

## **Submission on behalf of Golden End Farms**

### **Solihull LPR Draft Submission Plan**

**December 2020**

#### **Policy KN2: South of Knowle (Arden Triangle)**

##### **Q5. Comments on soundness of policy**

1. The soundness of this policy is uncertain as there are important questions and clarifications required relating to ensuring a comprehensive development of the site and the consequent viability of the proposal. It is clear that the key benefit of the KN2 allocation and the reason it was selected is the ability to secure a new improved Secondary School. This is made clear in both the policy and supporting text itself and from all the supporting promotional material for the site produced during the various stages of the local plan review to date. The main site promoter has focussed throughout on this key benefit, as has the Council in allocating the site.
2. However, there is concern in the manner in which the Policy and text is drafted that this key benefit could not be realised and that in fact only the housing off Warwick Road or Grove Road is ever delivered, leaving the school issue unresolved. Although the plan sets out at paragraph 709 an aspiration for a comprehensive development to avoid piecemeal development, neither the text or the policy wording itself does anything to prevent this. Indeed the actual replacement of the school is not even referenced in the list of infrastructure requirements, rather just the s106 funding is listed.
3. Given the importance of the above, and the fact that the allocation is controlled by numerous different landowners, there has to be a concern over delivery and viability of this site, and its soundness should be questioned as a consequence. Paragraph 709 of the Draft Submission Plan already signals this issue noting that the KN2 site has multiple and potentially complex land assembly issues. The proposal could well be unviable, but certainly it is very complex and this will mean that much of the housing will not be delivered until the later stages of the local plan period. In circumstances where the Council and site promoters cannot demonstrate during the examination a co-ordinated approach to delivery of the whole site and a high degree of confidence that the future redevelopment of the existing school is viable, then the site allocation should be considered not sound and removed.
4. In circumstances where sufficient confidence on viability is provided, and in order to then ensure the policy is sound and will secure a comprehensive development of the site, there should be a clear control mechanism in the policy to secure the school redevelopment prior to commencement of any housing development. Given the stated importance of this to the justification for the site coming forward, and the way it has been presented throughout the local plan review process, it is essential that such a secure mechanism is included in the

policy to ensure this key benefit is delivered. At planning application stage this will be dealt with through a s106 obligations but the Local Plan must signal more formally that this is a policy requirement.

## **Q6. Specific modifications requested**

1. In circumstances where the Council and site promoters cannot demonstrate during the examination a comprehensive and co-ordinated approach to delivery of the whole site can be achieved and that it is viable in line with paragraph 709 of the Plan, then the site allocation should be considered not sound and removed.
2. In circumstances where the comprehensive treatment and viability of the site can be satisfied and the policy is retained, the wording of Policy KN2 and accompanying text should be amended to ensure the critical education infrastructure is delivered. In these circumstances the policy should be amended as follows:
  - Policy KN2 Paragraph 3(i) should be replaced with the following: “***Re-provision of the existing Arden Academy and provision of new primary school as an ‘all through school. The preferred site for the school is on land immediately south of the existing school as shown on the concept masterplan. No housing development on any part of the site shall be allowed to commence until such time as the final site has been selected, and a commitment and timescale for the school development is secured, in addition to the necessary financial contributions’.***”