



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy KN2 - Land South of Knowle (Arden Triangle) and Justification

1 Summary

These representations address firstly, an objection to the lack of evidence regarding the deliverability of this allocation: and secondly, a raft of measures that are needed to add to or strengthen policy provisions in relation to site KN2: South of Knowle (Arden Triangle). They concern densities; community access; highway access; trees and hedgerows; structure planting; primary health care; bus services; footpaths; and concept masterplans.

2 Representations

2.1 Policy KN2

In common with Policy KN1, these representations are in two parts. The first part addresses the Forum's concerns around the deliverability and effectiveness of the KN2 proposals, including the relocation of Arden Academy and creation of a 'through school'.

The second part addresses the measures that are required to add to and strengthen the policy provision in relation to KN2 in the event that evidence is produced to demonstrate that the deliverability issues can be satisfactorily resolved.

2.2 Part 1: Deliverability and Effectiveness Representations

The Forum recognises the benefits that a new Academy could offer the community. Neighbourhood Plan policies ECF 1 and 2 are relevant to the provision of school places and to support for new schools where identified criteria are met. The Forum also recognises that the proposals are controversial locally. They have previously generated both strong support for a relocated Academy and strong opposition on the grounds of loss of Green Belt and impact of the scale of housing on local infrastructure. Recent responses to the Forum's survey on Local Plan proposals indicates that this remains the position, although some who support a new Academy building have also expressed concern about the number of houses.

In common with the Hampton Road Site, the *raison d'être* for this site selection was that it would be of a scale to deliver significant community benefit. Confidence that such benefits will be achieved is therefore a key Forum objective.

The National Planning Policy Framework requires¹ that plans shall be deliverable. A key element is ensuring that necessary development contributions do not undermine deliverability.² Further advice is provided in the Government's guidance "Viability and plan making".³ Proportionate evidence is also required.⁴

The Forum is aware that the Council is working with Homes England and the other landowners on a package of measures to deliver the new schools and housing. However, no evidence has yet been produced to demonstrate that this site is viable.

¹ See, for example, Paras 16 b) and 35 c)

² See NPPF Paras 34 and 57

³ www.gov.uk/guidance/viability

⁴ See NPPF Paras 31 and 35 b)



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The Council's approach to viability has been to examine the viability of various typologies. The closest typology to the Arden Triangle site is Rural Greenfield (>200 dw) which is based (erroneously) on the Hampton Road site. However, the Arden Triangle site is atypical. The policy requirements show that the site would be subject to a large number of development requirements and abnormal costs (see footnote⁵). In addition to the physical constraints, particularly the challenge of locating the through school and sports pitches on sloping ground, there have been land ownership issues which have only recently seen a more comprehensive approach being adopted. Even then, landowner objections around viability were still being expressed in public immediately prior to the publication of this Submission Draft Local Plan. The typology approach is not appropriate in this case and a bespoke assessment should be carried out.

A specific assessment for this site would be consistent with government guidance on viability in plan making in view of its large size and education requirements⁶.

Delivery of this large housing allocation is integral to the effectiveness of the Local Plan. Without any credible viability evidence that it can be developed in a manner that meets the policy requirements, the effectiveness of the Local Plan is undermined and the test of soundness, required by national policy, has not been met. **In the absence of such evidence, the allocation should be deleted.** The Forum would, however, strongly prefer that such evidence is forthcoming and that the necessary confidence can be given to residents that the community benefits associated with the new schools will be achieved.

A further consideration in relation to viability is whether the policy requirements could be met with a reduced number of houses. Whilst the reduction in numbers from 750 to 600 is welcome, there are still considerable concerns that the densities proposed for development of this site are too high and not reflective of the area's character or its Neighbourhood Plan policies. These concerns are addressed below but are of relevance to site viability.

⁵ Identified development requirements and abnormal costs include:

- Reduced developable area / quantum of housing as a result of the necessity to:
 - mitigate effects on Rotten Row Farm (Grade II listed);
 - exclude the Local Wildlife Site;
 - exclude the MIND site; and
 - respect housing density considerations.
- Public Open Space provision (4.9ha) and green link to Middlefield Development.
- Provision of replacement Arden Academy including additional engineering works (levelling for playing fields) and advanced funding.
- Provision of new two-form entry primary school.
- Affordable housing provision.
- Highways improvements.
- Measures to promote and enhance sustainable modes of transport including pedestrian and cycle connectivity.
- Raft of Green Belt enhancements.
- Biodiversity offsetting.
- Financial contribution to primary health care (not mentioned).
- Need for enhanced public transport provision.
- Need for structural (screen) landscaping along Warwick Road (not mentioned).
- Provision of SuDS, flood risk management and de-culverting of water course in an integrated drainage / landscape / ecological scheme.

⁶ www.gov.uk/guidance/viability 'It is important to consider the specific circumstances of strategic sites'- p3 and 'It is important that costs and land requirements for education provision are known to inform site specific typologies and site-specific viability assessments' p4



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A second aspect of concern over deliverability relates to the effectiveness of proposed health and transportation mitigation measures. These are addressed in detail in the representations to the Settlement Chapter. In summary, however, residents are very concerned at the lack of any firm proposals to create additional local health care provision, particularly to local GP services: and also at the very modest proposals to improve local transport infrastructure, particularly to bus services. The Forum has called for a step change in the provision of local bus services but the Council's Highways Officer has indicated that this is unlikely to be achieved as a consequence of the new development.⁷ Without more positive proposals, the outcome will inevitably lead to an increase in car borne trips, congestion and pollution contrary to the sustainability aims of the Local Plan.

2.3 Part 2: Measures Required to Address Issues and Strengthen Policy KN2

Policy KN2 - Density Matters

The representations on the Knowle, Dorridge and Bentley Heath (KDBH) Settlement Chapter (general matters) address the matter of densities on the allocated sites. So as to inform the design of future development, density constraints should be summarised in the supporting text. In addition, appropriate densities need to be set out in Policy KN2 as an important development principle. This may have implications for the overall number of dwellings to be delivered on the site. It should be noted that in the event that lower densities lead to a reduction in housing numbers, the Forum would strongly oppose the release of any further Green Belt land within the area to compensate. The housing requirement for the Knowle, Dorridge and Bentley Heath Neighbourhood Area in para 234 of the Local Plan would need to be amended accordingly. **(See Mod 1 and Mod 8)**

Policy KN2 - New Criterion after Point 1 - Community Use of New Schools

There should be a policy commitment to community use of the new schools. **(See Mod 2)**

Policy KN2-2i) Retention of important landscape features

A Tree Preservation Order protects a number of trees on the Lansdowne parcel of land. There are also other trees, including veteran trees, and hedgerows which should be retained to protect the character of the site and the approach into Knowle. **(see Mod 3a)**

Policy KN2 2 - New Matter - Structural Planting

There should be a requirement for a structural landscape strategy to include screen planting along the Warwick Road boundary. **(See Mod 4)**

Policy KN2 2 - New Criterion after Point 2 - Primary Health Care

There needs to be a policy commitment to use developer funding for related improvements to the local primary health care system. **(See Mod 5)**

⁷ Email from Walter Bailey, Highways Officer 27th November 2020



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Policy KN2 2 - New Criterion after Point 2 - Public Transport

There should be a requirement in the policy for enhanced provision of public transport. (See Mod 6 and Mod 9)

Policy KN2 2 - New Criterion after Point 2

There should be a requirement to retain public footpaths including the public bridleway on their existing alignment. (See Mod 6a)

Policy KN2 5 - Concept Masterplans

Concept Masterplans: The reference to concept masterplans should not suggest that there could be a departure from the stated principles. (See Mod 7)

Policy KN2 6 - New Matter - Planning Obligation

There needs to be a legal mechanism to ensure that the objectives of this allocation are met and the new educational facilities are built alongside the construction of new housing. (See Mod 7a)

Justification of Policy KN2

Para 724 - Access to Station Road

It is not clear from the Knowle Transport Study and the Solihull Traffic Impact Assessment that relocation of Arden Academy has been properly assessed. Although the studies state that both the retained in-situ and relocation options for the Academy have been assessed, this does not appear to be the case. For example, no housing trip generation figures have been assigned to Station Road.⁸ This would be expected assuming higher density mixed development with access off Station Road. Similarly, no allowance appears to have been made for schools traffic using Warwick Road and Grove Road. This suggests only the in-situ option has been considered.

It is therefore not clear that the relocation of the Academy will reduce congestion on Station Road, particularly as much congestion is caused by dropping off along the road. It is understood from the Council's Highways Officer⁹ that traffic flows along Station Road will increase, but it is expected that congestion will be alleviated by diverting school gate drop-offs to the Warwick Road entrance. However, school drop offs are likely to continue near pedestrian access routes along Station Rd.

The transport evidence needs to be revisited and justification of this statement is required.

Access to new school away from Station Road. This requirement should be contained within the policy. (See Mod 3)

⁸ See table 6.4 Solihull Traffic Impact Assessment and Figure 2.12 Knowle Transport Study re traffic generation and trip distribution

⁹ Email 27th November 2020 from Walter Bailey, Council Highways Officer



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Para 726 - Site Constraints

The 'other valued landscape features' include mature hedgerows, other tree cover and the Cuttle Brook. These features, together with the protected trees, are intrinsic to the character of the various land parcels within the site and should be retained¹⁰. They should be referenced in the justification.

In addition, no reference is made to the topography of the site. There are significant levels changes, particularly on that part of the site proposed for the new schools. This should be recognised in this paragraph. (See Mod 7b)

3 Modifications

3.1 Policy KN2 - South of Knowle (Arden Triangle)

1. The site is allocated for 600 dwellings together with the redevelopment of the Arden Academy secondary school and new primary school to provide an 'all through' school.
 - X Densities shall be low in the south and east rising to a maximum of 40dph on the Station Rd frontage. (Mod 1)
 - X Community access to the schools shall be in accordance with terms agreed in accordance with Policies ECF2 and ECF6 of the KDBH Neighbourhood Plan. (Mod 2)
 - X There shall be no vehicular access to the schools off Station Road. (Mod 3)
2. Development of the site should be consistent with the principles as shown in the concept masterplan, which include:
 - i. Retention of important landscape features, including trees and hedgerows, to conserve the character of the site and the approach into Knowle; and the setting of heritage assets; (Mod 3a)
 - X A structural landscape strategy to include screen planting along the Warwick Road boundary; (Mod 4)
 - ii. A site layout designed to give priority to pedestrians and cyclists, providing safe and direct routes throughout the development linking to existing and proposed footway/footpath/cycleway networks;
 - iii. Provision of suitable SuDS and flood risk management. Careful design consideration should be given to the opportunities to reduce flood risk within the site boundary. Deculverting the watercourse passing through the site will be required to provide flood alleviation and environmental benefits;
 - iv. Provision of 4.9ha of open space. Doorstep, Local and Neighbourhood Play areas will be required. Public open space should provide a green link to the neighbouring Middlefield Development;

¹⁰ Arden Triangle, Site Specific Landscape and Visual Appraisal, Crestwood Environmental 2019



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- v. Retention of the Local Wildlife Site. No development will be permitted on the Local Wildlife Site;
 - vi. Biodiversity off-setting for the loss of semi-improved grassland;
 - vii. Retention of the MIND Garden;
 - viii. On site accommodation for older people in accordance with Policy P4E;
 - ix. 5% of open market dwellings to be provided in the form of Self and Custom Build Plots in accordance with Policy 4D;
 - X Developer contributions will be required for related improvements to the local primary health care system; (Mod 5)
 - X Provision shall be made for access to enhanced bus services; (Mod 6)
 - X Existing rights of way, including the bridleway, shall be retained along their present alignments. (Mod 6a)
3. Infrastructure requirements should include:
- i. Financial contribution to the provision of an 'all through' school to provide a facility for both primary and secondary education on the site;
 - ii. Highway improvements as required;
 - iii. Appropriate measures to promote and enhance sustainable modes of transport including pedestrian and cycle connectivity to the surrounding area including Knowle village centre, Dorridge Railway Station and the wider Green Belt.
4. Green Belt enhancements should include:
- i. Woodland planting;
 - ii. Improved landscaping;
 - iii. On site green and blue infrastructure that is multifunctional and accessible;
 - iv. Public open space;
 - v. Access improvements to the wider Green Belt beyond the site boundary;
 - vi. Biodiversity enhancements;
 - vii. Any other compensatory improvements that are considered acceptable.
5. The Concept Masterplan document should be read alongside this policy. Whilst the concept masterplans may be subject to change in light of further work that may need to be carried out at the planning application stage, any significant departure from the principles outlined for Site KN2 will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised. there shall be no departure from the principles and other requirements applying to Site KN2 as set out in this policy. (Mod 7)



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6. There shall be no commencement of development until a planning obligation has been executed governing the nature of the development; its timing and phasing; and the funding of all aspects. (Mod7a)

3.2 Modifications to Justification

Para 720 No change.

Additional para after Para 720

That part of the site adjacent to Station Road is closer to bus routes and to the amenities of Knowle and Dorridge. Higher densities would be appropriate. Elsewhere, the landscape setting and proximity to the listed Rotten Row Farm dictate a lower density of housing, reducing in a southerly and easterly direction reflecting the transition to countryside. (Mod 8)

Para 721 - 724 No change.

Additional para after Para 724

Policy KN2 requires access to enhanced bus services. As a minimum, applicants will be expected to negotiate with providers to achieve a meaningful diversion of existing services into the site. Increased frequency and the provision of new services shall also be considered and addressed where feasible. (Mod 9)

Para 726 The site as a whole includes a number of constraints including changes in levels, a Local Wildlife Site, protected trees and other valued landscape features, such as the mature hedgerows, other trees and Cuttle Brook. (Mod 7b)

727 - 729 No change.