



Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Forum

Interim Response to Planning Application: Ref. No: PL/2022/00064/PPFL

**St Johns Way Shopping Centre, St. Johns Way, Knowle, Solihull B93 0LE
(Knowle Precinct)**

Refurbishment and upgrade works to existing St John's Way shopping centre to provide 17 No. retail units (Use Class E) at the ground floor level with some first floor storage space, 28 No. residential apartments at the first floor level and the formation of a second floor to provide 19 No. residential apartments, car parking, landscaping and all other associated works. Demolition, including of two No. existing over passes.

FAO: Lawrence Osborne, Case Officer

1. Summary

The KDBH Neighbourhood Forum (the Forum):

- welcomes this investment and is very supportive of the development in principle, but has some concerns
- requests that the Council work with the applicant, before proceeding further, to refine three key aspects and improve alignment to Neighbourhood Plan (NP) policies:
 - a. **Car parking:** issues identified in Section 4 below need to be addressed, taking into consideration also the wider impact of the proposed Solihull Local Plan housing developments in Knowle. The applicant cannot resolve this alone. The Forum urges the Council to work with applicant to identify proposed solutions to mitigate car parking issues
 - b. **Design aspects:** the Forum requests that the Council's design team work with the applicant to consider how modifications to certain aspects of design, primarily relating to materials and the mansard roof, could more closely align with NP policies and the findings in the KDBH Heritage and Character assessment;
 - c. **Viability:** the Forum seeks clarification of aspects discussed below regarding Affordable Housing; Section 106 Education contribution and application of CIL
- would welcome involvement in finalising the proposals where appropriate
- requests a further consultation once we have received additional information to clarify matters raised that will enable us to finalise our response; and
- urges the Council to speedily resolve these issues to enable the development to proceed.

2. Introduction

This is the Forum's initial response regarding the Council's consultation request for comments on this planning application to be submitted by 10 February 2021. Whilst the Forum is very keen to see improvements to the St John's Way shopping precinct, we understand that further documentation, specifically a Viability Study has been requested. Consequently, bearing in mind that further time is needed to review all the documentation and that discussions are ongoing, this letter represents the Forum's interim position pending clarification of matters set out below. We will review our response once further information is received. In the meantime, we hope these comments help the Council's consideration of the application.



Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Forum

3. Principle of Development

Before considering the proposals against NP policies, it is important to recognise feedback from the pre-application consultation. This generally reflected local concern at the run down and tired appearance of the existing precinct and welcomed new investment to modernise and upgrade the shopping centre. Against this background of strong support for new investment, some reservations have been expressed, mainly about design and lack of parking. More recent feedback on this application indicates that car parking and design remain the main areas of concern.

Overall, therefore, investment in the shopping centre is welcomed as long overdue. It is, however, also necessary to assess to what extent application proposals have addressed these reservations and comply with NP policies.

4. Knowle Dorridge and Bentley Heath Neighbourhood Plan

The planning application documents include an analysis of the proposal assessed against relevant development plan policies, including the KDBH NP. The main NP policy considerations relate to: economic development (Policies E1 and E2); conservation/heritage (Policies VC2 and VC3); design (Policies D1 and D2); car parking/accessibility (Policies T1 - T5); housing requirements (Policies H2 and H3); and contributions to education and community facilities (Policies ECF1 and ECF4).

4.1 Policy E2 New Development in Village Centres:

Policy E2 supports the erection or change of use of buildings within the village retail centres subject to the following criteria:

- the scale of development being proportionate to its location
- there being no unacceptable impact on the character and appearance of the area, particularly if located in a Conservation Area
- there being no material harm to residential amenity
- an overall mix of uses is maintained consistent with policy E1
- adequate provision is made for car parking and servicing
- compliance with policies in national guidance and the Solihull Local Plan.

This is an overarching policy as it embraces the scale, conservation, design, parking and amenity issues covered by many of the other policies. We therefore turn to the criteria of this policy first, drawing in other policies as relevant.

Scale and impact on the Conservation Area (CA)

Policy D2 states that buildings in the CA will generally be two storeys in height. The proposed development retains two storeys on the High St frontage which lies within the CA; 3 storeys are maintained where existing buildings are already that height. The proposed additional storey of residential accommodation is within the main precinct area, which lies outside but immediately behind the CA frontage. From the Design and Access Statement, it appears that the new 3 storey elements have been set back sufficiently to prevent the height intruding into views of the CA from the High St.

Based on this analysis, it appears that the overall scale is acceptable in terms of being proportionate and not having an overbearing impact on the Conservation Area. (The Forum understands, however, that the Knowle Society will be submitting detailed comments regarding impact on the CA).

Within the main precinct area, the Forum has reservations about the impact of the design on the area's character and appearance, specifically the roof design and choice of some of the materials.



Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Forum

Roof Design: As regards the proposed mansard roof design, the former NatWest building on the High St is identified as an example and a precedent. However, that roof does not 'read' as a mansard style roof in keeping with others in the area. The 2 and part-3 storey 'Arden Grange' McCarthy and Stone development (1649 on Knowle High Street) offers a much more appropriate 3 storey roof design. The applicants state that a traditional pitched roof design would not give enough floor space for the upper flats. We therefore ask the Council to ensure that the mansard roof is angled back as far as possible to prevent the third floor becoming too overbearing within the confines of the main part of the precinct.

Materials: The retention of brick on the Conservation Area frontages, together with the introduction of new Georgian style windows and new shopfronts, is welcomed. However, the frontages within the main precinct area and those facing onto the public car park rely extensively on cladding/weatherboarding, with colour still to be determined. Whilst some cladding adds interest, the extent of proposed cladding, with virtually no exposed brick work, creates a 'New England' look that is considered out of character with the local area and, in particular, the CA. The Heritage and Character Assessment and Masterplanning and Design Coding studies that form part the NP evidence base both identify the local palette of materials as being predominantly brick, render, tile and render, with wood used for decoration. We would therefore wish to see use of more traditional brickwork within the main precinct area to ensure materials are in keeping with the area, consistent with the criteria of Policy E1 and also Policies D1 and D2 of the NP. In addition, the introduction of iron ornamental arches is not considered to be in keeping with the area and we would wish to see these removed. At present, we consider that the proposals do not comply with Policies D1, D2 or this criterion of Policy E2.

Harm to residential amenity

We are aware that existing residents who own their apartments have raised concerns about how the owners of the centre are treating them. Whilst we appreciate this is not a planning matter, we would be very concerned if any residents, especially elderly residents, should feel adversely pressured. We ask that the Council seek to ensure that residents are fairly and sympathetically treated regarding alternative living arrangements. For example, consideration could be given to existing residents being offered a discounted market value; or being able to live in the new apartments at the same cost and rental arrangement as at present and if the apartment is subsequently sold or no longer required the property then reverts to the landowner.

Alternatively, some of the dwellings should be affordable homes, in line with Council policy, and offered to existing residents with affordability issues, in line with Policy H2 of the NP.

As regards the amenity of the new apartments, clarification is requested on the adequacy of outdoor amenity space for the dwellings as well as provision of waste collection facilities. Regarding the amenity of existing neighbouring dwellings, such as those in Dell Farm Close, proposals need to make clear that these will not be adversely affected by any overlooking or additional parking problems.

Overall mix of uses

The Forum has no objection to the overall mix of uses. However, we note that reconfiguration of retail units is intended to appeal to national retailers, as well as to smaller 'niche' retailers. We would emphasise that Knowle is not a town centre and is not recognised as such in the Solihull Local Plan. It seeks to retain a village character that is not dominated by national retailers, a theme that has underpinned significant local investment recently in the 'Visit Knowle' promotional activities. The opportunity for specialist local and independent retailers to be represented in the refurbished shopping centre will therefore be strongly supported to help maintain Knowle's special village character.



Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Forum

Adequate provision for car parking and servicing

Apart from the desire to see the precinct improved, car parking is the issue of greatest concern to residents and to some businesses. Car parking problems in and around Knowle village centre, and within the wider area, were the highest priority issues raised during development of the NP and instrumental in shaping NP transportation policies. This criterion is included in Policy E2, but Policy T2 is most relevant in that it requires parking provision for new development to be sufficient to ensure that any existing conditions relating to traffic congestion or parking capacity are not exacerbated. Specific reference is made to development within a 750m radius of centres, including Knowle.

The applicants have submitted a Transport Assessment and a Parking Study. There is insufficient time or resources to undertake a technical critique of these documents; however, a number of concerns arise from the perspective of residents who are regular users of the local road network and the centre's car parks. These include:

- a. Proposals include 47 residential units, 13 parking spaces at the rear and 72 cycle spaces. On the application form, the applicants state there are currently no allocated car parking spaces, although reference is made to existing informal parking for 16 vehicles in the rear area for some residents. It is not clear if these parking spaces are for staff in the commercial units or for residents. In any event, there is a substantial shortfall, even allowing for the central village location of this development.
- b. The Parking Study provides an analysis of car park usage and concludes that there is 'ample' capacity in the car parks, or on street parking, for residents of the apartments. We disagree with this conclusion for the following reasons:
 - the aim of refurbishment is to draw shoppers back into Knowle and increase footfall. This is welcomed, but it means more people will visit Knowle and increase pressure on already busy car parks. More spaces, not less, will be needed
 - although not always full, the level of car park usage is demonstrated to be consistently high, particularly in car parks closest to the development. (Note that some of the identified spaces are not generally regarded as public car parks, eg the Greswolde car park). It is not appropriate to simply count vacant spaces and conclude there is sufficient capacity; this ignores the reality of being able to find those spaces. With usage frequently very high, no account is taken of the movements of drivers searching for spaces. Since there is no visibility of where vacant spaces are, drivers move around and between car parks, leading to congestion, particularly in and around St John's Close. This situation will inevitably be exacerbated by the proposed development
 - if the Council grants resident permits to occupants of the new apartments (indicated as an option), this will further reduce available public parking. More information is required on how such an arrangement would work.
- c. The Submission Solihull Local Plan is now at an advanced stage. No account is taken of the impact on demand for village centre parking arising from Council proposals to build an additional 800+ homes in Knowle. Whilst we appreciate that efforts will be made to promote alternatives to car usage, the peripheral location of the proposed new housing will inevitably increase pressure on existing car parks. In considering this proposal, the Council cannot disregard the overall likely growth of traffic in Knowle arising from its own proposals.
- d. The Transport Study reviews local bus services and concludes that the development offers 'good opportunities to access the site by bus'. However, as Table 3.1 indicates, bus services are hourly, with very limited evening and weekend services. This does not constitute a 'good service'. The Council's own definition of a high frequency service suitable for a centre (Policy P7) is every 15 minutes. The level of accessibility by bus patently does not meet this standard. An increase in car usage - by new residents, additional staff and additional visiting shoppers - is an inevitable consequence of this proposal.



Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Forum

- e. It appears that most of the 13 spaces at the rear of the units would be used by staff, although this is not clear. What is clear, however, is that there are insufficient parking spaces to meet the needs of both staff and residents. Existing workers, and some residents, park on surrounding roads such as parts of Lodge Road, Milverton Road, the top of Longdon Road and around St John's Close. These roads are regularly subject to long stay parking, which causes significant congestion. It is also hazardous, as cars often mount the pavement to get out of the way of oncoming traffic trying to get past parked cars.
6. Safety: it is noted that there have been 11 collisions in 5 years in the vicinity of Warwick Rd, Lodge Rd, High St and St John's Close. Whilst we accept that these cannot be attributed to the shopping centre, it is indicative of the generally increasing congestion around Knowle village centre. The consultants, in commenting that 9 of these collisions were 'slight' and only 2 were 'severe', seem content to conclude that, as most were the fault of drivers or pedestrians, there is no problem with road layout. However, in our view collisions should not be discounted so lightly when the new development will attract new patronage, and hence more cars on roads already acknowledged to be very busy.

For the above reasons, we conclude that the traffic implications of the proposed development will exacerbate parking and congestion problems and requirements of NP Policies E2, T1, T2 and T5 will not be met. More needs to be done to alleviate these problems before the application is acceptable.

The Forum recognises that traffic and car parking problems cannot be addressed by the applicants alone. They and the Council need to work together to mitigate the effects of the shortage of parking before the application is determined.

There is potential for the applicants to amend proposals to alleviate some of the shortfall. For example, whilst cycle spaces are welcome and meet Policy T4 requirements, the provision of 72 spaces seems excessive. Some of those spaces should be converted to resident parking. A car pool scheme could also be considered, with dedicated parking at the rear coupled with restrictions on car ownership managed via conditions of sale. This could offer residents access to a car without having to own one.

This application creates an opportunity to reconfigure the poor layout and circulation of the public car parks in the area. The Traffic Study states at para 2.3.9 that the proposals include redesign of existing car parks in the immediate vicinity, as set out in Chapter 4 of the study. However, it is not clear from Chapter 4, 6 or from the plans that there is, in fact, any such proposal. If none exists, it is very disappointing that the applicant and Solihull Council are not taking this opportunity to improve traffic circulation and car parking layouts in the vicinity, and in so doing better aligning proposals with the requirements of Policies T1, T2 and T5 of the NP. This matter needs to be revisited.

Other policy considerations

Policy H2 Affordable Housing: Policy P4a of the Solihull Local Plan expects that 40% of dwellings on qualifying sites will be in the form of affordable housing. NP Policy H2 Affordable Housing requires that 25% of all new affordable housing shall be occupied by households with a strong local connection. The applicants are not proposing any affordable housing, and no viability assessment has been made available to explain why no such provision is being made. At present, therefore, it appears that Policy H2 is not satisfied.



Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Forum

Education and community facilities (policies ECF1 and ECF4): The proposal provides for a net increase in excess of 20 new dwellings. However, it is not clear whether the development will make any contribution to satisfy requirements of Policy ECF1 Formal Education - Places for Local Pupils. Similarly, policy ECF4 requires that developments of more than 20 dwellings should be assessed regarding the need to enhance local community facilities to meet the needs of new residents. The Planning Statement references these policies but is silent on whether / how they are being addressed.

CIL Contributions: We request clarification regarding whether CIL will be applied to this proposal, and, if so, how much. We note that a Viability Assessment has been requested, which should assist in answering these questions. We await its findings.

5. Interim Response Conclusion

This application will secure much needed investment and improvements to the retail offer and environment of Knowle Village Centre and in principle is much welcomed. There are, however, a number of areas set out above where proposals have not yet been demonstrated to satisfy the policies of the NP. It is very much hoped and expected that the Council will seek to address these matters with the applicants to ensure that this significant opportunity delivers the best possible outcome for local business and residents, and well as being a great investment for development.

The Forum wishes to be notified of any amendments to this important proposed village development and we look forward to the opportunity to discuss our views with the Case Officer in due course. We will finalise our response in the light of any further information received.

Roger Cook
Chair
Knowle Dorridge and Bentley Heath Neighbourhood Forum