



Knowle, Dorridge and Bentley Heath (KDBH)

Neighbourhood Forum

VF13274 Vodafone Installation, Pre-Application Consultation

28 April 2020

Dear Mr Moosa

Proposed base station installation at land off Conker Lane, off Manor Road, Dorridge B93 8SN

Thank you for consulting the Knowle, Dorridge and Bentley Heath Neighbourhood Forum as part of the pre-application consultation on the above proposal. The Forum recognises the importance of having good mobile infrastructure in our Area, perhaps now more so than ever, and so in principle is supportive of proposals to improve coverage as soon as possible. To this end, our Neighbourhood Plan includes a specific policy (see below) on mobile phone masts. This reflects residents' desire for improved coverage, although we are anxious to ensure that such equipment is provided in the least obtrusive way.

We recognise the extent of work done to date on this proposal, as evidenced by the documentation provided showing the number of sites considered and the evaluation done on these. We are keen to see this work continued, to be able to support a planning application in the near future, and to see the actual benefits available to our residents. We trust you will appreciate that, as a Forum, it is incumbent on us as part of that process to ensure the detailed considerations in the Knowle, Dorridge and Bentley Heath Neighbourhood Plan have been taken into account and either met, or a valid reason established as to why that has not been possible in this case.

Within that overall positive context, we have reviewed the documentation and wish to make the following detailed comments:

1. The Development Plan

We note that you say that the policies in the Development Plan have been reviewed and taken into account. It is not clear, however, if the policies in our Neighbourhood Plan, which forms part of the Development Plan for Solihull MBC, have been taken into account. This is available directly from our website home page at kdbh-np.org.

2. Relevant Neighbourhood Plan Policies

The most relevant Neighbourhood Plan policies are U1 Mobile Phone and Broadband Infrastructure, supported by Policy E4 Working from Home and Policy VC4 Green Spaces. Some of the policy drivers in Sections 12 and 13 of the Neighbourhood Plan are also relevant.

Policy U1 states that the provision of mobile phone masts and other telephony or communications transmission or receiving equipment will be permitted provided that, either alone or in combination, they are not materially harmful to the character or appearance of the area within which they are located. It also makes reference to the sharing of masts by different providers which will be encouraged.

This policy responded to comments made by local residents about the poor mobile service in parts of the Neighbourhood Plan Area. Such improvements will also assist in encouraging working from home, consistent with the aims of Policy E4.

The key test that this proposal needs to address to comply with Policy U1 is the extent to which the proposal causes material harm to the character and appearance of the area within which it is located. The Forum accepts that mobile technology and equipment is often, by its very nature, harmful in appearance. It is not the intention of the Forum to apply this policy in a way that prevents new mobile infrastructure installations within the majority of the KDBH Area on the basis of this test - it is intended to ensure that we achieve the best outcome possible in terms of improved coverage with the least harm to character and appearance.

In this regard Policy VC4 is also of importance.

Policy VC4 designates the area of land in which the mast location is proposed at Conker lane as a Local Green Space (LGS). Development in the LGS will not be allowed unless it is ancillary to use of that green space and does not diminish its character as green space or it is demonstrated that there are very special circumstances in which to make an exception. These tests must be added to that of Policy U1.

Extent of material harm: we are not convinced by the photo montages which suggest that there will be no harm to views or character of the area. The photomontages appear to have been deliberately positioned to be from places where the mast is hardly visible. The important view would be from the green space itself which is where most people will view it from whilst out walking / exercising dogs etc. Whilst there is some tree screening, particularly in the summer months, we would wish to see further information with regard to:

- impact on views from the popular walk in Conker Lane, including in winter when there is no leaf cover;
- an assessment that within this area, the best siting from a visual impact perspective has been chosen;
- evidence to demonstrate that all design options for the mast have been considered in an effort to minimise the height and extent of physical intrusion; and
- how the impact of construction on flora and fauna will be minimised, including mitigation measures and a construction plan.

Very special circumstances: as regards the policy tests in VC4, it is apparent that the use is not ancillary to its use as green space and, at 21m high and surrounded by fencing, it will inevitably diminish the character as green space. The applicants need, therefore, to demonstrate that very special circumstances exist that outweigh the harm caused in order to comply with the policy. Despite the work done to date, we do not believe that very special circumstances have been shown to exist from the information available.



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In addition to the information requested above regarding the siting, design and impact of the mast, we consider that further justification is required as part of a very special circumstances case. This should include:

- i. evidence of where the missing coverage is, what the operator's 'technical requirements' are, and why the search area boundary has been defined where it is. Otherwise the 'search area' just appears to be a somewhat lazy justification of the site the applicants wish to use. The very special circumstances should include a more robust assessment of the required area of search, alternative site options and reasons why they have been discounted. We would particularly appreciate: a) clarification of why sites 12, 13 and 14 have been classed as greenfield; and b) a better understanding of the Network Rail restrictions on their own land. Our understanding is that site 13, the car park behind Sainsburys PFS, is owned by Solihull Council although this needs to be verified; and
- ii. an explanation as to why is it not possible to upgrade existing infrastructure in this area, bearing in mind that it appears Vodafone already has masts on Widney Manor Rd just before the motorway bridge, near the bottom end of Arden Academy playing fields, and near Grange Rd as one leaves Dorridge heading towards Hockley Heath.

In conclusion, we reiterate that the Neighbourhood Forum recognises the importance of achieving better mobile phone coverage within our Area, but we wish to see further evidence to demonstrate that the relevant policies and expectations of the Neighbourhood Plan have been properly addressed so that we can offer support for this proposal. We look forward to working proactively with you to take this proposal forward so please do not hesitate to contact either myself on 07825 425182 or Gill Griggs on 01564 774692 to discuss this further.

Yours sincerely

Jane Aykroyd
Chair, KDBH Neighbourhood Forum