

**CONSULTATION RESPONSE**  
**to the**  
**DRAFT LOCAL PLAN PROPOSALS**  
**of**  
**SOLIHULL METROPOLITAN BOROUGH COUNCIL**  
**by**  
**THE KNOWLE SOCIETY**  
**February 2017**

## **Introduction**

The Knowle Society (KS) represents its 3,300+ Members, the vast majority of whom live in Knowle. From its foundation in 1962 it has always attempted to maintain the character of the Village and to see that pressures for development and change do not engulf and destroy its unique character.

KS has limited this Response to Solihull Council's draft Local Plan Proposals of November 2016 (the Proposal) to the impact of those individual matters which have an impact on Knowle, its Conservation Area, its residents and businesses.

The Knowle, Dorridge and Bentley Heath Neighbourhood Forum (NF) have, in their Response to the Proposal, also included comments on impacts on Knowle and KS wholeheartedly supports the NF Response.

The Council has engaged in open discussions with Residents but it is noted the Councillor with Cabinet Responsibility for delivering the Proposal has made it clear that the greater extent of open areas of land taken for housing was deliberately biased to the south and east of the Borough.

The Council's decision-making process has been based on a points system which includes the following aspects:

well defined parcels of land  
preventing towns merging,  
checking unrestricted sprawl,  
safeguarding the countryside from encroachment, -and  
preservation of the setting of historic towns.

No indication has been provided of the Council's loading of any or all of these points to indicate any point being of a greater importance than another.

Consideration by KS has been given to the two areas in Knowle, numbers 8 and 9, against these five Council points as follows:

It is accepted both areas meet the first point but this acceptance is only on the basis of the areas being considered as a whole - rather than the sites making them up being considered individually. This could well have produced a false result,

Knowle is at least 2 miles distant from both Hampton-in-Arden and Chadwick End, but is already irretrievably linked to both Dorridge and Bentley Heath. It is therefore considered that the second point is irrelevant to both these areas,

Save for the smaller individual site (Knowle football club) incorporated in area 8, both areas certainly do not comply with the third point,

Neither area in its entirety complies with the fourth point because encroachment is precisely the result of including these areas to the edge of Knowle which result in its 'settlement boundary' being extended beyond the existing boundary further into the Green Belt,

As for the fifth point it will be shown later in this Response that the anticipated harm to the village and its Conservation Area caused by the development of these two areas will be considerable.

The following is a list of those points contained in the Proposal which this Report will address:-

- Housing numbers and size of the affected area of the Green Belt.
- Consideration of the proposed areas and concerns arising from their choice.
- Design of the new developments.
- Impact on the overall character of Knowle.
- Consideration of alternative sites.

Although they have been numbered in the text below, the order of the items does not represent the degree of importance attached thereto.

## **1 - Housing numbers and size of affected areas**

The current Local Plan of 2013 is deficient in its provision of future housing to meet anticipated needs. In addition, the overall number of new dwellings considered necessary by the Council in the Proposal has been increased by 2,000 (24% of the overall 8,384 total) as a result of the 'agreement to share' the shortfall of housing in the City of Birmingham. This 'agreement to share' is current Government Policy but it increases the area of Green Belt given up.

Of the 8,384 total, 2,250 (27%) are from windfall sites, ie those sites currently not under consideration but which may come forward during the period of the Proposal. Some of these are already expected to be in and around Knowle, exacerbating the impact of the planned sites.

The Council in 2016 invited land owners and others to submit sites for inclusion in the Proposal. This resulted in no less than 245 individual sites being identified of which 35 (14%) are in Knowle Ward, 34 in and around Knowle itself.

There are 18 Housing Allocations areas included in the Proposal made up of 39 of the 245 individual sites. These 18 areas include 2 in Knowle – numbers 8 and 9, which are made up of 9 of the 245 individual sites (3.7%).

However, the proportion of the number of dwellings (1,050) proposed for Knowle is 20% of the total number of dwellings to be provided in the Green Belt (5,250). We consider this both unjustified and unfair and the Council is challenged to support this imposition

## 2 - Consideration of the proposed areas and concerns arising from their choice.

### AREA 8

Taking the areas in numerical order, number 8 fronting Hampton Road includes firstly, the old Thacker's Nursery together with arable farming land to both its south-east and north-west and secondly, the current ground of Knowle Football Club. As these are separated by Hampton Road we contend that they should have been considered individually, not combined into one area.

The larger site including Thacker's disused nursery is bounded as follows:

on the most north western side by the rear gardens of houses on Wychwood Avenue and includes Purnell's Brook (the Brook), and the land protected by The Streamside Trust, together with some privately owned woodland between the Brook, and open farming land to the canal;

on its south eastern side by Hampton Road;

on its southwestern side the rear gardens of houses on the Arden Vale estate;

and on its north eastern side by open fields which extend down to the canal.

The area is sloping uphill away from Knowle and the north eastern boundary is located on one of Knowle's highest points. The impact of two or three-storey dwellings on that boundary will create an unacceptable skyline in Knowle.

There are other 'gateways' to the heart of Knowle to its north and south located on the A4141 which clearly identify the north/south limits of the important Conservation Area. A concentration of mixed development to the east will create the image of a town emerging, rather than a Village, which will detract from the Conservation Area status.

This concept of living and/or working in a *Village* is seen as an important feature which is valued by all. Its loss as a direct consequence of such a vast increase in its population with the necessary infrastructure requirements is that the Village will become a small town. This outcome would be severely detrimental to the setting of the historic Village of Knowle.

The likelihood of the suggested density being achieved on this site is low when taking into account those areas that cannot be developed. These are the wood, the stream including a necessary buffer area to retain the existing wildlife, ecology and flood plain of the Brook as well as access for maintenance. There is also the probable enlargement of a balancing pond which exists between the Brook and Hampton Road itself and, of course, the retention of the ancient hedgerows that cross the site coupled with no less than 16 Tree Preservation Orders, all of which would be at risk should the Proposal be approved. There is also the Public Footpath that links Wychwood Avenue with Hampton Road and which crosses the Brook at the only point possible taking into account the current route of the footpath between the houses on Wychwood Avenue.

The smaller site of the existing Knowle Football Club is located with its existing access/egress point being virtually opposite the junction of Arden Vale Road with Hampton Road and some 10 metres or so from the adjacent junction of the recently completed housing estate developed by Miller Homes. To create a relatively safe situation for access/egress from the new estate, a number of speed cushions have been recently constructed in Hampton Road but unfortunately, their type and spacing are such as to allow some vehicles to continue using Hampton Road at an almost unabated speed in excess of the posted 30mph limit.

More effective traffic calming measures would be necessary especially in view of any potential increase in traffic should either of these areas be finally considered appropriate for residential development.

In the meantime, the Football Club has taken the opportunity of announcing its proposed plan for a much larger sports complex including pitches and associated facilities. Its proposed location is that area of land between the Thacker Nursery's north eastern boundary and the canal.

The consequential effect of the proposed linking of the residential extension to Knowle to this considerably enlarged sports complex which, although depending upon on the built facilities of the sports complex may be an acceptable use of the Green Belt, it nevertheless is still considered to be inappropriate in this location. It is considered that this sports complex will combine with the new housing to produce an 'urban sprawl' on Hampton Road on its way into the Village.

This 'urban sprawl' will create a scale of development which is completely out of character and size with Knowle and thus fails to meet at least two of the five criteria mentioned above and therefore is both inappropriate and unacceptable.

## **AREA 9**

Considering now the Arden Triangle, area number 9, which comprises not only the present Arden Academy site but also that area of mainly arable land bounded by Grove Road and houses on developments behind Grove Road, including that currently under construction by Taylor-Wimpey, and the A4141 Warwick Road between Stripes Hill and Rotten Row.

It is public knowledge that the Academy is seeking to relocate to a new complex which has been called the Arden Centre for Community Learning. This would require an extensive part of site number 9 located to the north of the Taylor-Wimpey site now under construction.

It should be stressed that at the time of preparing this response no formal planning application has been made by Arden Academy. However, the proposal for this new complex is presumably why the number of dwellings proposed for this site is 750 on 46 hectares (16/ha) compared with that of 300 on 13 hectares (23/ha) comprising the two Hampton Road sites. It is therefore not an unreasonable assumption to make that part of site number 9 has already been assigned to this complex.

One of the many documents which have been produced by Arden Academy and which are now in the public domain makes reference therein on a site plan to a 'green dotted line' which is a 'proposed new Green Belt boundary'. This of course, demonstrates just how extensive would be the Green Belt erosion should both the complex and the housing be approved.

It should be noted that this Response does not address the proposal for this new complex as it is not part of the current consultation even though the site plans and schedule of sites suggest a different position has been already taken by the Council.

However, what this Response does do is to indicate that the approach to the Complex already appears to be a statement of fact. Much work still needs to be completed for inclusion in its planning application, consequently there is a distinct possibility that it may not after all, be built.

The inclusion of area number 9 in the Proposal is therefore considered to be flawed as demonstrated below:

The existing settlement boundary to the south of Knowle is to the rear of houses at the top of Stripes Hill, along the line of Milverton Close, Station Road and Downing Close to the south, to the rear of those houses to the east of Grove Road and the relatively recent development off Middlefield Avenue and the new Taylor-Wimpey development.

The Proposal indicates that the settlement boundary would extend to the boundaries provided by the remaining length of Grove Road to the south and the Warwick Road (A4141) to the east.

It is part of the normal planning process to relate any new application to the existing use of the land in question, which in this instance is mainly arable land and is all in the Green Belt.

The Proposal is to meet the declared need for additional housing in Solihull. It does not include any discussion of use of any part of area 9 for relocating and extending the Academy. If some of the land is, in fact, allocated to this scheme, it should have been clearly stated in the Proposal. That scheme must therefore stand or fall on its merits. If the Academy scheme were not to go ahead but housing built on the remainder of the area there would remain a large gap of land as arable land between Knowle's existing and this new housing. This in itself, is an unacceptable situation which, under normal planning guidelines, would mean such residential application being considered as an isolated development in the Green Belt and consequently refused consent.

Therefore, without there being a formal application being made for the Arden proposals on the northern part of the land and it having gone through due process, the consideration of the southern half for residential development must be considered to be premature.

The consequence of the above planning situation must be to withdraw area number 9 from the Proposal.

There is at present, only one identifiable location of road access/egress into area 9 and that is from the Warwick Road, approximately 100 yards from the bottom of Stripes Hill, and is based on the current access/egress to Lansdowne Farm. This access, even if a roundabout were to be provided, would clearly be insufficient and unsuitable for any significant development in the area.

### **3 - Design of the proposed developments**

The provision of affordable housing across all new sites included in the Proposal will increase from its current 40% requirement to 50% of all new housing. It should be noted that current Government Policy is to include under this category, 'starter homes'. It is understood that the Proposal follows such Government Policy with 20% starter homes and 30% affordable provision under the previous definition.

The average age of the population in Knowle is increasing due in part to the non-provision of affordable homes from the mid-1960's until recently. The three developments just completed/now in the course of construction all included a 40% provision of affordable homes as required under the current Local plan of 2013.

Although these developments, ie that in Four Ashes Road, Hampton Road and the Taylor-Wimpey development, did include a 40% provision of affordable homes, there are only three bespoke homes for older people in and around Knowle which have recently been developed and it is understood these are now close to 100% occupancy. Moreover, these are all residential homes which would only suit a minority of older people.

There is no mention of any provision in the Proposal for the inclusion of any additional accommodation for older people. It does not identify any future suitable provision for what is the largest sector of the Knowle population. This is considered completely unacceptable in such a fundamental extension of housing provision in the area.

Concern has been raised by residents of the two recent sites which have been developed and which included the current 40% requirement of affordable housing ‘pepper-potted’ around the site. This arrangement would appear to have had an adverse impact on all residents, those in market housing and affordable housing alike.

In part it is understood that this is due to a poor standard of management provided by the individual Registered Social Landlords ie Housing Associations (HAs). Unfortunately, HAs have grown to such large organisations that managing a site of say, 20/30 homes spread over several acres is not cost effective and residents tend therefore to be left to their own devices.

Of two possible solutions to this problem, one would be not to pepper-pot homes being managed by HAs. The second would be to encourage the private sector to provide homes at affordable levels by offering them at a discount, say 30%, of purchase price or market rent.

Those homes sold would be shared ownership with their leases preventing any increases in the share of the freehold originally purchased, thus maintaining affordability in perpetuity. Management would be provided on the same terms and conditions as those privately rented. In addition a proportion of such accommodation should be offered to local people only.

The densities stated in the Proposal mean that the houses would have to be small, built close to each other, with minimal gardens and narrow roads and poor or inadequate parking facilities as demonstrated on the three recent sites in Knowle and Bentley Heath. These new layouts have been very unpopular with local residents and do not fit with the character of Knowle or Solihull.

To avoid new homes with high densities being considered as the slums of the future, the Council should reduce the density and provide larger homes to improve living conditions with adequate gardens and off-road parking. Satisfactory site layouts which follow site contours will increase their appeal and restore quality of life provided in Knowle prior to the mid-1980's.

The loss of Green Belt overall in Solihull as a result of the Proposal is stated to be only 2.5%. A reduction in density in these Proposals might require an extra 0.5%. This would make very little difference to the loss of the Green Belt but would result in considerably improved developments.

#### **4 - Impact on the overall character of Knowle**

Knowle currently enjoys a reputation of a thriving retail and commercial centre with an increasing number of offices.

Nonetheless, all those who work in Knowle or who live in and around the Village enjoy the surroundings of the Village Centre which benefits from its Conservation Area status. Problems of daily use however, arise continually and those that cause the major concerns are traffic and parking.

KS, during its consideration of the recent planning application made by Kimberley Developments Ltd for a new Waitrose food store was made well aware of the details of both traffic and parking provided by Kimberley in support of its application.

Reference is now made to certain aspects of that application. As it received approval from the Council the details of traffic flows and car park used in the application means that such details were accepted as factual and accurate. The numbers quoted here are from the Kimberley/Waitrose Transportation assessment dated September 2011, prepared by Turner Lowe Associates.

Traffic flows are first addressed through the High Street. Save for the addition of traffic turning into/out of St John's Way which was surveyed in 2010, all other movements included in the approved application from Kimberley were noted in 2009. In view of the time that has since elapsed and the growth in traffic flows, these movements are considered underestimates. Although the DfT estimate traffic flows on the A4141 from station road to the M42 increased by 3.8% between 2010 and 2015, this increase has NOT been taken into account in the calculations below.

An empirical rule used by highways engineers is that each new home generates 10 traffic movements in any 24 hour period. Thus for site number 8 (Hampton Road) that would be 3,000 movements and for site number 9 (South of Knowle), 7,500 movements a day.

#### NORTHBOUND MORNING TRAFFIC

Taking the impact of area number 9 first, of the 7,500 movements generated it is not unreasonable to expect 10% of it would be in the weekday morning peak hour (08.00 to 09.00) and evening peak hour (17.00 to 18.00). With knowledge of the likely employment locations of the residents it is suggested that 75% of the morning movements (562) would be to travel north towards Solihull and the M42 with the same number returning from the north in the evening.

The consequential morning northbound traffic movements entering Knowle from the Warwick Road therefore would more than double from the 416 noted in 2009 to a total of 978 [416 + 562] during the hour, ie an average of 16 vehicles every minute.

In addition, vehicles join the High Street from Station Road, Wilsons Road and Kenilworth Road to travel north, so numbers passing through the High Street between Kenilworth Road and St John's Close were 726 travelling north between 8.00 and 9.00am . Adding the expected increase of 562 vehicles leads to 1,288 per hour travelling north on that section (21 per minute).

The same exercise of the impact of area number 8 is based on the not unreasonable expectation that in the weekday morning peak hour 50% of the total morning movements arising from the 300 homes in Hampton Road would be traffic attempting to enter Knowle at the already congested junction at the Hampton Road/High Street junction. The numbers would thus increase from the 219 noted in 2009 to 369 during the hour, ie an average of 6 vehicle movements every minute

#### SOUTHBOUND EVENING TRAFFIC

Carrying out the same exercise during the evening peak hour shows that traffic passing south through the High Street between St John's Close and the Kenilworth Road would increase from 734 to 1,299 per hour [734 + 562 - no increase from area 8] (22 per minute).

#### CUMULATIVE IMPACT

These figures would be expected to increase traffic levels as a result of the Proposal being approved to 2,021 vehicles for that hour travelling north and south through the High Street during the mornings and to 2,095 for that hour travelling north and south through in the High Street during the evenings.

Needless to say the additional traffic movements generated by site number 8 and crossing the northbound traffic will have even a greater impact on the north/south morning/evening traffic flows in Knowle from those generated by site number 9 itself.

The High Street is already at capacity –the current road works in Lodge Road have created a one way north only route in Lodge Road with south-bound traffic using the High Street to access Station Road. The build-up of south-bound traffic was seen to be the full length of Warwick Road from the M42 into Knowle between 8.00 and 9.00am during these works. No doubt there was also a queue north-bound at the same time. The Proposal will cause permanent queues of traffic emitting exhaust fumes contaminating both the atmosphere and High Street buildings which, in any event, will increase the risk of potential foundation damage over that risk which already exists.

It would also increase the hazard to pedestrians and result in the use of 'rat-runs' as drivers attempt to avoid the worst sections. There are no reasonable alternative routes for this traffic to follow.

It is noted that four-way traffic lights at the High Street/Lodge Road/Hampton Road junction would be inappropriate in a Conservation Area.

It is also understood that the temporary four way lights during the laying of the high-voltage electricity main between the sub-station near the M42 motorway junction 5 and the JLR base at Chadwick End did not work to such an extent they were discounted as a suitable arrangement during the current replacement of the gas main in Lodge Road.

Attempts have been made to deal with the current lack of parking provision in Knowle by the introduction of parking charges pending the anticipated introduction of additional spaces being provided by Kimberley. However, this has already been identified by the Council as inadequate with attempts now underway to improve their existing management. It is highly unlikely that any new measure introduced will satisfactorily address the basic shortfall by the provision of additional parking spaces. This would only be exacerbated by the Proposal should it be adopted by the Council.

Unless significant additional parking were provided, and funded either by an s106 Agreement or CIL, the problem would become even more acute with increasing street parking impairing traffic flow around and through Knowle.

It is obvious that there is a need for the provision of additional long-term parking, preferably with a site being to the 'edge of village centre' coupled with an increase in yellow lines to remove that option entirely. Dependent on the size of the site brought into such use, it may be necessary for more than one parking deck to be provided. However, if the current, or 'shoppers', car parks are re-priced so that long-term parking become prohibitive, then any new car park specifically allocated for long-term parking by making short-term parking prohibitively expensive, if its provision was not funded by the new developments, would require an operator to fund the development and recover the cost from income arising from the users of the car park. This suggestion is made notwithstanding that it is likely to be controversial. However, it is a drastic proposal to meet drastic increases in the housing provision if the Proposal is adopted by the Council.

The provision of other essential services of emergency fire, police and ambulance, will require a greater local presence to avoid the extremely poor response times during peak periods from the services currently based north of the centre of Solihull, especially with the increase in housing to the south of Knowle Village and with a limited access point. It is accepted that the poor response times for emergency vehicles may not be entirely due to traffic congestion around the Village centre but it certainly does not help those requiring emergency assistance at the time should such congestion worsen delays.

The scale of the Proposal is such that there will be considerable pressure on existing local services. Additional essential local services should therefore, be allocated, resourced and completed before the commencement of any new development. It has been the norm in the past when other large-scale increases in the population have occurred that the provision of such local services are not made until after developments are completed. This must not happen in this case if large scale development is to go ahead.



## **5 - Consideration of alternative sites**

It has already been mentioned that the thrust of the Proposal is to encroach into the Green Belt to the south and east of the Borough. The Council rejected a self-contained new village near Berkswell due, it is understood, to inadequate access. How inadequate was it for that opinion to be applicable? Is not the same situation going to arise in Knowle from these sites if they are developed?

Alternative sites lie to the south of the Borough but presumably, because they lie to the east, have been discounted. Those which either abut or have close proximity to the A3400 - a considerably better link to Solihull and the M42 at junction 4 in any event as the road does not pass through any settlement such as Knowle - have already been put forward to the Council.

From the published list the Council have to date discounted site numbers 34 (Box Trees Farm Craft Centre), 103 (Box Tree Farm itself), 199 (land at Four Ashes Road), 13 (land to the rear of 2214 Stratford Road, Hockley Heath) 14 (2440 Stratford Road and land adjacent) , 57 (Land adjoining 2102 Stratford Road), 121 (land west of Stratford Road, Hockley Heath) and 165 (Box Trees Site 2).

To demonstrate its preference for the two areas 8 and 9, both of which have a considerable direct impact on the Village of Knowle, over those alternative sites indicated above, the Council must publish its decision-making process based on their stated planning points if the Council is to win any support at all of their Proposal from those who live and/or work in Knowle.

## **Conclusion**

This Response to the Council's Consultation on the draft Local Plan dated November 2016 by The Knowle Society is submitted to the Council for full and due consideration. In due course The Knowle Society would wish to attend any Public Hearings to make relevant representations to the Planning Inspector.

The Knowle Society  
17th February 2017