

**Land at J10 M42 between Tamworth and Dordon/Polesworth**

**Critical Appraisal of Meaningful Gap Evidence  
Base**

**A Report on behalf of Hodgetts Estates**

March 2018

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## EXECUTIVE SUMMARY

- A. Hodgetts Estates is promoting land west of Dordon for a sustainably located, mixed use development which includes proposals for substantial green infrastructure and structural landscape, as set out in a Masterplan Vision. The development site is located within an area proposed for a Meaningful Gap within NWBC Consultation Draft Local Plan policy LP5.
- B. A critical appraisal has been undertaken, by a Chartered Landscape Architect, with respect to landscape and visibility issues. Any reference of assessment of planning matters is made in the context of the same. Two documents which are being used to justify this proposed 'Meaningful Gap' policy:
- Meaningful Gap Assessment (MGA) prepared by North Warwickshire Borough Council (August 2015),
  - Assessment of the Meaningful Gap and Potential Green Belt Alterations (AMGPGBA), prepared by LUC (January 2018).
- C. Consideration was also given within the appraisal to the informing context with respect to the MGA, including reference to a key background document ("Strategic Gap and Green Wedge Policies in Structure Plans, Main Report", ODPM, 2003 – the 'Eastleigh Test'), relevant Appeal decisions, planning policy, and noting comments on MGA made by the appointed Inspector of the emerging Core Strategy in September 2014.
- D. Core Strategy (adopted 2014) policy NW19 Polesworth and Dordon does not discount the potential of development west of Dordon noting that it "...*must respect the separate identities of Polesworth and Dordon and Tamworth and maintain a meaningful gap between them.*"
- E. The appraisal finds that the MGA has been prepared, and draft policy LP5 proposed, with an express "a priori" rationale of excluding any development west of Dordon/ Polesworth, which is contrary to Core Strategy policy. The appraisal does nonetheless recognise that the MGA (Section 8, Area 8 p.14 of 29) recognises that development on the western edge of Dordon "...*may also provide the opportunity for softening the urban edge through appropriate landscaping.*" . The benefits of development west of Dordon to; "*provide a more successful settlement edge*" are also noted in the North Warwickshire Landscape Character Assessment (p101).

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- F. However the MGA report is overall fundamentally flawed due to errors of assessment methodology. The errors include a lack of stated, transparent methodology; the lack of spatial planning information; the use of inappropriate criteria for assessment; and inconsistencies in assessment process. This is not an approach that should be endorsed. It would have been expected that the report would have instead comprised an orthodox capacity assessment
- G. This appraisal finds that the LUC report (January 2018) uses a Green Belt assessment methodology to appraise the MGA study area. The methodology is inappropriate in such circumstances; furthermore, such an approach is considered to be an attempt to give the MG area a strategic importance that it does not deserve. This appears to be recognised and accepted in the LUC report paragraphs 6.16 – 6.20 as the conclusion states “...it would not be recommended that any application was made to designate new areas of Green Belt, without an adopted Local Plan clearly demonstrating a five year land supply for housing and employment”. This combination and confusion of planning and landscape considerations demonstrates a central problem with this work.
- H. The LUC report also has errors in its methodology, including: in principle exclusion of land parcels from the assessment; and inconsistent commentary on the importance of various areas within a meaningful gap. The use of the parcel areas is also at times inconsistent with the MGA report.
- I. This appraisal then applies the ‘Eastleigh Test’ (as set out in the ‘Strategic Gap and Green Wedge Policies in Structure Plans, Main Report’, - ODPM, 2003) to the land west of Dordon (MGA Area 8). The ‘Eastleigh Test’ is considered to be a far more appropriate assessment process for such a location.
- J. This appraisal goes on to consider the area as it presently exists, in its current condition, and then on the basis of implementing a development approach as set out in the proposed Masterplan Vision. The first step does not presuppose the acceptability of any particular outcome, rather it arrives at a view as to capacity and then judges the proposals in the context of that assessment. This is the orthodox approach way to approach such an appraisal.

- K. This appraisal finds that it is considered that such a change, provided that it is delivered through a high quality proposed development with a generous and carefully positioned and designed new landscape structure, would successfully maintain an area of meaningful gap. This would not only be in accordance with adopted Core Strategy policy but would deliver a range of wider planning benefits, such as for health and well-being and the environment as a whole.
- L. Overall it is considered that the assessment reports prepared by or on behalf of NWDC provide a flawed and inappropriate basis for informing future patterns of development and that draft policy LP5 would prevent high quality and sustainable development opportunities being realised. The report does not comprise a sound basis for the assessment of a meaningful gap and it is strongly recommended that the assessment needs to be recast without a preconceived outcome informing the analysis.

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## 1.0 INTRODUCTION

- 1.1 Nicholas Pearson Associates (NPA) was appointed in January 2018 by Hodgetts Estates, to undertake a critique of the Meaningful Gap Assessment (MGA) prepared by North Warwickshire Borough Council (August 2015), and subsequently to undertake a critique of the Assessment of the Meaningful Gap and Potential Green Belt Alterations (AMGPGBA), prepared by LUC (January 2018). The appointment included consideration of the “Strategic Gap and Green Wedge Policies in Structure Plans, Main Report”, ODPM, 2003 also known as the ‘Eastleigh Test’.
- 1.2 Hodgetts Estates is promoting land for development at J10 M42 between Tamworth and Dordon/ Polesworth (the Site), see figure 1, through the Draft Submission Local Plan process. The land being promoted is located within Area 8 of the MGA and AMGPGBA reports.

*Nicholas Pearson Associates*

- 1.3 Nicholas Pearson Associates (NPA) is a multidisciplinary consultancy of Landscape Architects, Environmental Planners, Urban Designers and Ecologists. The company was established in 1982 and has its office in Bath. The company has considerable experience of environmental and landscape assessments, including undertaking reviews of planning designations and policy. This experience includes reviews of green wedges, gaps and designated Green belt, with reference to landscape and visual matters. This critical appraisal has been undertaken, by a Chartered Landscape Architect, with respect to landscape and visibility issues. Any reference of assessment of planning matters is made in the context of the same.
- 1.4 As well as being appointed to undertake a critique of the MGA, NPA was also appointed to undertake a landscape character assessment of the Site being proposed for development by Hodgetts Estate and to prepare a strategic development masterplan for the Site, as part of representations to the Draft Submission Local Plan. This is presented within a Masterplan Vision report submitted separately. Importantly the critique of the MGA was assessed first and so informed rather than justified the latter work. Moreover before accepting this commission NPA satisfied itself that opportunities existed to avoid, minimise mitigate, and provide enhancements, such that the landscape effects would not be unacceptable.

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*Report Objectives*

1.5 The objectives of this critique are to:

- Review the informing context with respect to the MGA, including reference to a key background document (“Strategic Gap and Green Wedge Policies in Structure Plans, Main Report”, ODPM, 2003), relevant Appeal decisions, planning policy and noting comments on MGA made by the appointed Inspector of the emerging Core Strategy in September 2014 (see below in Section 1);
- Section 2 – provide a critique of the MGA report prepared by NWDC, including noting errors in methodology and considering its basis for informing planning policy;
- Section 3 – provide a critique of the Assessment of the Meaningful Gap and Potential Green Belt Alterations (AMGPGBA), prepared by LUC (January 2018), including noting errors in methodology and considering its basis for informing planning policy;
- Section 4 - Appraise the Site, as existing, against criteria in “Strategic Gap and Green Wedge Policies in Structure Plans, Main Report”, ODPM, 2003;
- Section 5 - Appraise the Site, against criteria in the above ODPM report, on the basis of the proposed development approach as set out in the Masterplan Vision;
- Section 6 – Conclude as to whether such a development approach, with respect to the Site, would be consistent with meeting the purpose and objective of the Meaningful Gap between Tamworth and Dordon, as set out in the Core Strategy.

*Informing Context*

1.6 A desktop review of relevant planning policy and mapping data was undertaken, supplemented by a detailed site appraisal in January 2018. As the site appraisal was undertaken in January, necessarily a “worse case” approach has been adopted. Review was also undertaken of relevant Landscape Character Assessments and other planning documents.

1.7 It has been noted that other representations, with respect to commentary and/ or objections to the proposed policy LP5 and/ or the MGA report, have been made to the Draft Submission Local Plan. These are referenced in the report below and include:

- **DLPI6** Craig Tracey (local Member of Parliament for North Warwickshire);

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- **DLP85** St Modwen Developments Ltd (see reps prepared by Robert Barnes of Planning Prospects Ltd);
  - **DLP329** Taylor Wimpey (objection to Policy LP5 Meaningful Gap);
  - **DLP355** Hallam Land Management (Johnathon Collins – objection of Policy LP5).

1.8 A review has also been made of Landscape Proof Evidence (prepared by Andrew Williams of DEFINE) for the permitted St Modwen's appeal (North West Warwickshire Council Ref: PAP/2014/0648 and PINS Ref: APP/R3705/W/15/3136495) which provided a critique of the MGA (see Appendix I below). This is provided as an appendix to this report for information. Consideration is also given to the Inspectors decision, which allowed the appeal.

1.9 A key document is "Strategic Gap and Green Wedge Policies in Structure Plans, Main Report", ODPM, 2003. This document took forward principles and criteria first used in the Inspector's report for the Eastleigh Local Plan Inquiry in 1998, and such an approach, known as the 'Eastleigh Test', has been used for a number of subsequent planning examinations, appeals and applications, and is a robust and appropriate methodology for assessing such locations.

1.10 Paragraph 4.15 of the ODPM report considers the criteria for defining the effectiveness of strategic gaps and green wedges to be:

- Distance;
- Topography;
- Landscape character/type;
- Vegetation;
- Existing uses and density of buildings;
- Nature of urban edges;
- Inter-visibility (the ability to see one edge from another);
- Intra-visibility (the ability to see both edges from a single point);
- The sense of leaving a place and arriving somewhere else.

1.11 These criteria have been used below in sections 4 and 5 to appraise the local context associated with the site.



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*Planning Policy Context*

- I.12 The identification of an ‘area of restraint’ with respect to restricting development between Tamworth and Dordon appears to have been a long term policy objective for NWBC. The current position was established in the Council’s Core Strategy (adopted 2014), under policy NW19 Polesworth and Dordon which states:

*“The broad location of growth will be to the south and east of the settlements subject to there being no unacceptable environmental impacts from surface mining and that viable and practicable coal reserves are safeguarded.*

*Any development to the west of Polesworth & Dordon must respect the separate identities of Polesworth and Dordon and Tamworth and maintain a meaningful gap between them.”*

- I.13 It is noteworthy that the Inspector, in his report on the emerging Core Strategy in September 2014, included as one of the ‘principal modifications’ a requirement for the following alteration to the strategy:

*“Deleting the presumption against anything other than minor development in the gap between Polesworth and Dordon and Tamworth (but ensuring a meaningful gap is retained).”*

- I.14 Essentially a highly restrictive “gap policy” was promoted by NWDC without it being properly grounded upon a sound evidence base. The premise that such a preclusive policy was appropriate was expressly rejected by the examining Inspector.

- I.15 The MGA was then prepared internally by officers of the Council so as to inform the Draft Submission Local Plan. I understand that when the MGA was first published that it used language which suggested that it would be used as a tool of policy, however following the service of a pre-action protocol letter by St Modwen the Council expressly clarified that it was no more than an evidence base document to inform plan preparation and was not intended to comprise policy. I presume this correspondence will have been drawn to the attention of the Local Plan Inspector. At all event Mr Williams in his proof of evidence, referred to above, provides a cogent and compelling criticism of the MGA which uses an opaque methodology mixing landscape considerations with other matters such as heritage in

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respect of arbitrarily drawn land parcels, it is difficult to fault Mr Williams that it is a poor piece of work which does not provide a proper foundation for a gap policy.

I.16 Nonetheless NWBC went on to propose a Meaningful Gap Policy (draft Local Plan Policy LP5), see figure 2, which states:

*“LP5 Meaningful Gap*

- 1) The Meaningful Gap between Tamworth and Polesworth and Dordon is defined on the Proposals Map.*
- 2) Any development to the west of Polesworth & Dordon must respect the separate identities of Polesworth and Dordon and Tamworth and maintain a meaningful gap between them.*
- 3) All new development within this gap should be small in scale and not intrude visually into the gap or physically reduce the size of the gap.”*

I.17 It is noted that point 3) reintroduces a means of controlling development, with the text wording endeavouring to prevent any development that would physically reduce the size of the gap. This is inconsistent with the approach taken by the Inspector to the Core Strategy, and it is important therefore to examine whether there is any change in the information now available to warrant such a change. This criticism has also be noted in representations DLP85 St Modwen Developments Ltd, DLP329 Taylor Wimpey and DLP355 Hallam Land Management.

I.18 During the course of the consultation on the draft plan, in January 2018 NWBC published the ‘Assessment of the Value of the Meaningful Gap and Potential Green Belt Alterations’ report (LUC). It is a problematic approach to publish evidence to justify a policy after having first promoted the policy itself. Plainly the work should have been prepared and presented in the public domain before and not after the publication of the Draft Submission Local Plan. I understand that an additional period of consultation was then permitted after this criticism was made of NWBC by Hodgetts Estate. The purpose of the study on its face was said to be to *“determine whether each parcel fulfils the objectives of the Meaningful Gap designation, and whether they have the potential to serve the purposes of Green Belt, as defined in the National Planning Policy Framework.”*

## 2.0 CRITIQUE OF MEANINGFUL GAP ASSESSMENT REPORT, PREPARED BY NWBC

2.1 The following table sets out a critique of the original MGA report which preceded the publication of the consultation draft of the plan, including errors of methodology.

**Table 1: Critique of MGA report**

Point	MGA Report Reference	MGA Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology
2.1.1	General	Information on report authorship	No information, with reference to author(s) professional capability or experience. The report would appear to have been prepared as an exercise in advocacy.	Work should be have been undertaken by an independent, suitably qualified consultant, such as a Chartered Landscape Architect.
2.1.2	General	Methodology	The report does not include an assessment methodology, which is not good practice, and doesn't provide a sound basis for any assessment.	This is an error in process.
2.1.3	Para 1.1	That the "... <i>designation of a gap between Tamworth and Polesworth/Dordon is essential to help shape the future settlement pattern and protect current settlement identity, so that new employment land and new homes can be accommodated, between 2011 and 2029, but in ways which will avoid the coalescence of the settlements and loss of settlement identity.</i> "	This statement does not exclude the potential for development in any location, as long as it (such development) avoids coalescence.  The reference to 'employment land' would intimate development of a scale considerably greater than 'small in scale' as required by draft policy LP5.	The proposed development opportunity on land west of Dordon, as set out in the Masterplan Vision, will avoid the coalescence of the settlements and loss of settlement identity.

Point	MGA Report Reference	MGA Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology
2.1.4	Para 2.1	The proposed MG designation “...is a spatial planning tool... not [a] countryside protection [policy] or landscape designation...”; the text then also notes that “...gaps can have other positive aspects: in retaining open land adjacent to urban areas which can be used for new/enhanced recreation and other green infrastructure purposes.”	<p>On the basis of a spatial planning designation, it is clearly the spatial planning aspects of the area which must be set out.</p> <p>There is almost no spatial planning information included in the report, through section 3 - 8.</p>	<p>This is an error in the methodology.</p> <p>It is recommended that the Eastleigh Test should have been used within the assessment.</p>
2.1.5	Para 2.2	Background documents refer to previous National Guidance on gaps and green wedges.	No reference is made to the use of principles or criteria of the “Strategic Gap and Green Wedge Policies in Structure Plans, Main Report”, ODPM, 2003.	<p>This is an error in the methodology.</p> <p>It is recommended that the Eastleigh Test should have been used within the assessment.</p>
2.1.6	Para 2.4	“Landscape quality/amenity can also contribute towards determining which areas of meaningful gap are most sensitive and should preferably contribute towards supplying the specific area that constitutes the meaningful gap.”	<p>Such ‘landscape quality/ amenity’ factors can contribute to an appraisal; however this should be a supporting element to the spatial planning analysis.</p> <p>These factors are in fact the main element of the MGA report.</p>	<p>This is an error in the methodology.</p> <p>It is recommended that the Eastleigh Test should have been used within the assessment.</p>
2.1.7	Section 4	Describes the study area for the MGA	Section gives very limited spatial planning information, apart from the location of various communication routes through the area with their associated and various land sub divisions.	<p>This is an error in the methodology.</p> <p>It is recommended that the Eastleigh Test should have been used within the assessment.</p>

Point	MGA Report Reference	MGA Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology
2.1.8	Section 5	Sets out some significant existing and potential future infrastructure assets and constraints, and notes that these influence/ impact the gap.	There is a lack of clarity as to how or why they are important to the assessment.	This is an error in the methodology.  More clarity should have been provided, but the basis for using such criteria is a major flaw in the assessment.
2.1.9	Section 6 Para 6.4	Sets out the landscape character context.  Notes; “...poorly managed, intermittent hedgerows or significant enlarged fields, where hedgerow removal to enable more efficient arable cropping has occurred”.	This identifies degraded landscapes which can be less sensitive in landscape terms to development and provide opportunities for restoration.	The proposed development opportunity on land west of Dordon, as set out in the Masterplan Vision, is proposed to be located within such a degraded landscape and so provides opportunities for restoration.
2.1.10	Section 7 Para 7.1	Considers landscape and heritage sensitivity.  “In order to start identifying the most appropriate area to designate as a “Meaningful Gap” it would be appropriate to identify those areas sensitive in landscape terms in addition to contributing to maintaining the gap between the settlements.”	This sensitivity appraisal relates to the ability to accommodate development, and is a separate exercise to assessing the function of a ‘meaningful gap’	This is an error in the methodology.  It is recommended that the Eastleigh Test should have been used within the assessment.

Point	MGA Report Reference	MGA Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology
2.1.11	Section 8 General	Format of assessment tables and recommendations, sub dividing the study area into 10 areas and using five criteria: landscape; heritage; infrastructure; properties; environmental constraints.	<p>The assessment comprises a form of landscape sensitivity assessment with reference to undefined types of development, which is confusing and does not inform the spatial function of the MG.</p> <p>Spatial planning considerations do not appear as an assessment criteria. Eg. There are no measurements of distance/ widths of gap.</p> <p>The assessment approach adopted for each area, is not consistent, methodical nor uniform.</p>	<p>These are errors in process and the methodology.</p> <p>It is recommended that the Eastleigh Test should have been used within the assessment.</p>
2.1.12	Section 8 General	Note of the gas pipeline, as an element of infrastructure informing the assessment.	This is immaterial to the assessment as it is underground and has specifically limited influence on the landscape character or spatial function of the area.	This is an error in the methodology.
2.1.13	Section 8 General	The assessment uses a 'traffic light' system in the assessment tables.	This approach lacks any clarity or evidence as to how the conclusions are drawn and how it informs the spatial planning function of the MG.	This is an error in the methodology.
2.1.14	Section 8 General	Comments in Section 8 about potential development and its impact.	This introduces a facet of planning process which does not add to an understanding of MG functions.	This is an error in the methodology.

Point	MGA Report Reference	MGA Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology
2.1.15	Section 8 Area 5	Provides an area of land, which is in part open and located between the settlements – and hence acts as an element of a MG, but is recommended not to be included within MG	The reasons recommending the area as not to be included within MG are not stated.  This is inconsistent.	This is an error in the methodology.
2.1.16	Section 8 Area 7	Area 7 is considered to contribute to the function of MG between the settlements but is discounted.	The reasons the area is discounted is not stated.  This is inconsistent.	This is an error in the methodology.
2.1.17	Section 8 Area 8 General	The defined boundary for area 8	This comprises a relatively large land parcel which varies between the northern part and the southern part, especially in terms of distance between settlements.	It would have been more appropriate to split the area into a northern and southern part.
2.1.18	Section 8 Area 8 Landscape	Criteria notes that: <i>“Development along the eastern edge may also provide the opportunity for softening the urban edge through appropriate landscaping.”</i>	This is notable as being the <b>only</b> reference within the assessment where future development is positively stated as offering the potential to manage/change the landscape. The opportunity for such development has been raised in other representations (DLPI6 Craig Tracey).  The potential benefits of development west of Dordon are also noted in the North Warwickshire Landscape Character Assessment (p.101)	The proposed development on land west of Dordon provides such an opportunity for softening the urban edge.

Point	MGA Report Reference	MGA Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology
2.1.19	Section 8 Area 8 Landscape and Heritage	Noted as having 'moderate' sensitivity with respect to both landscape and heritage criteria.	Such a judgement is also ascribed to all the other areas recommended for not being including within MG.  This is inconsistent.  There is no recognition of the varying distance between settlements with the Area.	This is an error in the methodology.
2.1.20	Section 8 Area 9	Area 9 is recommended for inclusion in MG.	It is noted that Area 9 is now excluded from the proposed draft policy area.	This demonstrates a lack of credibility/transparency in the assessment process.
2.1.21	Appendix 1	'Area for Assessment of Meaningful Gap'	This does not include all of the land between Tamworth and Polesworth and Dordon, and also identifies areas which are then not assessed within Section 8 – eg. Birchmoor.  This is inconsistent.	This is an error in the methodology.
2.1.22	Appendix 4	Plan showing gas pipeline and buffer zone and HS2 Y route	This shows an area of land west of the M42, west of Area 10 as an area for assessment. However this area is not shown on other plans.  This is inconsistent.	This is an error in the methodology.

2.2 Similar criticisms of the MGA approach and report have been made in representations DLP329 Taylor Wimpey and DLP355 Hallam Land Management, and also during the St Modwen Development's appeal (North West Warwickshire Council Ref: PAP/2014/0648 PINS Ref: APP/R3705/W/15/3136495) within the evidence of Mr Williams noted above.



2.3 Overall the MGA:

- Is not an appraisal which properly assesses the spatial functions of the areas in planning terms as per the stated aims of MGA para 2.1.
- Does not use the criteria used in the ODPM 2003 report, which is an established appraisal process for considering the spatial functions of similar situations.
- Is a form of landscape sensitivity appraisal which seeks to define sensitivity on the basis of landscape quality, with a confusion of references to heritage, other planning considerations and elements of visual amenity. It defines and recommends inclusion or not in the MGA on the basis of landscape sensitivity and the potential impact of development (of no defined scale or type) on the open landscape. The report does not therefore provide a sound basis for informing planning policy.
- Includes a range of errors in methodology which prevent a robust assessment being prepared.
- It is considered surprising that any reliance continues to be placed upon this document by NWBC.

2.4 In conclusion the assessment is fundamentally flawed and does not provide a suitable or robust reference document to inform related policy decisions.

**3.0 Critique of Assessment of the 2018 ‘Meaningful Gap and Potential Green Belt Alterations (AMGPGBA)’ Report, prepared by LUC**

3.1 The following table sets out a critique of the LUC report, including errors of methodology and fact.

Table 2: Critique of LUC report

Point	LUC Report Reference	LUC Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology/ fact
3.1.1	Version table (pdf p.2/ 76)	This report was issued in January 2018, with a series of drafts prepared between July 2016 and July 2017	Issue date after publication of the Draft Submission Local Plan.	The report does not appear to have been used to inform the proposed draft MG policy LP5 and, if this were the case, might appear to be a post justification exercise.
3.1.2	Para 1.1	The purpose of the report purports to be to determine whether each parcel fulfils the objectives of the Meaningful Gap designation. The methodology assesses the parcels against the five purposes of Green Belt function found at para. 80 of the NPPF.	Such an approach, using GB function, is inappropriate in this context and is an attempt to give the MG area a strategic importance which it does not deserve.	A more appropriate approach would be to use the methodology set out in the "Strategic Gap and Green Wedge Policies in Structure Plans, Main Report", ODPM, 2003 - the 'Eastleigh Test'. Which is not referenced
3.1.3	Para 1.1  Para 2.3	<i>"...whether each parcel fulfils the objectives of the Meaningful Gap designation."</i>  <i>"Gap policies tend to allow for small scale development which does not 'significantly diminish' the extent of the gap."</i>	The report does not address whether development opportunities exist west of Dordon. A suitable level of development would be in accordance with Core Strategy policy NW19.	This demonstrates an error of methodology using of a Green Belt type appraisal for a qualitatively different form of policy.  Use of the 'Eastleigh Test' would be more appropriate.

Point	LUC Report Reference	LUC Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology/ fact
3.1.4	Para. 1.1 – 1.4	The report seeks to review/ assess: the land between Polesworth and Dordon and Tamworth re. MG; an additional parcel of land to the south of the Meaningful Gap and directly adjoining the existing Green Belt re. GB purposes; the broad areas of land between Wood End and Atherstone, and as far as Ansley in the south re. GB purposes; a review of the existing Green Belt in the district;	The use of a single assessment approach to the different areas for varying policy designations is inappropriate.	Use of the ‘Eastleigh Test’ or an equivalent approach would be more appropriate for the MG area.
3.1.5	Para 2.1	<p><i>‘In early 2015, NWBC completed a study to assess and define a ‘Meaningful Gap’, designed to protect the integrity of Polesworth and Dordon and prevent coalescence with Tamworth, which lies to the west on the other side of the M42. The current extent of the Meaningful Gap is shown in Figure 2.1.’</i></p> <p>Figure 2.1 key states ‘Current Meaningful Gap Area’</p>	<p>Current Core Strategy adopted policy NW19 does not define an area.</p> <p>There is no ‘current extent’ of existing defined or designated area as a meaningful gap. The NWDC report selected areas for an MG assessment to inform policy considerations.</p> <p>The area shown on figure 2.1 relates to Areas assessed within the NWDC MGA, not the draft policy LP5</p> <p>Draft MG policy LP5 area is all located to the north of the A5</p>	This is an error of fact. And belies the fact that the report assumes that a gap policy is already established. Such an a priori assumption infects the overall approach.

Point	LUC Report Reference	LUC Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology/ fact
3.1.6	Para 2.8	<i>Paragraph 84 of the NPPF indicates that 'when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.'</i>	The report does not take into consideration delivery of sustainable development and so cannot draw conclusions as to whether or not the parcels should be allocated for housing or conversely be identified as meaningful gap in the Local Plan.	This is an error in the methodology.  Consideration should be given to opportunities for sustainable development, such as set out in the proposed Masterplan Vision for land west of Dordon. Self evidently a report of this nature should consider the landscape capacity of parcels of land given the overall objective to ensure separate identities of settlement.
3.1.7	Para 2.12  Para 3.2	<i>Green Belt studies should be "fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations". Green Belt reviews should be 'comprehensive' rather than 'selective'</i>  <i>In defining review 'parcels' (Note - MGA report called them Areas); "Parcels 4 and 5 and the part of parcel 10 to the west of the M42 from the original study were not included in this evaluation, as the original Meaningful Gap Assessment did not designate these areas as Meaningful Gap"</i>	On the basis that some areas located between Polesworth/ Dordon and Tamworth have been excluded from the assessment the evidence is not "fair, comprehensive and consistent" as required in para 2.12.	This is an error of methodology.  All areas of land should have been included within an assessment. Not to do so evidences that it is an ex post facto justification of a preconceived outcome.

Point	LUC Report Reference	LUC Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology/ fact
3.1.8	2.26	<i>The former Tamworth Municipal Golf Course (to the west of the Meaningful Gap) is to be developed with 1,100 homes planned. This will also result in a narrowing of the distance between Tamworth and Polesworth, increasing the importance of the Meaningful Gap.</i>	The golf course site is west of Areas 4 and 5 which are excluded from the assessment. This adds weight to the above comment that all areas of land should be included.	This is an error of methodology, since it reinforces the need to include all areas of land within the appraisal process to be comprehensive, as per para 2.12.
3.1.9	3.1	<i>This chapter presents the methodology and results for the assessment of land within the Meaningful Gap against both the purposes of the existing Meaningful Gap policy and the five Green Belt purposes outlined in the NPPF.</i>	Policy NW19; “...Any development to the west of Polesworth & Dordon must respect the separate identities of Polesworth and Dordon and Tamworth and maintain a meaningful gap between them.”	This is an error in the methodology.  Consideration should be given to opportunities for sustainable development, such as set out in the proposed Masterplan Vision for land west of Dordon.
3.1.10	3.5	<i>For the Meaningful Gap review, only the key purpose of the designation was assessed in this study (i.e. to prevent merging of settlements and maintain a meaningful gap between them).</i>	As per comment re. para 2.8 above, the assessment therefore fails to consider the potential positive contribution which a sympathetically designed scheme could make towards meeting the aims of purpose 2 of the Green Belt criteria, the Eastleigh Test or the broader aim of sustainable development.	
3.1.11	3.2	Parcels used within the LUC assessment take forward those defined in MGA prepared by NWDC.	By using areas defined by NWDC this approach does not reflect an independent approach to the assessment as claimed by LUC in para. 1.1	
3.1.12	3.2 – 3.4	Parcel definition commentary.	The methodology for defining parcels introduces variations from the MGA report.	The methodology is at times confusing and inconsistent.

Point	LUC Report Reference	LUC Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology/ fact
3.1.13	3.12	Parcel 8 summary commentary;  <i>“The parcel provides a gap of approximately 830 metres between Tamworth and Dordon across the northern part of the parcel. The gap between Birchmoor and Dordon is approximately 330 metres. This parcel performs very strongly as part of the Meaningful Gap by providing a buffer and sense of separation between the three separate settlements which are very close to each other. ...”</i>	There is no mention that the gap at the southern end of the parcel (eg. >1km) is considerable wider than the northern part.  Such differences are mentioned for other parcels eg. Parcel 7, and also in Appendix I eg. Parcel 2.  There is no mention of Dordon being on higher ground in comparison with the southern part of 8, which is noted in Parcel 9.	This is an inconsistency.
3.1.14	3.13	<i>“Parcel 8 makes a relatively strong contribution to the Green Belt purposes due its large size...”</i>	The size of any parcel is not a criteria within the assessment.	This is an error in the methodology.
3.1.15	3.20	<i>“Were this area not protected, development over time could potentially result in the merging of Tamworth with Polesworth/Dordon, Birchmoor and Freasley, which all vary in character.”</i>	Adopted Core Strategy NW19 provides protection to prevent merging of settlements.	This is not a robust conclusion.
3.1.16	3.20	<i>“...placing all of these homes in the North Warwickshire/Tamworth boundary area is likely to have a detrimental impact on the Meaningful Gap and not be in line with Policy NW19 of the Core Strategy.”</i>	This statement sets aside the opportunity for development to the west of Polesworth & Dordon to respect the separate identities of Polesworth and Dordon and Tamworth and maintain a meaningful gap between them which is in line with NW19.	This is not a robust conclusion.

Point	LUC Report Reference	LUC Report commentary/ statement	NPA Critique comment	
			Issue	Recommendation / opinion, including errors in methodology/ fact
3.1.17	3.22	<i>"...parcels between Tamworth and Dordon (Parcels 6, 7 and 8) also score highly against Green Belt Purposes 1 and 2, primarily because of the narrow gap between the settlements at this point..."</i>	This statement ignores the gap of >1km which exists at the southern part of Parcel 8.	This is not a robust conclusion.
3.1.18	3.26	<i>"...If development were to encroach upon the countryside from the east (Polesworth/Dordon), this boundary [M42] would be less effective and there is still a risk of the settlements appearing to merge, should this land be extensively developed."</i>	This statement ignores the Adopted Core Strategy policy NW19	This is not a robust conclusion.
3.1.19	6.19 - 6.20	Overall recommendation re. Green Belt; <i>"...it would not be recommended that any application was made to designate new areas of Green Belt, without an adopted Local Plan clearly demonstrating a five year land supply for housing and employment."</i>	The use of the Green Belt appraisal methodology for the assessment could be perceived as giving strategic importance which it does not deserve.	

### 3.2 Overall the LUC report:

- Uses a Green belt appraisal methodology which is, in itself, an inappropriate methodology for assessing a meaningful gap.
- Does not use the criteria used in the ODPM 2003 report, which is an established appraisal process for considering the spatial functions of similar situations.
- Does not consider the opportunity for development to the west of Polesworth & Dordon to respect the separate identities of Polesworth and Dordon and Tamworth and maintain a meaningful gap between them which is in line with adopted Core Strategy policy NW19. At the

least a capacity analysis should be undertaken to inform the effect of development in this location – rather than simply providing ex post facto justification for the gap.

- Includes, in part by taking forward elements of the NWDC MGA report, a range of errors in methodology which prevent a robust assessment being prepared.

3.3 In conclusion the assessment is fundamentally flawed and does not provide a suitable or robust reference document to inform related policy decisions. It is strongly recommend that NWDA is invited to commission a proper landscape capacity exercise to inform future land uses west of Dordon. A predetermined outcome should not be advocated within this work, and instead the work should be presented fairly as part of the evidence to ensure that the emerging plan is soundly based.



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#### **4.0 REVIEW OF AREA 8 (AS EXISTING) AGAINST ODPM 2003 DOCUMENT CRITERIA ('EASTLEIGH TEST')**

- 4.1 This section provides an appraisal of Area 8, as existing, against the criteria established within the ODPM 2003 document, as follows:
- 4.2 Distance – the distance between settlements varies between approximately 313m at the northernmost, narrowest part between Dordon and Birchmoor, and approximately 1336m between Dordon and the M42. This latter distance is that which approximates to the proposed development Site west of Dordon.
- 4.3 Topography – the land rises very gently from a low area (circa 94 – 95m AOD) in the SW corner adjacent to J10 M42 eastwards and north eastwards towards Dordon. A highpoint of 115m AODm is located at/ adjacent to the existing public open space at the western edge of Dordon.
- 4.4 Landscape character – in summary the landscape comprises open, agricultural land of relatively large, contiguous fields, with very few, and limited extents of, gappy remnant hedgerows. The north eastern part comprises school playing fields (Birchmoor Primary School). The adjacent settlement edges of Tamworth, Dordon and Birchmoor are strongly influencing urban elements, as is the emerging industrial and logistic parks of large scale built form to the south of the A5. The M42 corridor and J10, together with the A5 (dual carriageway) are also noted features to the west and south respectively, along with the associated traffic noise. The resultant effect is of a somewhat degraded, urban fringe landscape type.
- 4.5 Vegetation – very limited, comprising the remnant hedgerows, a few mature trees (Oak, Ash and Sycamore) and a variable hedgerow/ narrow belt of trees/ shrubs adjacent to isolated properties and along the A5, and a belt of vegetation along the M42.
- 4.6 Existing uses – the majority of the land is agricultural (arable), with the school playing fields and a small area of grassland (unknown use) adjacent to the public open space (accessed off Kitwood Avenue). Two public rights of way (bridleway and footpath) cross the land linking Birchmoor with the A5.

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- 4.7 Nature of urban edges – Dordon 20<sup>th</sup> century residential area to the east; 21<sup>st</sup> century industrial warehousing to the south of A5; Tamworth 20<sup>th</sup> century business/ industrial park/ motorway service area (MSA) to the west of the M42; Birchmoor 20<sup>th</sup> century residential area to the north west. All urban edges are variously visible across the area, and at times locally dominant and or prominent, although vegetation to southern (A5) and western (M42) provides some limited softening.
- 4.8 Inter-visibility – there is generally very strong/ open/ available inter-visibility between the edges and settlements, although west of the M42 views eastwards from the edge of Tamworth, are restricted by a combination of built form and existing vegetation, and some sequential views along the A5 are partially limited or restricted by the roadside vegetation. The primary receptors are residents and workers (static) on either side and at the edges of the open land and users of highways and roads (transitory)
- 4.9 Intra-visibility - there is generally very strong/open/available intra-visibility from within the area. This is experienced, sequentially, along the public rights of way. Remnant hedgerows provide very limited or negligible concealment.
- 4.10 The sense of leaving and or arriving at a place – this relates to the existing physical gap between settlements, the journey time travelling between the settlements (eg along the A5) and the visual experience of the journey. The difference between the residential edge character of Dordon and Tamworth does introduce an awareness of the different places. However the industrial and logistic parks to the south of the A5 do influence this perception along the A5. The M42 at J10 also provides a noted feature defining the edge of Tamworth. The clear inter-visibility between the two settlements does, it is considered, partially limit to the perception of separation.
- 4.11 Overall the functionality of the gap within Area 8, including that relating to the Site, is derived from a combination of the open landscape, the varying distance between the settlements within the Area, the lack of vegetation, the associated visibility, and the experience when travelling between the settlements. It is wrong however to assert that this means that there is no capacity for additional development within that gap provided that it is closely associated with the settlement and seeks to promote a landscape-led solution.

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4.12 Following an appraisal of the local area, it is agreed that a functional gap does or would assist in respecting the separate identities of Polesworth, Dordon and Tamworth. That is not to say a specific policy designation is necessary to protect such a feature given the land will be protected as open countryside, nor does it mean that all land which is presently open should be retained as open land.

4.13 However, there is no finite quantitative size (distance or area) to achieving a meaningful gap function. This is demonstrated by the considerable variety of land areas which are being promoted as MGs. It is noted from the MGA that the width/ size of the existing land areas which currently provide the gap varies considerably, as does its landscape character and component parts and elements. What is reasonable is that it needs to be of a form and character such that it provides, both physically and visually, an area of undeveloped land between the settlements, so giving a reasonable sense of leaving or arriving at a place.

## **5.0 REVIEW OF MGA AREA 8 AGAINST ODPM 2003 DOCUMENT CRITERIA ('EASTLEIGH TEST') – ON THE BASIS OF DEVELOPMENT IN ACCORDANCE WITH PROPOSED MASTERPLAN VISION**

5.1 This section, taking forward the development opportunity as stated in the MGA for Area 8, sets out a possible approach to future development; it would define a new landscape framework and land management arrangement which, it is considered, could, as soon as it is introduced (eg. such as through advanced structure planting in advance of development) start to immediately improve and enhance the existing landscape character. It will also ensure that an area functions as a meaningful gap as well as providing substantial landscape enhancements. Such a development approach is set out in the Masterplan Vision document.

5.2 The MGS (NWDC) assessment of Area 8 identifies it as 'moderate' sensitivity (amber) not high sensitivity; as such this would indicate that the landscape has some capacity to accommodate change. Indeed the 'landscape' criteria for Area 8 advises that "*development along the eastern edge of the area may provide an opportunity for 'softening the urban edge through appropriate landscaping.'*"

5.3 It is accepted that the introduction of built development will or would reduce the physical area and width of the gap, and result in some landscape and visual impacts. However, it is considered that a proportionate reduction of the physical area does not necessarily diminish

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the function or the success of the remaining space in achieving a meaningful gap, as long as the space retained is of a character and type which allows a continued perception of a meaningful gap between the respective settlements, especially if that it accompanied by generous and well design landscape.

- 5.4 With respect to Area 8, and specifically the Site, the current landscape character has been degraded through tree and hedgerow removal, and the overall size and width is substantially greater, in comparison to other parts of the proposed MG policy areas. On this basis opportunities exist to reduce the width of the gap in this locality and to change the landscape character in such a manner that the separate identities of the settlements can be maintained. Such a strategy, with associated landscape features and elements, could, as soon as such measures are implemented/ introduced, immediately start to provide elements of mitigation with respect to landscape and visual impacts of development.
- 5.5 Such a change could comprise a combination of development at the outer edges of the area and a comprehensive approach to providing a new landscape framework of tree and woodland planting, together with subtle landform contouring, supported by commitments and arrangements for suitable long term land management measures. The new landscape framework could, and would best, include use of advanced structure planting of trees and woodland. Such a measure provides an early element of new landscape structure, in advance of the commencement of development, contributing to landscape and visual integration and as an element of green infrastructure.
- 5.6 The approach, based upon landscape character assessment, should seek to enhance the local character as an area of open landscape, so as to reinforce its identity as such between areas of development. Reference to historic mapping could inform the new landscape and suitable uses for the open space could be include for a range of recreation activities. The definition of the revised edges to the meaningful gap should be by use of existing landscape features or by newly introduced landscape elements and structures (eg. woodland and suitable landforms), so as to be strong, enduring and defensible. This could potentially be delivered in advance of development commencing and be reinforced by a long term management plan.
- 5.7 It is considered helpful to reassess the functionality of the meaningful gap (using the OPDM 2003 criteria) should such an approach be taken forward. In such circumstances the criteria would be met as follows:

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- Distance - a physical reduction from the current gaps outer edge from both east and west would occur. The final distance would depend on site layout but may be in the region of approximately 500metres, would be well in excess of the narrowest part of the gap at present (approximately 313m, between Dordon and Birchmoor).
  - Topography – some limited changes would be appropriate associated with local landforms and potential drainage features.
  - Landscape character – this would be comprehensively and positively changed, with the new elements of built form to the outer edges and with the new landscape framework of trees and woodland between development areas. Such vegetation, especially if it included planting in advance of other development (known as ‘advanced planting’), would provide early benefits and as it matures variously provide increased enclosure and concealment of adjacent development.
  - Vegetation – as noted above, this would change with the new landscape framework, but on the basis of being informed by landscape character assessment, would provide an enhancement to the landscape.
  - Existing uses – these would change and be that associated with the built form and a potential change to a form of woodland/ grassland cover, potentially with recreational uses.
  - Nature of urban edges – these would change in part to relate to the new development, but the proposed landscape framework would result in a ‘softening’ and increased integration and concealment of such edges.
  - Inter-visibility – as the new landscape elements mature there would be an increasing reduction in inter-visibility between settlement edges and along the adjacent A5 corridor.
  - Intra-visibility - as the new landscape elements mature there would be an increasing reduction in intra-visibility from the public rights of way.

- The sense of leaving/ arriving at a place – this might perceptually change as a result of the decreased distance between the settlement edges. However a new landscape framework would likely, as it matures and gives increasing integration and concealment, reduce the visual prominence of any settlement edges. Such an effect would retain, in time, a sense of leaving or arriving at each settlement.

5.8 Overall, it is considered that such a change, when delivered through a high quality proposed development, would maintain an area of meaningful gap by way of:

- Retained width/ area of open/ undeveloped landscape, as separation between settlement edges;
- Improved/ enhanced landscape character, in line with landscape policy and guideline objectives;
- Reduced/limited visual prominence of the urban edges.

## 6.0 CONCLUSION

6.1 A critique has been undertaken of the Meaningful Gap Assessment (MGA) report prepared by North Warwickshire Borough Council (August 2015), and of the Assessment of the Meaningful Gap and Potential Green Belt Alterations (AMGPGBA), prepared by LUC (January 2018), with specific reference to the land between Tamworth and Dordon. The critique has been undertaken by Chartered Landscape Architects experienced in landscape and visual assessment and consideration of effects of landscape change.

6.2 The critique notes that a previous Government document; “Strategic Gap and Green Wedge Policies in Structure Plans, Main Report”, (ODPM, 2003), provides a more appropriate basis for criteria for assessing such locations/ gaps.

6.3 A review of the planning context has established a long term aspiration to maintain an area of open landscape between Tamworth and Dordon, through planning policies to control, limit or restrict development. The adopted Core Strategy retains this principle position noting that “*Any development to the west of Polesworth & Dordon must respect the separate identities of Polesworth and Dordon and Tamworth and maintain a meaningful gap between them.*” However the proposed draft policy LP5 is inconsistent in taking this forward.

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- 6.4 A review of the MGA, backed up by site appraisal, confirms that a meaningful gap does currently exist between Tamworth and Dordon (MGA Area 8), however the landscape character in this location is in a degraded condition and existing urban edges are dominant.
- 6.5 A review of the MGA has identified a number of errors of methodology within the report, such that it is fundamentally flawed. These include a lack of clarity of author capability; an inconsistency in the methodology of the assessment; and a lack of clarity as to how conclusions have been drawn. The MGA is not clear as to what elements and features contribute to a gap and the basis for making recommendations for areas inclusion within a future gap policy. The MGA also explicitly identifies opportunities for development, most notably recognising that some development within Area 8 could “*provide the opportunity for softening the urban edge through appropriate landscaping*”. Draft Policy LP5 as currently worded then prevents this opportunity being taken forward.
- 6.6 It is noted that a number of other representations to the Draft Submission Local Plan are critical of both the proposed policy LP5 and the MGA report.
- 6.7 The appraisal finds that the LUC report (January 2018) uses a Green Belt assessment methodology to appraise the MGA study area. The methodology is inappropriate in such a circumstance and such an approach is an attempt to give the MG area a strategic importance which it does not deserve. This appears to be recognised and accepted in the LUC report paragraphs 6.16 – 6.20 as the conclusion states “...it would not be recommended that any application was made to designate new areas of Green Belt, without an adopted Local Plan clearly demonstrating a five year land supply for housing and employment”
- 6.8 The appraisal does not consider that some development to the west of Dordon such as in within Area 8 could “*provide the opportunity for softening the urban edge through appropriate landscaping*” as is recognised in the MGA report and also in NW LCA, and would be consistent with adopted Core strategy NW19, wording “...respect the separate identities of Polesworth and Dordon and Tamworth and maintain a meaningful gap between them.”
- 6.9 The LUC report also has errors of methodology, including; exclusion of land parcels from the assessment; inconsistent commentary on the importance of various areas within a meaningful gap. The use of the parcel areas is also inappropriate and at times inconsistent with the MGA report.

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- 6.10 An appraisal as to the function of the area was then undertaken using the ODPM report criteria (Eastleigh Test), which highlighted key issues informing the function of the gap as derived through a combination of the open landscape, the varying distance between the settlements, the lack of vegetation, the associated visibility and the experience when travelling between the settlements.
- 6.11 Importantly, there is no finite size to achieve such a function, and it is noted from the MGA that the width/ size/ area of the existing land areas which currently provide the gap varies considerably, as does its landscape character and component parts and elements. What is reasonable is that any area of land should respect the need for it to be proportionate to overall quality/ condition and perception/ awareness of undeveloped land between the settlements.
- 6.12 An approach is then put forward as to how development (as suggested in the MGA) could be accommodated, in combination with a new landscape framework of tree and woodland planting and landforms which would, whilst changing elements of the existing gap, maintain a meaningful gap and provide benefits for health and well-being and the environment including landscape enhancements.
- 6.13 Overall it is considered that the MGA report provides a flawed and inappropriate basis for informing future patterns of development and that draft policy LP5 would prevent high quality development opportunities being realised.
- 6.14 Accordingly it is recommended that:
- (i) the current evidence basis for any form of gap policy between Tamworth and Polesworth and Dordon is so flawed that it does not provide a sound evidential basis for policy making;
  - (ii) if a gap policy is to be promoted then further work should be commissioned to resolve those methodological concerns and to include an assessment of the capacity of sites within the gap to accommodate development;
  - (iii) if no such work has been commissioned then it would be unsound to include such a policy (as occurred before the Core Strategy Inspector);
  - (iv) a capacity exercise as presented above, is based upon an orthodox and well recognised methodology ('Eastleigh Test'). This assesses the value of land in



contributing to a meaningful gap, and demonstrates that Hodgetts Estates land has capacity for development without compromising that objective.

[End]

## APPENDIX I

'Analysis of NWBC Meaningful Gap Assessment' – Appendix A - Extract from Landscape Proof Evidence (prepared by Andrew Williams of DEFINE), St Modwen's appeal (North West Warwickshire Council Ref: PAP/2014/0648 and PINS Ref: APP/R3705/W/15/3136495)

The following sets out my analysis of North Warwickshire Borough Council's Meaningful Gap Assessment:

1. The settlement location is not set out in writing, but clearly reflects the Local Plan Proposals Map in its appended drawings;
  2. The report does not set out a methodology – this is unprofessional, and is not in accordance with professional guidance for similar studies (such as that set out in the Guidelines for Landscape and Visual Impact Assessment 3);
  3. The methodology that appears to have been applied relies almost entirely on a 'traffic light' system of assessment illustrating the parcel's sensitivity in respect of various constraints (landscape, heritage, infrastructure, properties and environment). Such an approach is illogical and has little to no bearing on how the parcel a) contributes to the separation of Tamworth and Dordon / Poleworth and the maintenance of a gap between them, or b) the potential effects of development on this separation.
  4. This methodology assesses the development potential of the parcels, in respect of its potential constraints. This type of study is fundamentally different from an assessment of identity and gap, and will naturally lead to wholly inaccurate conclusions if the answer to this methodology is interpreted as one that speaks to identity and gap. For example, Area 8 has an identical score (two greens, two amber and one red) to Area 9, yet any basic physical examination of the gap from public vantage points would clearly show that Area 8 has a major role in the separation of Tamworth and Dordon, it is located centrally between these settlements, and is open in character with little vegetation or development beyond the settlement boundary. This area is significantly different in how it performs in respect of supporting the separate identities of Dordon and Tamworth when compared to Area 9.
  5. Moreover, the assessment of constraints themselves are not accurate – for example it scores Area 9 as 'red' in respect of infrastructure on the basis of the high pressure gas pipeline constraint, however the appeal scheme comfortably accommodates this requirement.
  6. Furthermore, the "traffic light" system used in section 8 lacks basic rigour without an accompanying matrix to show in a systematic, precise and transparent manner how the various ratings are arrived at. Without this it is impossible to compare between each Area (e.g. why one Area might achieve a "green light" for "Heritage" and another an "amber light") and also to understand what the effective meaning of each rating for each matter is (e.g. how "bad" is a "red light" for landscape, and how "good" is a "green light"?).
  7. At no point in the assessment of the meaningful gap is a quantitative or qualitative assessment of the performance of the parcel as 'a gap', or how this might change through development, carried out. This omission is wholly contrary to recent guidance by the Planning Advisory Service in respect of
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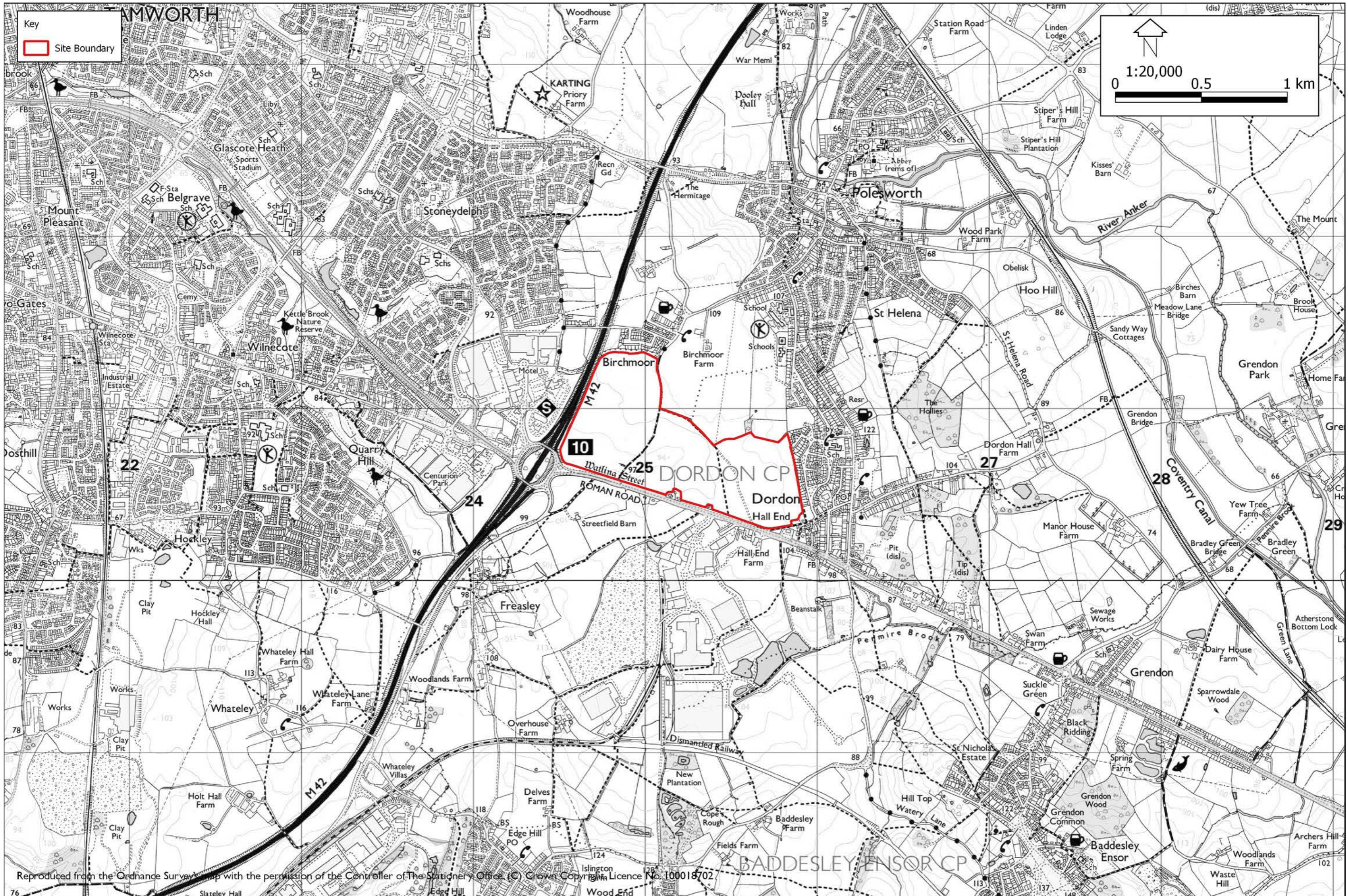
Green Belt Assessment of avoiding towns merging<sup>8</sup>, and of contemporary studies<sup>9</sup>

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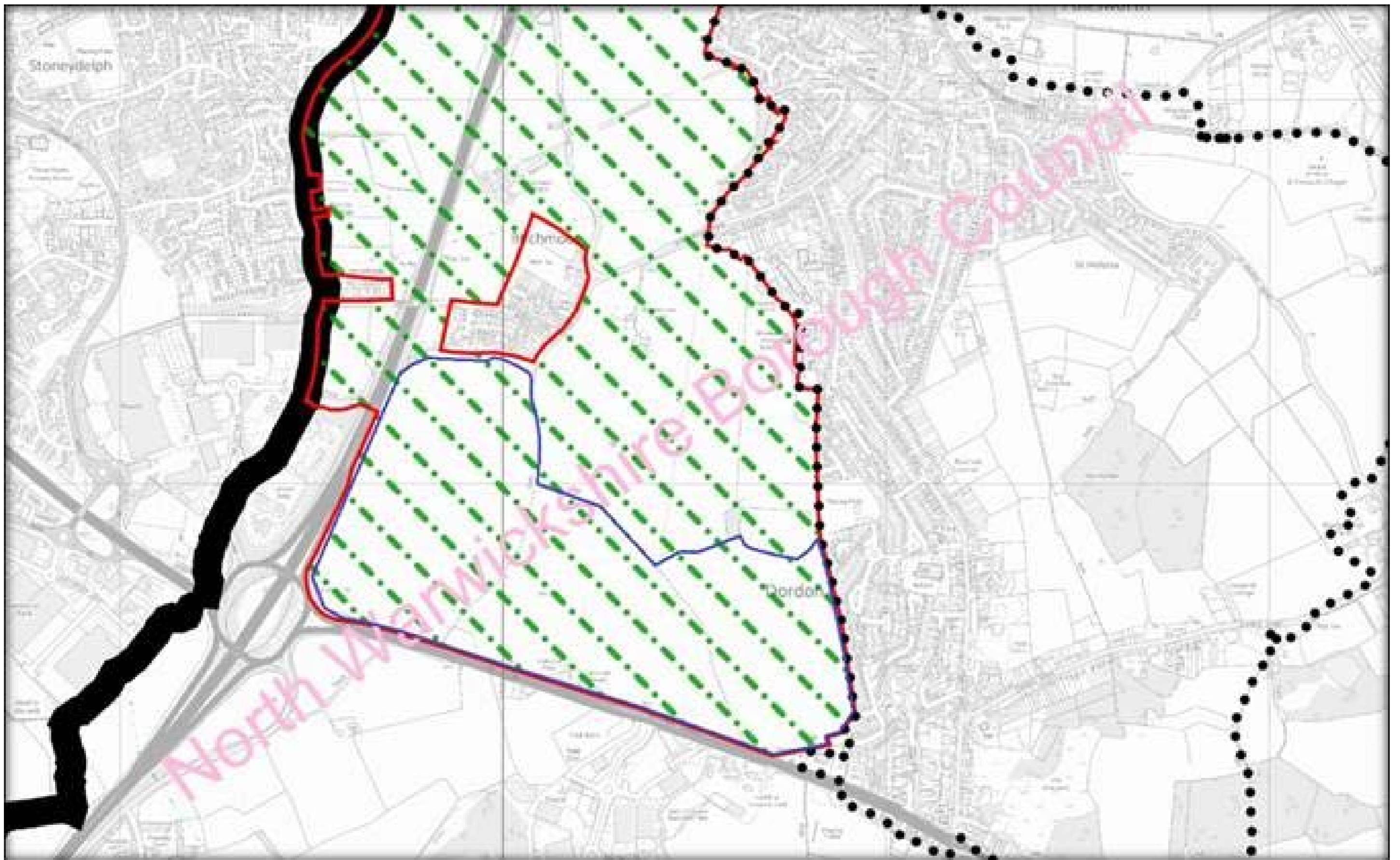
<sup>8</sup> See Appendix B1



<sup>9</sup> See Appendix B2

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-  Proposed Meaningful Gap policy LP5 area (extract from NWBC Consultation Draft Local Plan Proposals Map)
-  Site area

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Document Title: Land at J10 M42 between Tamworth and Dordon/Polesworth  
Critical Appraisal of Meaningful Gap Evidence Base

Project No: HID/NPA/10987

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Prepared by:	S Kale	Managing Director	16.3.2018
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**DOCUMENT CONTROL**

## REVISION RECORD

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