



# KDBH Neighbourhood Forum

## Representations on Solihull Council's Submission Draft Local Plan: KDBH Settlement Chapter

### Representations on KDBH Settlement Chapter

#### 1 Summary

Modifications to the Knowle, Dorridge and Bentley Heath (KDBH) Settlement Chapter are needed regarding public transport; highway improvements; community access; affordable housing; primary health care; and densities.

#### 2 Representations

##### 2.1 Preamble

These representations relate to the Knowle, Dorridge and Bentley Heath (KDBH) Settlement Chapter (Paras 675 to 719) and its content on "The Settlement Now", "What is Required for the Settlement in the Future?" and "Proposed Approach". They should be read in conjunction with all the other representations of the KDBH Neighbourhood Forum:

- *Plan Introduction - Status of Neighbourhood Plans*
- *Policy P4A - Affordable Housing - Local Connection*
- *Policy P4C - Housing Mix*
- *Justification to Policy P5 - Housing Requirement for KDBH*
- *Justification to Policy P5 - Density*
- *Justification to Policy P5 - Concept Masterplans*
- *KDBH Settlement Chapter (this representation)*
- *Policy KN1 - Hampton Road, Knowle and Justification*
- *Policy KN2 - South of Knowle (Arden Triangle) and Justification*
- *Concept Masterplans - General Matters*
- *Concept Masterplans - KN1: Hampton Road, Knowle*
- *Concept Masterplans - KN2: South of Knowle*

##### **KDBH Neighbourhood Forum - Overall Approach**

The Neighbourhood Forum was established in 2015 for the purpose of preparing a Neighbourhood Plan for the Knowle, Dorridge and Bentley Heath Neighbourhood Area. The population is some 20,000.

The intention of the Forum was to bring forward a neighbourhood plan following adoption of the Local Plan Review. However, because of substantial delays, there was a need to continue ahead of the review. After 5 years of exceptionally hard work, the Neighbourhood Plan was made in April 2019 with a 34% turnout and 96% support at referendum.

The Forum became a registered charity in July 2020 with a focus on securing implementation of the Neighbourhood Plan for the benefit of our Neighbourhood Area.



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One of the main purposes of the Neighbourhood Plan was to ensure that new housing development would be of much better design and layout and more in keeping with the character and distinctiveness of the local villages than recent housing schemes. Recent developments have attracted criticism for cramped layouts, lack of greenery, inadequate parking and failure to take account of topography. The Forum therefore commissioned a Heritage and Character Assessment, Masterplanning/Design and Design Coding Study (both 2017) as well as Landscape Appraisals to inform our policies. This evidence base has also informed the response to the Local Plan consultation.

In summary, the response to this Local Plan consultation is as follows:

1. The Forum is not a NIMBY organisation. It recognises the need for new housing and that the neighbourhood area must play its part in meeting a fair share of the Borough's need. It does not welcome the loss of significant swathes of the Green Belt that encircles the villages, but there is a preparedness to accept housing development that is of a **scale** that does not add to existing **infrastructure pressures**, brings **significant benefits to the whole community** and **delivers well-designed housing** that reflects local character, distinctiveness and valued green landscape setting in a manner which reflects the Neighbourhood Plan policies.
2. The Forum welcomes the reduction in the **scale** of allocated housing from 1,040 to 780; however, there is still concern at the numbers proposed.
3. The Forum recognises the potential **community benefits** of new schools and sports provision, but acknowledges that they are controversial because of the extensive loss of Green Belt.
4. Representations are made relating to, amongst other things, lack of clarity over application of Neighbourhood Plan policies; the deliverability of the Knowle site allocations, in particular the community facilities; effectiveness of infrastructure mitigation measures; and concerns around concept masterplans, design and densities. Most of these are made in the response to this chapter, the KN1 and KN2 policies and their respective concept masterplans.
5. The Forum's conclusion is that the provisions of the emerging Local Plan are unsound in a number of important respects. In many places, proposals are not justified by the evidence. Elsewhere there is a lack of consistency with national policy. In particular, it is not always evident how a decision maker should react to development proposals. There is ambiguity and lack of clarity.

## 2.2 Settlement Chapter - Knowle, Dorridge and Bentley Heath

### Paras 685 and 690 - Public Transport

Contrary to the assertion in Para 685 (and at Para 690), the area is *not* well served by public transport. This is an important point, relevant to the accessibility of the allocated sites and the need to improve bus services.

With regard to bus services, the situation is as follows:



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There are two main bus routes: the A7 ("South Circular") is a service linking with Solihull and running in a clockwise direction through KDBH. The A8 runs in the opposite direction (anti-clockwise). Both provide an hourly service through the day and into the evenings; also, through the day on Sundays.

The 87 and 88 services run between Solihull and Balsall Common, via Knowle, with the 87 continuing to Coventry. The essentially hourly services run through the day but not in the evenings or on Sundays.

In addition, there are three once-a-day services to and from Solihull that pass through Knowle, Mondays to Fridays. These serve Kenilworth via Balsall Common (233), Norton Lindsey (513) and Leamington via Lapworth (514).

There is no bus route along Hampton Road. The poor service to the eastern part of the Land South of Knowle site is evidenced by the Council's Highways Officer in a recent response to a planning application at the Wyevale Garden Centre<sup>1</sup>. There are also no direct bus services from Knowle to the large employment centres around the NEC/JLR/Birmingham International Airport/ Arden Cross locations to the east and Blythe Valley and Shirley employment hubs to the west.

The assertion that Knowle is well served by buses needs to be corrected. If development is to proceed on the allocated sites, significant improvements to bus travel will be needed to satisfy the requirements of Policy P7 of the Local Plan.

In terms of rail, there is an important railway station at Dorridge; but this is towards the southern boundary of the settlement and not readily accessible from the Knowle allocations.

The text needs to be corrected so as to avoid the misleading description. **(See Mod 1 and 2)**

#### Para 696 - Improved Public Transport

This acknowledges the need for improved public transport in KDBH, but relies on a higher population to improve the viability of services. There are no specific proposals in the Infrastructure Delivery Plan other than CIL or S106 to address this.

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<sup>1</sup> 'Accessibility Policy P7 of the Solihull Local Plan 2013 states that all new development should be focused in the most accessible locations and seek to enhance existing accessibility levels and promote ease of access. Section a) i. of Policy P7 is considered to be the most applicable to the development proposals, which sets out criteria and distances development sites should be located within to nearby facilities and amenities, including bus stops with high frequency bus services, railway stations, food stores, doctor's surgeries, and schools. The application site is considered to be relatively isolated and is not in an accessible location. Table 1 of the Transport Statement (TS) prepared by M-EC in support of the development proposals sets out the distances to nearby local facilities and amenities. Unfortunately, the nearest facilities and amenities highlighted do not comply with the criteria set out in section a) i. of Policy P7. Although a bus stop is provided to the frontage of the application site, this is not serviced by a regular bus service and is a 'hail and ride' service. The Highway Authority also notes that the bus services available at the nearest bus stops along Station Road, approximately 825m from the site, do not offer frequent services. It is therefore considered that the application site is not in an accessible location and does not comply with Policy P7 of the Solihull Local Plan 2013.'



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We do not believe that the Council's proposed mitigation measures will make the site allocations accessible to a 'high frequency bus service', particularly as Knowle is not a priority within the Solihull Connect Strategy and transportation measures in the IDP are modest. If measures are unsuccessful, the outcome will be an increase in car borne traffic, congestion and pollution, contrary to the policy and sustainability aims of the Local Plan.

A step change in bus provision is required, alongside the emphasis on cycling and walking, to make the Knowle and wider transportation policies of the Local Plan effective. The Council's Highways Officer has stated<sup>2</sup> that this is unlikely to be achieved as a consequence of the new development, although rural bus services will feature prominently in the review of the 'Solihull Connected' strategy. The Forum stresses that if Knowle is to accommodate such a large scale of growth, then substantial investment in local transportation improvements is essential. This requires inclusion of proposals within the IDP and CIL Regulation 123 schedule to enhance bus services (and walking and cycling measures) within KDBH and on east west routes to key employment centres.

#### Para 698 - Highway Improvements

A consequence of development on the allocated sites is that highway improvements will be needed at several local junctions. The IDP (p26) considers that the impact of the proposed Local Plan growth in Knowle will be mitigated by '*a range of cycle, pedestrian and public realm improvements within and around Knowle High St complemented a number of small-scale junction improvements*'; and measures to better manage, control and enforce parking provision.

The Knowle Transport Study assesses a number of options for achieving the junction improvements. The Study identifies a preferred solution for some junctions, but defers a final solution to further detailed design and safety assessment at the planning application stage. The apparent lack of consideration of safety at junctions and along primary transport routes at this stage of the planning process is a matter of concern.

A further concern is that the study indicates that traffic lights would be a technically acceptable solution, although "*additional work will be needed to identify alternative highways solutions that do not include traffic lights.*" Traffic lights are presently absent along Knowle High Street. To introduce them into the heart of the Conservation Area would have a severe detrimental effect. The Local Plan should rule out traffic lights as a potential solution. Additionally, work in the form of the Knowle Transport Study<sup>3</sup> has concluded that, for the junction of Hampton Road with High Street, "*the double mini-roundabout is the best performing of the proposed mitigation measures*". As such, Para 698 should be modified. **(See Mod 3)**

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<sup>2</sup> Email from Walter Bailey, Highways Officer 27/11/2020

<sup>3</sup> Knowle Transport Study, October 2020, Section 5.2.3



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#### Para 699 Cycle Lanes and Footpaths

Enhancements to encourage walking and cycling towards the schools, local centres and public transport are welcomed, as is the requirement for new developments to ensure that connectivity is provided within and beyond their site boundaries. 'Quiet lanes' are also proposed, including along Lodge Road. The reality is that there is no indication as to how such improvements along priority routes, particularly Lodge Road, Knowle High St and Station Road, can be implemented having regard to their busy nature, narrow pavements and relatively narrow carriageways. The proposed linkages shown in the Knowle Transport Study do not appear to add any significant improvement to the existing routes. This threatens the sustainability and effectiveness of the Plan policies.

Further clarity is required on the deliverability/effectiveness of the proposed mitigation measures.

#### Para 700 - New Education Provision

Paragraph 700 refers to a replacement Arden Academy. However, there is no mention of access to its facilities by the community.

The original rationale for the Arden Triangle allocation was that residential development in this location would pay for a replacement academy; *and that this replacement facility would be a community facility.*<sup>4</sup> This was a paramount consideration in the balance of factors that led to the allocation of this site. A commitment to community use should be added to the Local Plan.

The Neighbourhood Plan has two policies that are particularly relevant. Policy ECF2 requires consideration of dual use, by the community, of school buildings and outdoor recreational facilities. Policy ECF6 provides for the submission of a Community Access Statement and agreement regarding the extent of public access. To avoid ambiguity and lack of clarity, and to address this important point, explicit reference needs to be included to these Neighbourhood Plan policies within the Local Plan (refer also to the Forum's representation on the Introduction to Neighbourhood Plan policies). **(See Mod 4)**

#### Para 703 - Sport and Recreation

The rationale for the Hampton Road allocation was also the opportunity for community use of the replacement sports facilities.<sup>5</sup> As with the Arden Triangle site, this was a factor of paramount importance in site selection. Paragraph 703 of the Plan refers to such use "where appropriate". However, a strong commitment needs to be included within the Plan. **(See Mod 5)**

See also representations on KN1 and related concept masterplan in respect of concerns relating to delivery of the new sports facilities.

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<sup>4</sup> "This is a chance in a lifetime opportunity to enhance our school and create opportunities and new community facilities for everyone in the locality – young and old": Presentation on the New Arden Centre for Community Learning, 7 December 2016

<sup>5</sup> "...new pitches and clubhouse could be a community facility", KDBH Forum Minutes Relating to Council Consultation Presentation at Public Open Meeting, 7 December 2016.



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#### Para 704 Concept Masterplans

The references to identifying key features to be retained and providing certainty about the important elements of the development to be delivered are welcomed. However, see separate representations relating to concept masterplans in relation to Policy P5, KN1, KN2 and their respective masterplans which reveal inconsistencies with the aims of this paragraph.

#### Para 707 - Affordable Housing and Smaller Market Homes

The Neighbourhood Forum's affordable housing policy (Policy H2) requires 25% of such housing to be occupied by households who have a strong local connection with KDBH. This is at variance with the provisions in the draft Submission Plan (Policy P4A). However, as recognised in Para 20 of the Plan, *"...there may be occasions when existing neighbourhood plans (particularly if they are up to date and reflect current evidence) provide a more appropriate local expression of a standard or expectation that should be taken into account and given due weight."*

The KDBH Neighbourhood Plan was "made" in April 2019. It is up-to-date and relevant. For clarity and to avoid any ambiguity,<sup>6</sup> the appropriateness of Policy H2 should be recognised in Para 707.

A similar situation arises with regard to the required percentages of social rented accommodation and shared ownership housing (Policy P4A 6). The Neighbourhood Plan (Page 39) indicates a strong preference for a higher percentage of shared ownership. To avoid any ambiguity, this point should be addressed in the Local Plan. **(See Mod 6)**

#### After Para 707 – New Matter – Primary Health Care

The three doctors' surgeries within KDBH are all under stress. The previous iteration of the Local Plan required a health facility to be provided on the Arden Triangle site. This is no longer proposed.

There are no specific mitigation measures proposed in the IDP to address the impact of new development on local provision, although it is noted that it does refer to a Borough wide need for significant additional GP surgeries and related facilities. We understand that at least 3 new GP practices are required across the Borough, but the CCG is still reviewing its estate strategy in accordance with changing service models in the NHS.

Knowle is identified as the largest rural community. It is also subject to a proposed substantial level of growth. The Local Plan aims to reduce the need to travel. These policy aims lead to the conclusion that new health provision should be made locally to meet the needs of the expanded KDBH population.

There needs to be a commitment, within the Plan, to use developer contributions for related improvements to the local primary health care system. Also, if a new site is required, a suitable location should be identified to avoid the further loss of Green Belt land. **(See Mod 7)**

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<sup>6</sup> NPPF Para 16 d)



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#### After Para 709 - New Matter - Densities

The matter of residential densities on allocated sites was given very careful and detailed consideration throughout the preparation of the KDBH Neighbourhood Plan. It is a matter to be addressed under Policy H1: Housing on Allocated and Larger Sites; and Policy D2 (Character and Appearance) requires developments to be of a density characteristic of the Area. A plan at Appendix 1 of the Neighbourhood Plan gives examples of existing housing densities in the Neighbourhood Area.

The text supporting the KDBH Neighbourhood Plan Policy H1 states:

***Density:** Lower housing density is a key characteristic of some parts of KDBH, particularly as it reflects the semi-rural nature of the Area. No absolute figure or average is set for future housing in the Neighbourhood Plan Area, but it is important that new development reflects the locality and that any suggestion of a cramped appearance is avoided.<sup>7</sup>*

*All other things being equal, those sites or parts of sites close to village amenities and public transport corridors or nodes are likely to be more suitable for housing of a higher density. Purpose built specialist accommodation (eg for the elderly) may also be suitable for higher densities.*

These Neighbourhood Plan policies were based on the evidence provided by studies commissioned for the Forum on Heritage and Character Assessment and Masterplanning and Design Coding, both of which highlighted that lower housing density is a key characteristic of the Area. Recent responses from residents to the Forum regarding the Local Plan confirm that high densities remain one of the greatest local concerns.

Turning to the provisions in the Local Plan, the concept masterplan for the Hampton Road site illustrates medium density and low density housing with a proposed range of 30-40 dph (the Local Plan, at Para 240, suggests a range of 30-35 dph for this sort of site). It is accepted that a higher density would be appropriate on the site of the existing football club should this be developed as a care village or retirement complex. However, elsewhere, only low and medium density development (up to 35dph) would be appropriate given the site context. There is low density housing to the northwest and southwest (12.4 dph on the Wychwood estate) and opposite the site where Grimshaw Hall and related buildings are set in extensive grounds.

At the Arden Triangle site, the concept masterplan illustrates high, medium and low density housing ranging from 30-40+dph. Again, higher density development may be appropriate close to the Station Road frontage, for example in a flatted development. However, densities of 40-50 dph for mixed development would be inappropriate having regard to the character and surroundings of the area. The Neighbourhood Forum's landscape studies have pointed to the need for lower densities elsewhere on the site, and particularly on the lower and eastern parts which transition to countryside.

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 in Policies KN1 and KN2 as important development principles. (See **Mod 8** - also modifications to Policy KN1)

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<sup>7</sup> KDBH Neighbourhood Development Plan Heritage and Character Assessment p 32 and Masterplanning /Design and Design Coding p 27, 72 and 74





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#### 3 Modifications

##### SETTLEMENT CHAPTER - KNOWLE, DORRIDGE AND BENTLEY HEATH

###### The Settlement Now

Paras 675 - 684 No change

Para 685 ~~The settlement is well served by public transport with bus services running throughout~~  
Bus services run through the area with routes to Solihull, Balsall Common and  
Coventry. **(Mod 1)**

Paras 686 - 687 No change

###### The Settlement in the Future

Para 688 to 689 No change

Para 690 The area is however ~~well~~ served by public transport and it will be important to retain  
and where possible improve the public transport offer. **(Mod 2)**

Paras 691 - 694 No change

###### What is Required for the Settlement in the Future?

Paras 695 - 697 No change

Para 698 **Highway Improvements** – The Council's highway evidence highlights that traffic in the settlement is set to increase over the Plan period, even without any new development. Additional traffic growth as a result of site allocations is likely to exacerbate this situation and highway improvements will be required at various locations. Traffic lights in the heart of the Conservation Area would be detrimental to the character and appearance of the area. However, options can be tested through pre-application engagement with the Neighbourhood Forum, local communities and the highways authority to reach the most reasonable approach. **(Mod 3)**

Para 699 - 700 No change

Additional para after Para 700:

The Neighbourhood Plan has two policies that are particularly relevant. Policy ECF2 requires consideration of dual use, by the community, of school buildings and outdoor recreational facilities. Policy ECF6 provides for the submission of a Community Access Statement and agreement regarding the extent of public access. Both of these policies are applicable to the new education provision in Knowle. **(Mod 4)**





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Paras 701 - 702 No change

Para 703 **Sport and Recreation** - Replacement of any lost recreation / sports provision as a result of development will be required to an equivalent or better standard, including access and use by the wider community where appropriate. New sports pitch provision is proposed on land off Hampton Road should redevelopment of the existing Knowle Football Club take place. Neighbourhood Plan Policy ECF6 provides for the submission of a Community Access Statement and agreement regarding the extent of public access. This policy will be applicable to the proposed new sports provision. (Mod 5)

Paras 704 - 706 No change

Para 707 **Affordable Housing and Smaller Market Homes** - Affordable housing will be required on development sites (in accordance with the Local Plan) and smaller market homes for younger people wishing to stay in the area will be sought. The Neighbourhood Forum's affordable housing policy (Policy H2) requires 25% of affordable housing to be occupied by household with a strong local connection with KDBH. This is different from the Borough-wide provisions in this Local Plan. However, given its local credentials, Policy H2 is the policy to be applied in KDBH. With regard to the required affordable housing tenure split (Policy P4A 6), regard will be paid to the Neighbourhood Forum's preference for a higher percentage of shared ownership. (Mod 6)

Additional para after Para 707:

**Primary Health Care** - The three doctors' surgeries within KDBH are all under stress. As such, proportionate developer contributions will be required towards improvements to the local primary health care system. An appropriate location to meet the need will be identified. (Mod 7)

Para 708 - 709 No change

Additional para after Para 709:

The density of future development will need to reflect a number of factors. It will be appropriate to make efficient use of land and exploit proximity to existing services and amenities. At the same time, avoidance of a cramped appearance will be important as will the characteristics and distinctiveness of the area, the landscape setting and proximity to listed buildings. (Mod 8)