



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:

Solihull Local Plan – Draft Submission

Please return to psp@solihull.gov.uk or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14th December 23:59

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
	<i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i>	
Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Gary"/>
Last Name	<input type="text"/>	<input type="text" value="Stephens"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Partner"/>
Organisation (where relevant)	<input type="text" value="Rainier Developments Limited (School Road Hockley Heath)"/>	<input type="text" value="Marrons Planning"/>
Address Line 1	<input type="text"/>	<input type="text" value="Bridgeway House"/>
Line 2	<input type="text"/>	<input type="text" value="Bridgeway"/>
Line 3	<input type="text"/>	<input type="text" value="Stratford upon Avon"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="CV37 6YX"/>
Telephone Number	<input type="text"/>	<input type="text" value="██████████"/>

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached paper

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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9. Signature:

Gary Stephens

Date:

14/12/2020

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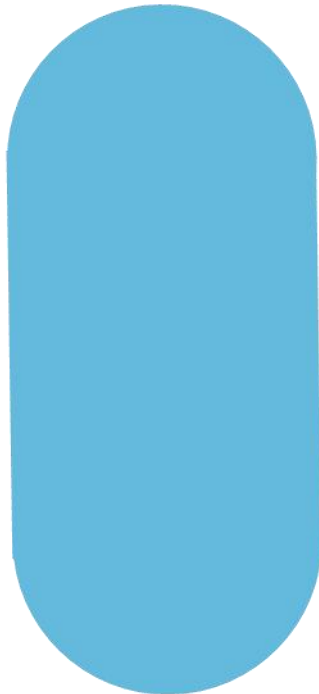
14/12/2020

Representations – School Road, Hockley Heath (Site 416)

Solihull Local Plan - Draft Submission Plan

Rainier Developments Limited

December 2020





1. The following representations are made in response to the Solihull Local Plan – Draft Submission Plan (October 2020) on behalf of Rainier Developments Limited in respect of their land interests at land off School Road, Hockley Heath (Site 416). These should be read alongside the completed Representation Form.

Paragraph 523 (Sustainability Appraisal)

Question 5

2. There is not a specific section within the Plan which refers to the Sustainability Appraisal (SA), therefore this objection is made in relation to Paragraph 523 of the Plan as this is the first reference to the SA in the Plan.
3. The SA has not fairly considered reasonable alternatives in respect of levels of housing growth. In fact, the level of growth was pre-determined prior to undertaking the SA this year, and has therefore not been informed by the SA in accordance with the Framework¹.
4. Option 2 (15,000 dwellings) is the Plan's preferred approach in light of the SA, and yet higher levels of growth perform equally as well. In fact, the only tangible difference between Option 3 (16,000 dwellings) and Option 2 is that Option 3 has a negative effect in relation to resource efficiency (resulting from greater generation of waste) whereas Option 2 is regarded as neutral². An additional 1,000 homes represents a percentage increase of less than 1% in the number of homes within the Borough, and whilst they will generate greater levels of waste, it will not be material. The SA is actually inconsistent on this point as it has considered the additional 1,000 homes delivered by Option 3 to not have a material difference to the positive effects on housing, social inclusion, regeneration and employment. In any event, the negative effect on resource efficiency is not significant adverse, and therefore the SA demonstrates that a higher level of housing growth than 15,000 dwellings can be accommodated sustainably.

¹ Paragraph 32 of the Framework

² Table 5.4 of the SA



5. Looking further, Option 4 (19,000 dwellings) is a sizeable jump from Option 3 without any explanation in the SA as to why it was selected over lesser options. The additional positive effects of Option 4 on housing, social inclusion, regeneration, and employment are noted. However, it also notes greater negative effects in relation to flooding and climate change, and the natural environment. Those greater negative effects appear to relate to the choice of locations that were put forward by the Council to assess this level of housing growth, e.g. significant growth (3,000 additional dwellings) at either Balsall Common or land south of the A45. Only considering two spatial options for this higher level of growth clearly has the potential to skew the conclusions of the SA. Further, the two spatial options were selected from the GBHMA Strategic Growth Study, and therefore had not even been taken from the Council's own SHELAA evidence as to land that was suitable for development. Greater negative effects say for example on flooding or green infrastructure would have been avoided had alternative options been considered.
6. It is acknowledged that the SA has to be manageable, and cannot consider endless alternatives and permutations. However, given the importance of testing higher levels of housing growth in light of the scale of unmet need arising from the neighbouring authority, the SA should have undertaken a finer grain analysis of options at levels of growth above 16,000 dwellings utilising its own evidence base of available and suitable sites.
7. The SA does therefore not provide a sound evidence base for not pursuing higher levels of housing growth in order to meet the housing requirement.
8. It is noted that Site 416 (Land north of School Road, Hockley Heath) has not been assessed within the SA even though the site was submitted to the Council in 2018. However, the Site Assessment makes reference to the SA of AECOM 59 (the adjoining site), there are a number of effects identified that can easily be mitigated and avoided as identified below. It is worth noting that the SA has indicated a number of significant negative effects for some of the proposed allocations (not least UK Central), but that on-site mitigation has been taken into consideration in the selection of the allocations.



9. In relation to ecology (SA9), it states the site overlaps or contains a local wildlife site and / or records of priority species and habitats. Site not of the scale to avoid sensitive habitats or to deliver strategic improvements to ecological networks and so development would likely lead to loss. This therefore is recorded as a negative effect. However, the site is not a LWS and is predominantly poor semi-improved grassland of low intrinsic ecological value. Moreover, the limited habitats on site are of only local value present and could easily be avoided through careful masterplanning³. Therefore, SA9 should be neutral with the potential for positive effects.
10. In relation to landscape (SA10), it states the landscape has high sensitivity to change. This therefore is recorded as a significant negative effect. However, a more finer grain analysis found within Appendix One shows the site has a reduced landscape sensitivity due to well-established urbanising influences nearby, and its strong sense of enclosure by existing landscape features and buildings. Therefore, SA10 should be neutral.
11. In relation to green infrastructure (SA11), the site is within walking distance of the canal towpath network, which provides access to an extensive area of green infrastructure⁴, and therefore SA11 should be neutral.
12. In relation to amenity, the location of the site adjacent to School Road is considered to affect amenity in relation to vehicular noise and therefore a negative effect. The site has the capability of accommodating a suitable buffer from School Road such that noise from vehicles would not affect its amenity, and this effect can easily be mitigated.
13. On the basis of the above, there are no significant adverse effects that would mean the site should not be allocated.

Question 6

³ As evidenced within the Representations in respect of landscape, ecological and heritage circumstances at Appendix 1.

⁴ As acknowledged in paragraph 656 of the Plan



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14. The SA should be updated to re-consider higher levels of housing growth using a more refined approach.
 15. The Land north of Stratford Road, Hockley Heath should be assessed within an updated SA.



Paragraphs 63 to 69 (Spatial Strategy/Site Selection)

Question 5

16. There is not a policy within the Plan that contains the Spatial Strategy, and so representations are made against paragraphs 63 to 69 of the Plan. The Plan should contain strategic policies which set out the overall strategy for development⁵, and therefore the Plan is not sound on this basis.
17. The Spatial Strategy as defined in paragraph 63 confirms that Options A to D are the 'starting point'. The Strategy then refers to other Options (E to G), which can only therefore be described as 'secondary' to A to D. Option F refers to 'limited expansion of rural villages/settlements. Limited is not defined within the Strategy, however a number of sites are selected under Option F which cater for levels of growth from around 100 to well in excess of 1,000 homes in the case of Balsall Common. Limited can therefore be fairly broadly defined.
18. Paragraph 65 then adds confusion by introducing three further criteria which inform the location of growth but don't relate in anyway to Options A to G. It is unclear which takes precedence (A to G or Paragraph 65).
19. Notwithstanding the above, in relation to the first criteria, reference is made to a highly accessible settlement. This is not defined within the Plan or within the evidence base, and therefore is ambiguous. The second criteria covers less accessible settlements (again not defined), but in the footnote includes the phrase 'This includes Balsall Common and Knowle/Dorridge/Bentley Heath'. Again, it is ambiguous and not clear which settlements this refers to beyond those listed. Similarly, the third criteria applies to less accessible settlements that have a limited range of services (including a primary school). Again, no definition within the Plan or the evidence base as to what settlements fall within this category (other than those listed in the footnote).
20. The absence of a clear Spatial Strategy and indeed settlement hierarchy therefore makes it impossible to understand how the scale and pattern of development is to be delivered within the Plan. Furthermore, within the evidence base, the Site Selection

⁵ Paragraph 20 of the Framework



Topic Paper includes an entirely new set of hierarchy criteria⁶, which has been used to inform the site selection.

21. It is noted that Hockley Heath is listed in the footnote under the third criteria in paragraph 65. Hockley Heath certainly contains a range of facilities for everyday needs, and includes a primary school.
22. Based on the Spatial Strategy as drafted, a proportionate addition is supported by the Plan. Again, proportionate is not defined within the Plan. Hockley Heath has a population in excess of 2,000 with circa 800 households, and yet only one allocation is proposed for 90 dwellings and overall only 141 dwellings are expected to be delivered in the Plan period⁷. An increase in the size of the settlement by circa 15% is a relatively small proportionate increase, and it is noted that the proposed increase in the size of Hockley Heath is significantly less than other settlements of similar size (such as Cheswick Green which is proposed to accommodate 1,000 dwellings).
23. The Spatial Strategy would therefore appear to support a higher level of growth in Hockley Heath than has been allocated in the sites selected.
24. The rationale for disproportionately constraining growth at Hockley Heath is set out in the Site Assessment for Site 416 (land off School Road). It refers to its limited range of services, although all the facilities necessary for everyday trips are catered for within the village.
25. Accessibility is considered in the Assessment to be lower than other settlements but that does not mean it is not sustainable, noting there are a number of bus services operating through the village connecting direct to Solihull, Shirley, Dorridge, Stratford upon Avon, Birmingham and Coventry.
26. Finally, the Assessment considers there to be restricted opportunities owing to the Borough boundary. There are opportunities as evident by Site 416, and the fact options may be limited is not a reason not to locate proportionate growth in a

⁶ Paragraph 43 of the Topic Paper

⁷ Paragraph 234 of the Plan



sustainable settlement. Reference is also made to backland development but this is not relevant to all options, such as Site 416.

27. It is considered therefore that selecting one site of 90 dwellings in Hockley Heath does not reflect the Spatial Strategy, and unnecessarily constrains growth in a sustainable location.

28. The site selection has not therefore fairly considered Site 416. It is in an accessible location, it is a lower performing site in Green Belt terms, and is therefore a Priority 5 site.

29. There are no sound reasons given within the Site Assessment for not selecting the site as an allocation. The site is well related to the settlement⁸. A defensible Green Belt boundary is proposed within the Plan to the rear of the properties along the northern side of School Road, and this can be extended westwards encompassing the site to its boundary with Ashford Lane. This boundary would have permanence, is defensible, and can incorporate the existing mature vegetation.

30. In landscape terms, the site has a reduced landscape sensitivity due to well-established urbanising influences and mature landscape features. The site is barely perceptible from the wider setting, is enclosed by built form on three sides, and development provides an opportunity to enhance and augment the landscape features along its boundaries (as evidenced within Appendix One).

31. The site should therefore be an allocation listed in Paragraph 69.

Question 6

32. The Spatial Strategy should be set out as a strategic policy in the Plan.

33. The Spatial Strategy should be more clear as to the scale and pattern of development that is intended to be delivered, and how this has informed site selection.

34. The Site Selection should include an allocation of land north of School Road, Hockley Heath.

⁸ See attached Connectivity Plan appended as Appendix Two



Policy P17 – Green Belt Policy

Question 5

35. Policy P17 makes no reference to safeguarding land within the Green Belt. Indeed, there is no reference to any consideration being given to safeguarding land. It is considered necessary for the Plan to safeguard land in order to meet longer-term development needs. Exceptional circumstances exist in that:
- a. the local authority is significantly constrained by Green Belt with opportunities outside it very limited;
 - b. unmet needs within the Housing Market Area already exist (see representations under the housing requirement and the Council propose to deal with them through the next review of the Plan); and,
 - c. there are no neighbouring Councils who have expressed a willingness to take any unmet needs arising from Solihull thereby meaning the next review of the Plan will need to release land from the Green Belt.
36. This Plan should therefore be safeguarding land in order to ensure there is a degree of permanence to the boundaries proposed within this Plan.

Question 6

37. The Plan should be amended to include safeguarded land to accommodate longer-term development needs.



Policy P5 – Provision of Land for Housing

Question 5

Housing Requirement

38. The housing requirement is not sound as it is not positively prepared, justified, effective or consistent with national policy for the following reasons.

Local Housing Need

39. The minimum Local Housing Need (LHN) has been calculated using the standard method which is well established and is not disputed. However, the Council will need to be mindful of any changes arising from the Government's stated intention to change the method for calculating LHN prior to submission of the Plan.

Plan Period

40. It is highly unlikely that the Local Plan will be adopted in 2021, thereby providing a plan period of 15 years post adoption as recommended by the Framework. On the basis that it is already December 2020 and the Plan has not been submitted, it is more likely to be adopted in 2022, and therefore the housing requirement and the Plan should be extended to 2037.

Employment uplift

41. LHN is afforded an employment uplift of nine dwellings per annum to take account of the substantial job growth at UK Central of around 13,000 net additional jobs. This is a figure which could increase as plans crystallise, and it is noted that the Council's Viability Study (2020) predicts up to 77,500 jobs by 2040. The Plan justifies the small increase based on the distinct jump between economic based housing needs and the number of jobs the minimum standard method can accommodate.



42. The Plan also justifies the small uplift from LHN on the assumption that only 25% of the jobs will be filled by people residing in Solihull, with the remainder in commuting from neighbouring areas. Travel to work data from the 2011 census is used to justify this, despite it being acknowledged in the HEDNA that patterns have likely changed since 2011.
43. Taking this approach will 'bake-in' inward commuting reflecting an historic pattern of movement rather than shaping growth to be more sustainable by locating homes close to where work is. This can only serve to increase traffic levels given the main mode of transport using census data in 2011 is the private car. In light of the Council's recognition of the gravity of the climate change emergency, it is not sound to Plan on the basis of accepting such high levels of inward commuting.
44. As a consequence for the housing requirement, the Plan as proposed creates an unmet housing need that has no clarity about how it will be addressed, as the HEDNA states:
- 6.43 The UK Central scenario (Growth C), which is the recommended growth scenario, results in a housing need 9 dwellings per annum above the Standard Method, under the commuting assumptions set out above. There is, however, an unmet need 379 dwellings per annum required to fulfil the 75% of in-commuting jobs associated with UK Central.*
45. This unmet need amounts to over 6,000 dwellings over the Plan period. It is stated that some of this may already be accommodated within other Plan's housing requirements (HEDNA Para 6.35), but there is no evidence to support that assumption.
46. The Plan also appears to suggest in paragraph 2.29 that its contribution to unmet needs from Birmingham should be taken into account as contributing to the UK Central employment uplift. However, the unmet housing needs arising from Birmingham had no regard to the level of job growth at UK Central and its implications on their housing needs.
47. The housing requirement should therefore be increased to take account of the employment uplift, particularly in the absence of any evidence that neighbouring areas are intending to accommodate higher housing numbers as a consequence.



Affordability uplift

48. The housing requirement should also be increased to take account of affordability within the Borough, consistent with national guidance (paragraph 2a-024-20190220) which states:

An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.

49. The identified affordable housing need is 578 homes per annum (HEDNA para 35). However, the Council has reached the conclusion that the maximum amount that can be viably sought is 40% on any given scheme. Even if it was assumed that all of the LHN (807dpa) could contribute 40% affordable housing it would amount to only 322 affordable homes per annum. This top line is substantially less than the evidence suggests, and in reality 322 per annum is unlikely given the sources of supply, despite the Housing Topic paper (Paragraph 73) noting other methods for maximising affordable housing provision.
50. The Housing Topic paper notes at footnote 10 that this reduced to 224dpa if households already in accommodation are excluded, however the HEDNA is clear that the figure is theoretical and should not be seen to minimise the acute housing need in the borough.
51. The housing requirement should therefore be increased to reflect the levels of affordability.

Unmet Needs

52. The Plan does not fully address unmet housing needs and the housing requirement should be increased accordingly. Paragraph 227 of the Plan advises that Birmingham has unmet needs (37,900 homes), and paragraph 228 advises that the Plan is proposing a contribution of 2,105 homes towards unmet needs. However, there is no evidence that this level of contribution is agreed with Birmingham or



- other neighbouring authorities⁹, or that the unmet needs that remain are to be addressed elsewhere¹⁰.
53. Further, there is no evidence as to why the contribution is only 2,105 homes. Solihull has a strong functional relationship with the City, with good transport connections, and in population terms is much larger than other neighbouring areas (such as North Warwickshire) which have agreed to take a greater share of the unmet need.
54. In addition to Birmingham's needs, it is also noted the Black County Authorities estimate unmet housing needs of 29,260 homes and up to 570ha of employment land to 2038, and have written to the Council notifying them. The Council has suggested their unmet needs can be dealt with as part of the next review of the Local Plan¹¹. However, that is not evidence of effective joint working, but rather deferring its consideration which is evidence of an unsound Plan in being contrary to paragraph 35 c) of the Framework.
55. It is unacceptable to propose before the Plan has even been submitted to the Inspectorate that a review will be necessary to properly address housing and employment needs. That amounts to 'poor planning', and is not evidence of a positively prepared Plan which, as a minimum, seeks to meet the needs of the area. The opportunity exists now to make this Plan sound before it is submitted to the Inspectorate, and the Council should properly address this issue.
56. In any event, were an early review of the Local Plan to be undertaken addressing unmet needs it will inevitably require the release of Green Belt land. This Plan demonstrates exceptional circumstances exist to require the removal of land from the Green Belt as a consequence of the level of need, the lack of sufficient alternatives outside of the Green Belt, and the absence of willing neighbouring Councils prepared to accommodate some of the need. Those exceptional circumstances are very likely to still exist when the Council comes to undertake its review as urban capacity is limited, and nearby Councils are similarly constrained.

⁹ Page 21 of the Summary of Representations to the Supplementary Consultation

¹⁰ The GBBC Housing Needs and Housing Land Supply Position Statement (August 2020) confirms unmet needs from Birmingham still exist of 2,597 homes taking into account the contribution from Solihull.

¹¹ Paragraph 154 of the Overall Approach Topic Paper



57. The Council have therefore failed to demonstrate the proposed Green Belt boundaries within this Plan will not need to be altered at the end of the Plan period¹², and therefore consideration must be given in this Plan to safeguarding land. If not, there is no permanence to the Green Belt boundaries proposed within this Plan and they will not endure beyond the Plan period contrary to the Framework¹³.

Housing Requirement

58. The Plan is proposing a housing requirement that equates to the supply that it considers is capable of being delivered over the Plan period. However, the Sustainability Appraisal of the Plan does not provide any evidence as to why higher levels of housing growth could not be accommodated without causing significant adverse effects.
59. There is therefore no flexibility within the supply to ensure that the housing requirement is met. An oversupply above the housing requirement is typical for all Plans to some degree, and a 10% buffer is advised for Solihull since the Plan is reliant upon sites with long gestation periods. and its portfolio of allocations relies upon larger strategic sites. In order for the Plan to be positively prepared, the housing requirement should be expressed as a minimum.

Supply over the Plan Period

60. There are a number of objections to how the Council has calculated supply over the plan period as set out below.

UK Central

61. The plan assumes 2,740 units will be delivered at UK Central by 2036. This is a substantial amount of growth for a site that is unlikely to see any completions for

¹² Paragraph 139 e) of the Framework

¹³ Paragraph 136 of the Framework



- several years post plan adoption¹⁴. The UK Central Hub Growth and Infrastructure Plan suggests 2028. However, it is difficult to envisage that substantial residential completions will take place on the UK Central site until such time as the HS2 railway line is constructed and operational.
62. The Transport Secretary said in a written statement to parliament in September 2019 that it could be between 2028-31 before trains run on the route. Even if completions could be achieved from 2028 this would assume an annual total of 340 completions to achieve the delivery projected in the plan period which is far beyond what might be realistically be achieved. Without sight of a realistic housing trajectory, there is no evidence to support this level of delivery and therefore it is not justified. Since this is a strategic site, it is appropriate for the anticipated rate of development to be included within the Plan in accordance with the Framework.
63. In addition, there are substantial infrastructure requirements in addition to HS2, such as public transport and active travel bridges across the WCML, which has an estimated cost of £40m and with no timescales confirmed for delivery. It is also noted the Council are still working with Highways England to assess the impact of development on their highway network¹⁵. The absence of any agreement undermines the extent to which the assumptions within the Plan on delivery can be relied upon.
64. This evidence is important in being able to demonstrate the Plan is deliverable and sustainable, and that improvements to infrastructure required as a result of development have been robustly assessed, costed in order to demonstrate viability, and capable of being delivered in a way which does not hinder the proposed delivery of housing and employment. The absence of this evidence means the Plan is not justified.

¹⁴ The UK Central Hub Growth and Infrastructure Plan suggests 2028.

¹⁵ Page 23 of the Draft Infrastructure Delivery Plan



Allocated Sites

65. The absence of any evidence in relation to housing trajectories for the proposed allocated sites means that the figure of 5,270 homes to be delivered by 2036 is not justified.
66. Also, of note, the allocation for Solihull Town Centre (Site 8) in the adopted Local Plan expected 350 units to come forward in the first phase of the Plan period. This has not transpired. The new Local Plan now estimates 861 units but none coming forward in the first 5 years, and no evidence to support its delivery¹⁶.

Windfalls

67. The estimated level of windfalls at 2,800 homes completed over 14 years is not justified.
68. Firstly, whilst it is stated that windfalls are not included for the first 3 years (to avoid double counting with extant planning permissions) only 2 years have been discounted.
69. Secondly, the annual average level of windfall is substantial for an authority significantly constrained by Green Belt. The SHELAA notes that of the known sites, 96% are in the Green Belt. Very few of these are likely to be suitable for windfall planning applications given Green Belt policy, but in any event these are a separate source of supply in the Plan.
70. Reliance is placed on historic trends, but there is no certainty that past sources of supply are likely to continue. Given the absence of a Local Plan meeting housing needs in Solihull for some time, there is a degree of inevitability that there has been a high level of windfalls historically. Relying upon past trend averages is not sufficient for a forward projection to be made. As the Framework states, the evidence should be so compelling that it is a source of supply that can be relied upon for delivering the housing requirement.

¹⁶ SHELAA – Site number 5015.01



71. The SHELAA notes that 20% of the windfall allowance is for sites under 1ha. Therefore, 80% is for over 1ha – which should be covered by sites assessed in the SHELAA. Indeed the SHELAA is so comprehensive that very small sites have also been assessed. Therefore, the windfalls allowance is double counting with other sources of supply in the Plan. Indeed, the source of housing supply includes sites identified in the land availability assessment, brownfield register, and town centre sites. This amounts to over 1,350 dwellings, much of which would have previously been counted as a windfall. It is also unclear in whether projecting forward using historic trends the Council has removed garden land from its supply.

Existing Sites

72. In the SHELAA, there are also Existing Sites and Communal Dwellings where it appears there may be calculation errors, including:
- a. Examples of demolition of existing dwellings where it is rightly noted the net is 0 but this is not reflected in the deliverable supply column which remains 1 (or greater).
 - b. 2102.06 where the net should be zero since it is a change of use.

Five Year Supply on Adoption

73. The Plan will not provide for a five year housing land supply upon adoption. As noted elsewhere, three years' worth of windfalls are included within the supply rather than two (an estimate which is high, and overlaps with other sources of supply). There is also 350 homes on allocated sites without the benefit of planning permission, without clear evidence that housing completions will begin within five years. Discounting by these two sources alone (ie.550 units) puts the supply under five years.
74. The Plan assumes that 1,170 homes will be delivered on allocated sites within the first five years but there is no evidence to support this. The table at Paragraph 226 of allocated sites only breaks down sites into phases of the Plan. There should be a year by year completions trajectory for the whole of the plan period for all sources of supply, and the SHELAA 2020 only does this in part. Without this, the Plan is not



justified. For all sites, there needs to be clear evidence that housing completions will begin within 5 years.

Question 6

75. The housing requirement should be amended to take account of the likely realistic date of adoption; a more sustainable balance between the jobs uplift and commuting patterns; unmet housing needs; and an affordability uplift. The housing requirement should also be expressed as a minimum figure. The exact figure will need to be informed by further assessment by the Council.
76. The housing supply should be justified with evidence, and assumptions in relation to windfalls should be reviewed and amended. The housing supply should contain a buffer of 10% over the housing requirement to ensure delivery and that housing needs can be met should some sources of supply slip.
77. There is an insufficient portfolio of sites, in particular small sites, that can deliver quickly ensuring a five year housing land supply is achieved upon adoption. National planning guidance advises where a stepped trajectory is used local authorities could identify a priority of sites that could come forward earlier in the plan period in order to ensure housing needs are met. This emphasises the imperative to release further small sites within Solihull that can deliver quickly.
78. Policy P5 and the table of allocated sites should be amended to include land north of School Road, Hockley Heath. The site:
 - a. is deliverable, available and achievable¹⁷;
 - b. is low performing in Green Belt terms when assessed within the Green Belt Assessment;
 - c. has a low impact in landscape terms due to its enclosed nature¹⁸; and,
 - d. is within walking distance of services and facilities including a regular bus service to Soilhull, Shirley, Dorridge, Stratford upon Avon, Birmingham and

¹⁷ Site 416 – Category 1 in the SHELAA Update

¹⁸ As evidenced within the Representations in respect of landscape, ecological and heritage circumstances at Appendix 1.



Coventry, and is therefore a sustainable location for residential development.

79. Further, the Sustainability Appraisal finds no significant adverse effects from development of the site, save for landscape, which it is noted was not considered a reason not to select the proposed allocation HH1 School Road. In any event, a more finer grain analysis shows that any adverse effects can be effectively mitigated through careful masterplanning.



**Land at School
Road, Hockley
Heath**

**Representations
in Respect of
Landscape,
Ecological and
Heritage
Circumstances**

Prepared by:
**The Environmental
Dimension
Partnership Ltd**

On behalf of:
**Rainier
Developments Ltd**

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Section 1

Introduction and Key Conclusions

- 1.1 Rainier Developments Ltd have appointed the Environmental Dimension Partnership Ltd (EDP) to undertake a series of preliminary environmental appraisals on a site known as Land off School Road, Hockley Heath ('the site'). The location and boundaries of the site are illustrated on **Plan EDP 1**.
- 1.2 EDP is an independent environmental consultancy providing advice to landowner and property development clients in the public and private sectors, in the fields of landscape, ecology, heritage, arboriculture and masterplanning. EDP is a Registered Practice of the Landscape Institute and a Corporate Member of IEMA. The Practice operates throughout the UK from offices in Cirencester, Cheltenham and Cardiff. Details of the Practice can be obtained at www.edp-uk.co.uk.
- 1.3 To date, the purpose of EDP's work has been to gain an early understanding of the environmental issues likely to affect the site's 'in principle' suitability for development and its potential capacity. To this end, the following specific work items have been undertaken:
- Data trawl of relevant landscape designations and considerations and assessment of the site's character and zone of primary visibility;
 - Data trawl of relevant heritage designations and assessment; and
 - Data trawl of relevant local ecological designations and extended Phase 1 habitat assessment.
- 1.4 The site sits on the western edge of Hockley Heath, to the north of School Road. The site comprises a single plot, which is currently in agricultural use. The site context is illustrated in **Image EDP 1.1**.



Image EDP 1.1: Aerial view of the site. Source: Google Map data 2020.

Key Conclusions of EDP's Assessments to Date

- 1.5 EDP has not found any 'in principle' issue, which would preclude the site's allocation for built development; indeed, it is not especially constrained in environmental terms. **Plan EDP 4** summaries the constraints and opportunities which should guide the next steps of the masterplanning process.

Landscape Matters

- 1.6 Due primarily to the enclosure created by existing landscape features within the site and immediate context and intervisibility with existing built form, the site has a reduced landscape sensitivity.
- 1.7 The site is barely perceptible from the wider setting and has well-established urbanising influences in close proximity to it, being well contained by both existing built form and mature landscape features. It is likely that the majority of landscape and visual effects resulting from proposed development within the site would be limited to the site itself and receptors immediately adjacent to the site.
- 1.8 The development of the site provides an opportunity to enhance and augment the remaining landscape features across the site and along its boundaries. Further, landscaping measures included within the promoted development would be able to provide targeted mitigation where necessary.

Ecological Matters

- 1.9 Based on the findings of EDP's Preliminary Ecological Appraisal, the designated sites, habitats and species potentially present within and around the site do not pose an 'in principle' constraint to development.
- 1.10 There are no international statutory designated sites within 15km of the site boundary. Five national statutory designated sites are present within 5km, though the closest of these is situated over 3km from the site and with the site situated outside the impact risk zone for a development of this type. The closest non-statutory designation, the Stratford on Avon Canal potential Local Wildlife Site (pLWS), is separated from the site by School Road on the southern site boundary and designated for its aquatic flora. Whilst spatially close to the site, the Stratford on Avon Canal is a large robust habitat which shares little direct connectivity with the onsite habitats. No statutory or non-statutory designated sites are considered to be at risk of any material and adverse effects as a result of the proposed development.
- 1.11 The single field within the site supports a predominantly poor semi-improved grassland sward which is heavily grazed by sheep and considered to be of low intrinsic ecological value. The site boundaries are delineated by mature treelined hedgerows to the east, south and west and species poor hedgerow to the north. Given the limited value of the habitats within the site it is considered that the proposed development would have a minimal effect on local biodiversity.
- 1.12 Where habitats of local level value are present, including hedgerows and trees, these can be retained within the development through appropriate masterplan design. As such adverse effects upon these habitats can be readily avoided, mitigated or compensated for and a net gain in biodiversity can be achieved.
- 1.13 A number of detailed baseline protected species surveys will be required to accompany any planning application for the site, together with an assessment of potential effects and strategies to avoid, mitigate or compensate for such effects. However, it is considered that through the adoption of industry standard impact avoidance and mitigation measures, any adverse effects on protected species can be appropriately addressed to ensure no net loss to biodiversity, in accordance with national planning policy.

Heritage Matters

- 1.14 With regard to designated heritage assets, it is considered that there are no constraints and the site could be developed in a manner causing no harm to such assets.
- 1.15 With regard to non-designated heritage assets, the site is considered to have a low potential to contain archaeological remains of sufficient significance that they would influence its deliverability or capacity. It is also not considered that the site contributes to the significance of any locally listed buildings, and such assets would not form a constraint to the future development of the site.

- 1.16 The site lies close to the Stratford Canal and an associated building. Given their level of heritage interest and their interaction with the site, it is not considered that they represent a significant constraint to the deliverability or capacity of the site, and any mitigation (if necessary) could be achieved through sensitive masterplanning.

Overall Conclusion

- 1.17 For the above reasons, EDP's overall conclusion at this stage is that the site is eminently suited to accommodate some development to help meet the Council's housing need and is capable of being developed in accordance with relevant environmental policy at local and national levels. **Plan EDP 4** summaries the constraints and opportunities which should guide the next steps of the masterplanning process.
- 1.18 Further detail of EDP's desk and field assessments can be found within **Sections 2-4**.

Section 2 Landscape and Visual Matters

- 2.1 Following desk-based analysis of local landscape-related planning policy, designations and character, a site appraisal was undertaken by an experienced Landscape Architect. This involved walking and driving the local area to understand the character of the site and context and to assess the likely landscape and visual effects that would arise from development of the site.

Landscape-Related Designations

- 2.2 Whilst the site is entirely within the green belt, there are no national or local landscape designations located within the broad study area.
- 2.3 Landscape related designations and policy considerations relevant to the site are shown on **Plan EDP 2**. In summary:
- The site is not subject to any local or national landscape designations;
 - There are numerous blocks of Ancient Woodland within 3km of the site, with a focus around the M42/M40 interchange;
 - Stratford upon Avon Canal Conservation Area is approximately 1km to the south; and
 - There are two listed buildings within Hockley Heath and a spattering in the surrounding landscape.

Landscape Character

EDP's Assessment

- 2.4 The site is situated to the north of School Road and is enclosed by vegetation (**Image EDP 2.1**) and residential development on all sides. The site has an urban fringe character, due to the surrounding dwellings (**Image EDP 2.2**). Development along School Road to the south extends to the south-western corner of the site (**Image EDP 2.3**).



Image EDP 2.1: The site in its current form, taken from the south-east corner toward Ashford Lane (west), illustrating the character of the robust vegetation which contains the site along the western and southern boundary.

- 2.5 The western and southern site boundaries are formed of mature vegetation, this vegetation also extends onto the verges of Ashford Lane and School Road. The northern boundary (**Image EDP 2.2**) is defined by built form and domestic planting. The entire eastern boundary is formed by the dwelling of 142 School Road and planting to the rear.



Image EDP 2.2: The northern site boundary is defined by built form and domestic planting.



Image EDP 2.3: Illustrating the adjacency of dwellings along School Road.



Image EDP 2.4: Illustrating mature trees and hedgerows across parts of the southern site area.

- 2.6 As discussed above, to the south of School Road is the canal, there are no opportunities for views toward the site due to topography, **Image EDP 2.4** illustrates the limited opportunities for views into the site and is taken from the bridge (Ashford Lane) where it crosses the canal.
- 2.7 Topographically the site is relatively flat.
- 2.8 In summary, the main character and fabric of the site is the influence and character of the surrounding residential dwellings and heavily vegetated boundaries along the west and south.

Green Belt

- 2.9 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are openness and permanence. As such, Green Belt is a planning policy designation rather than a landscape designation based on landscape character and value.
- 2.10 The National Planning Policy Framework (NPPF) paragraph 134 sets out five purposes of the Green Belt, which are listed below:
- *“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.”*
- 2.11 The NPPF sets out guidelines for local planning authorities in relation to Green Belts including: the desire to plan positively to enhance their beneficial use, looking for opportunities to provide access, outdoor sport, and recreation; and to retain and enhance landscapes, visual amenity, and biodiversity; or to improve damaged and derelict land.
- 2.12 Guidance in paragraphs 138 and 139 makes clear that, when reviewing Green Belt boundaries, Local Planning Authorities (LPAs) should take account of the need to promote sustainable patterns of development; they should consider the consequences for sustainable development of channelling development towards urban areas, towns and villages within the Green Belt or towards locations outside the Green Belt boundary. This will be considered further in the Planning Statement accompanying the consultation response.
- 2.13 Also of relevance to this report is guidance in paragraph 139 with regard to defining boundaries, which states that local authorities should *inter alia*:
- Not include land that it is unnecessary to keep permanently open; and
 - Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 2.14 Local landscape policy of relevance to the site is contained within Solihull Local Plan 2011 to 2028 (Adopted 2013) and within the draft Solihull Local Plan – Draft Submission Plan. Policies relevant to this site are noted below:
- POLICY P5 – Provision of Land for Housing;
 - POLICY P10 – Natural Environment;
 - POLICY P14 – Amenity;
 - POLICY P15 – Securing Design Quality;
 - POLICY P17 – Countryside and Green Belt;
 - POLICY P18 – Health and Well Being; and
 - POLICY P20 – Provision for Open Space, Children’s Play, Sport, Recreation and Leisure.

Policy Discussion

- 2.15 As described above, the whole of the site lies within the designated Green Belt. This is a long-standing and well-established development control tool which is embodied within the current Solihull Local Plan 2011 to 2028 (Adopted 2013) at Policy P17.

“The Council will not permit inappropriate development in the Green Belt, except in very special circumstances. In addition to the national policy, the following provisions shall apply to development in the Borough’s Green Belt:

- *Development involving the replacement, extension or alteration of buildings in the Green Belt will not be permitted if it will harm the need to retain smaller more affordable housing or the purposes of including land within the Green Belt;*
- *Limited infilling will not be considered to be inappropriate development within the Green Belt settlements, providing this would not have an adverse effect on the character of the settlements. Limited infilling shall be interpreted as the filling of a small gap within an otherwise built-up frontage with not more than two dwellings;*
- *The reasonable expansion of established businesses into the Green Belt will be allowed where the proposal would make a significant contribution to the local economy or employment, providing that appropriate mitigation can be secured; and*
- *Where the re-use of buildings or land is proposed, the new use, and any associated use of land surrounding the building, should not conflict with, nor have a materially greater impact on, the openness of the Green Belt and the purposes of including land in it, and the form, bulk and general design of the buildings shall be in keeping with their surroundings.”*

- 2.16 The draft Solihull Local Plan – Draft Submission Plan was published in October 2020. Like the current Solihull Local Plan 2011 to 2028, Green Belt is used as a development control. In the draft submission the policy has changed to accommodate the shortfall in housing within the Solihull Borough. The draft Green Belt policy is at Policy P17 of the Solihull Local Plan – Draft Submission Plan:

1. *“The Council will safeguard the “best and most versatile” agricultural land in the Borough unless there is an overriding need for development that outweighs the loss, and will seek to protect the character of the countryside.*
2. *Land designated as Green Belt in the Borough is identified on the Policies Map and will be kept permanently open, in accordance with national Green Belt policy.*
3. *Inappropriate development will not be permitted in the Solihull Green Belt, unless very special circumstances have been demonstrated in accordance with the NPPF. Paragraphs 145 and 146 of the NPPF set out forms of development that are not regarded as inappropriate. In interpreting these paragraphs the following provisions will apply:*

- *Limited in-filling or redevelopment may take place in the following settlements without constituting an inappropriate development:*
 - *Chadwick End*
 - *Cheswick Green*
 - *Millison's Wood*
 - *Tidbury Green*
- *Limited infilling in villages shall be interpreted as the filling of a small gap within an otherwise built up frontage with not more than two dwellings.*
- *Disproportionate additions shall be interpreted as additions that are more than 40% of the original floorspace of the building.*
- *Where the re-use of buildings or land is proposed, the new use, and any associated use of land surrounding the building, should not conflict with, nor have a materially greater impact on, the openness of the Green Belt and the purposes of including land in it, and the form, bulk and general design of the buildings shall be in keeping with their surroundings.*

2.17 The Spatial Strategy (paragraph 58-70) of the Solihull Local Plan – Draft Submission Plan recognises that housing targets have not been met and the consent for the HS2 proposals in April 2020 has resulted in an increased in growth and in housing. The Solihull Local Plan – Draft Submission Plan makes it clear that developing Green Belt and expanding rural settlements is an option in accommodating growth. The Spatial Strategy identifies 7 options for development opportunities on Green Belt. The site falls within “ *Growth Option F – Limited Expansion of Rural Villages/Settlements*”.

2.18 A Solihull Local Plan Concept Masterplan (October 2020) has been published alongside the Solihull Local Plan – Draft Submission Plan to help set out the vision and spatial strategy for the Borough up until 2036. The plan identifies sites for potential development in 20 potential allocations to deliver the housing needs. Policy HH1 – Land South of School Road, Hockley Heath identifies a site to the south-west of Hockley Heath for up to 90 dwellings.

Assessment

2.19 The approach is to undertake the assessment in two stages: first, to assess the site against the Atkins methodology. This will allow for a direct comparison to be made with the much larger RP49; Secondly, to assess the site against the EDP methodology outlined further below. This asks more questions of the site in order to develop a further detailed understanding of the contribution the site makes to the five purposes. The Green Belt Assessment has been undertaken by a Chartered Landscape Architect.

- 2.20 The scoring between the EDP and Atkins methodology is not comparative; the Atkins methodology asks four questions against four of the five purposes resulting in a maximum score of 12 if each purpose was to be strongly met. No contribution is given a score of '0'. The EDP methodology asks eight questions against all five purposes but no contribution is given a score of '1', resulting in a maximum score of 21 if each purpose was to be strongly met. The Atkins methodology does not score sites against their inclusion within the Green Belt, the reasoning being that all land within their review is within the Green Belt. However, for completeness, the EDP methodology does score sites for their inclusion within the Green Belt.

Assessment Criteria

- 2.21 As noted in the NPPF, paragraph 130 and above, the Green Belt serves five purposes. For each NPPF purpose, criteria have been determined that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose are described in more detail below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- 2.22 This is a test that considers whether any built form is contained within the site or if the site is able to prohibit further development. Commonly this is ribbon development, but may also be piecemeal development in isolated areas or along settlement edges. A site may have already been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness.
- 2.23 Sprawl may also be discouraged by defensible boundaries that are either natural (e.g. topography, woodland, water course) or man-made features such as a road, railway line, or settlement edge. These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries contribute towards greater openness.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- 2.24 The wording of the NPPF refers to 'towns', but in the context of this assessment study area, the Green Belt affects a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges as well as distinct settlement areas which might be defined as towns. In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or 'on the ground' by intervening natural or man-made features.
- 2.25 The interpretation of 'merging', in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, the range can be much smaller with distances reducing to as little as 100m in some cases. It is of note that susceptibility to 'merging' depends on the extent of openness between two settlements

and each situation needs to be reviewed in relation to the local landscape and visual context.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 2.26 In terms of Green Belt, the ‘countryside’ is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks or isolated properties, or even larger areas of settlement.
- 2.27 This assessment is based on the key landscape characteristics of the site and its surroundings as well as the visual context as described above.
- 2.28 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative ‘value’ element to be applied to landscapes.
- 2.29 The matter of ‘encroachment’ is also a judgement that considers whether or not built form (such as residential development and/or related urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or affects it and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site which has limited or no urbanising influences has a stronger role in safeguarding countryside.
- 2.30 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways. Natural features might include woodland, large water bodies such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- 2.31 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

- 2.32 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the conservation area local heritage designation allows the assessment to acknowledge that historic cores exist.

Purpose 5: to Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land.

2.33 The consultation exercise considers sites within the Green Belt as well as the redevelopment of urban land with the presumption in favour of development opportunities outside the Green Belt.

Assessment Against Atkins Methodology

2.34 EDP have assessed the site against the Atkins methodology contained in the Solihull Strategic Green Belt Assessment (July 2016). A summary of the findings are presented below, within **Table EDP 2.1**. Cells shaded orange represent a difference in scores using the same Atkins methodology. Where there is a difference, this is briefly explained below the table, whilst the EDP assessment expands on this analysis.

Table EDP 2.1: EDP Assessment using Atkins Methodology

Refined Parcel	Description	Purpose Scores					Highest Score
		1	2	3	4	Total	
RP49	Land to the west of Hockley Heath	1	2	2	0	5	2 (Purpose 2 and 3)
EDP Assessment Site	Land west of Stratford Road, Hockley Heath	1	0	1	0	2	1 (Purpose 1 and 3)

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

2.35 Using the Atkins methodology, the test is whether or not development of the site would prevent major urban areas/cities from merging. In this context, Coventry lies some 10km further east, which is beyond the 5km threshold in the Atkins methodology. Moreover, development would not extend the edge of Hockley Heath any further to the east.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

2.36 The site is not considered to be either rural or open. It is bounded by dwellings on two sides and roads to the west and south.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

2.37 As demonstrated by **Plan EDP 2** and as discussed above, the site is not within, nor does it adjoin any Conservation Area.

EDP Methodology

- 2.38 EDP have developed a methodology for Green Belt Assessment, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.
- 2.39 The site is scored against the criteria listed for each purpose as shown in **Appendix EDP 1**, with criteria scoring set out in **Table EDP 2.2** below.

Table EDP 2.2: Scoring

Criteria Score	Contribution to the Green Belt Purpose
1	No contribution
2	Limited contribution
3	Strong contribution

- 2.40 The grading of overall scores reflects the contribution the site makes towards meeting the purposes of the Green Belt. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt, or retained within it.
- 2.41 The findings are presented in the Green Belt Assessment Table in **Appendix EDP 2**.
- 2.42 This assessment does not include consideration of the potential of the site to address all NPPF paragraphs relating to the Green Belt. This is, however, provided as part of the planning statement supporting the information submitted to the LPA.
- 2.43 The findings demonstrate that, out of a maximum score of 21, which would indicate that a site would be performing a strong role in achieving all Green Belt purposes, and a minimum score of 8), the site scores 10 against the current baseline, which can be described as making a limited contribution.
- 2.44 A summary discussion of the findings in relation to each of the purposes is provided below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- 2.45 This assessment considers how the site and its features contribute towards the openness of the Green Belt and the potential to create a permanent boundary, should it be taken out of the designation. The site comprises a single pasture field with hedgerows and trees, it is heavily influenced by adjoining development. The sense of openness is, therefore, already limited. There are very limited opportunities for views into or out of the site. Development of the site would contribute towards increasing the built form and therefore reduce the sense of openness experienced in views across the site where available. However, that sense of openness has already been eroded by the surrounding development.

- 2.46 The area is delineated by clearly definable boundaries to all aspects. These are formed of roads, vegetation and the settlement of Hockley Heath itself.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- 2.47 It is not considered that the land parcel has any function in preventing coalescence. Development would not, for example, extend development beyond that to the other side of School Road.
- 2.48 It is therefore considered that development of the site will not contribute to 'unrestricted sprawl' or 'the merging of neighbouring towns'.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 2.49 The site is abutted by existing residential development to the north and east, and contained to the south and west by Ashford Lane and Stratford Road. The site is well associated with the existing settlement edge and could be considered infill.
- 2.50 In landscape character terms, the site does not have a strong sense of countryside in which to encroach. Furthermore, the site has limited connectivity with the wider open countryside which restricts the potential for any further encroachment.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

- 2.51 The site is so far removed from the historic centres of any towns or cities in the area that it can have no function in relation to this purpose.

Purpose 5: To Assist in Urban Regeneration, by encouraging the Recycling of Derelict and Other Urban Land

- 2.52 The site is entirely contained within the Green Belt and does therefore perform positively against this function. However, as demonstrated above, with the identified need for some development within the Green Belt, some development can occur in this location.
- 2.53 It is considered that the site could reasonably be removed from the Green Belt and developed in accordance with sound masterplanning principles without harm to the integrity of the Green Belt overall.

Key Constraints and Opportunities – Masterplanning Principles

- 2.54 The site is relatively visually unconstrained. Proposed development should respect the character of the surrounding built environment, including massing, scale and materials, and respond to the settlement approach along School Road.

2.55 Key considerations in relation to landscape and visual terms are:

- Visual amenity of residential properties with existing views of the site, namely receptors immediately adjacent to the site boundary;
- Visual amenity of local footpaths, which have adjacency to the site;
- Landscape character – retention and reinforcement of key landscape fabric that contributes to local landscape character (trees and hedgerows which surround); and
- Relationship of new development with the surrounding built environment characteristics, including massing, scale, materials and set back from School Road.

Conclusions in Respect of Landscape Matters

2.56 From a landscape perspective, it is EDP's opinion that there are no 'in principle' constraints with regard to future built development of the site. Furthermore, landscaping measures included within any promoted development would be able to provide targeted mitigation where necessary, which would be effective at promoting biodiversity gains.

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Section 3 Ecological Matters

Introduction and Methodology

- 3.1 This Preliminary Ecological Appraisal has been informed by a desk study undertaken in November 2020, which involved collation of information from the following sources:
- Warwickshire Biological Records Centre (WBRC); and
 - Multi-Agency Geographic Information for the Countryside (MAGIC¹).
- 3.2 The following information was obtained during the desk study:
- Internationally designated sites (15km radius around the site);
 - Statutory designated sites (5km radius);
 - Non-statutory designated sites (2km radius);
 - Annex II bat species² records (6km radius); and
 - All other protected/notable species records (2km radius).
- 3.3 These search areas are considered sufficient to cover the potential zone of influence, in relation to designated sites, habitats and species, of any future development.

Extended Phase 1 Survey

- 3.4 In order to assess the broad habitats present, and advise on any on-site constraints, an Extended Phase 1 survey (**Plan EDP 3**) was undertaken across the site by a suitably experienced ecologist on 26 November 2020.
- 3.5 An Extended Phase 1 survey adopts methodology from a standard Phase 1 Habitat survey with the addition of more detailed habitat and species mapping. This level of survey requires identification of principle habitat types and the dominant plant species present. This level of survey does not aim to compile a complete floral and faunal inventory for the site. In addition, evidence of protected species or species of principle importance are recorded, and the site is assessed for its potential to support such species.

¹ www.magic.gov.uk

² Bat species listed in Annex II of the EC Habitats Directive, namely Greater horseshoe, Lesser horseshoe, Barbastelle and Bechstein's bat

- 3.6 November is outside of the optimal time for Extended Phase 1 surveys, and the survey was limited by seasonal factors with plant species not being in flower at the time of survey. Plants were identified via other indicators, such as vegetative features, and the survey is still considered sufficient as it was able to broadly categorise the habitats present within the site, with no indication of complex/unique floral habitats present.

Preliminary Ecological Baseline

- 3.7 Information regarding designated sites was obtained during the ecological desk study. Statutory designations (those receiving legal protection) and non-statutory designations (those receiving planning policy protection only) are discussed in turn below.

Statutory Designations

- 3.8 Statutory designations represent the most significant ecological receptors, being of recognised importance at an international and/or national level. International designations include Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites. National designations include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs).

- 3.9 Statutory designations receive legal protection under various international and national legislative instruments. This protection is also reflected in policies included within NPPF (February 2019), which are given material consideration during the planning application process. In addition, at the local level, statutory designations are afforded planning policy protection under Solihull Metropolitan Borough Council Local Plan (December 2013) Policy P10: Natural Environment. It states that:

“The Council will protect areas of national and local importance for biodiversity and geodiversity, where it is reasonable, proportionate and feasible to do so. Development likely to have an adverse affect on a Site of Special Scientific Interest, whether directly or indirectly, will be subject to special scrutiny and will be permitted only if the reasons for the development clearly outweigh the nature conservation value of the site and the national policy to safeguard such sites.”

- 3.10 This is reflected in Policy P10 of the emerging Solihull Metropolitan Borough Council Local Plan (October 2020), as submitted for Examination.

- 3.11 No part of the site is covered by any statutory designation. There are no statutory designations of international importance within 15km of the site and none of national importance within 2km of the site. Furthermore, the site does not lie within any SSSI Impact Risk Zones for residential development.

Non-statutory Designations

- 3.12 Non-statutory designations are also commonly referred to in planning policies as ‘local sites’, although in fact these designations are typically considered to be important at a county level. In Solihull, such designations are named Local Wildlife Sites (LWS) though they also include deferred LWS (dLWS), destroyed LWS (deLWS), potential LWS (pLWS) rejected LWS (rLWS) and Ecosites. Additional designated sites which should be considered at this level include Local Nature Reserves (LNRs) and Ancient Semi-natural Woodland (ASNW) where these are not covered by other designations.
- 3.13 Non-statutory designations/local sites do not receive any formal legal protection. However, they do receive planning policy protection, as reflected in the NPPF (paragraph 174). Non-statutory designations are also currently afforded planning policy protection under Policy P10 of the Solihull Metropolitan Borough Council Local Plan, it states that:
- “Development likely to have an adverse affect on a Local Nature Reserve or a Local Wildlife or Geological Site will be permitted only if the reasons for the development clearly outweigh the nature conservation or geological value of the site and its contribution to wider biodiversity objectives.”*
- 3.14 This is reflected in Policy P10 of the emerging Solihull Metropolitan Borough Council Local Plan (October 2020), as submitted for Examination.
- 3.15 No part of the site is covered by any non-statutory designations, however, there are 58 such designations within 2km. The two closest designations identified around the site include two rejected LWS and one destroyed LWS. The two rLWS support grassland swards of low species richness and this is likely the reason that they have not been considered of value. The closest designated site, the Stratford on Avon Canal pLWS, runs along School Road to the south of the site and is designated for its aquatic and marginal flora, ferns and otter (*Lutra lutra*).
- 3.16 In addition, Big Spring Coppice pLWS, located 400m south of the site, supports ancient and semi-natural woodland and ancient replanted woodland. As highlighted in paragraph 10.4.3 of the Solihull Local Plan (2013), any site within 500m of an ancient woodland triggers the requirement to consult with the Forestry Commission.
- 3.17 Any development proposals for the site will need to have consideration to ensure that there are no significant direct or indirect impacts upon any nearby LWS, including changes to the local hydrology and impacts on surface and ground water flows which.

Habitats and Species

Habitats

- 3.18 The distribution of the different habitat types within the site, confirmed through an Extended Phase 1 Habitat survey, are described below.

Grassland

- 3.19 The majority of the site comprises a single field of species-poor semi-improved grassland. Grass species within the sward included perennial rye grass (*Lolium perenne*), cocks' foot (*Dactylus glomerata*), false oat (*Arrhenatherum elatius*) and creeping bent (*Agrostis stolonifera*). Occasional forbs within the sward included white clover (*Trifolium repens*), dandelion (*Taraxacum* sp.), creeping butter cup (*Ranunculus repens*), Common mouse-ear (*Cerastium fontanum*), broad-leaved dock (*Rumex obtusifolius*), cleavers (*Galium aparine*) and nettle (*Urtica dioica*). The grassland is grazed by sheep and as such has a short sward of c.10cm with little thatch layer and appears largely uniform. The grassland is of low intrinsic value and offers very limited opportunities for protected species due to the management regime.

Tall Ruderal

- 3.20 A small extent of tall ruderal vegetation present on the northern site boundary comprising common nettle and thistle (*Cirsium* sp.).

Dense Scrub

- 3.21 A small extent of dense scrub is present in the south-eastern corner of the site where gorse (*Ulex* sp.) and holly (*Ilex aquifolium*) have been allowed to encroach into the field from the hedgerow.

Hedgerows

- 3.22 Hedgerows are present along all of the site boundaries with species rich hedgerows to the east, south and west and a non-native *leylandii* hedgerow to the north. The western and southern hedgerows support mature trees and immature trees are present in the eastern hedgerow. Species within the hedgerows include elder (*Sambucus nigra*), holly, pedunculate oak (*Quercus robur*), yew (*Taxus baccata*), hazel (*Corylus avellana*), gorse, blackthorn (*Prunus spinosa*), ash (*Fraxinus excelsior*), privet (*Ligustrum vulgare*) and crab apple (*Malus sylvestris*). Non-native species within the hedgerows include laurel (*Prunus laurocerasus*), snowberry (*Symphoricarpos albus*) and cotoneaster sp. The hedgerows are largely intact, though little management has resulted in large sections of outgrown hedgerow with gaps forming. Many gaps in the hedgerows are filled with bramble (*Rubus fruticosus*).

Wet Ditches

- 3.23 Shallow drainage ditches delineated the roadway on the western and southern site boundaries. The lack of any significant aquatic flora suggests that these ditches are only wet during periods of higher rainfall.

Species

- 3.24 The desk study returned many records of protected/notable species within 2km of the site. These include many records of birds, including farmland species, which could be present within the site, including yellow hammer (*Emberiza citrinella*), song thrush (*Turdus philomelos*), house sparrow (*Passer domesticus*), redwing (*Turdus iliacus*) and fieldfare (*Turdus pilaris*). Moderate numbers of common and widespread bat species have also been recorded in the wider landscape around the site. Other records of protected/priority species in the wider area include barn owl (*Tyto alba*), brown hare (*Lepus europaeus*), harvest mouse (*Micromys minutus*), grass snake (*Natrix helvetica*), adder (*Vipera berus*), great crested newt (*Triturus cristatus*), smooth newt (*Lissotriton vulgaris*), common frog (*Rana temporaria*) and toad (*Bufo bufo*).
- 3.25 Although the site is considered to provide opportunities for several protected or notable species, these opportunities are primarily restricted to the boundary habitats, owing to the low ecological value and management of the grassland. It is considered unlikely that any of the species above would be significantly impacted by development within the site.

Key Constraints and Opportunities – Masterplanning Principles

- 3.26 The following constraints and opportunities have been identified during the Preliminary Ecological Appraisal;
- The proximity of the site to the Stratford on Avon Canal pLWS and Big Spring Copice pLWS; and
 - Retention and enhancement of existing hedgerows with new native tree/scrub/hedgerow planting and improved management.

Species

- 3.27 As with any proposed development, and subject to confirmation through consultation with the LPA's ecologist, a focused suite of Phase 2 surveys and an ecological assessment will be required to support any planning application coming forward for the site and to inform the design of a robust masterplan.
- 3.28 Based on the nature of the habitats present, as described above, and subject to an assessment of the likely impacts arising from any development proposals, the following additional suite of protected species surveys would likely be required to inform any forthcoming planning applications:
- Bat activity surveys;
 - Bat roost surveys of trees (if they are to be removed);

- Badger surveys; and
- Reptile surveys.

3.29 Overall, the Preliminary Ecological Appraisal has confirmed that the site supports habitats of low intrinsic ecological value, with a typical suite of likely protected species interests (to be confirmed through further detailed survey). There are considered no 'in principle' ecological constraints to any forthcoming development.

3.30 The scheme has potential to be delivered in accordance with current national and local planning policy with regard to the natural environment.

3.31 It is therefore concluded that the site would be capable of delivering a high-quality scheme in response to local housing needs, whilst ensuring compliance with national and local planning policy relating to biodiversity, and relevant wildlife legislation, subject to appropriate masterplanning of the site.

Section 4 Heritage and Archaeology Matters

Introduction

- 4.1 The following section considers any in principle issues with the allocation of the site in terms of the historic environment. This involved a review of information from the Solihull and Warwickshire Historic Environment Records (HER; including aerial photographs from the latter), mapping from online sources and data from the National Heritage List for England. These sources were augmented by a site walkover in December 2020.
- 4.2 The heritage context of the site is shown on **Image EDP 4.1**.



Image EDP 4.1: Relevant Heritage Assets (blue dots = listed buildings; brown dots = Locally Listed Buildings; green = HER information).

- 4.3 The site is an area of grassed farmland on the north-west edge of the village of Hockley Heath. The site comprises a single pasture field, which is surrounded by mature treed hedgerows. Modern development lies to the north and east, whilst roads are located to the south and west, beyond which are the canal and agricultural land.

- 4.4 The site is flat, at approximately 140m above Ordnance Datum (aOD). It is located on Arden Sandstone Formation overlain by Diamicton (www.bgs.ac.uk).

Designated Heritage Assets

- 4.5 The site does not contain any designated heritage assets, nor are there any in its immediate vicinity.
- 4.6 In the wider area, there are very few designated heritage assets, and none within 650m of the site. Three Grade II listed buildings are located in the built-up area of Hockley Heath, c650-950m to the south-east of the site. Other Grade listed buildings are located beyond the settlement, comprising: 2301/2303 Stratford Road, 680m to the northeast; and a barn and a farm, 850m to the west.
- 4.7 The Stratford Canal Conservation Area is located 1km to the south-east of the site, beyond the built-up area of Hockley Heath, although the section of the canal which runs close to the south-western boundary of the site lies in Stratford District, and is not designated as a conservation area (see below).
- 4.8 The closest scheduled monument to the site is Packwood Hall moat 2.3km to the east, whilst the closest Registered Park and Garden is at Packwood House, over 2.6km to the south-east.
- 4.9 Given the distance of these, their significance, the nature of their settings and the surroundings of the site, it is highly unlikely that the site forms part of their settings and therefore does not contribute to their significance such that they would form a constraint to the development of the site

Non-designated Heritage Assets

- 4.10 In terms of non-designated heritage assets, the site does not include any previously identified archaeological remains, as noted within the HERs.
- 4.11 In the wider study area (1km radius from the site boundaries), there are no records for prehistoric activity and only stray metal artefacts related to Roman activity recovered during metal detecting (MWA19003) c.890m to the west. These comprised of 10 coins, a dress fitting and two brooches, with the HER information suggesting they were found individually (as opposed to a hoard). Based on this scarcity of information, there is no reason to believe that the site contains remains from the prehistoric or Roman periods.
- 4.12 With regard to the early medieval and medieval periods, the site is located c.540m to the west of the theorised extent of the settlement of Hockley Heath (5832). Otherwise, the HERs record a collection of ridge and furrow, field boundaries, buildings, a canal and other activity from the medieval to modern periods, the extent and character of which are well understood and not considered to influence the archaeological potential of the site. Indeed, the site was most likely in use as farmland from the medieval period onwards and therefore

has a low potential to contain remains from these periods, other than 'negligible' value features and deposits related to medieval and later agricultural practices.

- 4.13 The Tanworth in Arden tithe map of 1842 depicts the site as a single field, described in the apportionment as the 'close' and used as a meadow. By the time of the 1889 Ordnance Survey (OS) map it had been incorporated into a larger field that extended further north and east, an arrangement which persisted until the 1963-1968 Edition OS map, when the poultry factory and housing has been constructed to the north-east and south-east. No further notable changes were identified in the remaining OS maps consulted, which span up to 1990. The cartographic sources do not indicate any additional archaeological interest within the site.
- 4.14 A review of aerial photographs held by the Warwickshire HER, spanning the period from 1948 to 1980, did not identify any additional archaeological remains within the site or its close proximity. Otherwise, the aerial photographs broadly reflect the information displayed on the later cartographic sources.
- 4.15 To the south-west of the site, beyond the road, is the Stratford-Upon-Avon canal, which is not designated where it lies in Stratford District. The canal (6734) is recorded in the Warwickshire HER, however, and it could be considered a non-designated heritage asset, along with a small brick built building at 209 School Lane (15054), although this is not identified as a 'Locally Listed Building' so appears to have limited heritage interest. The HER notes that the building may have had an associated use with the canal, and notes that there are few windows on the road facing side (**Image EDP 4.2**).



Image EDP 4.2: View of 209 School Lane looking south, also looking towards the canal, which lies in a cutting. The site, and well treed boundary, is to the left.

- 4.16 Notwithstanding this, the canal is situated in a slight cutting, and there is no experience of the site from its tow-path. The building is separated from the site by the road and tree planting. These two features, if considered heritage assets, are unlikely to represent significant (if any) constraints to the development of the site. The setting of the building may need some consideration, although it is considered that any effect would be minimal and could be address through sensitive masterplanning if necessary (e.g. structural planting).
- 4.17 Otherwise, there are two locally listed buildings comprising Georgian houses within the built-up area of Hockley Heath, c.720m to the east of the site. Given their separation from the site by the intervening vegetated and built environment, and lack of any known functional or historic relationship, the site is not considered to form part of their setting or contribute to their significance. They are not considered to constrain the development of the site.

Summary

- 4.18 With regard designated heritage assets, it is considered that there are no constraints and the site could be developed in a manner causing no harm.
- 4.19 With regard non-designated heritage assets, the site is considered to have a low potential to contain archaeological remains of sufficient significance that they would influence its deliverability or capacity. It is also not considered that the site contributes to the significance of any locally listed buildings, and such assets would not form a constraint to the future development of the site.
- 4.20 The site lies close to the Stratford Canal and an associated building. Given their level of heritage interest and their interaction with the site, it is not considered that they represent a significant constraint to the deliverability or capacity of the site, and any mitigation (if necessary) could be achieved through sensitive masterplanning.
- 4.21 On heritage or archaeological grounds, there is no reason why the site should not be allocated in the local plan.

Appendix EDP 1 Assessment Methodology and Criteria

NPPF Para 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
<u>Purpose 1</u> To check the unrestricted sprawl of large built-up areas	Creates a clear, recognisable distinction between urban fringe and open countryside.	<p>Does the site form a contiguous open buffer between the existing settlement edge and the wider countryside?</p> <p>a. Yes, the site is free of development and associated influences and strongly contributes to the openness of the Green Belt (score: 3);</p> <p>b. There is an absence of development within the site but it is overlooked by adjacent/nearby development (score: 2); and</p> <p>c. No, the site contains development and/or does not clearly define a distinction between the settlement edge and the open countryside (score: 1).</p>
	Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to Green Belt parcels. These may be within the site or form part of its boundary. Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as hedgerows and streams. Fences do not form defensible boundaries.	<p>Does the site have a defensible boundary which can prevent sprawl?</p> <p>a. The site does not have a defensible boundary and therefore openness is greater (score: 3);</p> <p>b. The site has a defensible boundary/-boundaries, which would need additional reinforcement (score: 2); and</p> <p>c. The site has a defensible boundary/-boundaries, which do not require additional reinforcement (score: 1).</p>
<u>Purpose 2</u> To prevent neighbouring towns merging into one another	Settlements maintain a clear and sinuous edge.	<p>Is the site well associated with the existing settlement edge?</p> <p>a. The site is isolated from the settlement boundary and appears divorced from it (score: 3);</p> <p>b. The site abuts one settlement boundary but is not divorced from it (score: 2); and</p> <p>c. The site abuts two or more settlement boundaries and therefore forms part of an indent (score: 1).</p>

NPPF Para 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
	<p>Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography: a larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap.</p> <p>The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent merging.</p>	<p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?</p> <ol style="list-style-type: none"> a. Immediate and clear intervisibility with next nearest settlement edge (score: 3); b. Partial visual association with next nearest settlement edges (score: 2); and c. Limited or no visual association with next nearest settlement edges (score: 1).
<u>Purpose 3</u> To assist in safeguarding the countryside from encroachment	<p>The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically.</p>	<p>To what extent does the site represent the key characteristics of the countryside?</p> <ol style="list-style-type: none"> a. The site is strongly representative of the key characteristics and clearly connects with off-site key characteristics. (score: 3); b. The site comprises some representative key characteristics but there are few connections with off-site characteristics (score: 2); and c. The site comprises little or no key characteristics and there is limited or no connection with off-site characteristics (score: 1).
	<p>Encroachment: features such as speed signage and street lighting affect the extent to which the countryside changes from rural to urban.</p>	<p>To what extent is the site urbanised, either by on-site or off-site features?</p> <ol style="list-style-type: none"> a. There are no urbanising features within the site or directly influencing it (score: 3); b. There are several urbanising features affecting the site (score: 2); and c. There are many urbanising features affecting the site, which reduces its representativeness of the countryside (score: 1).

NPPF Para 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
<u>Purpose 4</u> To preserve the setting and special character of historic towns	In the absence of professional judgement on setting and special character on a site-by-site basis by heritage consultants, the criteria considers the proximity of the site to the historic core of a town.	<p>What is the spatial and visual relationship between the site and the historic core of the nearest towns?</p> <p>a. The site shares a boundary with the historic core of the town, is partially or wholly within it or has clear intervisibility with the historic core (score: 2);</p> <p>b. The site does not share a boundary with the town and/or there is no intervisibility with its historic core (score: 1).</p>
<u>Purpose 5</u> To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	By association with the Green Belt designation, would assist in urban regeneration by directing development away from it.	<p>a. The site is in the Green Belt (score: 2)</p> <p>b. The site is not in the Green Belt (score: 1)</p>

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Appendix EDP 2 Green Belt Analysis

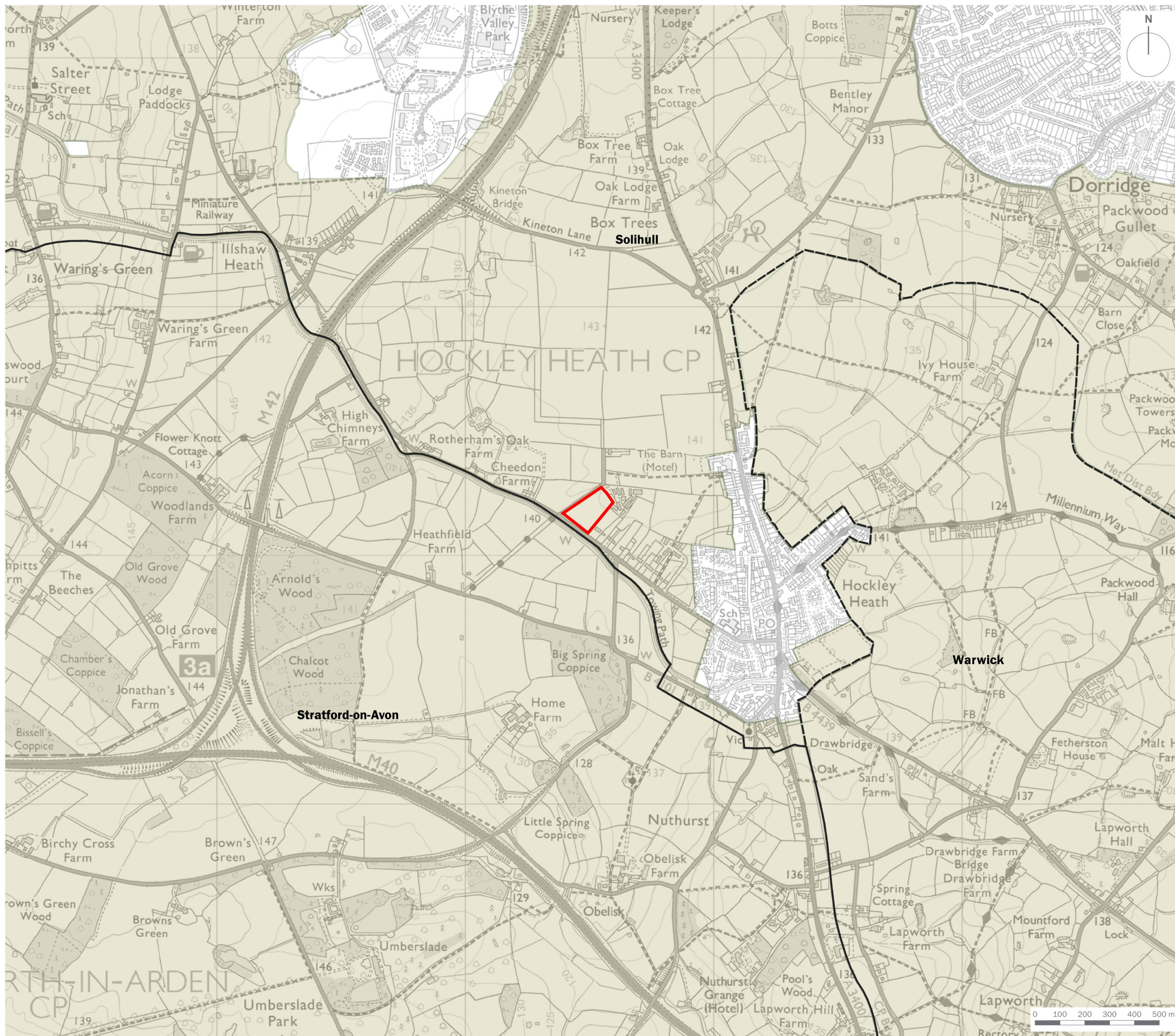
NPPF Para 134 Green Belt Test	Application of Criteria	Assessment	Criteria Score
Purpose 1: To check the unrestricted sprawl of large built-up areas	Does the site form a contiguous open buffer between the existing settlement edge and the other settlement areas/wider countryside?	The site is single parcel with residential development on two sides and roads on the remaining, it is contained by robust vegetative boundaries.	1
	Are there any defensible boundaries?	The site boundary follows strong defensible features such as roads, hedge lines and existing built form, no boundary reinforcement is required. The boundaries have an undisputable permanence and defensibility in preventing further development in their respective direction	1
Purpose 2: To prevent neighbouring towns merging into one another	Is the site well-associated with the existing settlement edge?	The site would not extend the settlement of Hockley Heath in a spatial sense in any direction.	1
	What is the intervisibility with the next nearest settlement edge?	The site is subject to visual containment and is not visible beyond its immediate context.	1
Purpose 3: To assist in safeguarding the countryside from encroachment;	How representative is the site of the key characteristics of the countryside?	The site currently has a suburban character due to its proximity to the settlement edge. The site does contain mature, representative boundary treatments which can be seen elsewhere in the settlement defining property frontages.	2
	What is the influence of urbanising features?	The influence of urbanising features can be seen across the site. The current land use and associated adjacent structures detract from any perception of rural countryside character. As it stands the site is already physically and visually separated from the wider open countryside to all aspects.	1

NPPF Para 134 Green Belt Test	Application of Criteria	Assessment	Criteria Score
<u>Purpose 4:</u> To preserve the setting and special character of historic towns;	What is the nature of the spatial and visual relationship between the site and the historic core of the nearest town?	There is no proximity or intervisibility with the historic core of a town and thus the site does not perform against this function.	1
<u>Purpose 5:</u> To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Is the land within the Green Belt	The site is entirely within the Green Belt	2
			10

Plans

- Plan EDP 1** Site Location and Site Boundaries
(edp6890_d002a 11 December 2020 WG/EO)
- Plan EDP 2** Environmental Planning Considerations
(edp6890_d003b 14 December 2020 WG/EO)
- Plan EDP 3** Extended Phase 1 Habitat Survey
(edp6890_d001a 11 December 2020 MH/ND)
- Plan EDP 4** Constraints and Opportunities
(edp6890_d004a 11 November 2020 WG/ND)

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- Site Boundary
- Local Authority District Boundaries
- Green Belt

client
Rainier Developments Ltd

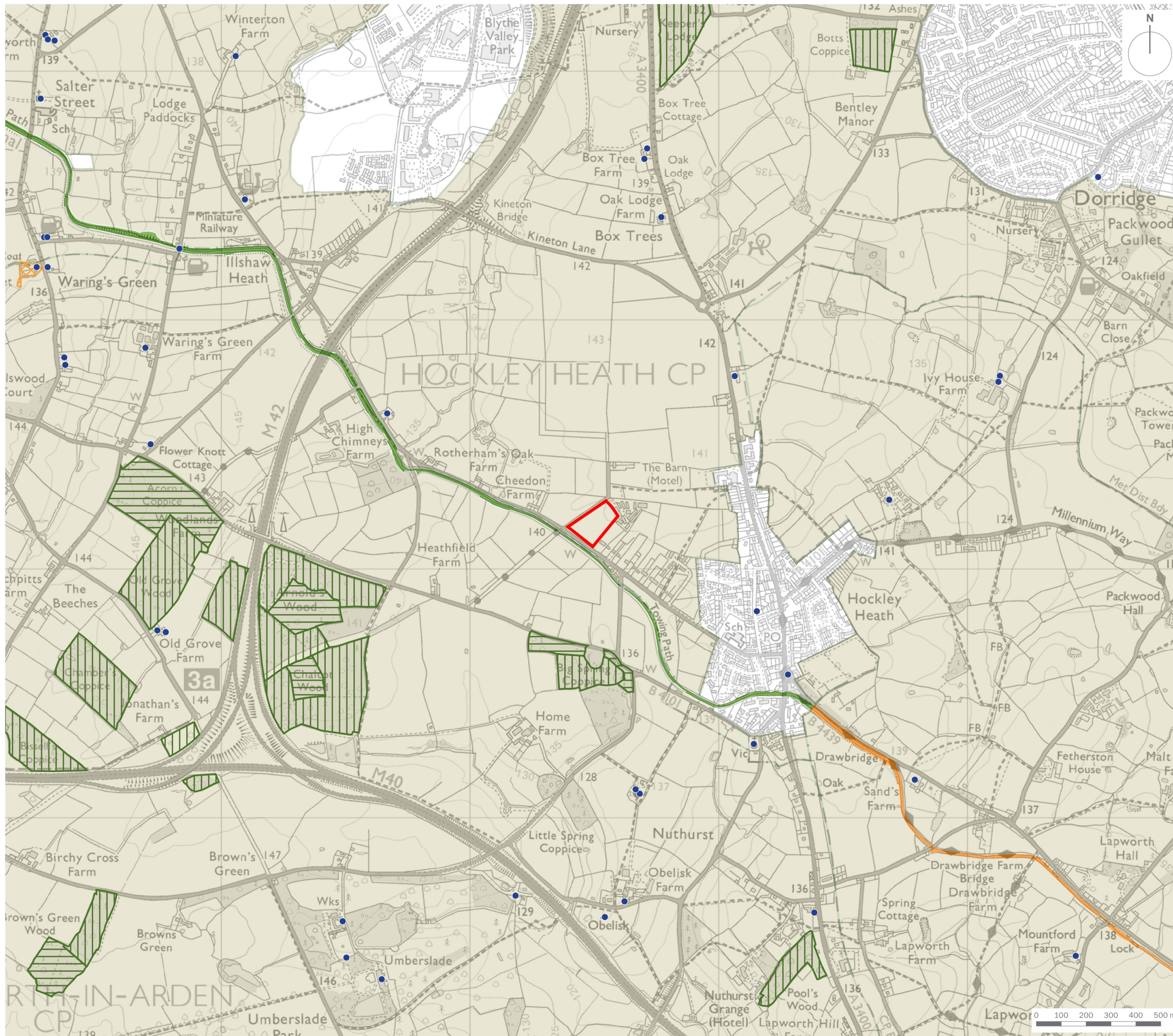
project title
Land at School Road, Hockley Heath

drawing title
Plan EDP 1: Site Location and Site Boundaries

date	11 DECEMBER 2020	drawn by	WG
drawing number	edp6890_d002a	checked	EO
scale	1:15,000 @ A3	QA	GY



Registered office: 01285 740427 - www.edp-uk.co.uk - info@edp-uk.co.uk



- Site Boundary
- Green Belt
- Ancient Semi-natural Woodland
- Plantation on Ancient Woodland Site
- Listed Building
- Conservation Area
- Non-Designated Canal

client
Rainier Developments Ltd

project title
Land at School Road, Hockley Heath









drawing title
Plan EDP 2: Environmental Planning Considerations

date	11 DECEMBER 2020	drawn by	WG
drawing number	edp6890_d003b	checked	EO
scale	1:15,000 @ A3	QA	GY



Registered office: 01285 740427 - www.edp-uk.co.uk - info@edp-uk.co.uk



-  Site Boundary
-  Dense Continuous Scrub
- SI Poor Semi-improved Grassland
-  Tall Ruderal
-  Intact Species-rich Hedgerow and Trees
-  Intact Species-poor Hedgerow
-  Running Water
-  Fence
-  Wall

client
Rainier Developments Ltd

project title
Land at School Road, Hockley Heath

drawing title
Plan EDP 3: Extended Phase 1 Habitat Survey

date	11 DECEMBER 2020	drawn by	MH
drawing number	edp6890_d001a	checked	ND
scale	1:1,000 @ A3	QA	GY





Site Boundary

Constraints

Opportunities

- Mature Trees
- Potential Green Infrastructure Links
- Proposed Green Buffer to School Road

Built form can be found to all aspects of the site.

Provide and enhance green infrastructure which connects to a wider network off site.

The site is well enclosed by robust boundary vegetation both within and beyond the site.

Provide generous set back to development along School Road to respect prevailing settlement pattern, the amenity of receptors along the canal and provide wildlife benefits.

client	Rainier Developments Ltd		
project title	Land at School Road, Hockley Heath		
drawing title	Plan EDP 4: Constraints and Opportunities		
date	11 DECEMBER 2020	drawn by	WG
drawing number	edp6890_d004a	checked	ND
scale	1:1,000 @ A3	QA	GY



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LEGEND

-  Site Boundary
-  Walking and Cycling Routes to Local Facilities (walking times in brackets)
-  Indicative Distance from the site
-  Bus Stop + Walking Route
-  20/20A/513/X50 Regular Hourly Service to Shirley, Blossomfield, Ilshaw Heath, Solihull, Stratford-Upon-Avon, Dorridge and Hockley Heath
-  513/812/A3/A8/A8W/517 Regular Hourly Service to Solihull, Dorridge and Hockley Heath
-  Draft Housing Allocations (Regulation 18)



Project
**Land North of School Road,
 Hockley Heath**
 Drawing Title
Connectivity Plan

Date	Scale	Drawn by	Check by
14.03.19	NTS	AS	LH
Project No	Drawing No	Revision	
29665	BM-M-13	C	



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