

Submission on behalf of Golden End Farms

Solihull LPR Draft Submission Plan

December 2020

Strategy for Knowle, Dorridge and Bentley Heath Chapter (Para 708-709)

Q5. General comments on soundness of approach

Overall Approach

1. The Proposed Approach to meeting housing needs in the settlement of Knowle, Dorridge and Bentley Heath is not sound.
2. Although we do not dispute that Green Belt release is required to meet housing requirements (given the lack of opportunities on previously developed land), we question both the site selection process as well as the overall quantum of land to be released.
3. On the issue of quantum, it is clear to us as set out in our response to Policy P5 that the Draft Submission Plan makes inadequate provision for housing overall to meet economic growth and to support the needs of the wider HMA. In this context and given that the settlement is close to the UK Central Hub and is already identified in the spatial strategy as a sustainable location for growth (with a high level of local services and good transport connectivity) it is clear that additional land releases in Knowle should be included in the plan to support sustainable patterns of growth.
4. The sites selected in the plan (KN1 and KN2) only provide for some 780 units. This is 270 less than previously identified for these sites in the 2016 Draft Local Plan. This reduction is a result of detailed site assessments which have shown these sites have less capacity than originally envisaged, rather than a decision to reduce housing growth in the settlement. It is clear to us therefore that the settlement has the capacity to accommodate growth of circa 1,000 dwellings as per the 2016 Draft Plan and that additional land should be released to accommodate this growth.
5. In relation to the site selection process, we find the approach taken to be unsound. The process has overlooked the most sustainable and deliverable site in the settlement, which is the Land at Golden End (Amber Site 4a/SHLAA ref: 59), in favour of sites with a wide range of impacts and complex land assembly issues. The selection of such sites and the omission of the land at Golden End is highly questionable in terms of planning for sustainable growth.

6. Paragraph 709 of the Draft Submission Plan acknowledges quite openly that *“Some of the sites, in particular land south of Knowle, have multiple and potential complex land assembly issues”*.
7. In fact, both of the allocations in the settlement area, KN1 and KN2, have land assembly issues that are potentially quite complex. We have made responses to both sites separately but in brief it should be noted that KN1 has 3 different landowners involved in delivery and KN2 multiple landowners (at least 7 it would seem). Whilst multiple landownership in itself is not an issue, it is not apparent from evidence provided to date that any joint ventures have been formed to a sufficient level of confidence that these sites can actually deliver both the housing and the required infrastructure that they are linked to, and if so at what stage in the plan period they would come forward.
8. There is also a question mark over the viability of these sites as is evidenced by the Council’s Viability Study (Cushman & Wakefield - Oct 2020). This study concludes that with the significant levels of infrastructure required and s106/CIL requirements, sites like KN1 and KN2 are only ‘marginal’ in viability terms. Whilst CIL rates can be used to improve viability this will have a consequent reduction in contributions to the much needed infrastructure required to be delivered alongside such allocations. Furthermore, given both sites will have significant abnormal costs due to topography, and given the reduced site capacity demonstrated through the Concept Masterplans, it is clear that there are many challenges for both sites to overcome. Resolution of such issues will undoubtedly take time to resolve and will delay both the housing and the infrastructure delivery on these sites.
9. Given the clear uncertainty over delivery of sites KN1 and KN2 as set out above and in our separate submissions on those sites, as well as the overall need to increase housing numbers, we consider the proposed approach for the settlement is not sound. In order to make it sound we submit that the land at Golden End should be included as an allocation. As explained in detail below, this site is not only a highly sustainable location for growth but can also provide an immediate contribution to housing delivery in the early years of the plan period. We submit that it should be included either as an additional site allocation or as a replacement site in circumstances where the Examination finds one or more other sites in the plan not sound.

Additional Site at Golden End, Knowle (Amber Site Reference A4/SHLAA ref: 59)

10. In what appears to be a degree of anticipation that more sites are likely to be needed in the Plan, Solihull MBC did undertake an additional stage of public consultation on the Draft Local Plan during 2019. This ‘Supplementary Consultation’ included a specific paper on a number of sites that have been omitted from the Draft Local Plan but that were considered by the Council to have performed better than other omission sites and to be less harmful. In essence they are the next tier of sites that the Council would have turned to as housing allocations in circumstances where housing requirements numbers required them to do so. These sites were called ‘Amber Sites’.
11. Amongst the Amber Sites is land at Golden End in Knowle. This site was referenced in the SHLAA as site 59 and in the Amber Sites Consultation paper is given reference A4.

12. This site immediately adjoins Knowle village to the east and offers a highly sustainable option to bring forward an exemplar housing development as outlined in the Golden End Site Supporting Statement submitted with this response. This Statement includes within it a Concept Masterplan.
13. The suitability of the site is clearly recognised in the Council's evidence base documents which score it extremely well in terms of accessibility, suitability, availability and deliverability. This is summarised as follows:

SMBC Site Assessment Summary – November 2020

14. The Council's Site Assessment summary for Golden End (Pages 124-126 of the Site Assessment Report dated November 2020) provides a very clear position on the site and an overview of the collective evidence base. It concludes as follows, with commentary from us in brackets:
 - I. Accessibility Study: The site has a very high score for primary school, GP and retail accessibility and a high for bus access providing an overall score of very high. (Indeed, the site is one of the highest scoring sites in the Borough).
 - II. Landscape Character: The site falls in an area with a medium score for landscape character sensitivity and landscape value and a low score for visual sensitivity, with a general low score for landscape capacity to change. (It is noted that the same assessment and identified pressures apply equally to all sites on the Knowle and Dorridge fringe and therefore the Golden End site does not perform any differently in this regard to any other selected site or omission site).
 - III. Sustainability Appraisal (Site Ref 52a): The updated 2019 Sustainability Appraisal Matrix for the site issued with the Supplementary Consultation shows 6 positive effects, 3 of which are significantly positive), 8 neutral effects and only 4 negative, none of which are categorised as significant. (This is a very positive outcome and one of the best scoring sites. Nevertheless, we actually consider the scoring should be even higher as it has not reflected the good proximity to existing local greenspaces correctly. The site is adjacent to playing fields and the LWS off Kixley Lane, as well as the canal network and therefore should have scored positively in this regard rather than negatively as it has done).
 - IV. Green Belt Assessment: The site falls within a higher scoring parcel. However, whilst the parcel as a whole scores high, the Council's commentary section then acknowledges that the site itself is well contained with strong features that would serve to make a logical defensible boundary, that it is only a small part of the wider parcel, and that built development is already present with ribbon development along Kixley Lane and Kenilworth Road. (We support this acknowledgment of the lower contribution to the Green Belt that the site provides than the parcel as a whole. Indeed, we have been making this very point throughout the local plan preparation process to date. Furthermore, we consider the Green Belt Assessment methodology and scoring is flawed in any event and we have stated this throughout as set out in the Site Supporting Statement. In essence, the site should never have been part of the

wider parcel being as it is so well contained. Furthermore, the Green Belt Assessment incorrectly ignores the existence of ribbon development within the parcel and the site itself.

15. The Council's concluding commentary on the site brings the various strands of assessment together and is worth repeating in full given it is so overwhelmingly positive in favour of the site:

“The site is located immediately adjacent to the centre of Knowle. The site itself is well contained by Kixley Lane, Kenilworth Road and the Canal, and these strong physical features would serve establish logical boundary, defining the extent of land to be removed from the Green Belt. Whilst it is recognised that the site lies within a parcel of land that performs highly in Green Belt terms as a whole, it is acknowledged that the site is a smaller part of the wider parcel and that built development is present in the immediate vicinity with ribbon development along Kixley Lane and Kenilworth Road. The site has very high accessibility overall and is in an area with medium landscape character sensitivity, medium landscape value and low landscape capacity to accommodate new development. The SA identifies 4 negative and 6 positive effects, with accessibility to public transport and local services and facilities included as significant positives. The site as a whole includes few constraints, although its close proximity to Knowle Conservation Area must be fully considered. Development of the site would be consistent with Option G of the Spatial Strategy for the significant expansion of rural villages”.

16. The merits of the site at Golden End are therefore clear to see and it remains a mystery therefore why it was then rejected. There is simply no justification for this particularly when the justification for the chosen sites is considered.
17. For example, in the reasoned justification for Site KN1 (Hampton Road) in the Supplementary Consultation 2019 (para 237) it states that site KN1 is: *“immediately adjacent to the built up area of the settlement and would represent a continuation of the existing development along Hampton Road. Whilst it is recognised that the site lies within a parcel of highly performing Green Belt, it is acknowledged that it comprises a small part of a wider parcel and that built development and/or urbanising influences are present either within the site or in the immediate vicinity adjacent to and opposite the site. The site is relatively well-contained and a defensible Green Belt boundary could be provided”.*
18. It is submitted that the above justification applies even more so to the site at Golden End. In terms of accessibility in particular, it is notable for example that the Golden End site is closer to both the primary school and the high street and has far better access to bus stops.
19. Finally, but importantly, is the issue of deliverability. Unlike many of the housing allocations in the local plan, including sites KN1 and KN2 as already referenced, the whole site is immediately deliverable. It is in single ownership, has no technical constraints and contains no existing playing fields that need to be re-provided. It has received overwhelming levels of developer interest and could therefore provide an immediate source of housing supply in the very early years of the local plan period.

20. Finally, in terms of the benefits that Golden End site can offer, the Site Supporting Statement and Concept Masterplan outlines the following benefits:
- The opportunity for at least 250 dwellings to cater for the full range of housing needs, from starter homes and live-work units through to housing for the elderly;
 - The inclusion of 6 hectares (15 acres) of new public open space and parkland, including new playing fields, a new canal side walk and ecological habitats;
 - Provision of additional village parking facilities and a coach access/turnaround adjacent to Knowle Primary Academy, helping to relieve school related congestion issues on Kixley Lane and provide additional village parking;
 - Provision of significant levels of pedestrian connectivity between the site, the village and the surrounding countryside;
 - Protection of existing boundary trees and hedges;
 - The opportunity to provide a walkers car park close to the canal bridge to relieve parking pressures by Knowle Locks;
 - Protection of views from the countryside into the Conservation Area and to the Church; and
 - Protection of the area of nature conservation north of Kixley Lane.
21. It is worthy of note that the Concept Masterplan was generally very well received at the KDBH Developer Showcase event which was held in July 2016 during the consultation period on the Draft Local Plan. It was listed in the event summary document produced by KDBH Forum as one of the 'most supported sites'. Unlike many of the sites listed in the 'most supported sites', it did also not appear on the 'most opposed sites' list.
22. Accordingly, it is concluded that the Local Plan should include the Golden End site as an additional allocation.

Q6. Specific modifications requested

1. In circumstances where the Examination is provided with insufficient levels of comfort that either of sites KN1 or KN2 are deliverable and viable, the relevant allocation should be removed.
2. Whether or not KN1/KN2 are removed, a new policy KN3 and associated justification text should be inserted into the Knowle, Dorridge and Bentley Heath Settlement Chapter allocating land at Golden End, Knowle for some 250 dwellings. The justification can be taken from the commentary taken from the Council's Site Assessment summary dated November 2020.
3. Adopting the style and content of the other allocations, this additional policy KN3 itself would read along the following lines:

“Policy KN3 – Golden End, Knowle

- 1. The site is allocated for 250 dwellings.***
- 2. Development of the site should be consistent with the principles as shown in the concept masterplan, which include:***
 - i. Preserving the views of St John’s Church***
 - ii. Provision of public open space and mini soccer pitches***
 - ii. Retention of trees and hedgerows along Kenilworth Road, Kixley Lane and the Canal***
 - iii. Enhancement of neighbouring Local Wildlife Sites***
 - iv. Enhancement of Canal corridor and pedestrian access route along west side of canal***
 - v. Provision of suitable SuDS***
 - vi. Pedestrian and cycle connectivity within and beyond the site boundary***
- 3. Infrastructure requirements should include:***
 - i. Financial contribution to new and improved education provision in Knowle,***
 - ii. Provision of car parking and a coach turning area off Kixley Lane to relieve current transport pressures on Kixley Lane associated with Knowle Primary Academy.***
 - iii. Vehicular access for the housing off Kenilworth Road only, and highway capacity improvements at the A4141 junction;***
 - iv. Appropriate measures to promote and enhance sustainable modes of transport including pedestrian and cycle connectivity towards Knowle village centre and the Grand Union Canal towpath.***
- 4. Green Belt enhancements should include:***
 - i. Access improvements to the canal and the wider Green Belt beyond the site boundary;***
 - ii. Improved landscaping;***
 - iii. On site green and blue infrastructure that is multifunctional and accessible;***
 - iv. Public open space including mini soccer pitches;***

v. ***Biodiversity enhancements.***

5. ***The Concept Masterplan document should be read alongside this policy. Whilst the concept masterplan may be subject to change in light of further work that may need to be carried out at the planning application stage, any significant departure from the principles outlines for Site KN3 will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised.***