approach sets out a site hierarchy, using a scoring system of 1-10. Sites falling within 1-4 are considered 'Green' and should generally be considered suitable for inclusion in the plan.
- 3.39. Sites between 5 and 7 are considered to have potential, but the document notes that these are not 'impact free', and also notes that there is potential for these to impact on the purposes of the Green Belt. These potential sites are sub-divided as scoring 5 (potential inclusion – yellow) and 6 or 7 (unlikely inclusion – blue).
- 3.40. Sites scoring 8-10 are 'Red' and are considered unsuitable.
- 3.41. These 'potential' (yellow) and 'unlikely' (blue) sites then proceed to Step Two of the site selection process, which assesses against the refining criteria. The analysis in step 2 is said to be used principally to confirm whether **'potential' allocations (yellow) should be included as green or amber sites in the consultation, and whether 'unlikely' allocations (blue) should be included as amber or red sites in the consultation** (emphasis added).
- 3.42. The factors set out in Table 2 below identify the considerations that have apparently been taken into account at Step 2. It is specifically noted that **higher performing sites in the hierarchy need more significant harmful impacts if they are to be excluded,** (emphasis added) and for sites not performing well in the hierarchy they will need more significant justification to be included.

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

**Table 2: Step 2 Refinement Criteria**

***Site reference 195 (Land at Damson Parkway)***

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

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

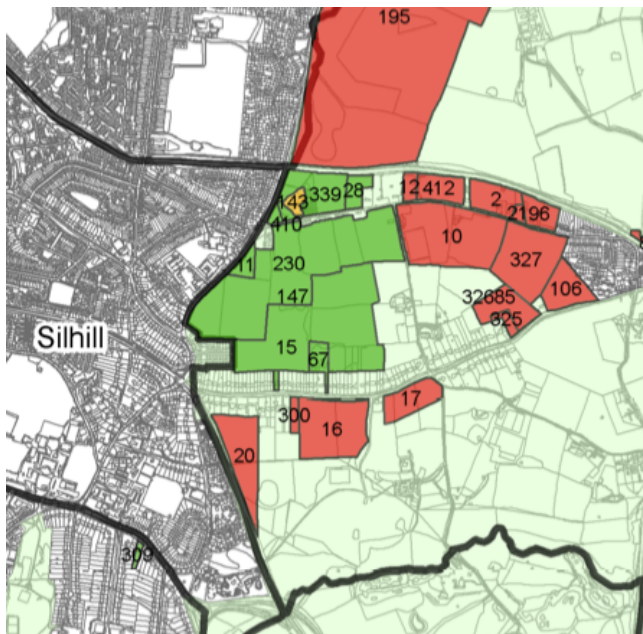
#### 4. NEIGHBOURING SITES

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

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

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

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



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

**Site reference 339 (Land adj. 161 Lugtrout Lane)**

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

**Site reference 230 (Land at Lugtrout Lane)**

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

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

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

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

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

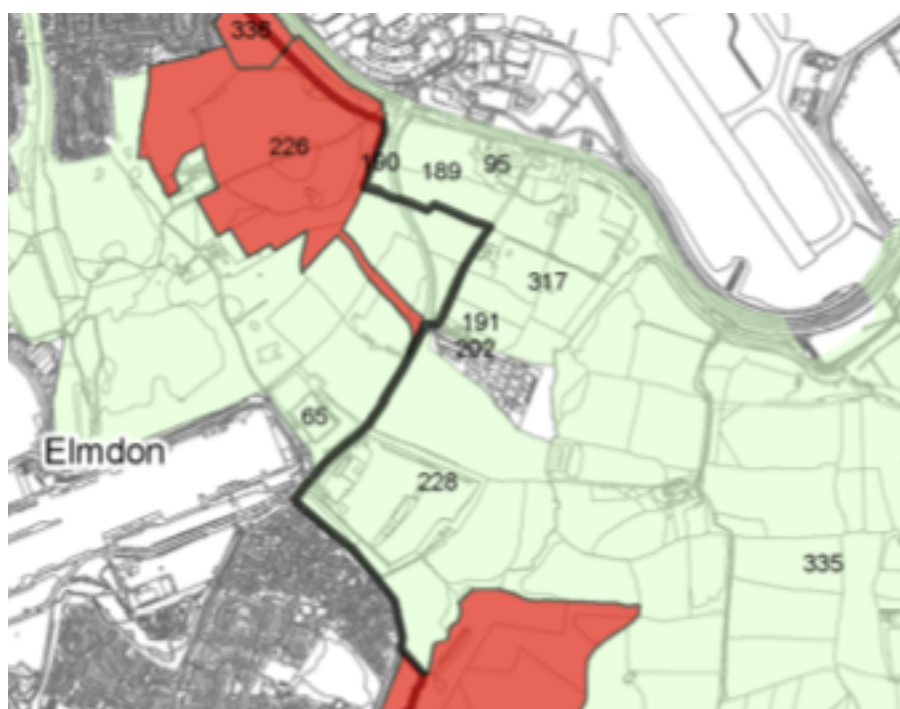
#### **Jaguar Land Rover**

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



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

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



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

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

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

## **5. ANALYSIS OF THE ASSESSMENT**

- 5.1. It is considered that a weakness in the approach to the Site Hierarchy Criteria is the reference to the scoring of Green Belt purposes.
- 5.2. The SGBA scores RP's against the purposes of Green Belt, utilising potential scores of 0 to 3, with no weighting applied between the respective Green Belt purposes. Objectively, the maximum potential score of a RP could be 12. Based on the use of a three step criteria (i.e. lower performing, moderately performing, or highly performing) the objective approach to the maximum score would be to divide this equally (e.g. low 0-4, moderate 5-8, high 9-12).
- 5.3. It is considered that the Site Hierarchy Criteria within the Supplementary Consultation has artificially moderated these scores, increasing the scoring base to 5 for lower performing Green Belt sites, condensing moderately performing sites to just 6 or 7, and increasing the range for higher performing sites to 8 or more.
- 5.4. The artificial moderation of score excludes a number of sites, including site reference 195 that was identified as a Priority 6 (Blue), from inclusion from Amber sites. This is despite site 195 performing equally to sites that have been identified as the 'least harmful' Amber sites that Solihull Council are also consulting on through the Supplementary Consultation. Irrespective of this, even with a Priority 6 rating, the site should be assessed at step 2 of which there is little evidence as the commentary does not draw on the sites potential for inclusion.
- 5.5. The indicative masterplan has been guided by a robust landscape strategy that includes the following elements;
  - The overall development envelope is defined by the visual and physical containment provided by Hampton Coppice, which wraps around the extent of development and is proposed to be retained and enhanced where appropriate. The extent of woodland will be increased, effectively extending Hampton Coppice to the north and south of the site, in reference to the sites history as a complete woodland.

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

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

## 6. SUMMARY AND CONCLUSION

- 6.1. This landscape and visual statement has been prepared in respect of land at **Damson Parkway**, Solihull and its classification in the Solihull MBC Draft Local Plan Supplementary Consultation (reference 195).
- 6.2. The site is located in the Green Belt, a matter which the NPPF attaches 'great importance' to, aiming to prevent urban sprawl by keeping land permanently open. In respect of conserving and enhancing the natural environment, the NPPF states that plans should 'allocate the land with the least environmental or amenity value'.
- 6.3. As such there is an inherent connection between landscape and visual matters and Green Belt and a consequent need to give due consideration to matters of landscape character, sensitivity and value.
- 6.4. The published landscape character guidance for the Borough notes that the site is located within an area that is of **medium sensitivity**, with valued characteristics and low capacity for development. The character guidance also notes that land use in this character area is influenced by the direct proximity of the urban edge to the open countryside.
- 6.5. The filtered visual connection to the settlement edge and adjacency to the countryside are matters that are clearly evident from field work undertaken in the local landscape. Overall the nature of the local landscape character suggests that the environmental and amenity value of the area form a constraint to development that should be considered in any evaluation of the site. These also provide opportunities to create an area of contained urban extension within a mature framework of existing vegetation.
- 6.6. A review of the Strategic Green Belt Assessment (SGBA) has demonstrated how the process of scoring has potentially over-rated the role and function of this part of the landscape, particularly in relation to check unrestricted sprawl of large built up areas.
- 6.7. Overall the SGBA concludes a score of Priority 6, whereas additional analysis based on field work demonstrates that the landscape in this area could be scored as Priority 5. This would follow on to the site being assessed as a Priority 5 site within the Supplementary Consultation site assessment document, which would mean that the site has potential for

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

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