

Attached Note relating to comments on Policy 15 2 i,

I'm writing to you about the DRAFT Plan and a major concern that I have about its misalignment with the APPROVED Knowle, Dorridge and Bentley Heath Neighbourhood Plan (NP).

The NP took a couple of years to produce and describes the shared wishes of the local community in respect of how KDBH develops in the future.....the NP embraces change and provides a challenge to poorly planned or executed change. The NP is a true, and the best, testimony for local direct democracy. The NP was only APPROVED by SMBC in April 2020 and so all thinking within it is fresh.

One of the key objectives of the NP is that the planned large scale housing developments should reflect the existing character of B93 particularly given the criticism of the recent Middlefield Spring development in Knowle. This development has a relatively very high density of housing units and as such is out of character with the area. There have been planning blunders on this site which are well illustrated by photographs in the NP and in particular the car parking is inadequate as reflected on by the prevalent 'on-pavement' street parking and the associated safety risks to pedestrians. These problems strongly influenced the desire of the NP to ensure they are not repeated with any new developments. This is why a B93 housing density survey was undertaken a couple of years ago and included in the NP. The purpose being to ensure that future developments complimented the existing housing density mix across KDBH. This issue is not about the types of housing rather it is about housing densities and having planning outcomes which reflect the wishes of local residents. As such I was hugely disappointed to see that the DRAFT Solihull Plan uses a different set of definitions for housing density which neither reflects the portfolio of existing housing densities across KDBH or indeed the wider Solihull. The definitions are based on new housing only and are therefore not reflective or representative of the wider community and as such are misleading. Hence the observed misalignment between the APPROVED NP and the DRAFT Local Plan. As you will fully understand the consequences of this misalignment are potentially huge.

The details are as follows:

I have confirmed with a former member of the KDBH Forum team who undertook the work to establish the existing housing densities across KDBH and he confirmed that the densities were calculated by looking at the total area in each of the 14 neighbourhoods surveyed. If you look at the land plan in Appendix 1 of the KDBH NP it can be readily seen that where present the open spaces are few in number and not of any material size so effectively the surveys show the total and developable areas as being the same.

My assessment of the exercise is that the following housing densities may be deduced:

Low density should be defined as +/- 10 houses per hectare (dph) this equates to 675 houses (neighbourhoods 1,4,10,11) or 20% of the total (3424 houses)

Medium density should be defined as +/- 20 dph this equates to 2423 houses (neighbourhoods 2,3,6,7,8,9,12) or 70% of the total (3424 houses)

High density should be defined as +/- 30 dph this equates to 326 houses (neighbourhoods 5,13,14) or 10% of the total (3424 houses).

As you can see by looking at the weightings, the existing high density parts of KDBH are only 10% of the total and to align with the requirements of the NP (about ensuring that new developments compliment the existing housing mix) then the majority of new housing should be about 20 dph.

This illustrates the misalignment with the DRAFT Concept Master Plans in that on page 7 the following housing densities are proposed:

Low 30 dph

Medium 36 dph

High +40 dph

Based upon the APPROVED KDBH NP only Low (or below Low) density housing as per the proposed Concept Master Plan definition should be proposed for the two KDBH development sites within the net developable areas.

I appreciate that I don't know the net developable areas for these sites but (irrespective of this fact) the misalignment between density definitions generates great concern that the developers may be allowed to squeeze more houses into the development areas than should be accepted. Of course reducing the number and size of any open spaces and hence maximising the size of the developable areas may mitigate the situation.

Simply put in the NP 'low density' housing would be about 10 houses per hectare and 'high density' would be 30, or slightly more, houses per hectare. The DRAFT Solihull Plan describes 'low density' as +30 houses per hectare and you can imagine the numbers for 'high density' housing.

Based on the issues raised about misalignment I believe the DRAFT Solihull Plan is UNSOUND and needs to be modified to align with the APPROVED NP before it can be approved.