



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

Name of the Local Plan to which this representation relates:

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	Miss	Miss
First Name	Zoe	Zoe
Last Name	Curnow	Simmonds
Job Title (where relevant)	Strategic Land & Planning Manager	
Organisation (where relevant)	Taylor Wimpey	Lichfields
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Line 3		Leeds
Line 4		
Post Code		LS1 2JG
Telephone Number	c/o agent	
E-mail Address	c/o agent	

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	<input type="text"/>	Policy	<input type="text"/>	Policies Map	X (in relation to site BL2 and Green Belt Boundary)
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4. Do you consider the Local Plan is :

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

The allocation of the land south of Dog Kennel Lane for release from the Green Belt and its development to deliver approximately 1,000 new homes is supported by Taylor Wimpey. The site is in an appropriate and accessible location and the Council have adopted an appropriate strategy in identifying it for development.

However, there are a number of changes to the Policies Map that are required in order to make it sound in relation to the proposed site allocation BL2. At present it is considered the Policies Map is not justified or consistent with national policy (as per the tests set out in paragraph 35 of the National Planning Policy Framework (NPPF)) when taking into account the following matters:

- Specific Green Belt boundary; and, related to this,
- The release of land south of Stratford Road/east of Creynolds Lane from the Green Belt

Each of the above are addressed in turn below.

Green Belt boundary

The land proposed to be taken out of the Green Belt is not considered to be based on a sound basis that reflects paragraph 139 of the National Planning Policy Framework. This paragraph includes a number of criteria by which Green Belt boundaries should be defined, one of which, is to "...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent".

In the justification text for Policy BL2 of the Draft Submission Local Plan, SMBC state that due to the existing field structure, there is no clear contiguous defensible Green Belt boundary to the south and therefore new 'internal estate roads' should form the new boundary.

Taylor Wimpey appointed EDP in 2009 to advise on Green Belt matters in relation to proposed Site Allocation BL2 and they have developed comprehensive, field-based local knowledge of the site since that time. On this basis, EDP considers that the site does have well-defined and defensible boundaries for a new Green Belt boundary. A Green Belt Position Note has been prepared by EDP and is included at Appendix 1 of this representation.

To the south, the site has a distinct 'layering' effect of mature landscape features within the central belt of the site, situated around the shallow valley landform. At this locality there are also robustly vegetated field boundaries, a number of woodland copse (around Light Hall and in the locality of the existing water features) and watercourse within the valley landform.

It is considered that a well-vegetated boundary, which could be enhanced with additional planting, would provide a much more appropriate and definable physical boundary on the ground than a proposed new internal road and in doing so would maintain the existing field structure within the landscape. Combined with new planting, this would be the most robust response to defining a new GB boundary. These existing landscape features can be used to create a defensible Green Belt boundary, and through Green Infrastructure strategies, could be enhanced further, in combination with new landscape features, which are in keeping with the character of the surrounding area.

SMBC assertion that the Green Belt will be re-aligned to a new roadway is an unsuitable approach to forming a defensible edge. To re-align to only a newly built man-made feature affords less opportunity to integrate the proposed development into the landscape setting, which may potentially impact the character of the countryside beyond and the perception of openness in the countryside and would make for an inefficient road layout and less permeable masterplan.

It is therefore, requested that the Green Belt boundary is amended to align with that proposed by Taylor Wimpey (see page 56 of the submitted Concept Masterplan document) which has been designed to attain a defensible Green Belt boundary through the following initiatives:

- A distinct 'layering' effect within the local landscape through the combination of robust field boundaries and mature tree components, tree groups and woodland copse. This is most obviously experienced in the southern extent of the site and these features combined with wider landscape elements can and will significantly reduce intervisibility of the site from the wider open countryside (Green Belt).
- Furthermore, development would preserve the ongoing inter-relationship between the settlement and the surrounding rural environment by new development being well contained and enclosed by the existing field boundaries. The '*Arden Pastures*' landscape type ('*Warwickshire Landscapes Guidelines: Arden*' (November 1993)) states the following: "*This pattern of late enclosure followed by the development of new settlements has been repeated throughout the Arden Pastures in places such as ...Hockley Heath (and) Wythall...this has resulted in a landscape often pervaded by suburban influences...Despite the densely populated character of the landscape, settlement is not usually a dominant visual element... the gently rolling topography and numerous mature trees*

combine to create a heavily wooded appearance...and a strong sense of enclosure."

- The Green Belt re-alignment proposed would ensure that the development would remain 'integrated' within its setting through existing landscape and physical features, which would afford the proposal enclosure rather than being incongruous within the landscape and experienced as quite raw and sporadic (as would be the case if SMBC's new internal roads did not follow the existing field pattern).

The above commentary demonstrates that the site has both physical and landscape features that provide clearly demarcated boundary features. The site is also relatively enclosed which limits any consequential landscape and visual effects through the utility of permanent and physical features within the site.

It is therefore considered that the Green Belt boundary proposed on the Taylor Wimpey (this can be found on page 56 of the SMBC Concept Masterplan document or at Appendix 2 of this note; drawing ref. 675A-28J) which follows the existing field structure, is a justified approach that is more appropriate than that which is currently being proposed by SMBC and which is consistent with national policy – specifically paragraph 139.

Omission of land south of Stratford Road and west of Creynolds Lane

Since February 2017 and the first of a number of consultations on the Regulation 18 version of the Local Plan Review, Taylor Wimpey has promoted the land for Site Allocation BL2 for development. The proposed site included the majority of the land included in the allocation (aside from the areas excluded as noted above) but also land to the south of Stratford Road and east of Creynolds Lane.

Informal discussions with SMBC officers have also been held over the past four years to promote the site for development and to confirm that it is suitable, available and deliverable.

It is notable that the respective parcel of land was included in the SMBC Concept Masterplans issued for public consultation in 2019 as part of the Additional/Alternative Sites consultation. However, this does not now form part of the allocated site.

It is, unclear why this parcel of land has been excluded from the site allocation as the below list of considerations demonstrates:

- Green Belt: from work undertaken by EDP, this land is considered to be a low functioning part of the Green Belt and which in landscape terms does not form an important 'gap' between any other area of settlement, nor does it reflect countryside into which development would, or could, 'encroach'. This is consistent with the Solihull Strategic Green Belt Assessment (dated July 2016) which scores the site (ref. PR65) a '5', the third lowest combined score category (the site scored the 1 for both Purposes 1 and 3 and 3 for Purpose 2). Therefore, there are no Green Belt or landscape grounds why this site should be excluded.
- Flood Risk: This area is not considered to be at particular risk of flooding. While it does include an extent of low to high surface water flood risk around existing ditches and boundaries which are principally located in areas fronting Stratford Road this would not preclude development on the land. The proposed development parcels shown on the Randall Thorp Masterplan (see Appendix 2) are located outside the surface water flood risk. Should this site come forward, existing surface water flow routes could be retained to avoid interruption of overland flows. Furthermore, it should be noted that the majority of the catchment that contributes to this

small area of potential flood risk is made up of the wider development site i.e. the existing contributing drainage catchment will be replaced by formal positive drainage system constructed to a high (1 in 100-year plus climate change) design standard as a result of development, thereby further reducing the likelihood that such flooding will occur. Appropriate mitigation measures would be considered as part of the site-specific Flood Risk Assessment, but it is not considered that flood risk is a significant constraint to the development of the eastern parcel.

- The site is not constrained by ecological features or designations and does not contain any heritage assets.

Based on the above assessment, the additional parcel of land should be released from the Green Belt and included for development in the site allocation. This would have the added benefit of increasing the capacity of the site and providing the additional housing numbers considered necessary.

Summary

Based on the arguments expressed above, the proposals map cannot be considered to meet two of the NPPF tests of soundness in that the site allocation boundary proposed is not justified and it is not consistent with national policy. A number of modifications are suggested below to make the Local Plan sound.

(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.

Suggested amendments to the proposals map:

- Amend the site and Green Belt boundary of Policy BL2 to align with the Masterplan prepared by Randall Thorp which is based on a robust, justified and appropriate strategy. This can be found on page 56 of the SMBC Concept Masterplan document or at Appendix 2 of this note for ease of reference.
- Remove the land to the south of Stratford Road and west of Creynolds Lane from the Green Belt and include it within the site allocation BL2 to ensure the site allocation is based on a robust, justified and appropriate strategy.

With both of these changes, it is considered the proposals map can be made Sound.

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

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.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As the promoters of this site, which has a long, complex history with a number of detailed technical issues to be considered, it is essential that they are represented at the Hearing Sessions to enable any queries raised by the Inspector, in relation to the matters raised above, to be appropriately addressed.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Zoe Simmonds

Date:

14/12/2020

Appendix 1 EDP Green Belt Position Note (November 2020)



**Land at Light Hall
Farm, Solihull**

**Green Belt Review
Position Note**

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

On behalf of:
Taylor Wimpey UK Ltd

December 2020
Report Reference
edp0938_r015c

Contents

Section 1	Introduction	1
Section 2	The Purpose of this Position Note	3
Section 3	Site Location and Planning Context	5
Section 4	Background to the Green Belt Designation	7
Section 5	Review of the Sites	11
Section 6	EDP’s Green Belt Appraisal of the Site	15
Section 7	Review of Boundary Resilience	21
Section 8	Summary.....	25

Appendices

Appendix EDP 1	SMBC’s Proposed Policies Map - Local Plan Review (October 2020)
Appendix EDP 2	Taylor Wimpey’s Illustrative Masterplan (ref: 675A-28C prepared by Randall Thorp)
Appendix EDP 3	Extract from the Solihull Local Plan Review – Draft Concepts Masterplans SMBC Illustrative Emerging Concept Masterplan: Sites 11, 12 & 26 (January 2019)
Appendix EDP 4	Extract from the Solihull Local Plan – Concept Masterplans SMBC Illustrative Concept Masterplan: Sites BL2 & BL3 (October 2020)

Plan

Plan EDP 1	Solihull Green Belt Refined Parcels and Broad Areas (edp0938_d052a 14 December 2020 MH/VP)
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This report is intended for electronic viewing only

	Report Ref: edp0938			
	Author	Formatted	Peer Review	Proofed by/Date
0015b_DRAFT	VP	CL	EB	-
0015c	VP	CL	EB	CM/14.12.20

Section 1 Introduction

- 1.1 Taylor Wimpey UK Ltd have appointed The Environmental Dimension Partnership Ltd (EDP) to undertake a Green Belt review on a site known as 'Light Hall Farm, Solihull, West Midlands' (hereafter referred to as 'the site'). The site falls within the Solihull Metropolitan Borough Council (SMBC) Local Planning Authority and is allocated for residential development of up to 1,000 homes within the SMBC's Submission Draft Local Plan within which it is referred to as Site BL2: 'South of Dog Kennel Lane' (refer to **Appendix EDP 1**). An extract of the policy map showing allocation Site BL2 is shown below at **Figure EDP 1.1** for reference.

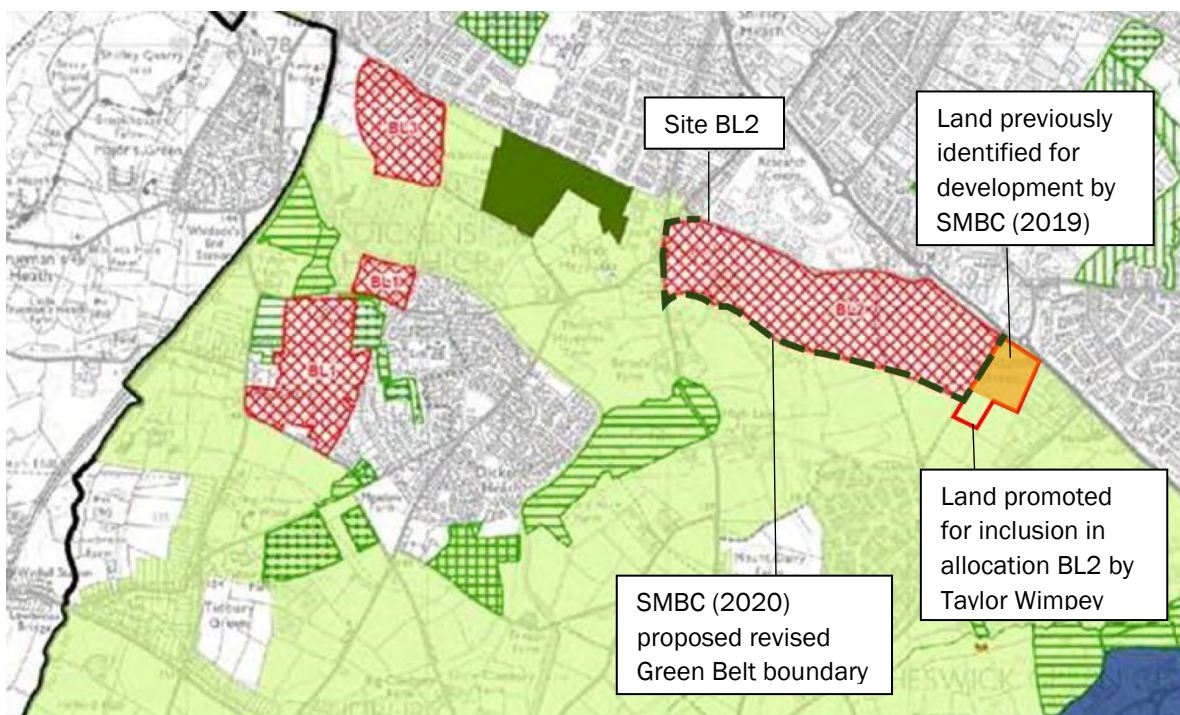


Figure EDP 1.1: Extract from the SMBC's Proposed Policies Map - Local Plan Review (October 2020) showing draft allocation Site BL2 additional land previously identified as forming part of the allocation in 2019.

- 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, a Corporate Member of IEMA and Registered Organisation of the Chartered Institute for Archaeologists. 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.

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Section 2 The Purpose of this Position Note

- 2.1 EDP has been involved with the site since 2009, gaining an early understanding of the landscape issues likely to affect the site's 'in principle' suitability for residential development and its potential capacity. Based upon the work carried out to date, EDP has inputted into the development of Taylor Wimpey's Concept Masterplan (contained **Appendix EDP 2**) and supported its promotion into Local Plan. This work has been informed by desk studies and site visits, and also by a range of specific studies in 2015, 2017, 2018 and 2020 which have provided additional detailed information in respect of the Green Belt.
- 2.2 SMBC have now published their Solihull Local Plan Draft Submission (October 2020). Notably, the proposed allocation has 'excluded' a parcel of land on the eastern boundary of the site shown at **Figure EDP 1.1** which was previously illustrated for residential development in SMBC's January 2019 'Draft Concept Masterplans' document (contained at **Appendix EDP 3**).
- 2.3 Therefore, this report has been authored to assist with the following:
- To inform the site's draft allocation under Policy BL2: South of Dog Kennel Lane of the Solihull Local Plan – Draft Submission Plan (October 2020);
 - To provide an appraisal of the site's function against the Green Belt purposes as set out in the National Planning Policy Framework (NPPF). To assist this, EDP has undertaken a 'Green Belt Appraisal', which looks at the five purposes from an openness perspective - that being the overriding purpose of land contained within the Green Belt;
 - To consider the suitability of land to the south of Stratford Road and west of Creynolds Lane to be removed from the Green Belt; and
 - To provide high-level consideration of Taylor Wimpey's proposed Green Belt re-alignment alongside that which is proposed by SMBC's 2020 Concept Masterplan, and the appropriateness of basing the new boundary on new internal estate roads; see **Appendix EDP 2** and **4** respectively.
- 2.4 Specifically, this document provides headline technical evidence to SMBC that the removal of the site from the Green Belt and its development would be appropriate.

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Section 3

Site Location and Planning Context

- 3.1 The site is located at Ordnance Survey Grid Reference (OSGR) SP 122 757 and is entirely within the (Birmingham) Green Belt on the southern edge of Shirley, Solihull, with Monkspath to the east, Cheswick Green 80m to the south and Dickens Heath 430m to the west (refer to **Plan EDP 1**).
- 3.2 A significant proportion of the site was identified as a housing site within the last publication of the 'Solihull Strategic Housing and Economic Land Availability Assessment' (SHELAA) adopted November 2016 and Site Assessments. Effectively the SHELAA identified a predominant area of the site which should be removed from the Green Belt and allocated for housing development (see SHELAA 2016 Site Ref: 1007).
- 3.3 In the recently published Solihull Local Plan Draft Submission (October 2020) the northern section of the site has been identified for new housing development and categorised as part of Growth Option G – Large Scale Urban Extensions. The site is identified within *Policy BL2 – South of Dog Kennel Lane* which is proposed to be released from the Green Belt. This is approximately 50% of the site quantum which Taylor Wimpey Development Ltd is promoting. The remaining southern area of the site is currently proposed within the Solihull Local Plan Draft Submission (October 2020) for public open space (POS).
- 3.4 The policy wording in relation to Policy BL2 states that:
- “Policy BL2 - South of Dog Kennel Lane:*
1. *The site is allocated for 1,000 dwellings;*
 2. *Development of the site should be broadly consistent with the principles as shown in the concept masterplan below, which include:*
 - i. *Respecting the setting of the Grade II Listed Light Hall Farm. Development should be set back from the immediate locality to avoid harm. Only if harm cannot be avoided should mitigation be considered, and then it should be fully justified and demonstrated to be successful in reducing harm;*
 - ii. *Provision of 8.2ha of public open space and a range of play areas for children and young people;*
 - iii. *Multi-modal access routes from Dog Kennel Lane that respond to those already established at the development at the Green;*
 - iv. *Enhancement of bridleway access from Cheswick Green through the site as a pedestrian route and key green infrastructure link;*

- v. *Trees and hedgerows along Dog Kennel Lane should be retained to protect the character of the highway;*
 - vi. *On site accommodation for older people in accordance with Policy P4E;*
 - vii. *5% of open market dwellings to be provided in the form of Self and Custom Build Plots in accordance with Policy 4D.*
3. *Likely infrastructure requirements [...]*
4. *Green Belt enhancements will include:*
- i. *Country Park to south of development extending to edge of Cheswick Green. Will provide greater access to the countryside, green infrastructure provision and opportunities to maximise biodiversity net gain.*
5. *The Concept Masterplans document should be read alongside this policy. Whilst the concept masterplan may be subject to change in light of further work that may need to be carried out at the planning application stage, any significant departure from the principles outlined for Site 12 will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised.”*

Section 4

Background to the Green Belt Designation

4.1 The National Planning Policy Framework (NPPF) requires land to demonstrate that it contributes towards these two essential characteristics of openness and permanence by meeting one or more of five ‘tests’ of Green Belt designation, which are set out in the NPPF Paragraph 134 (June 2019) as follows:

- *“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.”*

4.2 The NPPF Paragraph 136 (June 2019) says that:

“.... once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”

4.3 This report considers the extent to which the site fulfils the five Green Belt purposes in NPPF (June 2019) paragraph 134. In doing so, EDP have been minded to ensure that any revision to the Green Belt boundary *“will not need to be altered at the end of the development plan period”*, as well as ensuring any new boundaries are: *“clearly, using physical features that are readily recognisable and likely to be permanent”* (NPPF June 2019, paragraph 139, respectively).

Solihull Strategic Green Belt Assessment (July 2016)

Purpose and Methodology

4.4 The ‘Solihull Strategic Green Belt Assessment’ (SSGBA) was published in July 2016 against the current backdrop to the debate of Green Belt land release within the Borough and the wider West Midlands area:

“The key driver for this Strategic Green Belt Assessment (hereafter referred to as the Assessment) is SMBC’s need to adopt a review of its Local Plan by December 2017, with

an essential component of this being the requirement for the Plan to be informed by updated evidence.”

“Part of this evidence base includes the recent Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the Black Country Authorities Strategic Housing Needs Study. This study found that there is a significant shortfall in housing supply across the Greater Birmingham Housing Market Area which, alongside the growth associated with the planned HS2 Interchange, would further add to pressure for significant future development within the Borough over the lifetime of the Plan.....the provision of a sound and up to date evidence base to support the development of policies relating to growth in the Borough.”

4.5 The purpose of this assessment is stated as follows:

“The core purpose of this Assessment is to assess the extent to which the land currently designated as Green Belt within SMBC fulfils the essential characteristics and purpose of Green Belt land as set out in Paragraphs 79 and 80 of the National Planning Policy Framework (NPPF).”

4.6 As stated, this study is to be considered as one of only several representations to the Local Plan process and forms part of the Evidence Base in the development of planning policies and the Draft Allocation for housing development. It is therefore entirely reasonable for the landowners of the site to undertake further studies to inform the development of the emerging Plan, and for this to be considered in its preparation.

4.7 Further to this, the assessment is mindful of recognising and using strong permanent physical features, which are easily identifiable, and so ensuring that any new boundaries are: *“clearly, using physical features that are readily recognisable and likely to be permanent”* (NPPF para 139 (June 2019)).

4.8 With consideration of the site’s context, EDP identifies the following criteria of physical features as those which may be used to sustainably re-align the Green Belt for longevity:

- Established and/or historic field patterns;
- Areas of woodland established hedgerows and treelines (i.e. landscape features);
- Watercourses;
- Roads (motorways, A and B roads); and
- Rail and other permanent infrastructure.

4.9 The SSGBA has examined land across the Borough against the following criteria:

“Each Refined Parcel and Broad Area has been subject to an assessment against the first four purposes of Green Belt, all of which have equal weight, in line with the criteria set out

in Table 1 below and assigned a score for the extent to which it performs against each purpose.

- 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; and
- To preserve the setting and special character of historic towns.”

4.10 SMBC limited their assessment to only these first four Green Belt purposes, therefore, not including the fifth Green Belt purpose: “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. SMBC reasoned that: “By virtue of its designation, all Green Belt land makes an equal contribution to this purpose and therefore inclusion of this purpose would add no value to the Assessment.”

4.11 SMBC scored each land parcel for each of the first four purposes of the Green Belt as follows (see Section 3, page 5 of the ‘Solihull Strategic Green Belt Assessment’, July 2016):

- “Refined Parcel/Broad Area **does not** perform against the purpose;
- Refined Parcel/Broad Area is **lower performing** against the purpose;
- Refined Parcel/Broad Area is **more moderately** performing against the purpose;
- Refined Parcel/Broad Area is **higher performing** against the purpose.”

4.12 In the methodology of the SSGBA 2016, SMBC scores the above assessments as 0 to 3 respectively, with ‘higher performing’ scoring 3, and ‘does not perform’ scoring 0.

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Section 5 Review of the Sites

5.1 With reference to the SSGBA 2016, the site is identified as falling within three refined land parcels illustrated on **Plan EDP 1**; no doubt reflecting the physical features and differing landscape character found throughout the site:

- *RP 63* – this land parcel is situated within the site to the east-south-eastern extent of the site;
- *RP 64* – the site occupies the northern extent of this land parcel; and
- *RP 65* – this land parcel is situated within the site and forms the majority of the site’s quantum.

5.2 These three land parcels were considered in line with and SMBC’s scoring mechanism from the SSGBA 2016 against the assessment criteria (NPPF Paragraph 134 Green Belt purposes 1-4), which are identified in **Table EDP 5.1**.

Table EDP 5.1: Review of Land Parcels (forming the site) from SSGBA 2016

Land Parcel	Purpose 1 To check the unrestricted sprawl of large built-up areas	Purpose 2 To prevent neighbouring towns from merging into one another	Purpose 3 To assist in safeguarding the countryside from encroachment	Purpose 4 To preserve the setting and special character of historic towns	Overall Score
Parcel RP63	1	3	1	0	5 out of a max. of 16 (Main Purpose 2) averaging 1.25 overall
Parcel RP64	0	0	0	0	0 out of a max. of 16 (No Main Purpose) Averaging 0 overall
Parcel RP65	1	3	2	0	6 out of a max. of 16 (Main Purpose 2) averaging 1.5 overall

5.3 As can be seen from **Table EDP 5.1** above the three parcels of land which form the site have been assessed overall as quite low functioning elements of the Green Belt (Parcel RP

63 and RP 65) or having no score at all with regard to its function against these four main purposes of the Green Belt (Parcel RP 64).

- 5.4 The highest scores for RP 63 and RP 65 are found relative to Green Belt purpose 2: “*To prevent neighbouring towns from merging into one another.*” That said, a score of 2 is categorised by SMBC as: “*represents a gap of between 1 and 5 kilometres between urban areas = 2 Parcel is more moderately performing.*” SMBC comment as follows:

“Refined Parcels which perform highly against purpose 2 to ‘Prevent neighbouring towns merging into one another’ are those parcels within the south west corner of the borough which form the gap separating the urban area of Solihull from the nearby settlements of Cheswick Green and Dickens Heath. For example, parcels RP62 and RP63 form a gap of less than 1 kilometre between the Monkspath area of Solihull and Cheswick Green to the south. Likewise, parcels RP65 and RP69 form a gap of less than 1 kilometre between the Shirley area of Solihull to the north and Dickens Heath to the south.”

- 5.5 Land to the south of Stratford Road and west of Creynolds Lane (illustrated on **Figure EDP 1.1**) which has not been included as part of the draft allocated for Site BL2 (despite being previously considered suitable for development) is shown on **Plan EDP 1** as falling within RP 63. Land parcel RP 63 scores poorly against Green Belt Purpose 1: “*To check the unrestricted sprawl of large built-up areas*”; and Green Belt Purpose 3: “*To assist in safeguarding the countryside from encroachment*”. In landscape character terms, this parcel of land is urban fringe in character, and does not reflect countryside into which development would, or could, ‘encroach’.

- 5.6 RP 65 scores poorly for Green Belt Purpose 1 and moderately for Green Belt Purpose 3. Nonetheless, both RP 63 and RP 65 land parcels are not scored as ‘higher’ functioning elements against any of the Green Belt purposes i.e. score 3 (moderate at most).

- 5.7 With regard to RP 64, SMBC states the following:

“Refined parcels which do not perform against purpose 2 include those parcels which are entirely contained by the urban area and therefore do not form a gap..... parcel RP64 which is entirely formed of Cheswick Green.”

- 5.8 These three land parcels which form the site score 0 for Green Belt purpose 4: “*To preserve the setting and special character of historic towns.*”

Summary

- 5.9 EDP finds that the performance and character of Green Belt land within SMBC varies greatly across the Borough in landscape terms. In relation to the site, when the scores are combined all three land parcels which form the site are not deemed to be high functioning elements of the Green Belt to the south west of the Solihull, i.e. at most the site attains an average scoring of 1.5 which is moderate – lower in its function, albeit part of the site scores no function. This may, in part, be due to its location adjoining the existing urban edge of Solihull or being situated within a location which is already “*washed over*” by

surrounding urban development i.e. RP 64 which: *“does not perform against any of the first four purposes of Green Belt.”*

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Section 6

EDP's Green Belt Appraisal of the Site

- 6.1 The review includes an analysis of desk-based material and was supported by a site visit by a Chartered Landscape Architect from EDP in January and March 2020. The site visit was conducted during winter months and in clear and dry weather conditions by walking local roads and rights of way to gain an understanding of the landscape context of and surrounding the site.
- 6.2 This review of the site will be against the NPPF (June 2019) Para 134 Green Belt functions and is undertaken in accordance with a methodology published by SMBC and considers potential development areas within the site (as a whole).

Table EDP 6.1: EDP's Green Belt Appraisal based on Methodology of SSGBA 2016

Green Belt Purpose	Application of Criteria	Notes from EDP's Site Visit (March 2019)	Scoring
<p>Purpose 1: To check the unrestricted sprawl of large built-up areas</p>	<p>Does the site form a contiguous open buffer between the existing settlement edge and the other settlement areas/wider countryside?</p>	<ol style="list-style-type: none"> 1. The site does not contain development but is encompassed by other urban and sub-urban land uses to the north and north east. To the north and north east the site is overlooked by the adjacent properties within the existing industrial land use and settlement within Solihull. 2. The site is not continuously open because of robust hedgerows and mature tree groups to the eastern extent of the site leading to a sense off visual containment against the existing urban edge of Solihull. 3. The site is enclosed from the north and east by existing bands of vegetation, some of which are characteristic of the baseline character i.e. mature hedgerows within small rectilinear fields and robust tree groups. 4. Views into the site from existing houses will be apparent from very few receptors along Tamworth Lane to the west. 5. The site is essentially a pocket of open land with an otherwise urban setting to the north and east of the site. 	<p>1/3</p>
	<p>Are there any defensible boundaries?</p>	<ol style="list-style-type: none"> 1. The site contains defensible boundaries to the north with Dog Kennel Lane roadway, as well as with A34 Stratford Road to the east. Mature vegetation to the east and south creates a layered and enclosed effect. There is also a distinct valley feature to the west which forms a physical feature between the west and eastern aspects of the site. 2. There is a limited, if any, sense of openness across the site to the east and south. The western site area is perceived as more open with a larger field pattern, less defined field boundaries and fewer tree belts. There is opportunity for moderate intervisibility between the site and the wider open countryside to the west. 	

Green Belt Purpose	Application of Criteria	Notes from EDP's Site Visit (March 2019)	Scoring
Purpose 2: To prevent neighbouring towns merging into one another	What is the intervisibility with the next nearest settlement edge?	<ol style="list-style-type: none"> 1. There is very little intervisibility with the settlement edge of Solihull and views are not expected to be experienced far beyond the site boundary i.e. within 0.5km of the site. Views outside of the site are limited or filtered reduce the opportunity for intervisibility with the edge of surrounding settlements. 2. Development of the site would not change the perception of the open landscape to the north and east of the site. The presence and screening effects of existing development and vehicle routes with associated vegetation, including vegetation within the site's field pattern and along its boundary, all limit intervisibility. Mature vegetation along the site's southern boundary has a limiting effect on views from the nearby Cheswick Green settlement edge. 3. The western part of the site has a sense of visual openness; views from Tamworth Lane are likely to be significantly filtered by mature vegetation around the settlement edge of Dickens Heath i.e. from Square Acre Farm to Baroda Farm. 	1/3
Purpose 3: To assist in safeguarding the countryside from encroachment	How representative is the site of the key characteristics of the countryside?	<ol style="list-style-type: none"> 1. 'Solihull Countryside Strategy 2010 – 2020' finds that the site is located within two of the highlighted Zones. 2. The majority of the site, particularly the west and south-west, sits within Zone 1 'Hockley Heath Parish', with a north-eastern corridor alongside Stratford Road being within Zone 9 'West Solihull'. 3. The site is not representative of an open countryside but rather a landscape of countryside pocketed by strong urban influences. 4. Zone 1 typically has: <i>"a small-scale enclosed landscape, containing wide variety of natural habitats. At the same time, it is an area where "urban fringe" features are already apparent, including recreation and other mixed uses."</i> 	2/3

Green Belt Purpose	Application of Criteria	Notes from EDP's Site Visit (March 2019)	Scoring
		<p>5. Zone 9 is typically described as: <i>"The western area of Solihull is dominated by urban development. However, even though much of the area is urban and strongly influenced by its closeness to Birmingham.."</i></p> <p>6. The site would not be described as 'countryside' due to the lack of interrelationship with the wider area and sub-urbanising effect of adjoining land uses, particularly to the north and east. In addition, the character of the host landscape is one which has substantive urban elements."</p>	
	What is the influence of urbanising features?	<p>1. There is a noticeable degrading effect of the adjoining urban area. Adjacent roadways, associated noise and traffic movement and further landscape detractors present on site - including pylons and degraded hedgerows and tree groups (particularly to the west) - establish a sub-urbanising effect within the site and its immediate context.</p> <p>2. Lack of public footpath links and intervisibility with the wider area severely reduce the extent to which the open area of the site contains links to the wider countryside, particularly to the northern and eastern site areas.</p>	
Purpose 4: To preserve the setting and special character of historic towns	Is there potential for intervisibility with an historic core?	1. There is no intervisibility between the site and the nearest Conservation Area.	0/3
Overall Score:			7 out of a possible 12

Summary

- 6.3 Given the above preliminary appraisal of the site, EDP finds that the site is a very low functioning area of the Green Belt in landscape terms. Moreover, given, EDP's field-based assessment, it is our professional opinion that the site makes a lower contribution to that which was appraised by SMBC in 2016.

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Section 7 Review of Boundary Resilience

- 7.1 This ‘test’ stems from the NPPF (June 2019) paragraph 139 and whether the release of the site from the Green Belt, and effectively re-drawing the Green Belt boundary, would ensure the new boundary “*will not need to be altered at the end of the plan period*” and uses “*physical features that are readily recognisable and likely to be permanent.*”
- 7.2 In the justification text for Policy BL2 of the Draft Submission Local Plan, SMBC state that due to the existing field structure, there is no clear contiguous defensible Green Belt boundary to the south and therefore new ‘internal estate roads’ should form the new boundary (emphasis added):
- “Site BL2 is within a parcel of moderately performing Green Belt, and **given the existing field structure, does not have a clear contiguous defensible Green Belt boundary to the south.** To address this, the detailed design of the resulting development **will be expected to utilise internal estate roads to form the new Green Belt boundary.** This will be achieved by an estate road being provided on the southern (outer) edge of the development with dwellings only on its northern side. This will have the result that the new development fronts onto the open space/Green Belt rather than back gardens.”*
- 7.3 Given our field-based assessment, and local knowledge of the site (developed since 2009), EDP considers that the site does have well-defined and defensible boundaries on all four sides; particularly to the south. The northern and north-western edge of the site are defined by existing vehicle route (Stratford Road and Dog Kennel Lane respectively), which provide permanent physical elements.
- 7.4 To the south, the site has a distinct ‘layering’ effect of mature landscape features within the central belt of the site, situated around the shallow valley landform. At this locality there are also robustly vegetated field boundaries, a number of woodland copse (around Light Hall and in the locality of the existing water features) and watercourse within the valley landform.
- 7.5 EDP consider that a well-vegetated boundary would provide a much more appropriate physical boundary than a new internal road and in doing so would maintain the existing field structure within the landscape. Combined with new planting, this would be the most robust response. These existing landscape features can be used to create a defensible Green Belt boundary, and through Green Infrastructure strategies, could be enhanced further, in combination with new landscape features, which are in keeping with the character of the surrounding area.
- 7.6 With reference to the Taylor Wimpey’s Concept Masterplan (**Appendix EDP 2**) a defensible Green Belt boundary is attained through the following initiatives:
- There is a distinct ‘layering’ effect within the local landscape through the combination of robust field boundaries and mature tree components, tree groups and woodland

copse. This is most obviously experienced in the southern extent of RP65 and RP64 (**Plan EDP 1**) beyond the shallow valley landform running through the site. These features combined with wider landscape elements significantly reduces intervisibility of the site from the wider open countryside (Green Belt);

- The shallow valley landform forms a ‘hinterland’ within the open countryside, to the south and west of this feature, the existing field pattern is smaller scale and irregular in shape and form (reflective of the ‘Arden Pastures’ landscape type (‘Warwickshire Landscapes Guidelines: Arden’ (November 1993)). In their ‘Solihull’s Countryside Strategy 2010 – 2020’ SMBC described this landscape as:

“A small sale, enclosed landscape, often pervaded by suburban influences and characterised by small fields, typically bordered by mature hedgerow trees.”

- Furthermore, development would preserve the ongoing inter-relationship between the settlement and the surrounding rural environment by new development being well contained and enclosed by the existing field boundaries. The ‘Arden Pastures’ landscape type (‘Warwickshire Landscapes Guidelines: Arden’ (November 1993)) states the following:

“This pattern of late enclosure followed by the development of new settlements has been repeated throughout the Arden Pastures in places such as ...Hockley Heath (and) Wythall...this has resulted in a landscape often pervaded by suburban influences...Despite the densely populated character of the landscape, settlement is not usually a dominant visual element... the gently rolling topography and numerous mature trees combine to create a heavily wooded appearance...and a strong sense of enclosure.”

- The Green Belt re-alignment proposed in Taylor Wimpey’s Concept Masterplan would ensure that the development would remain ‘integrated’ within its setting through existing landscape and physical features, which would afford the proposal enclosure rather than being incongruous within the landscape and experienced as quite raw and sporadic (as would be the case if SMBC’s new internal roads did not follow the existing field pattern).

7.7 The combination of the above physical and landscape features results primarily from the clearly demarcated boundary features, the enclosed nature of the site and the consequential limitation in landscape and visual effects through the utility of permanent and physical features within the site.

7.8 EDP considers that the revised Green Belt boundary proposed on the Taylor Wimpey’s Concept Masterplan (**Appendix EDP 2**), which follows the existing field structure, is more appropriate than that which is currently being proposed by SMBC. The SMBC Solihull Draft Submission Local Plan – Concepts Masterplans has developed a high-level site masterplan which does not utilise the existing field pattern or follow the course of existing landscape features on its southern boundary. In this case, the SMBC proposal relies quite extensively on existing movement corridors for the re-alignment of the Green Belt. This new Green Belt

edge would be irrespective of any existing robust or historic field boundary hedgerows or mature trees. The use of landscape features would help screen and filter views, and provide a more succinctly defined edge for development which would better integrate any built form into its surroundings (and be reflective of the existing relationship between settlement edges and the character of the countryside as noted in the '*Arden Pastures*' landscape type ('*Warwickshire Landscapes Guidelines: Arden*' (November 1993)).

- 7.9 SMBC assertion that the Green Belt will be re-aligned to a new roadway is an unsuitable approach to forming a defensible edge. To re-align to only a newly built man-made feature affords less opportunity to integrate the proposed development into the landscape setting, which may potentially impact the character of the countryside beyond and the perception of openness in the countryside.
- 7.10 The utility of physical features, such as that devised within Taylor Wimpey's Concept Masterplan (**Appendix EDP 2**), would enable a better definition of the settlement edge for Solihull, rather than an almost sporadic approach which fails to reflect the local distinctiveness of the landscape.
- 7.11 Furthermore, Taylor Wimpey's Concept Masterplan ensures that an appropriate, and sensitive development edge is created, which can form an attractive interface between the development and the Green Belt. The retention of existing landscape features (of local character) and new initiatives for Green Infrastructure promote connectivity to the wider open countryside beyond affording pedestrian and cycle access, whilst retaining and enhancing the site's landscape character, which would integrate the new development.
- 7.12 In summary, this review shows that the boundaries of the site are not only demarcated by visible landscape features, but these features are both strong in a visual and perceptual sense and have a high degree of permanence due to their status.

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Section 8 Summary

- 8.1 This Position Note presents a Green Belt appraisal, which continues from more detailed analysis which EDP had previously undertaken in 2015, 2017 and 2018.
- 8.2 Given our most recent field-based assessment, EDP considers that the site performs a lower functioning role in the Green Belt (in the round) than that appraised by SMBC (SMBC's SSSBA 2016), see below **Table EDP 8.1**:

Table EDP 8.1: Comparative Summary of Green Belt Purpose Rating

Green Belt Purpose	Rating by SMBC (SSSBA 2016)	Rating by EDP (March 2019 using SSSBA 2016 methodology)
GB Purpose 1 To check the unrestricted sprawl of large built-up areas	Lower performing against the purpose	Lower performing against the purpose
GB Purpose 2 To prevent neighbouring towns from merging into one another	Moderately performing against the purpose	Lower performing against the purpose
GB Purpose 3 To assist in safeguarding the countryside from encroachment	Moderately performing against the purpose	Moderately performing against the purpose
GB Purpose 4 To preserve the setting and special character of historic towns	Does not perform against the purpose	Does not perform against the purpose
GB Purpose 5 To preserve the setting and special character of historic towns	No comment by SMBC on contribution	No comment on contribution by EDP
Highest Rating	Moderate	Moderate

- 8.3 EDP agrees that the main function of the site (and its immediate context) is to assist in safeguarding the countryside from encroachment, and effectively ensuring the openness of the countryside between Solihull, and its neighboring settlements (Cheswick Green and Dickens Heath to the south-east and south-west respectively).
- 8.4 Given the foregoing, it is important to ensure that any re-alignment of the Green Belt is one which ensures the new development is well integrated within the setting and is afforded visual filtering and screening to ensure the perception of the openness between Solihull and its outlying settlements are not unacceptably harmed. This places the need to consider realignment of the Green Belt to defensible boundaries which utilise the existing 'historic' field pattern rather than new internal roadways or movement corridors.

- 8.5 Therefore, emphasis should be placed on using existing landscape features and field boundaries where possible or establishing new landscape features in keeping with the character of the surrounding area. This ensures that an appropriate, and sensitive development edge is created, which can form an attractive interface between the development and the Green Belt. EDP considers, that the Taylor Wimpey's Concept Masterplan (**Appendix EDP 2**) is more successful in realising a new development edge whose physical features *"are readily recognisable and likely to be permanent."*
- 8.6 This Position Note provides a headline appraisal of the site's contribution to the function of the Green Belt and reviews the resilience and robustness of physical features which could be utilised for re-aligning the Green Belt in relation to the draft allocation of Site BL2: 'South of Dog Kennel Lane'. Land to the south of Stratford Road and west of Creynolds Lane (illustrated at **Figure EDP 1.1**) is found to be a low functioning part of the Green Belt, which in landscape terms does not form an important 'gap' between any other area of settlement, nor does it reflect countryside into which development would, or could, 'encroach'. EDP recommend that this land parcel should be included in the draft allocation for Site BL2.
- 8.7 In summary, the site (as a whole) is not a high functioning part of the Green Belt, and certainly not one in which development would result in the purposes of the Green Belt being 'significantly compromised'.
- 8.8 It is EDP's firm opinion, that the site could reasonably be removed from the Green Belt (i.e. 'Green Belt off') in isolation without harm to the purposes and functionality of the surrounding Green Belt. Hence, through the appropriate masterplanning of the site, the site could be developed in the future without harm to the integrity of the Green Belt overall.

Appendix EDP 1
SMBC's Proposed Policies Map - Local Plan Review
(October 2020)

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Proposed Policies Map - Local Plan Review

October 2020



- LPR Proposed Housing Sites
- LPR Proposed Employment Site
- LPR Proposed Mixed Use Site
- SLP Allocated Housing Sites
- SLP Allocated Employment Sites
- SLP Allocated Mixed Use Site
- Birmingham Airport
- NEC
- UKC Hub Area
- Jaguar Land Rover
- Birmingham Business Park
- Blythe Valley Park
- Preferred Area Minerals Sites
- Mineral Safeguarding Area
- Strategic Waste Management Sites
- Area of Search for Waste Management Facilities
- Town Centres
- SSSI
- Ancient Woodland
- LNR
- Local Wildlife Sites
- Local Geological Sites
- Local Green Spaces
- Registered Parks & Gardens
- Conservation Areas
- HS2 Line
- Balsall Common Relief Road Buffer Zone
- Green Belt
- Solihull Borough Boundary



Appendix EDP 2
Taylor Wimpey's Illustrative Masterplan
(Drwg No: 675A-42 prepared by Randall Thorp)

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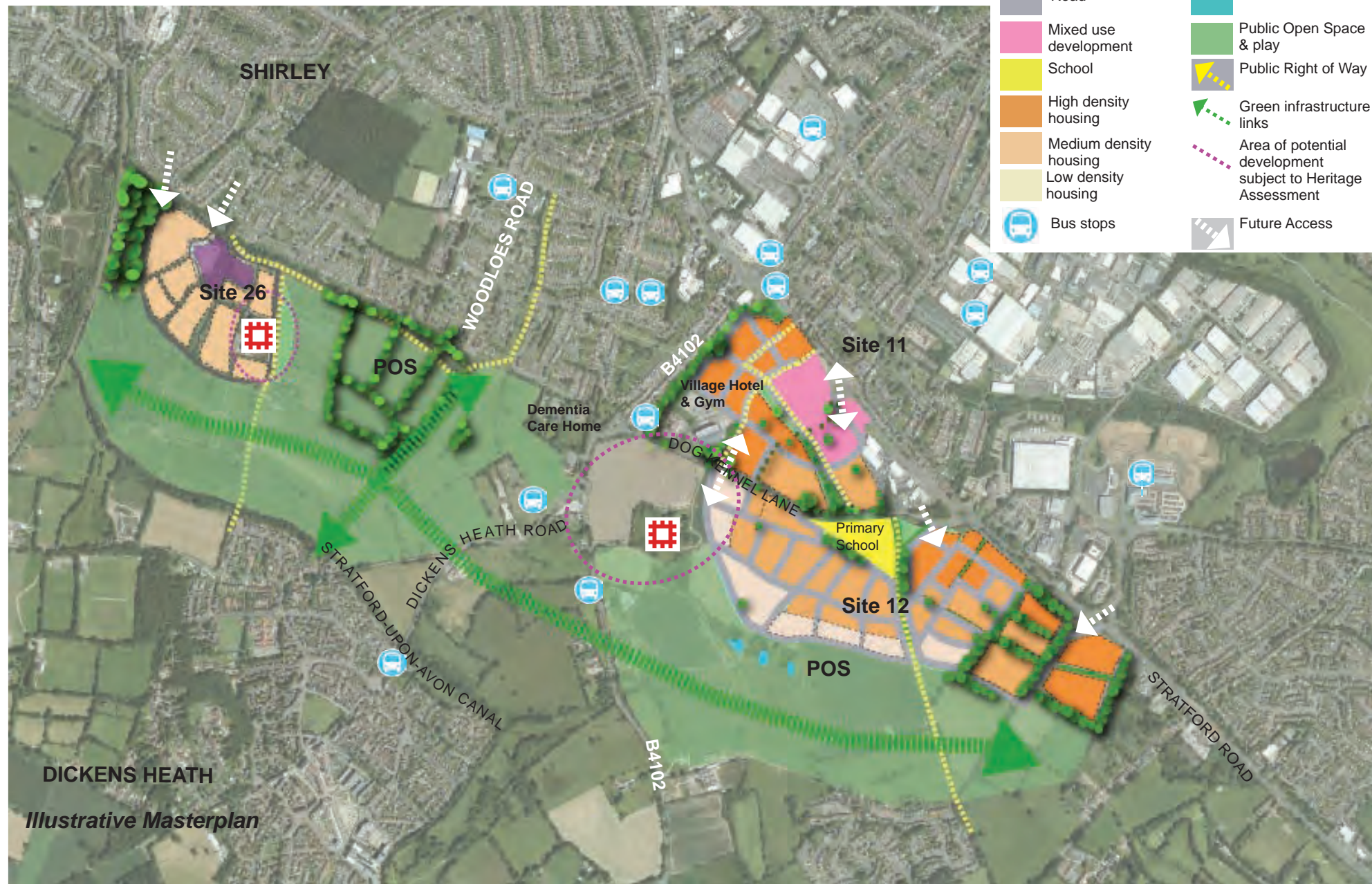
KEY:	Site boundary - Taylor Wimpey	Proposed development cells	Proposed primary spine road	Proposed green space	Proposed pedestrian and/or cycle connections to surrounding area
Existing trees/woodland	Proposed retail/commercial	Proposed secondary roads	Proposed country park	Proposed club house for formal sports pitch	Existing off-site pedestrian/cycle link to Hillfield Park
Existing hedgerows	Potential school site	Proposed pedestrian/cycle routes	Retained agricultural fields	Proposed SuDS	Proposed Green Belt boundary
Existing waterbodies	Proposed vehicular access	Proposed structural woodland planting	Proposed formal sports pitch		
Existing Public Rights of Way	Proposed vehicular access to country park	Proposed hedgerow	Proposed car park		

Date: 12.03.19
Drawn by: SR
Checker: DL
Rev by: SR/YH
Rev checker: SR
QM Status: Checked
Product Status: Issue

Appendix EDP 3
Extract from the Solihull Local Plan Review – Draft Concepts
Masterplans
SMBC Illustrative Emerging Concept Masterplan: Sites 11, 12 & 26
(January 2019)

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SMBC Illustrative Emerging Concept Masterplan: Sites 11, 12 & 26



Illustrative Masterplan

Appendix EDP 4
Extract from the Solihull Local Plan – Concept Masterplans
SMBC Illustrative Concept Masterplan: Sites BL2 & BL3
(October 2020)

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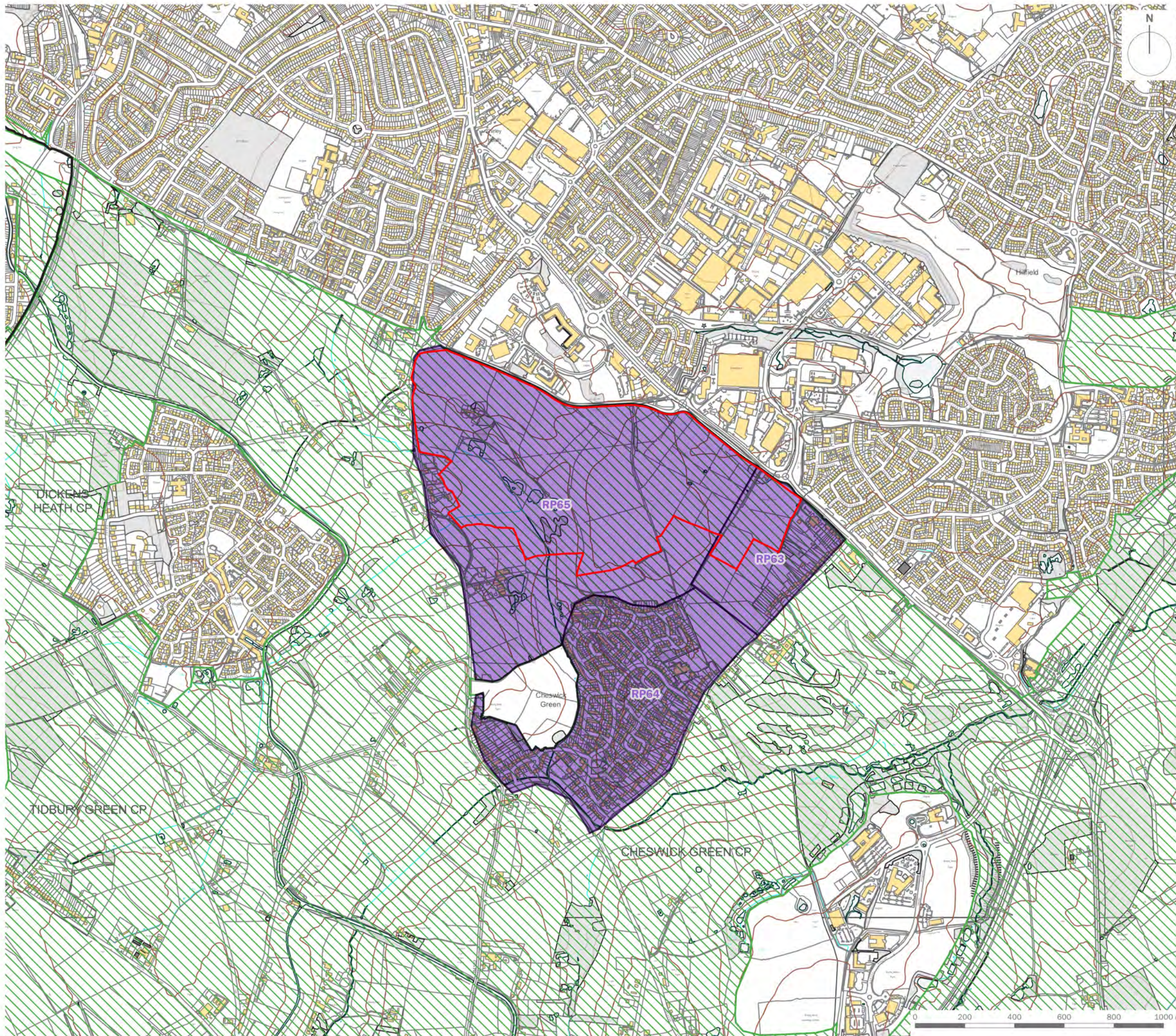
SMBC Illustrative Concept Masterplan: Sites BL2 & BL3



Plan

Plan EDP 1 Solihull Green Belt Refined Parcels and Broad Areas
(edp0938_d052a 14 December 2020 MH/VP)

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- Site Boundary
- Green belt
- Refined Parcel
- Solihull Borough Boundary

client
Taylor Wimpey West Midlands

project title
Land at Light Hall Farm, Solihull, West Midlands

drawing title
Plan EDP 1: Solihull Green Belt Refined Parcels and Broad Areas

date	14 DECEMBER 2020	drawn by	MH
drawing number	edp938_d052a	checked	VP
scale	1:15,000 @ A3	QA	RB



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Appendix 2 Randall Thorp Masterplan (ref. 675A-28J)



RANDALL THORP

LANDSCAPE ARCHITECTURE
ENVIRONMENTAL PLANNING
MASTERPLANNING
URBAN DESIGN

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KEY:	Site boundary - Taylor Wimpey	Proposed development cells	Proposed primary spine road	Proposed green space	Proposed pedestrian and/or cycle connections to surrounding area
Existing trees/woodland	Proposed retail/commercial	Proposed secondary roads	Proposed country park	Proposed club house for formal sports pitch	Existing off-site pedestrian/cycle link to Hillfield Park
Existing hedgerows	Potential school site	Proposed pedestrian/cycle routes	Retained agricultural fields	Proposed SuDS	Proposed structural woodland planting
Existing waterbodies	Proposed vehicular access	Proposed hedgerow	Proposed formal sports pitch	Proposed Green Belt boundary	
Existing Public Rights of Way	Proposed vehicular access to country park		Proposed car park		

Date: 12.03.19
Drawn by: SR
Checker: DL
Rev by: SR/YH
Rev checker: SR
QM Status: Checked
Product Status: Issue

Taylor Wimpey

Land at Light Hall, Solihull
Illustrative Masterplan

Drwg No: 675A-28J

Scale: 1:5,000 @ A2