

The Knowle Society
Response
to
Solihull Metropolitan Borough Council Local Plan
Informal
Supplementary Consultation

Introduction

The remit for The Knowle Society (KS) restricts activities to Knowle itself and therefore, save for any proposals arising outside Knowle in the Supplementary Consultation 2019 document (SC) which give rise to concerns for Knowle, whilst leaving questions that generally are relevant to other parts of the Borough, it does not necessarily mean KS either disagrees or accepts the relevant Policy as proposed.

In addition, attention is drawn where relevant to KS' Consultation Response to the Draft Local Plan Proposals 2016 submitted on 17 February 2017 (2017 Response).

No allowance has been made in this Response for any potential adverse implication arising on Knowle from any development of windfall sites in the area.

Q1 Do you believe that there are exceptional circumstances that would justify the Council using an alternative approach, if so, what are the exceptional circumstances and what should the alternative approach be?

It is well known that doubt has been placed on the 2014 based household projection figures as a consequence of its 2018 revised projections to establish local housing need. It is noted the draft Local Plan (LP) has indicated that in line with Government expectations the 2014 figures should be maintained which means developers in Solihull will need to provide an annual delivery rate of 885 dwellings per annum.

Supply of new homes is governed by demand and as the past average annual rate achieved over the last 10 years is half the suggested requirement, it is argued the proposed requirement rate is completely unrealistic. Needless to say any later change in the 2020 projections will, in any event, have an impact on future building rates but if it is less, then this raises the question of whether there is a need to demonstrate such land availability now.

The overall land availability should therefore, be provided over a much longer term than this LP suggests should be identified now. This creates uncertainty throughout the LP which should be removed by reflecting a current requirement relative to the long-established provision rate.

Q2 Do you agree with the methodology of the site selection process, if not why not and what alternative/amendment would you suggest?

No. The requirement for new housing is acknowledged but it is a Borough-wide problem. Putting to one side the validity of the numbers actually required, the provision of sites required to accept the huge increase in housing over the LP period appears to be unfairly balanced against Knowle.

It is suggested that this imbalance is purely due to Green Belt land which is considered to be readily available. However, Knowle probably suffers from some of the worst traffic problems in the Borough due primarily, to the proximity of the motorway network arising from an out of date Spatial Strategy.

The council-approved Knowle, Dorridge and Bentley Heath Neighbourhood Plan (NP) indicates that the population of the Plan Area in 2011 was just under 19,000 occupying 8,086 households (an average occupation rate of 2.35 persons) with about half in Knowle. This increased by 2016 to 20,000 occupying 8,068 households with a slight average occupation rate increase to 2.48 per household which, for the purpose of this Response, it is suggested that each household occupies one home..

During the three year interim, it is doubtful that Knowle had more than 200 new homes provided which would give an approximate current total of say, 4,200 homes with approximately 9,850 residents calculated on a pro-rata basis.

The overall number of new homes required – including the 2,000 for the HMA shortfall albeit which number is uncertain – is 15,029. The expectation of the two sites nrs 8 and 9 is 900 to 950 homes, the average of which (925) is used for the purpose of this Response. This total of 925 homes is approximately 6.15% of the total number of new homes required for the Borough or, for Knowle, 22% of the existing number of homes.

If the amber site of Golden End Farm (nr 59) is included with its suggested capacity of 250 dwellings, this would increase the proportion to 7.8% of the borough-wide total required and 28% respectively of the existing number of homes in Knowle.

Again, should the addition of the Blue Lake Road site be brought in to the proposed situation and which, although located in Dorridge, if it was to be developed, it would undoubtedly have a dramatic adverse impact on Knowle. The site is nr 104 with an estimated capacity of 340 homes which would increase the overall proportion of new homes in Knowle to approximately 10% of the Borough-wide total or, it should be noted, a 36% increase in the number of homes in Knowle.

The increase in the number of Knowle residents now proposed, based on the size of the current average household, could therefore be anything between 2,175 to 3,620 - an increase between 52% and 86% of the existing population - which is considered to be iniquitous as it is completely out of balance and unfair. This large expansion of the current population will provide such an impact on the existing infrastructure of Knowle that would be bordering on an impossible situation being satisfactorily resolved before 2035.

In any event, there do not appear to be any clear and decisive proposals within the SC to satisfy any infrastructure problems that will rise, especially in Knowle.

There is considerable concern regarding this lack of detail, particularly traffic-generated, let alone those that could cater for such a potentially vast increase in local residents living in Knowle

Consequently, it is suggested that if a number of new homes is to be provided in Knowle, they should be based on a more appropriate increase in population numbers. The past rate of 420 new dwellings per year with say, 40 per annum for Knowle (based on the number provided over the past three years) would, if continued at that rate, produce a total of 600 houses over the next 15 years. This existing rate of completing houses in Knowle, if not increased, should enable the less extensive but still necessary infrastructure that would be required could be provided over the same time frame.

Q22. Do you agree with the infrastructure requirements identified for Knowle, Dorridge and Bentley Heath, if not why not: or do you believe there are any other matters that should be included?

Although the Council has identified vague indications of infrastructure requirements it has not, as yet, produced definitive proposals which would enable a balanced and structured response to the whole of the Council's proposal for Knowle to be made causing considerable concern with this SC.

However, although the indicative requirements made by the Council would appear to go some way towards meeting known problems, it is the lack of supportive details, ie what, where and when during the next 15 years will be provided and how that would relate to an anticipated development programme of the provision of the new homes. Without any of that essential detail having been made available as part of this SC, not even the measurable impacts at various junctions which will have to be mitigated and how this can be achieved, the inevitable consequence is that this SC must be seen as being defective in this respect.

Q23 Do you believe that Site 8 Hampton Road should be included as an allocated site, if not why not? Do you have any comments on the draft masterplan for the site?

KS, in their 2017 Response in summary concluded that an 'urban sprawl' on Hampton Road on what has been in the past identified by the Council, for a very long time, as being unsuitable for development as it would otherwise create an unacceptable skyline to this approach to Knowle and consequently continues in its unsuitability for development .

The contours show the proposed site will require much thought in the design process should the site be duly allocated. It also leads up to what is, in fact, the highest point in Knowle and, should development be permitted, the consequence thereof could be the inclusion of a new and large sports complex between the proposed residential area and the canal which presumably could be seen as a defensible barrier.

If the canal is used in that circumstance in the future, it could open the flood gates to other development proposals on such land both to the north and south of this particular site.

The Grade II listed Grimshaw Hall located on or very close to the highest point in the immediate vicinity is located to the south of Hampton Road which could, therefore, subsequently become surrounded by further development which would cause serious harm to the Hall's setting in the open countryside. For this to be avoided, again if residential development were permitted to the north of Hampton Road, the possible sports complex should be excluded from any future proposal between that residential development and the canal by the clear statement limiting such residential development to the current proposed boundary just below the site's highest point.

Meanwhile traffic generated by both these aspects of potential development would create severe and unacceptable harm to the Knowle Conservation Area, access as it does now being at the north end of the High Street at a junction which is already overloaded with traffic movements at peak times.

Such development will undoubtedly create total grid-lock during those same peak periods, through unacceptable high exhaust emissions from standing traffic.

Adverse impact on the existing ecology of the area together with an unacceptable and inappropriate loss of Green Belt to this part of Knowle would be created if this proposal should go ahead despite the arguments for development based on the Atkins assessment of this part of the Green Belt.

Once again the lack of detail of any proposed infrastructure improvements at this junction does not help the validity and thus relevance of this SC.

Comments were also made in that 2017 Response on the adverse impact to the ecology of the area which appear to have been ignored. Therefore further information is required from the Council as to its proposals for ensuring any the harmful effect to the ecology arising on the site will be satisfactorily controlled.

Finally, should development be approved on this site, both its density and an adequate provision of open space on the site should reflect the policies included in the NP.

Q24 Do you believe that Site 9 land south of Knowle should be included as an allocated site, if not, why not? Do you have any comments on the draft concept masterplan for the site?

Considerable detail was submitted by KS in the 2017 Response in respect of their many concerns over the possibility of development on this site, and allowing for a further increase in traffic movement that may/will have occurred during the interim, with absolutely no new improvements to either road infrastructure through and/or the parking facilities in the Village Centre (in all directions) it is difficult to see that if development of this site is permitted, it will do nothing save worsen an already extremely busy road network especially during peak periods.

In addition the existing ecology of the site is extremely important and must not be ignored including the topography of the site's varying levels which may prove a challenge to the proposed development although, once more, there are the arguments for development based on the Atkins assessment of this part of the Green Belt.

The provision of two proposals for the site, one with and one without Arden's new development, is unusual. Whilst the arguments put forward in the 2017 Response demonstrate, nonetheless, comments on Option 2 are necessary due to the provision such a new and large development would make of additional land becoming available for residential development.

The existing school building is located on a site fronting Station Road opposite its junction with St Lawrence Way. The plan identifies it being suitable for high density housing but, in fact, there are many large homes fronting both sides of Station Road from the location of the site running in a south-westerly direction towards Dorridge and on the same side of Station Road as the school in a north-eastern direction towards the High Street the houses are to a medium density.

It is accepted the density of homes accessed from St Lawrence Way is of a relatively high density (certainly to the then existing standard of densities of the mid-1970's) and the traffic impact arising from/to St Lawrence Way at peak times has been known to cause some traffic disruption. It is acknowledged that such disruption is made worse by the number of students travelling to Arden the majority of whom walk.

To suggest therefore, another site of high density homes (the current development levels of which are probably at least 175% of those of 40 years ago) being created by Arden's re-location which is already in an area of traffic disruption which will become extreme, is unrealistic, to say the least. The relocation of the school will not in any way lessen the number of students in that area at peak time. Indeed, if Site 8 should be approved, it will see a substantial increase in students in any event.

There is no real benefit to Knowle should Arden not be redeveloped other than for the provision of a great number of homes which, the Council indicates, must be provided to satisfy the overall number required being as they are, based on Government figures.

However, the thrust of Arden's redevelopment is based on a perceived value in their existing site which is considered completely un-realistic – any high value in land cannot possibly be generated on high density homes – of which Knowle has insufficient at present but this site is not necessarily the right one due to its location.

Aside from a reasonable value being achieved by development of medium density homes to be in keeping with its existing environs, it does have a positive use which would be to the advantage of Knowle and its residents and businesses and that is to meet infrastructure requirements which, by definition, include the provision of health services, public services and emergency services.

At present there are just two doctors' surgeries, one to the north of the Village centre on the junction between Warwick Road and Lodge Road and the other close to the Station Road roundabout with Widney Road to the north and Grove Road to the south. A new Health clinic offering all necessary medical services under one roof close to the centre of the village, noting the potentially huge increase in the numbers of residents would suggest this location as being very appropriate.

Public services could also include facilities of a larger library with communal facilities therein as those which exist now, residents bolstered from the increased provision of number of homes all being able to take advantage easier access.

In addition there is the increase in emergency services which would be brought about by the huge increase in Residents in the area.

Current trends of the population includes 'on-line' shopping which results in deliveries made direct to homes. Consequently, the variety and number of delivery vans arriving in Knowle will increase proportionally as a result of such massive new development and which, for one reason or another, will need parking facilities from time to time. It is considered this site would be sufficiently large to cater not only for the parking of cars for the users of all these facilities stated above, it would also be of sufficient size for these delivery vans. To see a reduction in the random parking around the village being achieved would indeed be of considerable benefit to the local community.

That aside, any proposal which involves the location of Arden school is, at present, highly suspect as there has been no definitive indication of how the development will be funded assuming there is an acceptable planning solution for its relocation noting, in particular, that there is no guarantee from land owners to suggest firm agreements are in place to achieve Arden's aims.

Such redevelopment of Arden would create its own infrastructure problems. These would include student access, staff car parking etc, which must be part of any detailed planning application being made available to its own consultation process.

With these concerns and provisos in mind therefore, it must still be considered that Option 2 is the only option for further examination in the next round of consultation for future residential development. This statement therefore, is made solely as one of principle.

This Option would however, certainly have to include the retention of the new (junior or primary) school once the uncertainty of its potential need is resolved as well as meeting the additional demand from new development.

Q 38. Do you have any comments on these amber sites, ie is it right they should be omitted, or do you believe they should be included. If so, why?

Golden End Drive, Kenilworth Road – Site nr 59)

It is noted that the Council considers this Green Belt site is one that is 'highly performing' in accordance with the Atkins assessment on this site. This therefore begs the question why the Council should even begin to consider this site is also suitable for residential development.

This approach indicates a complete lack of consistency when the Council has been considering which sites should, or should not, go forward for inclusion in this SC.

However, it is acknowledged that it is relatively close to the centre of Knowle Village which might, but it is not guaranteed, see less traffic generated by those residents who wish to use the facilities in the Village centre.

Certainly, whilst this situation is far more likely than for those residents on either Site 8 or 9, it is considered that there will be a very high likelihood in the impact on traffic using High Street at the Kenilworth Road/Wilson's Road junctions – the increased traffic flow arising from Sites 8 and 9 will therefore will therefore suffer even more congestion travelling north and south worsening the already over-loaded High Street, especially of contamination from exhaust transmissions.

Blue Lake Road, Dorridge (Site nr 104)

It is understood that the Atkins assessment of this site's Green Belt status, being one that does not perform as highly as that of Site nr 59 (above) , nonetheless also gives rise to yet further and considerable adverse impact on the local infrastructure. This once more includes health, education and emergency services.

Although it has already been mentioned this site is not actually located in Knowle, its position is considered to be of considerable concern due to the anticipated increased traffic flow which will arise from its possible development.

North-bound traffic will either use Knowle Wood Road/Grove Road to Station Road or Norton Green Lane/Warwick Road direct in to Knowle Village.

South bound in the reverse direction with a further, and considerable, adverse impact on the traffic flow through Knowle itself or at the M42 junction 5.

Q 39 Are there any sites omitted for inclusion which you believe should be included; if so, which ones and why?

Once again reference is made to the relevant part of the 2017 Response which included the suggestions of eight alternative sites based on a far better existing infrastructure than could ever be achieved through Knowle due to the proposed huge increase in the population.

Save for their 'Step 2 assessment', the methodology of which certainly I questionable, there has been no real evidence put forward as to why the Council has, in its selection process, not discounted these sites which been included in this SC allocation.

The Council seemingly has demonstrated that the sites remaining in this current SC is only by it having gone out of its way to demonstrate their suitability despite there being many problems to be overcome to achieve their objective.

This situation is confirmed in the CS for both sites 8 and 9 relating to concerns including the existing topographical site conditions together with severe infrastructure difficulties – principally of traffic, their ability to not create disruption and maintain a clean environment – all of which at present, have yet to be identified.

Q 40 Would the above approach of requiring affordable housing contributions of 40% of total square meterage or habitable rooms/floorspace incentivise developers to build smaller market housing.

This suggestion is close to the ideal, but not quite there.

At present, the gross internal floor areas of market housing are subject to a continual downwards direction to make them smaller whilst still maximising the price the accommodation of each house offers to the market.

The result is housing which should provide less accommodation eg three bedrooms rather than four, in an acceptable total floor area so that its usable space is in fact, truly usable by it being capable of housing the requisite number of people comfortably, irrelevant of its tenure.

Q 41 If so, what is the most effective approach? Is it to calculate affordable housing as (a) 40% of bedroom numbers, (b) 40% of habitable rooms, or (c) 40% of habitable square meterage?

None of these alternatives.

To provide a 40% true representation of a total number of dwellings proposed for a site, then there should be provided 40% of each house type as affordable, thus by definition achieving a 40% representation of the whole.

Q 42 What is the best way of measuring developable space for this purpose: bedroom numbers, habitable rooms or habitable floorspace?

None of these alternatives.

The gross floor space of any house allows for non-habitable space included, such as utility rooms, kitchens and bathrooms all of which are an important factor taken into account by prospective purchasers/shared equity owners/tenants.

Their omission could seriously adversely affect overall floor space of a house by building smaller houses but maintaining the stated habitable accommodation space being provided.

Whether market housing or affordable housing, their overall floor areas should be the same for each house type being provided.

Q 41 What other measures would incentivise developers to build more smaller market housing?

Rather than 'incentivise' such an approach, minimum standards should be set of accommodation intended for families of a certain number of people.

Market research by developers highlight detailed awareness of demand in any location for new housing. The suggestion is that the Council should impose pre-stated minimum areas for each home relative to its intended occupancy as a matter of high importance.

Summary

The above responses have been made by The Knowle Society to the Informal Supplementary Consultation on Solihull MBC's Draft local plan 2019.

They are made without any benefit being provided from the detailed infrastructure proposals which, it is understood, are already in the possession of the Council. In particular their consultant has issued interim reports of a Traffic Study which would, it is considered, assist these replies to be more subject in their content.

However, such assistance which, it is hoped, would have been of assistance to the Council in their later deliberations has not been provided.

This poses the question of what will be the extent of the content of the final Draft Local Plan for the next round of consultations.


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The Knowle Society