

To: Matt Preece (Senior Development Officer - Major Projects)

Notification of Planning Application - PL/2019/00723/PPOL

The Council has previously refused the application on this site in 2016 for up to 45 dwellings on the basis that it amounted to inappropriate development in the Green Belt; the circumstances put forward in support of the proposal did not amount to the Very Special Circumstances set out in the NPPF and Policy P17 of the Solihull Local Plan; and the Landscape and Visual Assessment Report did not sufficiently demonstrate that there will be no significant impact on the amenity value of the landscape.

We consider that this planning application also fails to demonstrate that very special circumstances (vsc) exist that outweigh harm to the Green belt and that it should be considered through the Local Plan Review process alongside all the other sites that are being promoted. It is premature to consider this application in advance of that process.

The Neighbourhood Forum therefore wish to object on the basis of criteria laid out as follows:

1. The applicants have not considered the policies of the Neighbourhood Plan even though they have been a material consideration since the Council agreed in January that the Neighbourhood Plan should go to Referendum which has subsequently been passed and is now part of the statutory Development Plan. The most relevant policies that the applicant should seek to satisfy in the Neighbourhood Plan are VC1, NE1, H2, H3 and ECF 4.
2. National, Solihull and Neighbourhood Plan Green Belt policies are the main consideration. In a nutshell, these all say that such development should not be allowed unless 'very special circumstances' are demonstrated that outweigh harm to the GB.

The applicants argue that the urgent need for specialist (care home) accommodation for the elderly, the lack of non green belt sites Borough wide for such uses and job creation constitute the vsc. The applicants indicate that the Council has agreed such a need has amounted to vsc elsewhere in the Borough, leading to approval in a GB location. If this is the case the circumstances for such approval will need to be understood although each application should be assessed on its own merits.

KDBH Neighbourhood Plan Limited

Neighbourhood Forum

The Neighbourhood Plan recognises that there is a need for specialist accommodation for the elderly in our Area, but in this case we do not believe that the applicants have demonstrated that very special circumstances outweigh the harm to the GB for the following reasons:

- The Council has a duty under the NPPF to assess and allocate land to meet the housing needs for all groups, particularly the elderly. It is doing so through the Local Plan Review and is proposing large scale releases of Green Belt land around KDBH to meet a disproportionately large share of the Borough wide need. The Neighbourhood Forum expects all such needs, including specialist accommodation for the elderly, to be met within such allocations when they have been tested and endorsed by an Independent Inspector. The need is therefore being addressed through the Plan led system and, to date, the Council does not see the need to promote this site as an allocation. In these circumstances the Neighbourhood Forum does not consider there is a very special circumstances argument that supports the need to release this land.
- Policy VC 1 acknowledges that some land will be required around the Area to meet housing need and the remainder will stay in Green Belt. The Neighbourhood Forum expects such sites to come forward through the Local Plan Review process and not on an ad hoc basis.
- The need is not so urgent as to necessitate the immediate loss of more Green Belt. It should be noted that specialist accommodation has recently been provided at Knowle Gate (61 units) and at Four Ashes (51 sheltered care units). Permission has also been granted to Churchill for another 26 apartments for the elderly in the centre of Knowle. We understand that specialist accommodation for the elderly is also being built elsewhere in Solihull, for example at the former Shirley Aquatics site, Stratford Rd, at the former Powergen site and at Tanworth Lane, Shirley. Thus, provision has been and is being made and therefore the need is not so urgent as to amount to a very special circumstance in this case.
- There will be significant harm to the Green Belt, particularly the loss of openness and the breaching of a defensible boundary along Earlswood Rd. The vsc case advanced by the applicant does not outweigh the harm to the Green Belt in this location.

3. D1 Design- we believe that the proposals have inappropriate scale and massing, out of keeping with the local street scene, contrary to policy D1 of the Neighbourhood Plan. The street elevation looks particularly long and out of keeping, despite the visuals which show the central part largely screened by retained trees and hedgerows. There is a need to see an impression of the street scene in winter when the trees and hedgerows are bare. The full elevation would then be much more visible and the visual impact would be very different.

While the applicant's architects have clearly spent time on elements of design it will be out of keeping with the existing street scene and the long frontage to the road should be more broken up, however we note that the detailed design is not being approved at this stage.

4. NE 1 Trees and ecology – we need clarification on which trees are being affected by the development. Neighbourhood Plan policy is strong on retaining trees which contribute to the street scene. The proposal is to keep most of the frontage vegetation is welcome although we would request for a TPO to be placed on this site.

5. ECF 4- requires the impact on development to mitigate the impact on local services with new or expanded health services, particularly doctors' surgeries, dental practices and related local medical services. None of this has been addressed in the submission.

The Neighbourhood Forum concludes this application conflicts with national, local and neighbourhood Green Belt policies as well as Solihull and Neighbourhood Plan policies on design and protection of trees. We request it be refused.

Gillian Griggs on behalf of

Knowle, Dorridge and Bentley Heath Neighbourhood Forum