

## KNOWLE, DORRIDGE AND BENTLEY HEATH NEIGHBOURHOOD PLAN

### Summary of responses received at Regulation 16 stage (Submission)

In accordance with Regulation 4(3)(b)(iii) of the Neighbourhood Planning (Referendum) Regulations 2012 (as amended), the following table comprises a summary of the responses received to the Submission Draft Knowle, Dorridge and Bentley Heath Neighbourhood Plan.

All of the responses summarised below were considered by the examiner when preparing his assessment of, and making recommendations on the Knowle, Dorridge and Bentley Heath Neighbourhood Plan.

Responses received to the submission consultation that were submitted to the Independent Examiner		
Respondent	Support/ Object/ Comment	Summary of Response
A and H Baker	Comment / Object	<p>The Plan is weak and lacking on policies regarding the need to protect and enhance the character of the edges of historic settlements such as south east Knowle. There should be a presumption against development which would harm the landscape setting and nature of the edge of built development where it meets the countryside or where development would be detrimental to the setting of historic settlements, townscapes, landscapes or buildings. The draft site allocation at Arden Triangle was clearly rejected in the residents' survey and a number of alternative sites were proposed and voted on by residents. This should be recorded as part of the Plan.</p> <p><b>Policy ECF4: New Housing Development – Investment in Community Facilities</b> - Should be expanded to require that the scale of community development proposed is proportionate to a demonstrable need which cannot be funded from other sources. The scale of 'enabling development' should be the minimum required to provide the necessary funding for the provision of community facilities.</p>
Barton Wilmore	Object	<p><b>Policy VC4: Green Space</b> – The proposed designation of '8 Metre Strip Along Purnells Brook, Part of Former Bypass Route' as a Local Green Space fails to meet the requirements set out in paragraph 77 of the National Planning Policy Framework 2012 (NPPF)</p> <p><b>Policy T1: Parking for Residents</b> -The proposed parking standards do not accord with the strategic guidance provided by Solihull Metropolitan Borough Council (SMBC). As such the policy does not accord with paragraph 184 of the NPPF.</p>
B and L Holtham	Comment / Object	<p>The Plan is weak and lacking on policies regarding the need to protect and enhance the character of the edges of historic settlements such as south east Knowle. There should be a presumption against development which would harm the landscape setting and nature of the edge of built development where it meets the countryside or where development would be detrimental to the setting of historic settlements, townscapes, landscapes or buildings. The draft site allocation at Arden Triangle was clearly rejected in the residents' survey and a number of alternative</p>

		<p>sites were proposed and voted on by residents. This should be recorded as part of the Plan.</p> <p><b>Policy ECF4: New Housing Development – Investment in Community Facilities</b> - Should be expanded to require that the scale of community development proposed is proportionate to a demonstrable need which cannot be funded from other sources. The scale of ‘enabling development’ should be the minimum required to provide the necessary funding for the provision of community facilities.</p>
Canal & River Trust	Comment / support	<p>Knowle Locks and the Grand Union Canal should be more prominent within the Neighbourhood Plan (NP) to further encourage: health and well being of the local population; promotion of education and community facilities; safeguarding of heritage assets; access to the countryside; provision of habitats and improved biodiversity; opportunities for the enhancement of canal facilities through new development proposals.</p> <p>Improvements to the canal towpath should be secured through planning obligations.</p> <p>Consideration could be given as to how the NP would respond to proposals for a marina in the area, given past proposals for such a development.</p>
Chave Planning	Comment / Object	<p><b>Policy H4: Housing Mix</b> – The identification of a requirement for sheltered housing and dementia homes is welcomed but the policy should be made clearer in terms of the number of dementia home bed-spaces required. The policy is weak in terms of how it will secure delivery of such specialist housing for older people in terms of practicality and viability. It is recommended that the NP is amended to support site specific allocations for a specified number of dementia home bedspaces and 60 sheltered housing units as a minimum.</p> <p>Land at Lady Byron Lane would be suitable.</p>
Cerda Planning	Comment / Object	<p><b>Policy H1: Scale of New Housing</b> – The policy would conflict with the emerging Solihull Local Plan Review (LPR) and is in conflict with paragraph 184 of the NPPF. The assessed need for the area will not be accommodated and the policy as worded would effectively stifle sustainable development.</p> <p><b>Policy H2: Housing on Allocated and Larger Sites</b> – No objection</p> <p><b>Policy H3: Affordable Housing</b> – Concern that the policy wording would prevent non-Knowle, Dorridge and Bentley Heath (KDBH) residents who work nearby being eligible for a home which may not be available elsewhere. There needs to be sufficient justification for the policy and a mechanism which allows affordable housing to be offered to others in the Housing Market Area (HMA) in the event that there is low or no demand from those with a local connection.</p> <p><b>Policy H4: Housing Mix</b> – Whilst the policy appears to be flexible, the open market element of the scheme would be driven by the market but informed by the SHMA, adopted or emerging policies within the Local Plan. Slight concern is that the wording is very prescriptive which could hinder development coming forward.</p> <p><b>Policy H5: Apartments</b> – Reference to living conditions and car parking requirements is perhaps too narrow and instead it is recommended that the policy should make clear that the provision of apartments should meet all other policies in the development plan.</p>

Tyler Parkes on behalf of West Midlands Police Chief Constable	Support	Support recognition by the Neighbourhood Forum (NF) of the importance of considering crime prevention in all appropriate policies and proposals within the NP.
The Coal Authority	Comment	No comments to make on the NP.
D Gallagher	Comment / Object	<b>Policies H2: Housing on Allocated and Larger Sites and D1: Character and Appearance</b> - Should include additional criteria which establish a presumption against development which would harm the landscape setting and the nature of the edge of built development where it meets the countryside, or where development would be detrimental to the setting of historic settlements, townscapes, landscapes or buildings. <b>Policy ECF4: New Housing Development – Investment in Community Facilities</b> - Should be expanded to require that the scale of community development proposed is proportionate to a demonstrable need which cannot be funded from other sources. The scale of ‘enabling development’ should be the minimum required to provide the necessary funding for the provision of community facilities.
D Roberts	Support	Fully support the content of the plan and hope that SMBC will heed what the residents want for their community.
D and G Grantham	Comment / Object	<b>Policy ECF4: New Housing Development – Investment in Community Facilities</b> - Should be expanded to require that the scale of community development proposed is proportionate to a demonstrable need which cannot be funded from other sources. The scale of ‘enabling development’ should be the minimum required to provide the necessary funding for the provision of community facilities. <b>Policies H2: Housing on Allocated and Larger Sites and D1: Character and Appearance</b> -Should include additional criteria which establish a presumption against development which would harm the landscape setting and the nature of the edge of built development where it meets the countryside, or where development would be detrimental to the setting of historic settlements, townscapes, landscapes or buildings.
Environment Agency	Object	The NP does not include any policies to safeguard land at flood risk from the allocated sites or any future windfall sites and to ensure that new development is not at risk of flooding and does not increase flood risk elsewhere, taking into account the impacts of climate change. No reference to the flood risk management policies in the Council’s adopted Local Plan 2013. The Main Rivers which flow through the Neighbourhood Area should be shown in the Plan as they are major features. There is no acknowledgement of the Blythe Site of Special Scientific Interest (SSSI) running through the Neighbourhood Area. Specific regard could be given in Policy NE2
E Hulse	Support	Supportive of this thorough and well thought out NP. It identifies clearly and gives support to the importance of retaining and maintaining the Conservation Areas in Knowle and Dorridge. It also emphasises the need to retain

		green spaces throughout the area.
Gladman Developments	Object	<p>There should be sufficient flexibility in the policies of the NP to ensure no conflict with the emerging Solihull LPR that could lead to the NP policies being superseded.</p> <p>The wording of the vision does not set out a positive approach.</p> <p><b>Policy VC3: Heritage Assets</b> –The Policy should refer specifically to paragraphs 133 and 134 of the NPPF which sets out that Councils should assess the significance of the designated heritage asset and where there is less than substantial harm, this should be weighed in the planning balance against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm. For non-designated heritage assets, the policy must reflect the guidance set out within paragraph 135 of the NPPF which states that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset.</p> <p><b>Policy H1: Scale of New Housing</b> - Suggest the latest figure of 1,050 dwellings (as per the emerging Local Plan) is reflected in the policy now, rather than seeking to restrict development and avoid the unnecessary conflict that would arise.</p> <p><b>Policy D1: Character and Appearance</b> – Suggest more flexibility to the policy wording to avoid over prescription that could impact on viability.</p>
G Hayre	Comment / Object	<p>The Plan is weak and lacking on policies regarding the need to protect and enhance the character of the edges of historic settlements such as south east Knowle. There should be a presumption against development which would harm the landscape setting and nature of the edge of built development where it meets the countryside or where development would be detrimental to the setting of historic settlements, townscapes, landscapes or buildings.</p> <p>The draft site allocation at Arden Triangle was clearly rejected in the residents’ survey and a number of alternative sites were proposed and voted on by residents. This should be recorded as part of the Plan.</p> <p><b>Policy ECF4: New Housing Development – Investment in Community Facilities</b> – Should be expanded to require that the scale of community development proposed is proportionate to a demonstrable need which cannot be funded from other sources. The scale of ‘enabling development’ should be the minimum required to provide the necessary funding for the provision of community facilities.</p>
GVA	Comment / Object	<p><b>Section 4.5</b> – It should be acknowledged that KDBH is an area earmarked for growth in SMBC’s LPR.</p> <p><b>Section 5.1</b> - It is important that the NP recognises the potential for development of an appropriate scale to contribute towards the enhancement of local facilities and other infrastructure. It is also necessary for the NP to acknowledge the position of the LPR which plans for a mix of market and affordable housing as part of developments on the edge of Knowle and Dorridge.</p> <p><b>Policy VC1: Green Belt and Landscape</b> - National and local Green Belt policies are defined in the NPPF and the Solihull Local Plan. It is not necessary to have a further policy in the Neighbourhood Plan. Moreover, the Green</p>

		<p>Belt boundary will need to be subject to further revision in order for KDBH to meet the scale of growth arising from the Borough itself, and from the wider HMA. The need for additional Green Belt sites to be allocated for housing within the area should be made clear in the NP.</p> <p><b>Policy H1: Scale of New Housing</b> - Whilst the range identified by the NP would serve to meet local housing need, the scale of housing proposed in KDBH through the LPR seeks to exceed this need and make provision towards remedying the significant housing shortfall in the wider HMA. Further Green Belt releases will be necessary to achieve this, as there is insufficient land available in the built-up areas of the Borough to accommodate such growth. The NP fails to recognise this. It is critical that due attention is paid to the emerging Local Plan and the evidence underpinning it, such that the NP is able to plan effectively for a higher level of growth. The LPR proposes significantly more houses in KDBH than identified in the NP and accordingly Policy H1 does not comply with the emerging Development Plan or its evidence base.</p> <p><b>Policy H3: Affordable Housing</b> - Support the recognition that the level of affordable housing to be delivered in new developments will be subject to viability considerations. The part of the policy which seeks to direct all the affordable housing to those with a strong local connection may be overly prescriptive in its current form. Given the fact that there is an identified need for SMBC to accommodate new homes for those in the wider HMA who may have little or no local connection to KDBH, it is perhaps best to include more flexibility within the policy wording in order that the affordable housing can benefit more people.</p> <p><b>Policy H4: Housing Mix</b> - In order to make efficient use of land, particularly where Green Belt sites are required for development, and to ensure a wide choice of homes are available (as per the NPPF), it is recommended that Policy H4 is more flexibly worded and responds to the need to maintain a balanced local housing market. A less prescriptive approach to house sizes should be adopted to take account of changing needs. In order to maintain sufficient flexibility and allow for changing circumstances it is recommended that the NP refers to the housing mix in the latest Housing Needs Assessment and seeks to apply this, subject to viability and consideration of local character and/or any site specific constraints.</p> <p><b>Policy ECF4: New Housing Development – Investment in Community facilities</b> -Contributions sought in respect of infrastructure via the Council’s Community Infrastructure Levy (CIL) charging schedule must be consistent with the CIL Regulations 2011 (as amended). Suggest that greater flexibility is included in this policy as it cannot be expected that all new housing developments will make such contributions. What can realistically be provided will be based on viability and other commercial considerations. Any policy requirements should not place unnecessary burdens on development sites to the point of affecting viability and delivery.</p>
GVA on behalf of Cinnamon Care Capital	Comment / Object	<p>In addition to the land at Wychwood Roundabout and the Primary School, the Wyndley Garden Centre could be identified within the NP in the same way; as a site suitable to accommodate Class C2 extra care development. The NP includes a Housing Needs Assessment, which demonstrated a need for additional specialist housing to</p>

		<p>meet the needs of older people within the Neighbourhood Area. However, the NP does not allocate any suitable sites within the Neighbourhood Area for Class C2 development to address this matter.</p> <p><b>Policy H4: Housing Mix</b> - The policy should go further to deliver suitable housing for older people and sites should be identified, including redevelopment of Wyndley Garden Centre to a care village.</p>
Historic England	Support	<p>Applaud the comprehensive approach taken to the historic and natural environment and the wide range of well justified policies that are clearly focused upon “constructive conservation”. Particularly pleased to see the emphasis on local distinctiveness including non-designated heritage assets and upon the importance of design. The requirements for masterplanning, design codes and a Design Review Panel are highly commendable. The Plan takes a very positive approach to the historic environment and is a well-considered, concise and fit for purpose document.</p>
HS2 Limited	Comment	No objection to the content contained within the Draft NP
Hunter Page	Comment / Object	<p>Land East of Warwick Road should be advocated for housing in the NP. It would provide much needed housing in a manner which is in accordance with the NP’s Vision Statement.</p> <p><b>Policy H1: Scale of New Housing</b> - The policy doesn’t evidence how the figure of ‘about 500 houses’ has been arrived at and offers no certainty in terms of where ‘housing allocations’ are coming from. The NP repeats the objection to the LPR allocations yet offers no alternative strategy. If the NF were ultimately successful in their objection and the LPR allocations for Knowle were struck from the LPR, then there is no mechanism within the NP to deliver housing.</p>
Capita - Urban Vision	Object	<p>The NP should seek to align with strategic needs and priorities. The draft Plan falls short of securing these outcomes and lacks ambition and foresightedness.</p> <p>The scale of housing development proposed by the NF is idealistic rather than realistic, contrasting with the Draft LPR which must observe the NPPF in meeting objectively assessed housing need in the housing market area and respond positively to wider opportunities for growth.</p> <p><b>Policy V4: Green Space</b> - Object to the inclusion of Land at Arden Academy as Green Space. The land does not meet the NPPF definition. It is on school premises and should not be routinely accessed by the public. It is not demonstrably special to the community in general and has no local significant in terms of beauty, tranquillity or richness of wildlife.</p> <p><b>Policy H1: Scale of New Housing</b> - The proposed provision of about 500 houses across the Neighbourhood Plan Area as a whole is insufficiently ambitious and does not embrace the opportunities for strategic growth and community benefit that the Solihull LPR supports and considers necessary in order to meet overall housing requirements.</p> <p><b>Policy H2: Housing on Allocated and Larger Sites</b> - Planning applications will be required to deal with the matters listed and other matters in detail in order to meet national and local validation checklist requirements.</p>

		<p><b>Policy H3: Affordable Housing</b> - Object to Policy H3 on the grounds that it seeks to extend occupancy criteria to 50% of all affordable housing provision on sites other than Rural Exceptions. This exceeds the parameters of existing and emergent LPR policy which seeks the provision of affordable housing to meet needs of the District as a whole.</p> <p><b>Policy H4: Housing Mix</b> – Object as the policy seeks to micro-manage the type, size and mix of housing on allocated and larger sites without consideration to commercial considerations and site viability. By dictating expectations, it removes the scope to take account of the context and characteristics of individual sites and site parcels or the ability to assess the most appropriate mix having regard to broader infrastructure requirements.</p> <p><b>Policy ECF1: Formal Education – Places for Local Pupils</b> - Supported</p>
J and B Hillman	Comment / Object	<p>The Plan is weak and lacking on policies regarding the need to protect and enhance the character of the edges of historic settlements such as south east Knowle. There should be a presumption against development which would harm the landscape setting and nature of the edge of built development where it meets the countryside or where development would be detrimental to the setting of historic settlements, townscapes, landscapes or buildings. The draft site allocation at Arden Triangle was clearly rejected in the residents’ survey and a number of alternative sites were proposed and voted on by residents. This should be recorded as part of the Plan.</p> <p><b>Policy ECF4: New Housing Development – Investment in Community Facilities</b> - Should be expanded to require that the scale of community development proposed is proportionate to a demonstrable need which cannot be funded from other sources. The scale of ‘enabling development’ should be the minimum required to provide the necessary funding for the provision of community facilities.</p>
K Allen	Support	Fully support all elements of the KDBH NP. Particularly support the limits on housing allocations in the area and the affordable housing local link requirement and do NOT wish to see development in the Green Belt.
Knowle Society	Support	<p>Whole-hearted support to the NP complete with all of its Policies, not only to Knowle but also to its neighbouring areas of Dorridge and Bentley Heath.</p> <p>From Appendix 2 of the NP, the comparative lists of strengths, weaknesses, opportunities and threats clearly identify the potential impact to the Neighbourhood Area that might arise should the NP fail to be adopted.</p>
M Archer	Comment / Object	<p><b>Policy ECF4: New Housing Development – Investment in Community Facilities</b> - Should be expanded to require that the scale of community development proposed is proportionate to a demonstrable need which cannot be funded from other sources. The scale of ‘enabling development’ should be the minimum required to provide the necessary funding for the provision of community facilities.</p> <p><b>Policies H2: Housing on Allocated and Larger Sites and D1: Character and Appearance</b> should include additional criteria which establish a presumption against development which would harm the landscape setting and the nature of the edge of built development where it meets the countryside, or where development would be</p>

		detrimental to the setting of historic settlements, townscapes, landscapes or buildings.
M Trentham	Object	<p>The Plan contains several references relating to matters outside the scope of a NP (e.g. those relating to the on-going Review of Solihull Local Plan). These should be removed.</p> <p>The NP should be consistent with and support the delivery of the strategic policies contained in the Draft Local Plan (DLP), given that the housing allocations in the adopted Local Plan (in so far as they relate to KDBH) have expired. This is not the case and parts of the Draft NP are attempting to undermine proposed strategic Policy P5, in direct conflict with the NPPF.</p> <p>Housing need cannot always be met where it arises. It is not permissible for the NP to try to restrict new development in its own area to only that assessed to meet local needs. Wider housing needs need to be considered.</p> <p>Any objection to the housing allocations in the Solihull Local Plan should be pursued by individuals through the LPR process, not through the NP.</p> <p><b>Policy H1: Scale of New Housing</b> - Given the inability of the NP to control the scale of new housing there is no need or justification for a policy on the subject. The number of “about 500” could mislead the average voter in the referendum, to think that the NP does control the numbers, and that the “such number” referred to may be a little more or a little less than 500. Also if, in the eventually adopted new Local Plan includes no site allocation for KDBH, the NP cannot deliver 500 as it has no sites available. Either way the figure of 500 is spurious and misleading.</p>
M Harper	Comment	<p><b>Density of development</b> - The area has had much development in the last 30 years and it is noticeable that the nature and density of development has been of a similar character. This should continue in the new proposals. Once the principle of nibbling into the Green Belt has been established (which it has) there is absolutely no shortage of land suitable for development in the area and therefore no sense in increasing the density. That which has already been built at Middlefield is unsuitable.</p> <p><b>Dispersal of sites</b> - It makes sense to disperse sites for development over a wide area rather than concentrate it all in the Arden Triangle.</p> <p><b>Landscape</b> - The art of a good layout is to allow plenty of space for open space and trees.</p> <p><b>The School</b> - The question of rebuilding the school is a separate issue altogether and irrelevant to the main issue of more housing.</p>
National Grid	Comment	No record of electricity and gas transmission apparatus within the Neighbourhood Area.
Natural England	Comment	No comments.
Network Rail	Comment	Consideration should be given in Transport Assessments to the potential for increased footfall at Dorridge Railway Station as a result of proposals for residential development / employment areas within the Council’s Local Plan area. Location of the proposal, accessibility and density of the development, trip generation data should be considered in relation to the station. Where proposals are likely to increase footfall and the need for car parking at

		<p>Dorridge Railway Station, the Council should include developer contributions (either via CIL, S106) to provide funding for enhancements as part of planning decisions.</p> <p>Sustainable drainage proposals should take into account the impacts upon the adjacent railway infrastructure.</p> <p>All proposals in the Neighbourhood Area should be notified to Network Rail.</p>
Pegasus Group on behalf of Gallagher Estates Ltd	Comment / Object	<p>Progressing the NP in advance of the LPR is likely to result in a number of policies becoming misaligned and out of date.</p> <p>The NP as currently drafted, seeks to restrict growth and fails to recognise the opportunities that housing development can offer including balancing the local housing market to assist in meeting specific unmet needs, providing economic growth and assisting in the delivery of physical, social and green infrastructure</p> <p><b>Vision</b> - Whilst the vision is broadly supported, this currently focuses on preservation and protection and has little regard to supporting 'change' within the Neighbourhood Area to address key issues and maximise opportunities.</p> <p><b>Objectives</b> – The reference to 'over-provision' of housing should be removed from the housing objective. This reference, which seeks to restrict growth, is not in general conformity with current and emerging national planning guidance which seeks to substantially boost the supply of housing; speeding up delivery, tackling affordability issues and ensuring local choice.</p> <p><b>Policy H1: Scale of New Housing</b> – The policy should be removed from the NP until such time that it can be updated to reflect further consideration of the appropriate housing requirement through the Borough Council's LPR process. It is noted that the scale of growth in the Neighbourhood Area is not supported by local people, however a NP is not an appropriate vehicle to undermine or pre-empt the Borough wide spatial strategy by restricting growth to around 500 houses as opposed to 1,050 proposed in the LPR.</p> <p><b>Policy H2: Housing on Allocated and Larger Sites</b> - There is no requirement for concept masterplans or design briefs or design coding to be prepared in consultation with NFs. The Council's Statement of Community Involvement sets out requirements. With regard to density, efficient use of land should be made having regard to matters such as the character of the site and surrounding area with higher density development being appropriate on certain sites.</p> <p><b>Policy H4: Housing Mix</b> - The wording of the policy is too prescriptive and fails to recognise that flexibility in house type provision will be essential to achieving good design.</p> <p>Land at Four Ashes Road was one of the most supported sites locally in the Developer Showcase event. The site has the ability to accommodate a range of homes to assist in meeting locally derived needs within the Neighbourhood Area, including starter homes and homes for people looking to downsize.</p>
Richard Cobb on behalf of Copt Heath Golf Club	Comment / Object	<p>The Draft NP needs to accord with the draft Local Plan. If the NF consider that they cannot support the allocation of the Arden Triangle as proposed by Solihull Council or does not want to suggest additional housing sites, it should propose other alternative housing allocations that equate to the amount of new housing proposed for</p>

		<p>KDBH in the Local Plan.</p> <p><b>Policy H1: Scale of New Housing</b> – The policy is out of step with the Local Plan. There is a need to provide more housing across Solihull to meet not only local need, but also that from the wider housing market area. KDBH cannot escape having to meet their fair share of that.</p> <p>No alternative assessment of available sites has been considered. Land at Copt Heath Golf Club would not conflict with key policies proposed in the Draft NP.</p>
Savills on behalf of Codev Homes Ltd and Demrastore Ltd	Support /Comment / Object	<p>The AECOM Local Housing Needs Assessment only deals with local housing need which is not appropriate given that there is a significant housing shortfall within the Borough and wider HMA. KDBH should make a proportionate contribution to meet the Borough’s housing need and not just their local need. It is not considered that capping development at 500 dwellings to be appropriate and KDBH should accommodate a higher proportion of development above other smaller and less sustainable settlements within the Borough.</p> <p>Object to the Housing Density Map shown in Appendix 1. Seek clarification on how the areas on the plan have been selected. Consider that this Plan and the areas assessed are very selective as it does not show all areas within the KDBH NP area.</p> <p><b>Policy H1: Scale of New Housing</b> - Object to this policy and the restricted scale of growth currently proposed in the NP. Unclear how this has been arrived at as the 500 dwelling limit is significantly lower than the 1,050 dwellings currently proposed in the draft LPR document and it is therefore evident that the NP is proposing to solely address local need not properly taking account of the Borough’s need. The NP has also failed to take account of the HMA shortfall which the LPR is expected to accommodate.</p> <p><b>Policy H2: Housing on Allocated and Larger Sites</b> - Acknowledge the matters set out in bullet point form and their importance in securing the best quality development. Support the exclusion of a density figure or average within the NP. However, consider that reference to “lower density housing is a key characteristic of KDBH” should be amended to state “lower density housing is a key characteristic of <u>some parts</u> of KDBH” as not all of KDBH comprises low density housing.</p> <p><b>Policy H3: Affordable Housing</b> - The explanatory text states that definition of “Local Connection” has been based on the suggested criteria set out in SMBC’s ‘Meeting Housing Needs’ SPD (2014). We cannot identify any criteria related to the definition of a ‘local connection’ within the SPD, therefore further clarification is sought on how the criteria has been devised.</p> <p><b>Policy H4: Housing Mix</b> - Object to the inclusion of the percentage of market housing that should be provided on allocated and large sites. Consider that this is too prescriptive and the final market housing mix should be based on local housing need and market requirements which may change over time, according to prevailing market conditions. Seek justification for the proposed proportion of housing types. Object to the statement “<i>all schemes should pay particular regard to the character and appearance of that part of the Neighbourhood in which they are</i></p>

		<p><i>located</i>". Consider this is too prescriptive and do not consider that the Forum will desire this in every circumstance.</p> <p><b>Policy D1: Character and Appearance</b> - Wording is not reasonable or achievable and it is not expected that the NP forum would desire future dwellings to reflect local design in all instances.</p> <p><b>Policy T1: Parking for Residents</b> - Object to the policy as it is not in accordance with SMBC's Vehicle Parking Standards and Green Travel Plans Supplementary Planning Document (SPD) (2006). Policy T1 should set out clearly whether the proposed 3 parking spaces for 4+ bedroom properties includes garage space or excludes it. If it excludes garage space then it should be amended and 4+ bedroom properties should have 2 parking spaces plus integral garages.</p> <p><b>Policy T7: Cycling Infrastructure</b> – Do not consider that the requirement for <i>"all proposals for new major development shall incorporate continuous and well-lit cycle paths / tracks linking with village centres"</i> is deliverable because there are no cycle paths along existing roads. Developers can provide cycle paths within their development boundary but they cannot provide cycle paths / tracks on third party land or along existing roads where there is no possibility that they can be expanded to incorporate cycle paths / tracks.</p> <p><b>Policy T8: Road Infrastructure</b> - Note and support the inclusion of the junction of Hampton Road / Lodge Road / High Street / Warwick Road.</p> <p><b>Policy ECF3: Protection of Community Facilities and Services</b> – Support the policy.</p> <p><b>Policy ECF4: New Housing Development – Investment in Community Facilities</b> - Generally support this policy but consider that reference should be made to Regulation 122 (2) of the CIL Regulations 2010. The NP should recognise that the legal tests can only require development to mitigate its own impacts and not the wider community deficiencies that may already exist.</p> <p><b>Policy ECF5: Recreation, Leisure and Sport</b> - Object to the second bullet (<i>"allow proportionate use by all groups, community sectors and individuals within KDBH"</i>) as 'proportionate' has not been defined and is ambiguous and unenforceable. We consider that the word 'allow' should be replaced by 'encouraged'.</p> <p><b>Policy ECF6: Community Access and Management</b> - The provision of a Community Access Statement is not a national or local requirement. Consider that Policy ECF6 is not in general conformity with the Development Plan. Also seek clarification on how 'proportionate' is defined as in the second bullet in terms of the matters a Community Access Statement should cover.</p> <p>Support the infrastructure Policy Goal.</p>
Severn Trent	Comment	No specific comments to make.
Solihull Metropolitan Borough Council	Support / Object / Comment	<b>Policy VC1: Green Belt and Landscape</b> – Not necessary to include a separate policy on Green Belts given that it is covered in the NPPF and Local Plan. Concern about withdrawal of permitted development rights but accept that the supporting text provides flexibility for decision maker.

	<p><b>Policy VC4: Green Space</b> – No significant objections.</p> <p><b>Policy NE2: Habitats and Biodiversity</b> - Not considered appropriate to remove the requirement for ecological surveys if they are necessary and proportionate.</p> <p><b>Policy H1: Scale of New Housing</b> - There is insufficient land available in the urban area to meet the Borough’s overall housing need. This is not adequately recognised in the draft NP and there is no account for any contribution to the HMA shortfall. The policy would not contribute to the achievement of sustainable development and the scale of growth identified in the policy is not supported.</p> <p><b>Policy H2: Housing on Allocated and Larger Sites</b> - There is no statutory requirement for community and stakeholder involvement at the pre-application stage of the process. Housing density map does not include all areas and it should be recognised that higher density developments can be provided without adverse impact on character and appearance. Whilst new development should reflect the locality, it is important to ensure that land is used efficiently. The supporting text on open space provision, landscaping and gardens may conflict with developers’ emphasis on reducing estate road widths and housing frontages, and hence impact on achieving efficient densities.</p> <p><b>Policy H3: Affordable Housing</b> - It is not unreasonable for the NP to seek a proportion of affordable housing to be provided for local people. A figure of 50% is too high. A figure of 25% would seem more reasonable. The draft NP suggests that the local connection definition is based on suggested criteria set out in the Council’s “Meeting Housing Needs” SPD (2014). However, this definition is for rural exceptions sites granted under policy P4b) of the Solihull Local Plan. The split of affordable housing by social rent and shared ownership should be defined by the strategic Local Plan Policy as evidenced by the borough’s Strategic Housing Market Assessment.</p> <p><b>Policy H4: Housing Mix</b> – There is an inconsistency between Section 5.2 of the Plan which highlights a shifting demand towards smaller house types and the requirements of policy H4 which is seeking to maintain a high number of detached houses in the area of 50%. This is not compatible with the aims of widening the choice of homes, planning for a mix of housing and creating sustainable, inclusive and mixed communities. Would recommend the policy is more flexible with regard to house types / sizes.</p> <p><b>Policy H5: Apartments</b> – Wording of the policy could be taken to preclude apartments in Knowle Centre and the NPPF is supportive of residential uses in centres.</p> <p><b>Policy D2: Design</b> – Some of the policy wording is ambiguous and there are minor errors in names and references. Some of the bullet points in Appendix 6 are ambiguous and/or require clarification.</p> <p><b>Policy T1: Parking for Residents</b> – Whilst local concerns are acknowledged, the policy conflicts with Council and NPPF policy. The prescriptive approach proposed in the NP would not provide sufficient flexibility to fully consider the context of the site.</p> <p><b>Policy T2: Parking for Non-Residential Premises</b> – The policy would be difficult to apply and the issue may be</p>
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		<p>better addressed through the imposition of parking restrictions, rather than through a planning policy.</p> <p><b>Policy T3: Parking at Village Centres and for Rail Users</b> – Questionable why the provision of parking spaces equipped for the charging of electric vehicles is set at 20% specifically, and why then would such spaces not necessarily be provided for the exclusive use of such vehicles?</p> <p><b>Policy T8: Road Infrastructure</b> – It is expected that appropriate measures to ensure the safety and free flow of traffic is not compromised by any development, irrespective of its location and / or the road from which access is taken.</p> <p><b>Policy T9: Public Transport Infrastructure</b> - The provision of bus shelters fall within permitted development and may not require planning permission.</p> <p><b>Policy ECF4: New Housing Development – Investment in Community Facilities</b> – Use of the term ‘support’ should be used.</p> <p><b>Policy ECF6: Community Access and Management</b> - Community Access Statements are not a requirement for applications in Solihull and a planning application is unlikely to be refused in the absence of one.</p> <p><b>Policy E1:Retention of Shops and Services</b> - Resisting change of use from Class A1 retail in the Knowle Centre primary frontages may unintentionally result in vacant units which would therefore impact on the vitality and viability of the centre.</p> <p><b>Policy E2: New Development in Village Centres</b> - Proposals should be ‘supported’ rather than ‘granted’ and all proposals are subject to the policies in the Solihull Local Plan, not just larger development proposals, as suggested in the supporting text.</p>
Sport England	Comment	<p>It is essential that the NP reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to paragraphs 73 and 74. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land.</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved Local Plan or NP policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p>
S Lyle	Comment	<p>I have a major issue with the number of new houses being proposed in the SMBC Local Plan for the KDBH, and especially that they are all to be located in Knowle. The independent Local Housing Needs Assessment carried out at the request of the NF indicates a requirement of approximately half the number of houses that are being proposed. As far as I am aware, no assessment has been carried out by SMBC concerning the impact on traffic congestion or infrastructure. This seems a grave oversight given the inevitable effect of adding 1050+ dwellings to</p>

		<p>Knowle village (an increase of c. 27% based on the 2011 ONS census).  I understand in the January 2016 “Call for Sites” a proposal was put forward by Balsall Common in favour of a substantial or New Town development in their area This could contribute a considerable number of new homes to the local area but appears to have been ignored. This proposal is mentioned in the Feb 2018 Greater Birmingham HMA Strategic Growth Study (p. 194).  That same Study includes a section on Potential Urban Extension Broad Locations in Green Belt which does not mention KDBH and rather seems to imply that developing Green Belt around Knowle is not a preferred option. In addition, in neither the Areas of Search for Strategic Development nor Recommended Areas of Search for Strategic Development is the area around KDBH even mentioned.  In conclusion, it would seem that your proposal to allocate so many houses to KDBH is seriously flawed and lacks any substantive justification.</p>
Sunderlands	Comment	<p>Site at Golden Farm should be allocated for future development. It was one of the most supported sites locally at a Developer Showcase event.</p>
T Corns		<p><b>Policies H2: Housing on Allocated and Larger Sites and D1: Character and Appearance</b> should include additional criteria which establish a presumption against development which would harm the landscape setting and the nature of the edge of built development where it meets the countryside, or where development would be detrimental to the setting of historic settlements, townscapes, landscapes or buildings.  <b>Policy ECF4: New Housing Development – Investment in Community Facilities</b> – Should be expanded to require that the scale of community development proposed is proportionate to a demonstrable need which cannot be funded from other sources. The scale of ‘enabling development’ should be the minimum required to provide the necessary funding for the provision of community facilities.</p>