

Ms Emma Tinsley-Evans  
Planning Policy  
Solihull Metropolitan Borough Council  
Council House  
Manor Square  
Solihull  
B91 3QB



**Your Ref**  
**Our Ref**



180VAV00

15 March 2019

Dear Ms Tinsley-Evans,

**SOLIHULL METROPOLITAN BOROUGH COUNCIL DRAFT LOCAL PLAN REVIEW  
SUPPLEMENTARY CONSULTATION (2019) - REPRESENTATION IN SUPPORT OF PROPOSED SITE  
ALLOCATION PO9 LAND SOUTH OF KNOWLE**

Cushman and Wakefield (C&W) have been appointed by the Strategic Land and Property Team of Solihull Metropolitan Borough Council (SMBC) (acting in the Council's capacity as land owner) to submit this representation in support of the allocation of Site PO9 Land south of Knowle and its release from the Green Belt as part of the Draft Local Plan Review Supplementary Consultation (2019).

The land does not fulfil the five purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF, 2018).

Release of this land would provide a sustainable location for the development of new homes to help the Borough achieve its housing requirement within the plan period and is therefore supported. The justification for the release of this proposed allocated land is detailed below.

SMBC land ownership extends to approximately 46ha immediately to the rear of Station Road, including the Arden Academy site and playing field. SMBC Strategic Land and Property are aware of the aspirations of the Academy and the Arden 2020 'The New Arden - A Centre for Community Learning' consultation being undertaken by the school, independent to the Local Plan Review Supplementary Consultation. The remainder of Site P09 is in different ownership. We understand these land interests will be promoted separately, but the council are keen to work with other landowners to develop a comprehensive masterplan.

**Site Location**

PO5 is located close to central Knowle with existing road infrastructure connecting the site along the A4141 to Solihull and further afield to Warwick and Leamington Spa.

This site is within a 1 mile radius of the following services and amenities:

- Knowle High Street Centre
- Dorridge High Street Centre

- Dorridge Train Station (services to Birmingham and Leamington Spa)
- Bus Stops for 8 services to Kings Heath, Kingstanding, Kenilworth and Solihull

Due to the site's close proximity to local facilities and services along with the low grade Green Belt land surveyed as part of the supporting evidence to the Draft Local Plan Review (DLP, 2016), this site is considered a sustainable location for development.

In addition, the site has clear, strong defensible boundaries with the A4141 Warwick Road to the east, Grove Road to the south and the built up residential area of Knowle to the north and west. A parcel of land within the west of the proposed allocation is currently being built out for residential use.

### Green Belt Assessment

The site in question does not fulfill the five purposes of the Green Belt set out in NPPF paragraph 134. The table below demonstrates the sites failure to enrich and contribute to the purposes of the Green Belt:

NPPF purposes of the Green Belt	Site PO9 contribution to the Green Belt
a) to check the unrestricted sprawl of large built-up areas	The site is adjacent to existing built up residential and commercial areas to the north and west with new homes being built on the south of the site. The eastern boundary abuts the A4141, this defensible boundary acts as a permanent restriction to the sprawl of the wider Knowle settlement.
b) to prevent neighbouring towns merging into one another	Knowle and Dorridge are two settlements that are already physically merged however, both have retained their own identity and act as two settlements. The release of this parcel of land would not have significant impact on the merging of the two towns.
c) to assist in safeguarding the countryside from encroachment	The site has a strong, permanent defensible boundary to the east due to the A4141 abutting the site. This boundary will act as a safeguard to prevent encroachment into the wider countryside.
d) to preserve the setting and special character of historic towns	The site is outside of the Knowle Conservation Area and is not close to historic towns or features therefore limiting the setting and special character to be considered.
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	N/A

### Planning Policy Background

SMBC have undertaken technical work to support the proposed site allocation within the Draft Local Plan Review (2016). The following table explains the relevant background and policy context for site PO9.

The release of site PO9 Land South of Knowle is policy compliant and therefore justifiable to help SMBC meet their housing needs across the Borough.

Documents relevant	Summary
SHELAA 2016	<p>(SHELAA ref: 1010) The assessment notes that the site performs reasonably well against suitability, availability and achievability criteria.</p> <p>It was recognised that whilst the site is predominantly Green Belt land, the site also contains the Arden Academy.</p> <p>The assessment further mentions the site having a willing owner and states that it is likely to come forward within the next 5 years.</p>
AECOM Interim SA Report 2017 <b>[table attached]</b>	<p>The assessment highlighted that the site performs significantly negatively on 4 criteria (SA1: regeneration &amp; Economic Development, SA11: Enhance green Infrastructure, SA12: Enhance &amp; Protect Historic Assets and SA14: Amenity).</p> <p>The site performs neutrally or better on the remaining 12 criteria.</p> <p>Appendix 1 of this report shows more detail on the sustainability attributes of the site.</p>

The site is included in the Draft Local Plan Review (2016) as a preferred option. The site has a Green Belt score of 5 (worst performing) in terms of GB accessibility stated in the supporting Green Belt Assessment (2017).

The DLP notes the site is accessible to the surrounding local amenities and settlements and avoids intrusion into the Knowle Conservation Area. Arden Academy is listed as a constraint and the DLP recognises that infrastructure requirements are necessary to ensure deliverability.

Development of the site would positively meet the objectives of Draft Local Plan Review (2016) policy:

DLP Policy	Summary
<b>P4(A&amp;C) – Meeting Housing Need (Affordable Housing &amp; Market Housing)</b>	<p><b>A:</b> This policy expects that allocated and unallocated sites over 11 units provide affordable housing of 50% subject to variable factors. Financial contributions will be sought where the affordable housing criteria cannot be achieved.</p> <p><b>C:</b> The policy notes that Market Housing negotiations will be in line with any development briefs provided for the site in question.</p>
<b>P5 – Provision of Housing Land</b>	<p>This policy explains that the Council have allocated 6,522 units within the DLP to help achieve the additional housing requirement of 15,029 homes during the 2014-33 period (averaging 791dpa). The policy also notes that the submission version of the plan will include phasing designations for each allocation.</p>
<b>P7 – Accessibility and Ease of Access</b>	<p>Seeks to ensure all development is in the most accessible locations and development over 100 units provide bus access for at least 30 minute daytime, evening and weekend frequency. Alongside provision of or contribution to off-site transport infrastructure schemes.</p>
<b>P9 – Mitigating and</b>	<p>Seeks to include measures that reduce the impact of climate change on a</p>

<b>Adapting to Climate Change</b>	strategic and site specific level.
<b>P10 – Natural Environment</b>	This policy states that the value of all benefits to the natural environment (NE) will be considered for all developments. Specific reference was made to the Arden Landscape for protection and enhancement. The policy takes into account the need to protect and retain the distinctiveness of the Boroughs NE. The policy further expects that developers incorporate measures to protect and restore the landscape.
<b>P11 – Water Management</b>	This policy requires all major developments to include SUDS and take into account the relevant River Basin Management Plan. It further expects that through risk assessments on impacts to surface and groundwater systems appropriate mitigation is included with development proposals.
<b>P14 – Amenity</b>	Seeks to ensure a good standard for all existing and future occupiers of homes and employment units. Criteria is set within this policy for new developments to provide and have access to high quality amenities.
<b>P15 – Securing Design Quality</b>	This policy expects all developments to contribute to or create high quality places inclusive of sustainable design which should follow a set of criteria within policy P15. Developments should demonstrate a Building for Life 10 or equivalent and comply with urban design guidance (also listed within the policy).
<b>P16 – Conservation of Heritage Assets and Local Distinctiveness</b>	<p>This policy lists areas whose characteristics make a significant contribution to local character and distinctiveness. The historical development and architectural styles in mature suburbs was noted, specifically relevant is Knowle.</p> <p>The Arden Landscape was also mentioned as important within this policy and development is expected to conserve heritage assets appropriate to their significance.</p>
<b>P17 – Countryside and Green Belt</b>	Seeks to safeguard the best and most versatile land. This policy also explains that development on Green Belt land would be rejected unless very special circumstances are present.
<b>P20 Provision for Open Space, Childrens Play, Sport, Recreation and Leisure</b>	<p>Seeks to secure well-designed new and improved open space and their maintenance as an integral part of new residential (including care homes), commercial (over 1ha or 1,000 sqm) or mixed-use development.</p> <p>The policy also requires that provision should be made for on-site amenity space that is well designed and in accordance with Policy P15 – Securing Design Quality.</p>
<b>P21 – Developer Contributions and Infrastructure Provision</b>	Expects that development will contribute or provide mitigation measures to make the proposals acceptable in planning terms as well as physical, social, green and digital infrastructure to support any associated needs.

Land South of Knowle is been included in the DLP Review Supplementary Consultation (2019) Masterplan Concepts supporting document which identifies constraints and opportunities for the site in terms of development potential. This envisages capacity for up to 750 homes.

The Local Wildlife Site along the Cuttle Brook to the south of the site with marshy grassland, low lying areas and main water bodies is identified as a constraint. The opportunity to relocate Arden Academy within the site to create a more efficient use of land is recognised. This does not negate the positive potential of removing the site from the Green Belt.

### **Next steps**

In advance of consultation on the Local Plan Review Submission Draft expected in Summer 2019, SMBC Strategic Land and Property are proposing to engage with other landowners to develop a comprehensive masterplan for the delivery of the site. It is envisaged that this will take into account, and be informed by, relevant commercial considerations in addition to planning policy matters, including delivery strategy, financial viability, programme and phasing.

Evidence set out is presented in support of the allocation of site PO9 Land South of Knowle and release from the Green Belt. The site does not fulfill all of the five purposes of the Green Belt set out in the NPPF. The site is well defined by strong, permanent defensible boundaries to all sides, and development within the immediate area has established a precedent.

We support the release of this site from the Green Belt and ask SMBC to consider this a **favourable site for release** to help the Borough meet its development needs.

Yours Sincerely,



**Clare Lucey MRTPI**  
Associate, Development & Planning



**Appendix 1: AECOM Interim Sustainability Appraisal 2017 Table**

	Site ID	Site Name	SA1. Regeneration and economic development	SA2a. Distance to Primary School	SA2b. Distance to Secondary School	SA3a. Proximity to bus and train services	SA3b. Proximity to principal road network	SA4a. Soil	SA4b. Minerals	SA7. Flooding	SA9. Enhance ecological sites	SA10. Landscape sensitivity	SA11. Enhance green infrastructure	SA12. Enhance and protect historic assets	SA14. Amenity	SA17a. Distance to healthcare	SA17b. Access to leisure facilities	SA19a. Distance to Key Economic Assets	SA19b. Distance to convenience stores or supermarket
101	PO 5	Chester Road/ Moorend Avenue	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Yellow	Green	Green	Green	Green
96	PO 6	Meriden Road	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Red
102	PO 7	Kingshurst Village Centre	Green	Green	Green	Green	Green	Green	Green	Green	Green	?	Yellow	Green	Green	Green	Green	Green	Green
91	PO 8	Hampton Road	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow	Green
92	PO 8	Hampton Road	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green
90	PO 9	South of Knowle	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green
100	PO 10	West of Meriden	Yellow	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
103	PO 11	Former TRW site	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	?	Green	Green	Green	Green	Green	Green	Green
89	PO 12	South of Dog Kennel Lane	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Red	Yellow	Green	Green	Green	Green
88	PO 13	South of Shirley	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green
106	PO 14	Arran Way	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	?	Green	Green	Yellow	Green	Green	Green	Green
107	PO 15	Jensen House, Auckland Drive	Green	Green	Green	Green	Green	Green	Green	Green	Green	?	Green	Green	Yellow	Green	Green	Green	Green
93	PO 16	East of Solihull	Yellow	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
105	PO 17	Moat Lane, Vulcan Road	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	?	Green	Green	Yellow	Green	Green	Green	Green
104	PO 18	Sharmans Cross Road	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	?	Yellow	Green	Green	Green	Green	Green	Green
95	PO 19	UK Central Hub/HS2 interchange	Yellow	Yellow	Green	Green	Green	Red	Yellow	Yellow	?	Green	Green	Red	Yellow	Green	Red	Green	Red
94	PO 20	Land Damson Parkwa	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green	Green	Green