

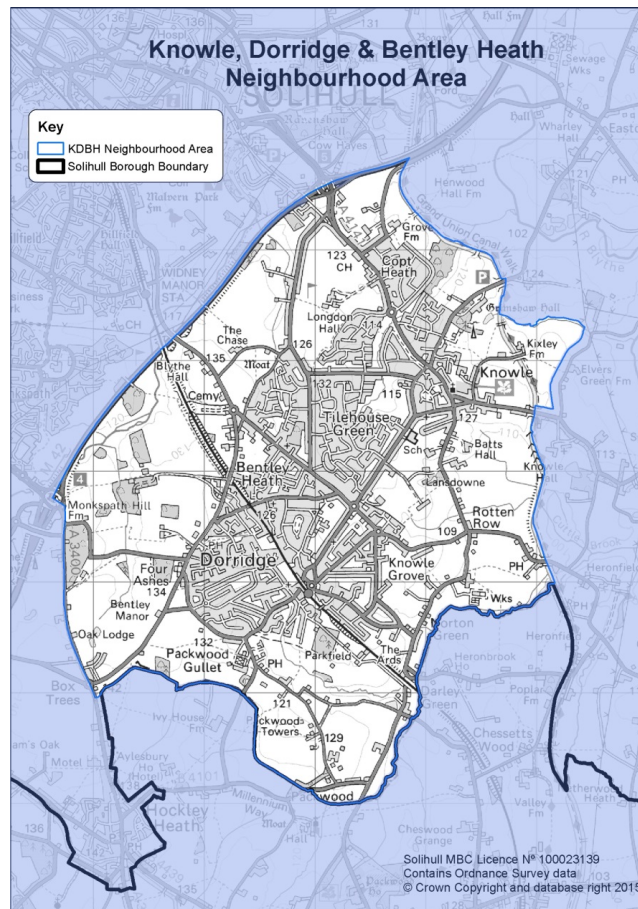
## 1. Introduction

The Knowle, Dorridge and Bentley Heath Neighbourhood Forum (KDBH-NF) welcomes the opportunity to respond to the consultation on the Solihull Local Plan Review: Scope, Issues and Options.

## 2. Background

KDBH-NF was formally established in October 2015. As a non Parished area, it has taken almost 12 months of hard work to establish the NF and the Neighbourhood Plan Area.

The Neighbourhood Area is shown below:



It covers a population of about 19,500, living in approximately 7,700 households. The membership of the Forum is growing steadily, and we have an ongoing programme of public engagement to ensure that the KDBH-NF represents the views of its residents and local businesses.

The purpose of the Neighbourhood Forum is to prepare a Neighbourhood Plan for the designated area under the terms of the Localism Act 2011. As a recently constituted body, we are now embarking on the plan preparation process that we envisage will take about two years. Our Plan programme sets out the key stages and demonstrates how the development of our NP will progress alongside the Local Plan Review. It is our intention to work with the Council to ensure that the views of the residents and businesses of the Neighbourhood Plan Area are taken in to account in the preparation of both the Solihull Local Plan and our Neighbourhood Plan.

### 3. General Comments in Relation to the Local Plan Review

The KDBH-NF must reflect the views of its residents and local businesses. We recognise that, at this early stage in the preparation of our NP, we have yet to survey our residents, businesses and other organisations to fully understand what are the main development and land use issues in relation to our Area. This information will in due course assist the KDBH-NF to respond to future consultations with the benefit of a wider understanding of the scale and type of development that people wish to see in our Area.

In the meantime, an Extraordinary Meeting of the Forum was convened on 13<sup>th</sup> January 2016 to explain the Council's Local Plan Review Consultation, and to consider Growth Options A to G together with their potential implications for development in the KDBH Area. The meeting was attended by approximately 120 people and was helpful in increasing local awareness of the planning challenges facing the Council and our Neighbourhood Area. There was an understanding of the development pressures the Borough faces, particularly on its Green Belt and infrastructure, and also recognition that housing growth could create opportunities for our community.

However, in view of: a) the complexity of the issues; b) the lack of clarity over how many residential units the Council will have to provide throughout the Borough; and c) the high level nature of the options presented, this was not a Meeting where substantive discussion or agreement on preferred options could be reached and held to be representative of the views of our area as a whole.

In the absence of an established consensus on the issues, we are unable to offer a detailed response to the questions in the consultation document on behalf of the community. We can, however, make some observations, which we hope will be helpful to your thinking and will inform the forward development of the Local Plan. These are set out below.

Our responses to the Local Plan Review are based upon some of the recurrent themes and issues that have been raised to date in response to various events. These include: the initial public meeting (7<sup>th</sup> Jan 2015); Dorridge Day (13<sup>th</sup> September); KDBH-NF Launch day (15<sup>th</sup> November); comments expressed at monthly KDBH-NF meetings and/or on line via the KDBH-NF web site; together with comments made at the Extraordinary Meeting and in response to the Draft submission which was circulated to the membership. Not surprisingly, we have received a wide variety of views from the community, ranging from opposition to any development in the Green Belt to recognition of the opportunities that larger scale housing development might bring.

**The main issues** that have been consistently raised to date are:

- 1) Concern about the future of the Green Belt
- 2) Existing pressures on local infrastructure. This includes the capacity of local schools and doctors surgeries; increasing problems associated with car parking and traffic congestion; and concerns about the quality and lack of community facilities
- 3) The need for more affordable housing and smaller market houses to enable young people (especially those with a local connection) to stay in the villages.

Other issues may arise as a consequence of our survey work that we expect to be undertaken and analysed in the Spring of 2016.

## 3.1 Concerns About the Potential Loss of Green Belt to Development

The current adopted Local Plan for Solihull allocates three sites in Knowle and the ward of Dorridge for new housing. These are at Hampton Road, Knowle, Four Ashes and Middlefield that were forecast to deliver some 365 houses within the first 5 years Plan period. To date, the Hampton Rd site is almost built out, Four Ashes is also nearing completion and the Middlefield site is shortly expected to receive planning permission for 110 houses. In addition to these developments, 28 apartments for the elderly have been built on Knowle High St, and 60 purpose built units for the elderly are nearing completion on land at Old Silhillians on Warwick Rd. The impact of these developments is placing increasing pressure on the local infrastructure, as they are being built within a relatively short time period. The effects of the Taylor Wimpey Middlefield scheme have yet to be felt.

With the exception of the Old Silhillians site, the above developments are not on Green Belt land. The Old Silhillians scheme is on Green Belt, and it is difficult to see how the KDBH-NP Area can accommodate much further growth without impinging further on Green Belt land. The KDBH NF recognises the pressures that the Council is under to deliver additional housing in the Borough and that a review of the Green Belt will have to be undertaken. Nevertheless, we anticipate strong support for the protection of Green Belt around our villages and for maintaining the separation of settlements from the main urban area of Solihull. **As our three villages are tightly constrained by Green Belt, the KDBH-NF must be fully engaged in the Review process if the role and purpose of the NF is to have any real validity. Any proposals to impose additional housing allocations on Green Belt land without engaging local people via the KDBH-NF would be to completely undermine the purpose of neighbourhood planning. In the event that any growth proposals are deemed necessary within the Green Belt around our villages, we would expect to play a key role in determining the scale and location of any growth proposals affecting the KDBH NP area.**

## 3.2 Existing Pressures on Local Infrastructure

Concerns about increasing levels of traffic, congestion and shortage of car parking have been raised on a regular basis. The main issues relate to parking at Dorridge Station and in the village centres of Knowle and Bentley Heath. In addition, concerns have been raised about traffic on Station Road and on-street parking around schools, particularly in connection with road and pedestrian safety. The lack of safe cycling and walking routes has also been raised as an issue.

The pressure on local services has also been raised on numerous occasions. In particular, the capacity of our primary schools and, potentially, of Arden Academy is a major concern. The KDBH-NF is currently looking into the capacity of health and education facilities, as well as issues affecting the retail centres. The quality and shortage of community facilities for both young and older residents is also an issue that needs to be addressed.

We therefore expect there will be support for policies in the Local Plan which provide for additional amenities and services that reduce existing pressure on these services, as well as cater for any increased demand arising from new development.

### **3.3 The Need for a Greater Mix of Housing, Including Affordable Housing**

Feedback to date indicates support for a wider mix of house types (including flats/apartments) that are more affordable. The lack of smaller house types suitable for starter homes for young local people, and for older people wishing to downsize, has been regularly commented upon. There is a particular desire for affordable homes to be built to enable young people who have grown up in the NP Area to stay here. The NP area is well provided for in terms of large detached houses, and the continuing use of sites (especially windfall sites) for more large detached houses has prompted adverse comments. A number of responses have suggested smaller family homes (3 bedrooms) would improve the mix and appeal of the area to young families.

The KDBH NF intends to investigate these issues in detail over the next few months.

## **4. Comments on the Options**

We note the seven high level Growth Options and that Options A, F and G potentially have the greatest impact on the KDBH NP Area.

We offer below some broad comments on the options based on the issues identified above. As indicated above, we reserve the right to submit more detailed and informed comments when the issues, impacts and wider implications of the Growth Options are more fully understood and the KDBH-NF has a more broad based view from its members.

### **4.1 Growth Option A-High Frequency Public Transport Corridors and Hubs**

This could have implications for our NP area as Dorridge is identified as a possible focus for development. This raises two main issues: a) development of any scale would mean building on the Green Belt, which would have to be properly assessed and justified relative to other Green Belt options; and b) additional housing around Dorridge, as well as in Knowle and/or Bentley Heath, would add to existing pressure on local infrastructure - specifically the availability of parking at the station and in the village centres and the lack of capacity at the primary schools. The capacity of the station and rail infrastructure at Dorridge to accommodate additional passengers would also have to be confirmed. An option based on public transport would only make sense under this scenario if new development is close enough to the station to make rail travel a realistic option without resorting to use of the car.

This option focuses on rail travel. However, if residents of new development do not work in locations along the rail route, but work elsewhere in the major employment areas (the airport, NEC, Resort World, Birmingham Business Park, JLR and Blythe Valley Park), then an unintended consequence of focussing too much on rail commuter hubs would be an increase in congestion on local roads (and indeed the already congested M42 from junction 4 to 6) as these employment areas are not adequately served by bus from Dorridge (or the wider NP area). We note that improved bus services from the KDBH NP Area are not listed as a transport priority in "Solihull Connected".

We note that the Sustainability Appraisal (SA) on behalf of the Council also refers to similar concerns about this Growth Option. It is essential therefore that, if there is to be any further development around Dorridge station, this Option must first adequately address these issues.

#### **4.2 Growth Option B - Solihull Town Centre**

This seems to be an appropriate and sustainable option if additional sites can be identified. This option also performs well in the SA. The Council could consider maximising the potential to add more residential units in to mixed use schemes.

#### **4.3 Growth Option C- North Solihull/Chelmsley Wood**

This seems to be an appropriate option if additional sites can be identified.

#### **4.4 Growth Option D-Shirley Town Centre and the A34 Corridor**

This area has seen considerable investment in recent years and more is already planned with the allocation of land at Blythe Valley Park for housing, the potential of the TRW site and the proposals for the former Powergen site. Development now extends along much of the A34 corridor from Shirley up to the M42 motorway. It would seem appropriate to focus further housing development along this corridor where it can benefit from good transport links, employment opportunities, access to good retail facilities and recreational facilities (Blythe Valley Country Park, Shirley Golf Club and various health clubs). This is therefore an appropriate option for further consideration in the Green Belt review.

#### **4.5 Growth Option E - The UKC Hub and HS2**

The Council has already indicated its support for this growth area, although it is not clear if this is only on the basis of HS2 proceeding. The potential for housing (c. 2000 units) in this area should be investigated irrespective of HS2, particularly to see if housing could be delivered earlier than currently indicated.

It is noted that this option performed best in the Council's Sustainability Appraisal.

This is therefore an appropriate option to be assessed further through the Green Belt review.

#### **4.6 Growth Option F-Limited expansion of Rural Villages/Settlements**

This option potentially has direct implications for the NP Area. The Forum intends to review the potential for any further small scale development on non Green Belt land within the built up areas of our villages and to seek local views on the scale of any such potential. Infill and brownfield development would help relieve pressure on the Green Belt but our initial understanding is that there will be limited opportunities within the built up area.

The 2012 SHLAA identified sites that virtually encircled the existing built areas of KDBH, all within Green Belt. These were all rejected by the Council as not suitable for development, mainly, we understand, on the grounds of Green Belt policy. The Council will revisit these sites as part of the SLP Review process, and the NF intends to be active in engaging local residents' views and assisting the Council with their analysis of the merits (or otherwise) of these sites as part of both the SLP Review and NP preparation.

Option F performs less well in the SA, which identifies no major beneficial outcomes and would be likely to increase car based travel. These concerns would have to be explored further in relation to any proposed small scale developments in the KDBH NP area.

#### **4.7 Growth Option G-New Settlements, Large Scale Urban Extensions or Significant Expansion of Rural Villages / Settlements**

We understand Solihull Council has no proposals for a new settlement of 5000 houses plus and that, unless such an opportunity arises, the most likely alternative is urban extensions.

This Option has potentially significant direct impacts on the KDBH Area, as reference is made to a possible expansion to the north west of Bentley Heath by 1000 dwellings, with smaller settlements of up to 500 dwellings around Knowle and Dorridge. This Option clearly raises the most issues in terms of impact on Green Belt and agricultural land around our villages, with consequent harm to landscape and wildlife. It would also place the village centres and other services under potentially unacceptable pressure, unless a large scale development could deliver sufficient benefits in terms of education, health and transport to address the existing infrastructure problems and accommodate the new development.

We can see that the option of a new settlement could have significant benefits to those areas within the wider HMA area that are keen to attract more growth. However, for the reasons outlined above, the KDBH-NF is concerned that this option could have unacceptable effects on the Green Belt, landscape, wildlife, village character and infrastructure of this Area, which are matters identified by local residents thus far as being the most important.

We note the interim findings of the SA are that this Option performs less well. It recognises there is the potential for large areas of housing to give rise to additional traffic flows, add to congestion and impact upon the rural landscape particularly in the areas of the rural south west. It adds that further consideration also needs to be given to the implications for local services.

Clearly all these matters need to be fully explored. We are unable to comment further in terms of the merits (or otherwise) of this option until more information on the potential scale and location of any urban extensions is known.

#### **5. Additional Options**

The Options proposed in this consultation are very high level and conceptual. It is not possible, at this stage, to understand what the impacts of the Options will be - that will only happen when more detailed proposals come forward. In reality, the Council's preferred option will likely include elements of all these Options. We suggest that the Council should refine these concepts into 2 or 3 possible combinations of potential growth locations for further consultation before selecting a preferred option. That would enable local people to better understand what each of the refined options would mean for growth in their areas and be able to offer more constructive feedback to the Council.

## **6. Infrastructure Requirements**

It is clear that any significant further housing development in the KDBH-NP area will exacerbate existing problems of congestion and parking, and impact on local amenities, unless significant measures are taken to mitigate their impacts. In addition, the Middlefield development has yet to be accommodated. It is essential, therefore, that these concerns are addressed early in the review of sites assessment to ensure only the most sustainable housing options are taken forward for further consideration.

Another important consideration for the NP Area is that a significant percentage of the population is in retirement, or approaching retirement. We must ensure that the needs of older people are not overlooked, especially those without a car.

## **7. Comments on Challenges and Policies**

We note the list of policies and challenges set out in the consultation document and your questions on possible policy amendments. We acknowledge the additional challenges associated with a greater emphasis on housing and economic growth, and the need for the Council to resolve potential policy conflicts that may arise between, for example, the environmental, transport and economic priorities. The issue for the KDBH-NF will be more in the nature of understanding the weight to be afforded to the various challenges and policies in deciding on development options. Our intention is to encourage discussions which reflect on these policy drivers and, where appropriate, to elicit and promote the community views on their relevance and importance for development in the KDBH-NP Area. This will require close working with Solihull Council both to understand the Local Plan policy priorities and to ensure that the emerging NP is in general conformity with the revised Local Plan.

## **8. Conclusion**

We recognise that the Council faces considerable challenges ahead in balancing Green Belt, housing and other policy priorities throughout the Borough. The KDBH-NF looks forward to working with Solihull Council on the preparation of the new Local Plan and our Neighbourhood Plan. We see this as an opportunity for the community to help plan and shape future development in and around our villages, which is the fundamental purpose of neighbourhood planning.