



Dickens Heath Parish Council

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Dear Kim

LAND AT DICKENS HEATH ROAD, DICKENS HEATH – APPLICATION 2013/1504

Dickens Heath Parish Council strongly objects to the above planning application made on behalf of Catesby Estates Limited, which it considers to be opportunistic and without planning merit. The Borough Council is therefore urged to refuse the planning application.

The Parish Council considers there is no need or other planning justification for the release of the site for housing, particularly having regard to the scheme presently underway on the Griffin Lane site and bearing in mind that Phase 2 of the Garden Squares site in the village centre is still awaiting completion. Furthermore it is understood that a planning application for housing development on the safeguarded land at Braggs Farm has been submitted, even though it is not identified for release prior to April 2018.

The committed developments will result in a substantial increase in households within the settlement without any corresponding improvements in terms of infrastructure, and the provision of social and community services and facilities. On the basis of the information submitted with the Catesby Estates' application the proposed development would bring no meaningful improvements to infrastructure, services and facilities but it would exacerbate the existing adverse impacts of too much housing being provided in this locality. The existing adverse situation would worsen further should yet more housing be permitted on the current application site and/or the safeguarded land at Braggs Farm. The Parish Council strongly believes that the individual and cumulative impacts of the various developments have not been properly assessed and maintains the view that no further planning permissions for housing within or on the edge of the settlement should be granted.

It seems to the Parish Council that the main justification given for the proposed Catesby Estates' development is the alleged absence of a five year supply of deliverable housing

land. The Parish Council is not in a position to comment in detail on this matter but notes from the information contained in the Main Modifications to the Local Plan (July 2013) that the Borough Council submits it does have the requisite provision of housing land and therefore there can be no justification for the grant of planning permission on housing land supply grounds.

However, even if there were not a five year supply of housing land that, in itself is not sufficient to justify the release of this Green Belt site. In this respect the Parish Council is aware that the Secretary of State has recently held that the absence of a five year supply of forward housing land, even in severe cases, is not a very special circumstance to outweigh the harm to the Green Belt.

Furthermore the Parish Council notes paragraph 49 of the National Planning Policy Framework states that it is only the development plan policies relating to the supply of housing which are to be considered out-of-date where a local planning authority cannot demonstrate a five year supply of deliverable housing sites. In addition the presumption in favour of the grant of planning permission (paragraph 14) does not apply where there are specific policies in the Framework which indicate development should be restricted.

In this case the adopted UDP, which is the development plan for the purposes of deciding the application, identifies the application site as being within the designated Green Belt, the continuing importance of which is stated in the Framework. The proposed development is not one of the exceptions listed in paragraph 89 of the Framework. Therefore it is inappropriate development and, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (paragraph 87).

The Parish Council has considered the submissions made by the applicants' agents with regard to 'very special circumstances' but does not find any of them convincing or to individually or cumulatively amount to very special circumstances sufficient to outweigh the harm caused to the Green Belt, and the other harm which would be caused by the proposals.

As stated the alleged shortfall in housing land supply is not a very special circumstance, nor is the fact that the land is identified in the emerging Local Plan for housing purposes. The emerging Local Plan does not form part of the development plan for the purposes of deciding the application and it cannot be given great weight as a material consideration. The examination into the soundness of the emerging Local Plan is yet to conclude and there are a number of unresolved issues, notwithstanding the inspector's interim findings. However it is to be noted that the emerging Local Plan does not propose the release of the application site until after April 2023 and there can be no reasonable expectation the inspector will find that it should be brought forward at an earlier date. Notwithstanding the Parish Council's objection in principle to the proposed development it considers there can be no justification to bring the site forward to a much earlier part of the Plan period. Planning permission should be refused in order to allow the committed schemes to be completed and a full and detailed assessment carried out of local infrastructure and service provision requirements.

Further the Parish Council challenges the assertion that the scheme represents a good example of sustainable development, in the Council's view the scheme does not perform the three roles set down in the Framework. The scheme is for the wrong development, in the wrong place and at the wrong time. The scheme does not contribute to the provision of infrastructure and accessible local services. The scheme will not support the local community and it will damage the natural and built environments. Furthermore sustainable development includes the importance attached by the Government to Green Belts, whereas the scheme would cause harm to the openness of the area.

Contrary to the submissions made on behalf of applicants the Parish Council submits that the proposed development would seriously prejudice the purposes of the Green Belt. The suggestion that the development will not add to urban sprawl is disingenuous, and the applicants' own plans show just how vulnerable the locality is to the spread of the main urban area and the coalescence of existing settlements: even though the 'site and setting' plan within the submitted landscape assessment omits to identify the safeguarded sites in the adopted UDP at Lowbrook Farm and Tidbury Green Farm, Tidbury Green.

Furthermore the proposed development will undoubtedly adversely affect the openness of the Green Belt, and constitute a major encroachment into the countryside. The suggestion that the development would be well-screened is not the case, the scheme would be seen from a number of public vantage points, and further it is no justification for the grant of permission. The suggestion that the site can be built on because it cannot be seen is clearly contrary to one of the basic tenets of town planning and Green Belt policy and not a very special circumstance.

In terms of urban regeneration and the existence of other sequentially preferred sites, the emerging Local Plan identifies a number of locations for housing in earlier Plan periods and development on greenfield sites in the rural area, such as the current application site, should not be brought forward in advance of those locations.

The housing needs of Dickens Heath do not justify permission being granted for another 130 dwellings, in addition to existing commitments, on Green Belt land.

In summary, the proposals are for unsustainable and inappropriate development on greenfield land within the designated Green Belt. There are no very special circumstances individually or cumulatively which outweigh the harm caused by reason of inappropriateness, and the other harm which would be caused by the proposed development. The Parish Council notes that the Borough Council has provided information to show that it has the necessary supply of housing land and therefore considers that this cannot be a very special circumstance to justify development within the Green Belt, or a sound reason to bring the land forward for housing in advance of the adoption of the emerging Local Plan, or to an earlier part of the Plan period.

The proposed development would prejudice the purposes of the Green Belt, harm the character and appearance of the locality and exacerbate existing problems within the settlement, for example the lack of parking within the village centre and the provision of open space, as well as generating significantly more vehicular movements on to a local network of rural roads which is already suffering from the amount of traffic forced on to it.

The Parish Council expects the Borough Council to refuse planning permission.

Yours Sincerely

Helen Marczak
Parish Clerk and RFO