



# KDBH Neighbourhood Forum

## Representations on Draft Solihull Local Plan:

### Overview

## 1 Introduction

The Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Forum (Forum) was established in October 2015 for the purpose of preparing a Neighbourhood Plan (NP) for the KDBH Neighbourhood Area, which covers a population of c 20,000.

Solihull Council started consulting on their Draft Local Plan (DLP) just a month later, in November 2015. The Forum therefore set out with the aim of bringing forward a NP soon after adoption of the new Local Plan. However, substantial delays to the DLP caused the Forum to 'disconnect' the NP from the DLP timescales so as to deliver the NP as quickly as possible. After 5 years of exceptionally hard work, the NP was made in April 2019, following a 34% turnout and 96% support at Referendum. In July 2020, the Forum became a registered charity with a focus on securing implementation of the NP for the benefit of our Neighbourhood Area.

An important driver in creating the NP was to ensure that future housing development is of much better design and layout, and more in keeping with the character and distinctiveness of our local villages, than recent housing schemes. These schemes have attracted criticism for cramped layouts, lack of greenery, inadequate parking and failure to take account of topography. To inform our NP policies, in 2017 the Forum therefore commissioned a Heritage and Character Assessment and Masterplanning / Design and Design Coding Study. We also used crowdfunding from residents to commission Landscape Appraisals for sites identified in the DLP as potential allocations for new development. These, and our NP evidence base, also inform our response to this Local Plan consultation.

## 2 Process for Creating Representations

The Forum's representations follow on from, and are informed by, resident feedback. The process has inevitably been severely constrained by Covid 19 restrictions and the Council's choice of a 6 week consultation period - the minimum legally allowed. The Forum has had insufficient time to fully assess all details in the Draft Local Plan and extensive updates to the evidence base, and in particular validate important details in key transport studies, the Infrastructure Delivery Plan and Viability Study.

Nevertheless, over the consultation period, the Forum has sought to inform residents by:

- keeping those registered with the Forum fully up to date and actively involved in what's happening via our newsletters - and the wider community via our Facebook page
- distilling what's most relevant to KDBH from the mass of information in the Council's evidence base and making this available on our website, along with an explanation of what this Submission stage of consultation entails
- producing four short on-line videos explaining in 'easy to digest' format the Forum's summary analysis and assessment of what the Draft Local Plan proposals mean specifically for KDBH
- undertaking an on-line residents survey, linking with the videos. Despite timescales meaning this could only be available for 6 days over a peak period in the run up to Christmas, the Forum received 814 detailed comments in nearly 300 responses
- calling on support from our network of local organisations to help publicise and reach as many residents as possible, eg. the Knowle Society and Dorridge and District Residents Associations, U3A etc.



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The Forum has received extremely positive feedback and appreciates the level of response from residents in the challenging circumstances. Ideally, we would have wished for more time to seek views; nevertheless, we have the benefit of being able also to draw on residents' responses to previous consultations (both in support and objections) and the Residents' Survey undertaken for the NP in preparing our representations.

The Forum's response has, of course, been shaped throughout by the aims and policies of the NP and their relationship to the Council's Submission Draft Local Plan policies.

### 3 Executive Summary of Forum Representations

- 3.1 The KDBH Neighbourhood Forum is not a NIMBY organisation. It recognises the need for new housing and that our Neighbourhood Area must play its part in meeting a fair share of the Borough's need. Nobody wants to see the loss of significant areas of the Green Belt that encircles our villages; however, there is an acceptance of the need for some housing development, where this is of a **scale** that does not add to existing **infrastructure pressures**, brings **significant benefits to the whole community** and **delivers well designed housing** that reflects our local character, distinctiveness and valued green landscape setting in a manner that reflects our **Neighbourhood Plan** policies.
- 3.2 The Forum welcomes the reduction in the scale of allocated housing from 1040 to 780.
- 3.3 The Forum recognises the potential **community benefits** of new schools and sports provision. Our Neighbourhood Plan supports new and improved facilities, subject to meeting identified criteria including that of allowing access to the wider community. We recognise, though, that the DLP proposals are controversial due to the extensive loss of Green Belt. The rationale for bringing forward these sites, as explained by the Council at a Forum meeting in December 2016, is that allocation of large sites will better achieve significant community benefits. On this basis, the Forum's response to this consultation focuses on:
  - whether there is evidence to demonstrate that these benefits will be delivered; and
  - in the event that there is, or that such evidence is not deemed necessary, what more detailed modifications are required to the Local Plan to achieve a satisfactory form of development, particularly on the allocated sites?
- 3.4 As regards **deliverability**, there is currently no assessment for the Arden Triangle site. Viability evidence could demonstrate whether this scheme can be delivered in the light of physical, financial and land ownership issues. Moreover, in view of density concerns, it would indicate whether it would be feasible to reduce the density in places to achieve compatibility with policies P5 of the Local Plan and H1 and D1 of the Neighbourhood Plan. This would have implications for the scale of housing.



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- 3.5 A viability assessment is provided for the Hampton Rd site; however, this is based on a significantly different number of houses than that now proposed in the Concept Masterplan. The Viability Study here does not demonstrate that delivery is possible with a reduced scale of development. The Forum is also aware of physical constraints (levels) and landownership issues that could affect the ability to deliver a relocated football club. A mechanism needs to be put in place to ensure that the sports facilities are linked to the provision of new housing.
- 3.6 Without evidence on the viability and deliverability of these two allocations, which are integral to delivery of the Plan's strategy, the Local Plan does not meet the tests of soundness. More importantly from a residents' perspective, it provides no confidence that the proposed community benefits that justify selection of these sites will be delivered. Allocations that deliver only the housing without the community benefits would be the worst possible outcome and must be avoided at all costs. These sites would have to be deleted if suitable evidence is not presented and examined.
- 3.7 The Forum makes other representations relating to, inter alia, clarity regarding application of **Neighbourhood Plan policies, effectiveness of infrastructure mitigation measures, and concerns around concept masterplans and design**. Most of these are made in response to the Knowle Dorridge and Bentley Heath Settlement Chapter.
- 3.8 The Forum's conclusion is that the provisions of the emerging Local Plan are unsound in a number of important respects, requiring material changes. In many places, proposals are not justified by the evidence.<sup>1</sup> Elsewhere there is a lack of consistency with national policy.<sup>2</sup> In particular, it is not always evident how a decision maker should react to development proposals - there is ambiguity and lack of clarity.<sup>3</sup> All these matters are addressed in the Forum's detailed representations.

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<sup>1</sup> NPPF Para 35 b)

<sup>2</sup> NPPF Para 35 d)

<sup>3</sup> NPPF Para 16 d)