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12 March 2019

Solihull MBC
Council House
Manor Square
Solihull
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F.A.O. Planning Office

Dear Sir/Madam,

Re: Draft Local Plan – Specifically Knowle, Dorridge & Bentley Heath (KDBH)

I wish to comment on the draft proposals for several sites to be considered for development in the KDBH area.

Having viewed the draft document on line I have become very concerned about what effects these plans would have on the local infrastructure, the fact that many of the sites are eating further into our green belt areas and would destroy the natural environment and also the character a fabric the village feel we all currently enjoy.

Specifically in relation to *Q38: (Do you have any comment on these amber sites i.e. is it right they should be omitted, or do you believe they should be included, if so why?)* I do not feel the site 413 (land off Blue Lake Road Dorridge) should be included in the plan for the following reasons:-

- Over the last five years there have been circa 500 additional housing units added to the KDBH area. That development has placed significant strain on local infrastructure, specifically roads and parking. These issues are articulated in Section 5.4 of the KDBH Neighbourhood Plan ("The Neighbourhood Plan").
- The Draft Local Plan subject to this consultation proposes an additional 900 to 950 residential units on two sites (8 and 9). Development at that level would place further material strain on local infrastructure that is already struggling to cope, leading to increased risks to health and safety. Inclusion of Amber Sites as Allocated Sites would push that strain to breaking point.
- Of particular note is the additional strain the development of sites 8 and 9 would put on the road infrastructure, in particular Station Road and Knowle High Street. Congestion at peak hours is chronic and both developments would load these two key components of the road infrastructure. Adding

either Amber Site in the KDBH area to the list of Allocated Sites would load both roads further. Mitigation through widening is not an option in either case, nor is a relief road solution.

- The Council's assessment is that the KDBH area can accommodate growth in excess of its local needs. That may be true to a point, but even the proposed level of development (without admitting Amber Sites as Allocated Sites) would compromise many of the principles set out in the Neighbourhood Plan, in particular those around Village Character and Natural Environment.
- The promoter of Site 413 is proposing circa 340 dwellings on under 10 hectares.
- Development at this level would place an unsustainable strain on the immediately surrounding roads of Darley Green Road, Grove Road and Knowle Wood Road, none of which is designed for anything other than very light traffic. It is very difficult to see how mitigating measures could be put in place, developer funded or otherwise.
- The Neighbourhood Plan sets out clear principles around development of the Green Belt in Policy VC1. Under that policy "any development must be in harmony with the rural character of the villages' surroundings and sit well in the landscape." Development of Site 413 at anything near the density proposed would fundamentally contravene that policy.
- Policy D1 in the Neighbourhood Plan goes on to set out clear principles around character and appearance of development. In particular, it establishes the following criteria:
 - o Development should be in harmony with the village character and sit well within the landscape;
 - o Development layouts should be characteristic of the surrounding area;
 - o Development should be of a density characteristic of the area; and
 - o Development should be in keeping with the scale, siting and appearance of nearby buildings.
- On any objective assessment development of Site 413, which is currently surrounded by low-density development sitting sympathetically around a well-established Green Belt boundary, score very low against the above criteria. There are several "Red Sites" in the KDBH area which would objectively score much higher.
- The National Planning Policy Framework requires that residential

development should "promote local character". That requirement would not be met for development on Site 413 in the context of the existing developed area.

- The Council assesses Site 413 to be a lower performing parcel under the Green Belt Assessment. Although the assessment methodology has been refined, that assessment is fundamentally at odds with that performed on substantially the same site when it was rejected for inclusion in the last Local Plan. I can see no objective justification for such a shift.
- The Council assesses the visual sensitivity as Low within the Landscape Character Assessment. That assessment is difficult to justify given the open nature of the site and its visibility from several perspectives. Local people would disagree with the assessment, which is not supported by extensive work performed to inform the Neighbourhood Plan.
- Accessibility by bus is assessed by SMBC as being "Very High". This would seem to be a completely inaccurate assessment as the nearest arterial bus routes are some significant distance from the site.

There is a strong, objective case not to include Site 413 as a site for residential development within the Local Plan. That case is founded on general issues relating to the past and proposed level of development in KDBH and on specific considerations relating to the site itself. The Neighbourhood Plan, which is likely to be adopted in March 2019, supports this assessment very robustly.

Yours faithfully

A black rectangular box redacting the signature of M Whitehouse.

M Whitehouse