

SUMMARY

The Knowle, Dorridge and Bentley Heath Neighbourhood Forum objects to the scale of housing proposed in KDBH, primarily through the Draft Housing Allocations in Knowle, in the Draft Local Plan on the grounds that:

- **1400+ houses in Knowle is disproportionate and unsustainable**
- **1400+ houses in Knowle is inconsistent with the spatial strategy which itself is inconsistent with other Council strategies and Draft Local Plan policies**
- **the scale of development proposed in Knowle is not justified by the Council's methodology and study findings**
- **the site selection methodology is unclear and its application seriously flawed**
- **the scale of development proposed in KDBH fails to take into account the impact on services and infrastructure**
- **the views of residents as expressed in the KDBH Residents Survey have not been taken into consideration**
- **there has been inadequate consideration of reasonable alternative patterns of distribution either Borough wide or at the KDBH level**
- **the proposed scale of growth will lead to an unacceptable loss of village intimacy, identity and character with adverse impacts on the Knowle Conservation Area and the wider KDBH area.**

Without prejudice to this objection, it is imperative that local residents, through representation by the NF, have the opportunity to take a lead role in any site masterplanning exercises in the Neighbourhood Plan area in order to ensure the maximum community benefit is realised.

INTRODUCTION

Solihull MBC approved the setting up of the Knowle, Dorridge and Bentley Heath Neighbourhood Forum (KDBH NF) in October 2015. The purpose of the Forum is to prepare a Neighbourhood Plan for the KDBH Area. The main influence on the KDBH Area is the proposed housing allocations in the Green Belt around KDBH. As these lie in Green Belt, they are outside the remit of the Neighbourhood Plan even though these will have a major impact on the future of our villages. However, if local people are to have any control over future planning of our area, as intended by Government policy, then the NF expects Solihull Council to respond positively to the objections of local residents and businesses.

Solihull Council is aware that the NF has been active in seeking the views of residents and businesses on the future of our villages. A Residents Survey and a Business Survey have both been completed over the last 12 months. The findings of these surveys and other sources such as feedback from public meetings and through the NF web site have given the NF an evidence base that underpins the objections below. The survey findings are referred to below as relevant. The Council was given a copy of the Residents Survey findings in August 2016. The findings of the Business Survey are now also available to the Council and they were summarised at a public meeting attended by a Council representative in January 2017.

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The NF has held open Forum meetings in December 2016, January 2017 and February 2017 to discuss its response to the Draft Local Plan. Opportunities to comment have been made via response cards available at the public meetings and via the KDBH web site. A draft of this response has also been available for local comment prior to its submission.

THE NF OBJECTION

Overall Housing numbers

The Neighbourhood Forum does not wish to challenge, at this point in time, the stated need for new allocations of land to accommodate 6,150 homes in the Borough over the Plan period. However, it is concerned about the extent of loss of Green Belt, to which the Government has recently reaffirmed its commitment, and questions whether the Borough as a whole has the capacity to accommodate this scale of development without putting at risk the qualities of environment, accessibility and community which make it successful.

The NF strongly challenges the scale of proposed development in Knowle which is disproportionate and is not justified by the methodology of the Draft Local Plan. Nor is it consistent with its spatial strategy and objectives. This has led to the allocation of two major sites in Knowle in locations which perform poorly against most measures of sustainability and will adversely affect the KDBH NP area. We explain our reasons for reaching this conclusion below.

Scale of housing development proposed in KDBH

The scale of development proposed in KDBH, almost entirely in Knowle, is unacceptable. The Council has offered no justification or evidence for attributing such a large scale of growth to Knowle. It does not stem from the site selection methodology or the spatial strategy, and it is not consistent with policy. It appears to be opportunistic, originating in large measure from the desire of Arden Academy to fund and build a new school.

The scale of housing proposed was presented by the Council to residents on the basis that the housing numbers cannot be challenged and two large sites offer the best means of achieving community benefits. There was no attempt to present the full picture to local residents which the NF considers is an unacceptable approach to local consultation.

The full picture of housing growth in KDBH between 2013 and 2033 is as follows:

- 1) Of the new allocations to be made across the Borough to accommodate 6150 new dwellings, 1,050 would be in Knowle. That represents 17%, a wholly disproportionate percentage.
- 2) In addition, 51 dwellings on two sites (at Wychwood Avenue roundabout and the site of St George and Teresa school) are included in the housing figures but not allocated in the Draft Plan. These only appear in the Topic Papers and were not mentioned at the Council's presentation to local residents on 7th December

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2016. There is no explanation of why these sites in KDBH have been selected or why others have been rejected.

3) In addition, windfall developments should be taken into account. If a similar proportion of windfall development took place within KDBH as estimated across the Borough, that would represent 383 additional dwellings over the Plan period.

The total anticipated increase in KDBH is therefore 1484 dwellings or 19%.

However, this fails to take account of the amount of housing growth that has taken place in KDBH in the last 5 years. 365 dwellings were allocated for housing in the Solihull Local Plan 2013. This was supposed to have been the allocation to 2028. All the allocations have now either been built or are currently being built. In addition, windfall developments have added to this total resulting in an expansion of housing in KDBH of 478 dwellings since 2011. These developments have already put considerable pressure on local services, roads and parking and are not yet complete.

If these dwellings are also taken into consideration, the scale of growth in KDBH from 2013 to 2033 will be in the region of 1962 or 26% - a totally unreasonable scale of growth for a rural part of the Borough. This totally disproportionate level of growth would place unacceptable pressure on the infrastructure and services of all three villages. In particular, the village of Knowle would lose its intimacy, identity, character and appearance with adverse effects on its Conservation Area, particularly as a consequence of traffic impacts on its historic core. This would be contrary to Policy P16 of the Draft Local Plan.

Residents generally accept that KDBH must make a reasonable contribution to housing needs in the Borough but there is a widely held view that this scale of growth is considered to be excessive and disproportionate. It is not justified for the following reasons:

1. The scale is not consistent with the spatial strategy of the Draft Local Plan

The Council's spatial strategy is not clear or coherent. The aim of the strategy is to ensure a sustainable pattern of development and to protect the character and distinctiveness of each part of the Borough. The emphasis on large scale expansion of rural settlements including an allocation of over 1000 houses in Knowle fails to achieve a sustainable pattern of development by placing substantial numbers of houses in locations that are away from the main employment centres leading to a reliance on car borne traffic. This will adversely affect the character and distinctiveness of Knowle and the wider KDBH area. The Strategy is therefore inconsistent with its strategic aim.

The strategy also purports to be a balanced approach between concentration and dispersal but the emphasis is clearly upon large site allocations both Borough wide and in KDBH. The SHELAA states that "*Whilst large sites are being delivered, it is considered that there is a need for smaller schemes to ensure variety and diversity within the market*" (p12, para 2.45). Small schemes are referred to as less than 100 houses. This would be consistent with recent research by the Federation of Master Builders and the Local Government Information Unit which has challenged the "big sites" approach.¹ However, the Council's spatial strategy focuses heavily

¹ "Small is beautiful: Delivering homes through small sites", FMB and LGIU, December 2016

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on large sites with very few smaller sites being allocated. In Knowle, the focus is on two very large sites.

The strategy fails to adequately link housing distribution to its economic and transport policies. These emphasise growth in accessible corridors including the A45, the A34 and Solihull town centre as well as the corridor linking the town centre to the A45 hub. The spatial strategy also does not reflect the findings of its assessment work. This is demonstrated by the large scale allocations in Knowle which are inappropriate having regard to the following:

- i) Knowle is not in or adjacent to the main providers of employment or drivers of employment growth in the Borough.
- ii) Knowle is not well connected by public transport to these employment areas and there are no proposals in the recently adopted 'Solihull Connected' Transport Strategy to improve these connections. Growth in this location is therefore inconsistent with the Council's own transport policy.
- iii) The large scale allocations in Knowle will lead to significant additional journeys by car, contrary to the spatial strategy's objectives and to Policies P7, P8 and P9 of the Draft Local Plan.

The Council has, therefore, opted for a spatial strategy that places large numbers of houses in rural locations away from the main centres of employment and where car-borne travel and related congestion would be an inevitable outcome. There seems to be little or no relationship between the Council's Transport Strategy, Solihull Connected, its priorities and implied spatial strategy, and the allocation of over 1000 houses in Knowle (and elsewhere in the rural areas). The Strategy therefore fails to achieve its fundamental aim of a sustainable pattern of development.

An alternative would seek to better align the Economic, Transport and Housing Strategies. The Council should consider further analysis of the potential of the land to the east of Damson Parkway up to the M42 Motorway to be incorporated into the large scale urban extension to the north east of Damson Parkway. Larger scale growth within this corridor would locate housing close to jobs in the main area of economic growth, where full advantage could be taken of planned transport infrastructure improvements along the Solihull town centre to A45 corridor and the new Bickenhill interchange proposals. It would also enable new social infrastructure to be planned, leading to a more sustainable solution. This approach requires more radical thinking in relation to the boundary of the Green Belt.

Another alternative would be to consider another freestanding village such as suggested by Berkswell PC at Cornets Lane End. It would also be possible to continue to build on Blythe Valley Park to create a new village. A new village could be positively planned to incorporate services and public transport in a location that would fit well with the economic strategy. **A further option** might be to consider the westward expansion of Coventry, utilising the potential of Tile Hill railway station.

It is understood there may be implementation issues with these options but there is little or no evidence that the Council has engaged in positive planning to assess whether these alternative distributions of housing numbers could offer a better, more sustainable solution in planning terms.

2. The scale is not justified by the Council's own evidence base

The Council has commissioned a number of studies to assist its selection of sites. We consider a number of these in more detail below but there is a flaw in the methodology which is common to these studies. The flaw is the parcel definition, specifically, in relation to KDBH, the definition of Site 9, Land South of Knowle (between Station Road, Warwick Road and Grove Road) , which is also referred to as "The Arden Triangle" in the Call for Sites submission by Arden Academy. This allocation (referred to in this objection as The Arden Triangle) has been assessed as one parcel which amalgamates submission sites numbers 148, 150, 151, 152, 153, 156 and 157. This means that the existing built school site and playing fields is considered together with Lansdowne Farm, properties on Stripes Hill and land fronting Grove Road. The existing school site is reasonably well located in relation to services and transport. However the rest of the land extending to the south east has a very different, more rural, character and is not well served by public transport or easily accessible to any of the three village centres. By considering these sites as one parcel, the scoring is skewed in favour of the whole area. This is a fundamental flaw which needs to be rectified.

The Green Belt Assessment (GBA): The scale of housing proposed in Knowle is not justified by the GBA and reflects substantial development in the lowest priority of its strategic principles guiding development in the Green Belt.

The draft Local Plan Review identifies a number of Strategic Objectives, the purpose of which is to help determine the locations towards which growth should be directed. The Strategic Objectives establish a hierarchical approach comprised of five levels with highly or moderately accessible greenfield Green Belt sites ranking fourth out of five and "other" greenfield Green Belt sites ranking fifth (worst performing).

The Plan goes on to suggest additional criteria for development within "other" sites; also, Guiding Principles. However, the origin and justification for these criteria and principles and how they have been applied is unclear. Certainly, they do not follow from the earlier discussion. They preclude some options, such as new freestanding settlements and consideration of the westward expansion of Coventry and they appear to represent some form of post-decision justification for the choices made.

Landscape Character Area Study: The allocation of large scale sites in the rural fringe around Knowle is contrary to the findings of the Landscape Character Area study which concluded that the area around KDBH had an overall "Low" landscape capacity to accommodate new development. It would be likely to accommodate small areas of new development. Development of the scale proposed is not consistent with Policy P10 of the Draft Local Plan.

Accessibility Study: The two sites, Hampton Road and the Arden Triangle (particularly its southern part), do not perform well in the Council's Accessibility Study, even with the relaxation of the commonly adopted standards for access to services and public transport. Apart from the existing Arden Academy site, neither site has good public transport access. This inevitably means that both sites will be heavily car dependent, placing further pressure on existing roads and parking.

It is clear that parts of the Arden Triangle area and the Hampton Road sites are at the "least accessible" end of the hierarchical approach to GBA adopted by the

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Council. By choosing these sites, the Council has opted for allocations that perform worst against the Strategic Objectives and are inconsistent with Policies P7, P8 and P9 of the Draft Local Plan.

Interim Sustainability Appraisals, November 2015 and January 2017

In the Scoping Interim Sustainability Appraisal (ISA) (November 2015) large scale expansion of rural settlements was one of the worst performing options. The ISA highlighted that major adverse effects are anticipated in terms of resource efficiency (with loss of open land; need for highway improvements; demands upon education, health and social care; and effect of Borough-wide resource allocation). In addition, there would be moderate adverse effects with regard to reducing the need to travel and impact on the landscape. With regard to road travel the interim SA stated that *"it is recognised that most rural locations have limited transport accessibility which are very unlikely to offer genuine choice of transport modes"* (para 3.7.44). With regard to rail travel it stated that *"Their small size [ie Dorridge and Widney Manor stations] also makes it unlikely they have the infrastructure to accommodate any significant strategic housing need through a sustainable urban extension"* (Para 3.7.41).

The recently published Interim Sustainability Appraisal (ISA2) (January 2017) is difficult to follow but the NF would make the following comments:

- 1) SA Objective 3 seeks to ensure that the location of development can be accommodated by existing and/or planned infrastructure and reduces the need to travel. There are no public transport infrastructure improvements planned in relation to KDBH so the identification of such a large scale of development in Knowle will lead to mainly car borne travel, contrary to this objective. It is not clear why the finding from the first ISA in relation to negative impacts of car borne travel become plusses in the preferred option in ISA2. The shortcomings in the rural locations remain the same.
- 2) The Knowle site allocations do not appear to perform well against Objectives 9 ecology, 10 landscape effects, 11 facilitating delivery of enhanced green infrastructure, 12 conserving and enhancing the historic environment and 13 improvements to townscape and local distinctiveness. The Council has not undertaken adequate assessments of these impacts (preferring to defer this to the concept masterplan stage) so the NF is planning to commission further studies to better understand these impacts (see below).
- 3) It is unclear why some parcels that were submitted in response to the Call for Sites have been assessed whereas others do not appear to have been. It also appears that several independent parcels have been assessed together which distorts the results. For example, several combined sites have been assessed as red in relation to impact on soils in view of their combined size even though individually they would not score red. In addition, distances to services and bus routes vary considerably across combined sites which is not reflected in the assessment.
- 4) In Growth Scenario B, the ISA2 assesses the impacts on communities as all broadly positive. It is not clear how this can be concluded when impacts on infrastructure have yet to be properly addressed. Both the Residents' Survey and Business' Surveys of KDBH revealed serious issues around transport, parking, congestion and social infrastructure which do not sit well with the ISA2 assessment of impact on communities.

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The NF concludes that the scale of growth in Knowle is not justified by the findings of the Council's technical studies.

3. Lack of consideration of infrastructure impacts arising from the proposed scale of growth

The recent Resident's Survey of the KDBH NP Area showed very clearly the level of concern over existing pressures on local infrastructure. This concern is shared by local traders and businesses as indicated by the results of the Business Survey. Key issues raised included:

- lack of parking at Dorridge station with associated on street parking in residential areas
- lack of parking in Knowle village centre with associated issues of parking around St John's Close and at the top of Longdon Road and Lodge Rd. This is now so extensive that on street parking is causing danger to road users and pedestrians
- congestion associated with school parking on roads, particularly on Station Rd and Widney Road/Mill Lane
- pressure on GP surgeries
- pressure on places at primary schools
- road capacity and impact of traffic volumes on the historic cores of Knowle and Dorridge

There is no obvious way of extending parking provision at Dorridge station. There is also no obvious way of providing additional parking in Knowle, Dorridge or Bentley Heath. Knowle is the predominant centre but it is a historic centre with Conservation Area status. There is little, if any, potential to provide additional parking without significantly impacting on its historic core. The High Street already suffers from high traffic volumes and congestion and the addition of over 1050+ new homes will inevitably add significant traffic flows on to the High St, its junctions and other key routes. Previous traffic studies (for example for the Waitrose development) have shown that traffic signals would not assist traffic movements at the Wilson's Road junction and would lead to queuing traffic. The overall increase in parking and significant traffic generation will adversely affect the character and attractiveness of the village and, in particular, harm the character of the Conservation Area.

The Council has recently stated that it will revisit the by-pass option for Knowle, presumably in recognition of the severe impacts the proposed scale of development will have on Knowle village centre. This route was only removed as an improvement line in 2013 and parts of the route now have Village Green status. This route (assuming the same route will be reconsidered) is not a by-pass for Knowle but a by-pass for the High St. It would take through traffic through residential areas adjacent to Jobs Close Park and sever the commercial centre from large parts of the village. It would have a significant effect on the character and integrity of the village and would be a very high price to pay for housing growth.

The proposed scale of additional housing in Knowle will inevitably lead to significant additional pressure on all the above local infrastructure. Yet the Council is asking residents to accept the principle of another 1400+ houses with no proper consideration of the impacts on the wider infrastructure. The Council has stated that such considerations will be addressed by site specific concept masterplans. However, Concept Masterplans will not look at wider issues; they will focus on site

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specifics and local traffic impacts. Wider impacts on Knowle and KDBH as a whole should be a vital part of policy development; and the involvement of the NF in this work will be crucial to its credibility.

Even if consideration were to be given to these wider issues, leaving such key infrastructure assessments to the next stage of plan preparation leaves residents with a “fait accompli” as, by the time the information is available, the principle of that allocation will have become established. It is essential that this information is available **before** final decisions are taken on the scale of growth in KDBH and sites are allocated. In the absence of this information from the Council, the NF is commissioning work on traffic impacts, landscape and ecological impacts. Given the nature and timing of grant applications and commissioning consultants, this work will not be available before the deadline for objections. The NF will inform the Council of the outcome of such work as soon as possible. Notwithstanding this shortcoming, the NF objection stands in relation to overall scale of housing proposed in KDBH.

Residents and business’ concerns are very clear that there is too much pressure on local infrastructure now and the scale of development proposed must be reduced. These concerns over infrastructure impacts have not been addressed. It is unreasonable to expect residents to accept any substantial further development in KDBH without any indication as to how the wider infrastructure impacts would be overcome.

Without prejudice to this objection on the scale of development in KDBH, it is imperative that local residents have the opportunity to make a major contribution to any masterplanning exercise in the NP area.

In conclusion, it may be noted that the scale of development in Knowle and the wider KDBH area shows a poor fit with the methodological approach advocated in the Plan. The preferred sites are not in sustainable accessible locations, contrary to the Council’s own strategic principles and methodology. Irrespective of whether two sites or several smaller sites are proposed, the major issues around infrastructure necessitates a substantial reduction in the proposed housing numbers in the NP area and further consideration of alternatives at the Borough wide level.

SITE SPECIFIC COMMENTS

The priority for the NF is to see the housing numbers significantly reduced. In making site specific comments, it is stressed that there should be no consideration given to making alternative provision in KDBH from other sites to reach a total of 1050+ additional dwellings in the area. It is the total number that must be reduced to a justified and proportionate level that satisfactorily addresses infrastructure issues.

In this section the NF comments on a number of specific issues arising from the proposed site allocations which need to be taken into consideration when considering a reduced scale of development in KDBH.

The proposed allocation of two large sites in Knowle, both in the Green Belt, does not accord with residents’ clear wishes for a more dispersed pattern of development

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as expressed in the Residents Survey findings. Only 4% of residents thought that additional dwellings should in developments on Green Belt sites of 101 to 500 properties. Only 1% were supportive of Green Belt sites with over 500 properties. At the very least, greater emphasis should be given to accessible locations and to an element of dispersal around a lower overall number.

Site 9, Land South of Knowle - The Arden Triangle

The principal driver for the proposed scale of housing growth in Knowle is the ambition of Arden Academy to have new school premises. This is evident from the Academy's submission in response to the "Call for Sites" (refer para 1.4 of submission on Parcel 153 *"The catalyst underlying the Arden Triangle is the desire of the Arden Academy governors to vacate the existing school and relocate to another site...."*).

The Academy's ambition, and the need for housing to fund it, presented the Council with the opportunity to allocate large scale housing in Knowle in a location that would not otherwise have gained support. The need for a new school offering better facilities has support in KDBH, as well as opposition. A view is emerging that a new school could be of benefit to the community but the price to pay for those benefits in terms of the consequential impacts on infrastructure, landscape, and access to countryside that would result from 750 houses is unnecessarily high. The scale of 750 houses is not justified by the Council's evidence base: nor is that quantum justified by the need to fund the new Academy. On this basis, the NF objects to the proposed allocation.

To date, the case made by the Academy has been taken at face value. There are too many basic questions being left unanswered for the NF to reach a view on what a reasonable reduced housing number might be. Until evidence and clarity is provided to substantiate the claims about poor building condition, the minimum housing numbers required to cross fund the school, what alternative sources of funding are available for construction of a new secondary school, how traffic congestion will be alleviated on Station Rd, what the proposals are for another primary school, and what community benefits will be available and delivered in perpetuity, residents are unable to make an informed decision about its future.

This information should then be considered alongside the other findings of the Council's assessment of this site and the Residents Survey including the following:

- 1) This area of Green Belt is highly valued by residents as it has acted to prevent urban sprawl and encroachment into the countryside and protects the landscape setting of Knowle. The scoring on this parcel is flawed because of the parcel definition but, even so, it performs no better than other fringe locations that have been rejected.
- 2) The findings of the LCA that this area was only suitable for small scale developments. Such a large site will cause significant loss of some of the most attractive and valuable Arden landscape around Knowle and Dorridge. The rural approach into Knowle from the south will be lost. The statement by the Academy that housing will not be seen cannot be accepted. (See para 1.22 of Parcel 153 submission: *"The entire Arden area is almost entirely obscured from view from Warwick Road to the east...there is no visual perception of openness or awareness of the countryside from this direction that would be compromised adversely by the release of land from the Green Belt"*). There would be a very obvious expansion of the built-up area of Knowle and exposure to view when

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travelling along Grove Road and Stripes Hill, exacerbated by the topography. This exposure would be compounded by the necessity to open up new access points off Warwick Road and Grove Road in an effort to provide adequate access to the area. The impact on the landscape and on the setting of Knowle would be substantial and have a significant adverse effect on the setting of the village. The NF will commission further work on landscape impact assessment.

- 3) The findings of the Accessibility Study that large parts of the site are not accessible even with the relaxation of standards, leading to primarily car borne journeys. The site only performs better because of the assumption that a GP practice and a shop will be provided within the development. However there is no certainty that such services will be viable.
- 4) The potential loss of easy access via a rural bridleway to the countryside for residents, particularly those living on the eastern side of Knowle, a principle that is very highly valued as demonstrated by the Resident's Survey responses.
- 5) Solihull Mind. The charity has occupied land within the Arden Triangle for many years and has support within the community. The NF would wish to see its future secured within any new Academy proposals if they proceed.

Conclusions on Arden Triangle

Much of the Arden Triangle site is poor in accessibility terms and represents an unacceptable location for new housing development. Even if community benefits were to be secured, following the building of a new academy, the quantum of proposed new housing (750 houses) far exceeds the stated necessary size of the enabling development which itself needs to be proven (450 houses). There is no local justification for the additional housing which will have a significant impact on the landscape and setting of Knowle. In view of the lack of evidence and clarity regarding this proposal, and the findings of the Council's own evidence base on the scale of housing proposed, the NF has no alternative but to object to the allocation of 750 houses as proposed in the draft Local Plan.

In any event, the NF must be fully engaged in masterplanning the site if it goes ahead.

Site 8, Hampton Road

The proposed Hampton Road sites are at the least accessible end of the scale and poor in locational terms. Development here would be beyond the built-up area of Knowle and a significant encroachment into open countryside. These sites are the two best performing parcels of Green Belt within KDBH in the GBA and their allocation for housing therefore requires justification. In addition, there is a danger that necessary highway improvements at the junction with High Street would have an unacceptable effect upon the character and appearance of the Conservation Area.

Other matters requiring consideration are the number of protected trees on site, the Local Wildlife Sites, the unfavourable topography and the lack of footpath access.

The masterplans produced by the sites' promoter need clarification. One shows the cricket ground being included, the other does not. It is not clear if this affects the proposed number of houses if the existing cricket ground is to be redeveloped. In addition, early plans suggested the inclusion of a Solihull "Football Hub" serving a

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wider area. Clarification is required of this as it would lead to additional car borne traffic in a location that is not accessible by public transport. Further clarification is also required of the range of sports to be provided and how they would be maintained.

To date, the proposers and the Council have not provided any evidence that justifies that this scale of development is necessary to fund the proposed relocation of the Football Club. Again, if the community benefits are to outweigh the loss of countryside with its adverse impacts on landscape, loss of Green Belt and adverse effects on the wider infrastructure, then further evidence is required of the nature of those benefits and how they would be delivered before the principle of an allocation of over 300 houses is accepted.

Again, without prejudice to the above, if development proceeds, the NF must be fully involved in the masterplanning of these sites.

OTHER COMMENTS

Affordable housing

The Residents Survey revealed a measure of support for more affordable housing for local people. However, there were strong concerns expressed about the level of affordable housing proposed which at 50% is felt to be too high particularly given the high numbers of houses proposed in the area. In addition, some 62% of respondents thought that social housing for rent was not suitable for KDBH. Local residents support starter homes and a lower percentage of other forms of affordable housing where an element of priority is given to people with a proven local connection. It is felt that the Council could support this on the basis that housing allocations around KDBH will be in Green Belt and therefore the approach of rural exceptions sites could be adopted for these allocations.

Density

The Residents' Survey revealed strong adverse reactions to recent developments in respect of housing layout, density and lack of parking. It is considered that these have produced very poor design and layout leading to cramped living space, inadequate gardens and, above all, cars parked all over the roads as a result of inadequate on-site parking. Residents have overwhelmingly demonstrated that they wish for lower densities and better design. Opportunities for smaller house builders should be considered as they may offer alternative designs and layouts.

Both these matters have an important bearing on the quality of housing. The Local Plan Review stresses time and again the importance of the Borough's economic prosperity. High quality housing areas are fundamental to the achievement of that objective. Overdevelopment and reducing standards will jeopardise the qualities that make KDBH a special place to live (as demonstrated by the Survey results) and have unintended consequences for the future of the NP Area and the wider Borough.

Role of Neighbourhood Planning

The Government has promised more power to local people to determine the location of new housing, as referred to in the new legislation on Neighbourhood Planning which is passing through Parliament. However, there has been a lack of

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meaningful engagement to date. For example, there seems to have been little involvement in any of the studies or workshops associated with the Council's evidence base. The NF is very concerned that local people feel disengaged and that the Draft Local Plan proposals are a "done deal". This has been reinforced by the approach taken to the presentation of the Draft Local Plan to the NF in December. The NF has put in a lot of time and effort into trying to understand the issues and concerns that matter to local residents and businesses and trusts that the Council will take note of these and respond positively to this objection.

The NF asks the Council to reconsider the scale of housing proposed in KDBH and to ensure that it is involved in any discussions on site allocations. The NF will appraise the Council of the outcome of the further studies that it is commissioning and there needs to be a continuing dialogue between the Council and the NF. In addition, the NF wishes to be fully engaged in any masterplanning exercises that may subsequently take place.