

Dickens Heath Local Plan Response

February 2017



IN THE COUNTRY WE FLOURISH

Waterside, Dickens Heath



This document has been produced by Dickens Heath Parish Council on behalf of the residents.

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Section One

1.0 Introduction

Dickens Heath Parish largely comprises the new village of Dickens Heath and the immediate countryside around it. Its boundaries lie just south of the edge of the urban area of Shirley to the north, the North Warwickshire railway line and Tilehouse Lane to the west, Birchy Leasowes Lane and part of Cleobury Lane to the south, and the B4102 Tanworth Lane to the east. The entire Parish outside the developed area of the new village is in the Green Belt.

Dickens Heath is a planned new village with clearly defined limits. It is unique in Solihull as having emerged through the Unitary Development Plan process as an entirely new community. It has an architectural character of its own. It is not an urban extension. It differs therefore from previous urban development in the Borough of Solihull, planned and carried out in previous decades as large-scale urban extensions: Chelmsley Wood (1960s/70s) and Cranmore-Widney (1970s-80s).

The Parish Council request that Dickens Heath should be identified in the Local Plan as having a particular character and design and that there should be limits to its continued growth in terms of numbers and direction; the Parish Council considers that a specific Policy should be drawn up to protect and conserve the new village, its character and its setting in the countryside.

Proposals in the Local Plan Review affecting Dickens Heath Parish:

There are two proposed housing allocations in the LPR located in Dickens Heath Parish. Housing Allocation Site 4 - West of Dickens Heath for 700 dwellings, and Housing Allocation Site 13 - South Shirley for 600 dwellings.

1. Aims

The aims of this response are :

- ☐ To ascertain, through use of a questionnaire, the views of the Dickens Heath community to allocation of Green Belt land to be utilised for new dwellings
- ☐ To provide a factual, unbiased, response based on the views provided by the Dickens Heath community
- ☐ To provide the response in the format required by Solihull Metropolitan Borough Council

2. Methodology

This response has been formed using the following methods:

Communication with Dickens Heath community and interested parties

- ☐ A Dickens Heath online questionnaire – at Appendix 3
- ☐ Organised meetings and ‘drop in’ discussion groups
- ☐ Parish Council meetings
- ☐ One to one meetings and discussions with Parish Council members

Desk based assessment:

Review of reports, photographs and unpublished works

Web based assessments:

Internet research

Site visits to:

- ☐ Allocation Site 4 – (site A) West of Dickens Heath for 700 dwellings,
- ☐ Allocation Site 13 – (site B) South Shirley for 600 dwellings

Interviews and personal communication with:

Gary Palmer. Planning Manager (Development) Solihull MBC

Richborough Developments. Draft proposals for development of Site 4

David Horne. Land owner at site 4

John Crossling. WALC

Richard Holt. Solihull Borough Councillor

Richard Cobb. Former planner at Solihull MBC

Christopher Weatherburn. The Prince's Foundation. Policy Communication Leader

3. Limitations

The response was compiled with the aim of objectivity on the part of the Parish Council to relay the **conclusions drawn by the community**. Some information provided to the council in seeking professional assessment of planning regulations was heavily biased by two parties in opposing positions. The Parish Council has endeavoured, we believe successfully, to produce the true reflection of Dickens Heath's community views. This can be viewed in Appendix 1.

4. Acknowledgements

We would like to thank the community of Dickens Heath who have independently written and provided a response to the Local Plan questionnaire. They have done so with passion and in number.

We would also like to thank retired Chartered Town Planner Jean Walters, who is a resident living in Dickens Heath in close proximity to site A, for her kind permission to use sections of her personal response and that offered on behalf of CPRE. Jean's knowledge was of enormous support to the Parish Council.

Section Two

Response to Consultation Questions

Having carried out an extensive survey on behalf of the residents, which has been analysed independently, the Parish Council wish to comment on the various questions posed by the Council in the Draft Local Plan. (See Appendix 1, Dickens Heath Parish Survey)

2.1 Borough Vision

QUESTION

Do you agree with the Borough Vision we have set out? If not why not, and what alternative would you suggest?

RESPONSE

In the box setting out the Borough Vision (page 27), it is stated that “The Borough will play a part in meeting, in a sustainable manner, the needs of its housing market area so that its residents have access to a range and choice of quality accommodation. The Borough will retain its sense of identity, both in its urban and rural area (including appropriate protection of the Green Belt); and the quality of the environment that make it a special place.”

Dickens Heath residents broadly support this statement in terms of its general approach, but the allocation of sites 4 and 13 do not comply with the SMBC vision. It is believed the sites would be unsustainable and would no longer make Dickens Heath a “special place”.

The Government has consistently committed to protecting the Green Belt and stated that the single issue of unmet housing demand is unlikely to outweigh harm to the Green Belt. Other sites in the Borough, we believe are more suitable for development, and no robust detailed appraisal of alternative sites has been carried out in a sequential tests. We have not seen evidence that the Council has fully examined the infrastructure requirements which would justify and mitigate altering the Green Belt. Permanence is a feature of Green Belt and any decision to change its status should be considered carefully. It is considered the decision to develop land at Dickens Heath may have been rushed into the emerging Local Plan without sufficient justification or planning.

In the Vision for the Borough, Dickens Heath is addressed at paragraph 87:

*“The area will have provided new market and affordable housing through significant new development at Dickens Heath, Cheswick Green, and Blythe Valley Park to contribute towards meeting the Borough’s housing need, **whilst retaining its intrinsic character of distinctive villages separated by open countryside**“ (our emphasis).*

The proposed major developments of sites 4 and 13 may not be in accordance with this stated policy.

This is addressed in detail in response to Question 23 below.

The earlier paragraph 62 offers a description of Dickens Heath:-

“The modern, multi-award winning village of Dickens Heath was ‘created’ in the late 1990s and, guided by an architect-led masterplan. It has since undergone rapid expansion with a variety of architectural styles of development and a village centre. Whilst housing densities are higher around the village centre, the area has an attractive, mature woodland, utilised open community space and canal side setting, with a few early cottages adding sporadic visual interest.”

This is an accurate description. The proposed major housing allocations of site 4 and site 13 in the Parish we understand may not be in accordance with the challenges stated in Para.79, particularly C, D, E & L. The objective of challenge E (page 21) is to :-

“Maintain the Green Belt and improve the network of green infrastructure in Solihull, to prevent unrestricted expansion of the major urban area, to safeguard the key gaps between settlements such as the Meriden Gap and the countryside. Ensure that the countryside is managed so as to deliver a range of benefits including the growing of food and energy products, create an attractive rural setting and improved public access and recreational opportunities”

The proposed large-scale housing allocations on Green Belt land in Dickens Heath Parish would be a major expansion of the urban area and would reduce or remove key gaps between settlements such as Shirley and Majors Green. The attractive rural setting of Dickens Heath could be partly lost to development. In Dickens Heath Parish, access to the countryside and recreational opportunities would be reduced, not improved.

2.2 Spatial strategy.

QUESTION

Do you agree with the spatial strategy we have set out? If not why not, and what alternative would you suggest?

RESPONSE

The general spatial strategy of the Plan Review is sound, but there appear to be two major anomalies in the way new housing is proposed and located:-

1. There is a concentration on a small number of large housing sites as opposed to a range of large, medium and small.
2. There is a disproportionate amount of the additional housing in the Plan Review that is proposed to be located in the Blythe Ward i.e. the Parishes of Dickens Heath and Cheswick Green. Of the additional housing, 45% would be sited in these two Parishes.

The residents of Dickens Heath Parish consider this is an excessive burden placed in such a small area. We believe there are no housing proposals in the Dorridge & Hockley Heath Ward; which comprises a significant part of the Borough. These alternative areas have locations suggested for development in the 'call for sites' and identified in the SHELAA (Housing Land Availability Assessment). It is understood these may not have been assessed in the analysis conducted to arrive at the final suggested allocations.

Additionally, with the development of the HS2 interchange, this may create greater need in the future for housing nearer to and more accessible to the 'UK Central' location north of the A45 and east of the M42. Blythe Ward is plainly remote from the 'UK Central' site, and would not be accessible to it by direct public transport.

The recent report 'Small is Beautiful', by the Federation of Master Builders states, *"Local planning authorities should be required to include within their local plans a strategic consideration of the contribution that small sites can make and how small scale development is to be enabled."*

See also a recent report in The Planner :-

http://www.theplanner.co.uk/news/report-smes-could-build-more-home-if-less-barriers?utm_source=Adestra&utm_medium=email&utm_term

Our responses to the questionnaire indicate that The Local Plan should be revised to reduce the number and scale of large allocations in Dickens Heath.

2.3 Sustainable Economic Growth

RESPONSE

No comment – this question regards commercial development at ‘UK Central’ and policies for the urban area.

2.4 Providing Homes for All

QUESTION

Do you believe we are planning to build new homes in the right locations? If not why not, and which locations do you believe shouldn't be included? Are there any other locations that you think should be included?

RESPONSE

The Blythe/South Shirley area has a disproportionately larger number of dwellings proposed in the Plan.. Dickens Heath residents believe the housing allocation should be spread more evenly throughout the Borough, with more medium and smaller sites in the Green Belt being allocated rather than large scale developments. Areas of land which are assessed in the Atkins Green Belt Assessment as having a high score, presumably because they perform best against the criteria for being in the Green Belt, should not therefore be removed. It is felt illogical to take high scoring sites out of the Green Belt for development.

We understand alternative sites are available as discussed later in this response. The Council could consider as alternatives, those which do not have such a high Atkins Green Belt score. The residents drew attention to the following sites, listed and identified in the SHELAA report, which are considered to contribute less to the Green Belt than the sites in Dickens Heath Parish.

The SHELAA site references are:-

49, 82, 83, 87 (brownfield employment site), 89, 121,132,133,136,139,175,184 & 244.

We therefore cannot agree with the Solihull Council's statement,

“The table of allocated sites includes a number that will require land to be released from the Green Belt to enable them to be delivered. It is considered that the scale of housing growth to be accommodated, and the lack of alternative sites that are not located in the Green Belt, provide the exceptional circumstances required to justify this approach.”

This does not accord with Government policy to protect Green Belt from development. An example is the Secretary of State's statement in the Commons on 18 July 2016: *"The Green Belt is absolutely sacrosanct. We have made that clear: it was in the Conservative party manifesto and that will not change. The Green Belt remains special. Unless there are very exceptional circumstances, we should not be carrying out any development on it."*

The new Housing White Paper, which has been recently issued, draws to attention the policy on Green Belt. It also suggested smaller sites be made available for development to by local builders and those wishing to self build.

It is felt exceptional circumstances have not been demonstrated to remove these sites from Green Belt. There are other sites within the Green Belt which have lower scores in the Atkins Assessment, which could be considered sustainable with less adverse effects.

2.5 Infrastructure

QUESTION

Do you believe we have identified the infrastructure required to support these developments? If not, why not? Are there any additional facilities you believe are required, if so what are they?

RESPONSE

We are not aware whether the infrastructure required has been examined. A new distributor road may be considered necessary to handle the additional traffic generated to reduce congestion in the South Shirley and Dickens Heath area.

Additional retail provision may be required to reduce the number of vehicles travelling into central Dickens Heath. Car parking is already inadequate.

Improving Accessibility and Encouraging Sustainable Travel

Proposed Housing Allocation sites 4 and 13 may not be sustainable locations and would possibly create substantial car traffic. Whilst site 4 would be close to Whitlocks End railway station, the rail service at that station gives access to Central Birmingham and Stratford-upon-Avon, it does not provide a service to Solihull Town Centre, for which there is only a slow and indirect bus service or across the Borough to UK Central. Cycle and pedestrian access to the village centre was a core principle of the design for Dickens Heath and could require improvement.

2.6 Protecting and Enhancing our Environment

QUESTION

Do you agree with the policies for protecting the environment? If not why not, and what alternatives would you suggest?

RESPONSE

Dickens Heath residents broadly support these policies, but the proposed allocations of site 4 and site 13 do not conform to the stated policies. Policy P10 (Natural Environment) emphasises the Arden Landscape:

Arden Landscape

“The Council will seek to protect, enhance and restore the diverse landscape features of the Borough and to create characteristic habitats such as new woodlands, copses, hedgerows and standard trees, species-rich grassland and wood pasture. To halt and where possible reverse the degrading of the Arden landscape and promote local distinctiveness”.

The housing proposals in Dickens Heath Parish conflict with Policy P10. They would degrade the Arden landscape and the protection and enhancement of it may not be possible if the scale of housing proposed in the Parish were to take place.

2.7 Promoting Quality of Place

QUESTION

Do you agree with the policies for quality of place? If not why not, and what alternatives would you suggest?

RESPONSE

Dickens Heath residents support the policies in Chapter 10. The proposals for housing on site 4 and site 13 conflict with two Policies set out in the following chapters:-

- ☐ P16 Conservation of Heritage assets and Local Distinctiveness
- ☐ P17 Countryside and Green Belt

2.8 Health and Supporting Local Communities

QUESTION

Do you agree with the health policies and supporting communities? If not why not, and what alternatives would you suggest?

RESPONSE

The Policies in this Chapter are supported. It is noted that the proposals for housing on Housing Allocation sites 4 and 13 conflict with Policy P18 (Health and Wellbeing). Policy P18 supports:-

“the retention and protection of facilities which promote healthy lifestyles such as open space, including public rights of way to open space, playing pitches [our emphasis] and allotments;”

If both sites 4 and 13 are included in the Local Plan, there could be a major loss of sports grounds, playing fields and leisure facilities.

The proposed replacement sports facility on site 4 between Tythe Barn Lane and the Stratford Canal may not adequately replace the many sports clubs' facilities if this site is developed. The facilities are used by people from a large area of the conurbation and surrounding towns and villages. Residents (36% according to the questionnaire) indicated they had concern regarding the loss of outdoor space at sites 4 and 13, in particular for walking, exercise, football and rugby. Concern has also been expressed at the loss of the Akamba Heritage Centre. These losses of recreational facilities would be contrary to Policy P10 :-

(Provision for Open Space, Children's Play, Sport, Recreation and Leisure). Policy P10 states:

“Existing facilities that are of value to the local community for recreation, visual amenity, nature conservation or that make an important contribution to the quality of the environment or network of green infrastructure will be protected, unless it can be evidenced clearly that the open space or facilities are surplus to requirements and are no longer required to meet local need;

The proposed development provides equivalent or better replacement open space, sport, or recreation facilities in size, quality and accessibility within an accessible location for existing and potential new users;

Or the development results in a substantial community benefit that clearly outweighs the harm resulting from the loss of the existing open space/facilities.”

Site 13 contains a well utilised area of open space which is used for outside recreational and leisure purposes. Site 4 contains recreational and sports facilities. The questionnaire evidences that 36% of residents object to the loss of outdoor sports and leisure facilities.

Section Three

Comments

QUESTION

Are there any other comments you wish to make on the Draft Local Plan?

RESPONSE

Dickens Heath History

Only 3 miles from Solihull Town Centre, Dickens Heath the new village was originally designed for only 700 dwellings by London architects John Simpson & Partners who devised a concept plan, which was developed and refined to become the approved master Plan in 1995. The four key elements identified in the Master Plan were to:-

1. Have a clear identity giving residents a sense of place and belonging.
2. Echo the traditional features of village development including homes, employment, recreation, social and welfare facilities intermixed to create a cohesive whole.
3. Provide a range of housing, from first time buyers housing through to family housing and smaller units suitable for the elderly, thereby creating a mixed community of all ages and incomes.
4. Create a safe and pleasing environment for pedestrians whilst still accommodating the motor car, without allowing it to dominate the environment

“An underlying objective from the outset was to build a functioning village with a strong visible centre, not just another suburban housing estate. In part, this was a quid pro quo to nearby local residents. It was to provide a new surgery and school in return for support for building on hitherto agricultural land”. The design principals in summary were:-

- Clear identity
- Traditional features of a village
- Balanced mix of housing
- Safe and pleasant environment for pedestrians”

Quote from the SUNN Report dated April 2011:

The Dickens Heath Village Plan

“From the outset, the Council decided that Dickens Heath would be special and wouldn’t be just a housing estate in the country. It was decided that the new development would be based on the model of a traditional village, made up of shops, offices, restaurants and homes as well as a school, library, village hall, doctors’ surgery, pub, village green and country park.”

The proposed allocation of sites 4 and 13 for a further 1300 dwellings would mean that Dickens Heath would no longer be a “Village” but would become a town.

In March 1995, there was a second public enquiry into the Solihull Unitary Development Plan. Outline planning permission was approved by the Council in December 1996. Construction began in August 1997 with the first show home opening in December 1997. The first home was occupied in May 1998. The school opened in September 2002 and the library opened in October 2004.

In 1991, SMBC employed renowned architect John Simpson who produced proof of evidence at the 1991 UDP enquiry on the Dickens Heath new village and the alternative put forward by McAlpines, which forms most of the site now being proposed by SMBC to be developed. One of the main concepts of the design was to create a village where people could get about without being completely reliant on the motor car. This meant that all housing should be within easy walking distance (800 metres) of the centre (generally taken as being the village library). John Simpson went on to say that “A village works as one cohesive entity because the perception is that everything is within easy walking distance”. The emphasis for the scheme as a whole was accessibility where the majority of residents would be no more than 5 minutes walking time from the village centre. The majority of the housing allocation for sites 4 and 13 would exceed this walking distance so that new residents would probably favour using their cars to use the village amenities. Car parking is already a major problem in the village centre and in transport terms both /either sites would be unsustainable as justified by the residents’ response in the survey results where 61% made representations on parking problems in the village.

The highway network for the original John Simpson design of the village was only for 700 dwellings. This figure was subsequently increased to a long term maximum of 1500 dwellings with some highway improvements. The present highway network is unsuitable

for the current 2200 dwellings in addition to the increased through traffic from Tidbury Green when the Lowbrow Farm and Tidbury Green Farm developments are completed. The proposals are unsustainable on highway safety grounds. If there are any new developments major road improvements should be carried out. This would however mean the removal of established hedgerows and mature trees which greatly add to and enhance the character and setting of the village. The central village road network was not designed for increased usage.

In John Simpson's 1991 Proof of Evidence in Para.2.04.1, he states:-

"In general Dickens Heath has strong boundaries defined by the Stratford upon Avon canal on two sides and a site of interest to nature conservation (SINC)."

The SINC comprises of an ancient woodland which forms a natural boundary to the north west.

John Simpson's report goes on to analyse the McAlpine proposals where the site for the new village would be moved north west. In Para 3.01.3 he states that:-

"The combination of the woodland SINC, the woodland with tree preservation orders (TPO) and the existing housing provide a further barrier to development running north south and splitting the site in two". Any proposed extensions to the village would have the effect of spreading the settlement pattern. This would have the effect of denying Dickens Heath its village character and it would lose its identity and become a town. The UDP stated that for the village to work in the sense of being "a recognisable community with a distinctive character", the inhabitants would need to feel close to the centre of activity and identify with it. This vision would not be possible for new residents of the proposed sites.

One of the main reasons put forward by McAlpines was the close proximity of Whitlocks End station; the same reason SMBC has for including site 4 in the LPR. Public transport problems have been raised as an issue by 41% of residents in their survey results. There is a lack of transport to the station and limited car parking.

There would be a loss of ecological value as there are several badger sets in the sports fields. Bats, sparrow hawks and greater spotted woodpeckers fly over the sites foraging for food. 28% of residents have raised concerns regarding the impact on wildlife and other environmental issues.

Dickens Heath New Village - importance of status and protecting its character:

The special character of Dickens Heath and the way it was conceived, designed and

developed give weight to not attempting to add to or greatly expand the village.

Set out below are factors regarding Dickens Heath which make it different from other settlements in Solihull and give it a character of its own and thereby justify not allowing any significant expansion of the new village which could undermine this. The residents have indicated by their responses the following:-

1. Dickens Heath was conceived and signed as a new settlement and a 'new village'. A concept plan was drawn up for SMBC by the architect John Simpson (responsible for parts of Poundsbury). It was designed and laid out as a village with a majority of the residents living within a five minute walk and no part more than 800 metres from the village centre, so that is a sustainable settlement with walking possible to reach all services. A master plan for the new village was approved in 1995 for 850 dwellings. Residents maintain one of their reasons for objecting to the proposed developments is that the area will lose its character/feel/appeal. They had bought into a village concept restricted by numbers and Green Belt constraints in accordance with the master plan.

2. The location and its extent was determined and tested by a Public Inquiry (UDP Inquiry 1991). Proposals for additions or additional growth were examined at enquiries and rejected and the original form of village confirmed by the outcome of these (UDP Inquiry 1995, UDP Inquiry 2004). These outcomes - recommendations by Inspectors accepted by the planning authority - are material to any new proposals to add to or to extend the new village.

3. Dickens Heath has status as a new village designed to planning and design principles. It has attracted assessment and reviews by architectural and planning journals. The professional interest by outside bodies to the design and development of the new village give weight to the conclusion that it should not be subject to imposed change which could undermine its character and sustainability as a settlement. See Appendix 2 with the existing village boundary defined by the canal in blue, the woodland to the north west edge in green, the amenity land to the south east in red and the village centre shown as a yellow dot.

The survey results (Appendix 1) revealed that the residents of Dickens Heath understand that there is a need for more housing throughout the Borough but feel that the Blythe area has more than its fair share of housing proposed. Other smaller sites should be considered. There is a major objection by the residents of Dickens Heath on sustainability grounds as demonstrated by most aspects of the survey results.

RESPONSE

Dickens Heath Parish Council sets out in this section the detailed reasons from residents why housing sites 4 and 13 should be removed from the Plan Review. A recent survey was carried out by the Dickens Heath Parish Council seeking residents' views on the SLPR proposals for Site 4 & 13. The Survey results are in Appendix 1. The results of this survey proved overwhelmingly (over 90%) that the residents of Dickens Heath are strongly opposed to the proposed allocation of sites 4 and 13. Therefore the statement by the former Secretary of State Brandon Lewis should be given due weight.

Policy:

The allocation of sites 4 and 13 are contrary to the Council's stated policies. In Solihull Council's Scope, Issues & Options document April 2016 it states the following:-
"It is acknowledged that the various evidence base studies will need to be consistent with the requirements for evidence and each other."

"Green Belt land will continue to be protected in order to meet its strategic purposes, including countryside protection, in accordance with established principles and the NPPF." This has not been the case in proposing Sites 4 and 13 against the evidence provided in the Green Belt Review. The Green Belt in sites 4 and 13 score 7-8 and 6 respectively in the Atkins Green Belt assessment and prevents coalescence with neighbouring settlements.

Another main issue of the SLPR is the challenge of protecting the environment, particularly the Green Belt/rural character and building into the Review an emphasis on sustainability/climate change. Sites 4 and 13 would significantly adversely affect the Village character and rural setting and would be unsustainable as both proposed developments are more than the accepted walking distance of 800 metres to the centre of the Village. As evidenced in the residents' survey results, 61% have raised their concerns regarding the existing village centre car parking shortage. The increased traffic could place an unacceptable burden on the already inadequate, congested road system. The proposals for development at the two sites would not be in accordance with the stated policy or with the policies also stated below. The opening paragraph of the SLPR states:-

"At the heart of planning is the need to plan positively for sustainable development. One of the principal ways this is achieved is by having a local plan to guide the development of an

area. Having a local plan is key to delivering sustainable development that reflects the vision and aspirations of local communities.”

“Sustainability will be a key focus of the Review including sustainable transport accessibility.”

“The vision recognises the importance of the Borough’s distinctive rural settlements and wider rural area.”

“Growth in rural settlements will be considered in the context of emerging Neighbourhood Plans and the capacity of local infrastructure or the potential for new capacity.”

“Sustainable development will be a central focus for the Review and will take into consideration effects on communities, HS2 and flood risk.”

In the Scope, Issues and Options Consultation – Summary of Representations and the Council’s Response, it is stated on Page 25:-

“The Council will seek through a managed growth approach to ensure that growth does not result in deterioration in the quality of life of residents and visitors.”

“Enhancing Solihull as a place where people aspire to live, learn, work and play, whilst recognising and protecting character and local distinctiveness.”

In addition Para. 5.22 of the SSHAA 2012 states in Policy P5 “the character of settlements and their ability to meet the needs of their residents needs to be assessed.”

The residents’ survey clearly expresses the residents’ views and needs.

Infrastructure, physical or environmental constraints:

Some 90% of residents objected to the removal of both sites from the Green Belt. The formal assessment of these sites must show how it performs against the 5 purposes of including land in the Green Belt set out in the NPPF.

The developments are likely to have a significant adverse impact on the character of the Village and approaches to the settlement. The land presently provides for some of the purposes of Green Belt, but allowing development of these parcels of land, although having clear boundaries to prevent future urban sprawl, would result in settlement coalescence, would not ‘fit’ the wider settlement pattern and would not provide a variety of opportunities for positive planning.

It is felt that the Council has not taken into account the overall spatial strategy and the availability of alternative more suitable sites in the Green Belt. The development of the sites would have an impact on the character and function of the Green Belt in this area which is not outweighed by the need to identify additional housing sites of such a scale.

There will be increased pressures on the road network in particular from the addition of 1300 new houses.

It is considered that development would have an adverse impact on the ecology of the Green Belt.

There are medium risks associated with surface water flooding from adjacent land and a risk of flooding from groundwater and artificial sources. Again, issues around flooding in those areas more susceptible to it due to the belt of thick boulder clay. Residents' responses to the Survey have identified concerns about flooding and ground water.

If it is proposed to remove these sites from the Green Belt it will not be in line with paragraph 85 of the NPPF. The residual Green Belt will not continue to meet the essential characteristic set out in paragraph 79 of the NPPF. The development of this site will have an impact on the extent to which the land adjacent is consistent with the essential characteristics of Green Belt (NPPF para 79). There would be damage to the rural landscape, the visual amenity, reduction of openness of the area, coalescence with neighbouring settlements, degradation of the landscape of the area and increased traffic congestion. Serious mitigation would be difficult to achieve.

The Government has consistently committed to protecting the Green Belt, which is also stated in the recent Housing White Paper and has repeatedly confirmed that the single issue of unmet demand is unlikely to outweigh harm to the Green Belt. Other sites within the Green Belt may be more suitable for development. No robust and detailed appraisal of alternative sites appears to have been carried out. Permanence is a feature of Green Belt and any decision to change its status should be considered carefully, however, it appears that the decision to develop Dickens Heath may have been rushed into the emerging Local Plan without sufficient justification or planning.

SMBC's approach to assessing exceptional circumstances is questionable. It is considered many smaller sites within the Borough could be more sustainable. These two sites are not the best sites within the Green Belt to meet the need, taking into account the Green Belt

study as well as other aspects of the site assessments. The Green Belt study made it absolutely clear that some areas of Green Belt are higher performing and its status should therefore not be changed. Following SMBC's basis for assessing the presence of exceptional circumstances this methodology appears to be flawed.

Conclusion

The conclusion of the Dickens Heath Residents' Survey has illustrated a 90% majority of the residents are not in favour of the area of Dickens Heath being enlarged, particularly by the use of Green Belt land. Details and justification can be found in Appendix 1

The Survey Results have been independently analysed by Viv O'Boyle (F.A.T. Research, Nottingham)

Appendices

- Appendix 1. Analysis of Dickens Heath Residents' Survey Results
- Appendix 2. Proposed Site Plan 4
- Appendix 2.1 Proposed Site Plan 13
- Appendix 3 Survey Questions

References

Reports

Town and Country Planning Association/ Best Practice in Urban Extensions and New Settlements. 2007

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The Brandon Lewis Report

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