



KDBH Neighbourhood Forum
Representations on
Solihull Council's Submission Draft Local Plan

List of Representations

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NOTE: The Forum's representations are in the form of a single document which can be split into twelve separate sections as necessary.

All the representations relate to the matter of soundness of the Submission Draft Local Plan.

The Forum wishes to participate in the hearing sessions in respect of the Knowle Settlement Chapter, Policies KN1 and KN2 and their respective concept masterplans. We consider this to be necessary as we are the statutory Neighbourhood Forum for the Knowle Dorridge and Bentley Heath Neighbourhood Area.



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KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Draft Local Plan Introduction - Status of Neighbourhood Plans

1 Summary

The Introduction needs to be modified to indicate that, following adoption of the Local Plan, neighbourhood plans will still be part of the development plan. In addition, neighbourhood plan policies that provide a more appropriate local expression should be identified in the related settlement chapter / allocation policy.

2 Representations

Para 20 of the Introduction to the Draft Local Plan states:

"There are now three neighbourhood development plans that have been 'made', and they formed part of the development plan for the Borough before this plan was adopted."

This sentence indicates that the neighbourhood plans are no longer part of the development plan. This is wrong in law. Where there is conflict, policies in the neighbourhood plan will be superseded by policies in the Local Plan that are adopted subsequently.¹ However, the neighbourhood plan still forms part of the development plan. The sentence needs to be modified accordingly. **See Mod 1.**

Para 21 of the Introduction states:

"The Council places great importance on neighbourhood plans and recognises the substantial efforts that communities have made in bringing forward plans. In the context that this plan provides a number of policies that include Borough wide standards or expectations, 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."

This paragraph is not clear and unambiguous.² A decision maker will not know which policies provide a more appropriate local expression. To avoid doubt in decision making, relevant policies will need to be identified in the settlement chapters / allocation policies and this point recognised in Para 21. **See Mod 2.**

The Knowle, Dorridge and Bentley Heath Neighbourhood Forum places great importance on understanding which of its policies will continue to provide "a more appropriate local expression". Specific representations on the relationship between the Local Plan and the recently adopted KDBH Neighbourhood Plan are submitted in respect of Policies P4A on affordable housing; Policy P4C on market housing mix; and in the relevant settlement chapter, particularly in relation to densities and community policies.

¹ NPPF Para 30

² NPPF Para 16 d)



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Representations on Solihull Council's Submission Draft Local Plan: Draft Local Plan Introduction - Status of Neighbourhood Plans

3 Modifications

Amend Para 20 as follows:

- 20 There are now three neighbourhood development plans that have been 'made' and are part of the development plan for the Borough, ~~and they formed part of the development plan for the Borough before this plan was adopted~~. Others that come forward will need to reflect the strategic policies of this plan. **(Mod 1)**

Amend Para 21 as follows:

- 21 The Council places great importance on neighbourhood plans and recognises the substantial efforts that communities have made in bringing forward plans. In the context that this plan provides a number of policies that include Borough wide standards or expectations, 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. These policies are identified in the related settlement chapter or allocation policy. **(Mod 2)**



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Representations on Solihull Council's Submission Draft Local Plan: Policy P4A Affordable Housing

Occupation by Households with a Local Connection

1 Summary

Policy P4A does not address occupation by households with a strong local connection. Whilst the local needs of households are covered in Policy P4B, this is only in relation to rural exception sites. There is a failure to recognise the presence of neighbourhood plan policy dealing with local needs affordable housing on allocated housing sites. In addition, differences regarding the tenure split are not acknowledged.

2 Representations

Policy P4A sets out the Council's requirements for the provision of affordable housing in developments providing 10 or more homes. The policy deals with tenure split as well as housing mix for dwellings that are to be both socially rented and in shared ownership. However, there is no reference to occupation by households with a local connection.

Occupation by households with a local connection is addressed, in part, in Policy P4B. This supports local needs housing, but only on rural exception sites. On allocated sites, the Draft Local Plan is silent.

During development of the Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Plan, the Forum was at pains to consider local occupation following strong representations by residents. This has found expression in Neighbourhood Plan Policy H2: Affordable Housing which provides for, amongst other things, 25% of all affordable housing to be occupied by households with a strong local connection (as defined in the policy). It applies to all new affordable housing, notably that on allocated sites.

Occupation is referred to in the justification to Policy P4A. Paragraph 182 states,

"The policy in this plan does not cover matters relating to how affordable dwellings will be allocated for occupation... However, where Neighbourhood Plans include a policy relating to the occupation of affordable housing (through for instance a priority being given to those with a strong local connection), then due consideration should be given to the neighbourhood plan."

The reference to "due consideration" is ambiguous and lacking in clarity. A decision maker would not know how to react to a development proposal.¹ Given the presence of a specific neighbourhood plan policy that is both relevant and up-to-date, clearly written mention should be made within Policy P4A. See **Mod 1**.

A second matter of concern in relation to affordable housing is the tenure split that is required under Policy P4A. Paragraph 6 of the policy states: "On-site provision and off site contributions should be calculated based on a tenure split of 65% social rent with 35% provided as shared ownership." This is at variance with the justification, in the KDBH Neighbourhood Plan, to Policy H2: Affordable Housing which states:

¹ NPPF Para 16 d)



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Representations on Solihull Council's Submission Draft Local Plan: Policy P4A Affordable Housing

“The Council’s policy seeks 65% of affordable housing to be social rented accommodation and 35% to be for shared ownership. Residents’ views, supported to some extent by the AECOM Housing Needs Assessment, show a strong preference for a higher percentage of the affordable housing provision to be in the form of shared ownership to support more young people and families. This will be pursued with the Council as part of consideration of any planning applications that come forward on strategic sites. This is included as a Community Action in Appendix 4.”

For clarity, the draft Submission Plan should recognise the scope for discussion on the tenure split to be achieved in new affordable housing within Knowle, Dorridge and Bentley Heath. See **Mod 2**.

3 Modifications

In Policy P4A, after Paragraph 8, add the following new paragraph:

The provision of affordable housing on allocated sites to meet the needs of households in that Parish or Neighbourhood will be supported where it is consistent with a neighbourhood plan. (Mod 1)

In the justification to Policy P4A, amend Paragraph 175 as follows:

The Council is justified in defining the tenure of ‘affordable’ homes on the basis that a spread of tenure options is required to satisfy needs and aspirations of households. In determining planning applications, regard shall also be paid to relevant neighbourhood plan provisions. (Mod 2)



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy P4C - Market Housing Mix

Meeting Housing Needs Market Housing and Justification

1 Representation

See also Forum representation to the Introduction.

The recommended market mix in this policy differs from Policy H3 Market Mix of the Knowle Dorridge and Bentley Heath Neighbourhood Plan (NP). The NP was 'made' in April 2019 and is up to date and relevant. It is noted that para 187 states that relevant policies in neighbourhood plans will be taken into consideration along with other matters. However, the other matters are also referenced within the policy. In view of the role and status of neighbourhood plans, they should also be included in the policy.

2 Modification

Add to policy P4C, after point 1vi:

1vii any relevant policies in neighbourhood plans.



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Representations on Solihull Council's Submission Draft Local Plan: Policy P5 - Housing Requirement for Designated Neighbourhood Areas

1 Summary

The housing number identified for the Knowle, Dorridge and Bentley Heath Neighbourhood Area (808) is derived from the estimated capacity of the selected sites. The Forum has raised issues around the policies and concept masterplans for these sites which seek modification to that number. The Forum would oppose any further site allocations to compensate.

2 Representations

Para 234 of the draft Submission Plan establishes the amount of housing to be provided in strategic housing allocations and other sites in the Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Area. This figure, excluding windfalls, is 808 of which 780 are on two strategic allocations. The figure is derived from a "bottom up" approach based upon the Council's assessment of the expected capacity of the selected sites.

Elsewhere in the Forum's submissions, strong representations are made to the proposed densities on the Knowle site allocations. This is because the Neighbourhood Plan aims to achieve a higher standard of design, more in keeping with the character and distinctiveness of its area (as reflected in Policies H1 and D1 of the KDBH Neighbourhood Plan). Lower densities or other revisions proposed on some parts of the allocated sites will be necessary to achieve this aim, as explained further in the responses to Policy KN1 and KN2 and their respective concept masterplans. This will have implications for the overall capacity of the allocations.

The purpose of this representation is to make clear that the Forum would strongly oppose pressure to release further Green Belt land to compensate for any consequential reduction in capacity that may arise. The appropriate amount of housing for the Knowle, Dorridge and Bentley Heath Neighbourhood Area would need to be modified accordingly.

3 Modification

In the event that the Forum's representations on the Knowle site allocations and concept masterplans lead to a revised housing capacity, a consequential modification will be required to the Knowle, Dorridge and Bentley Heath Neighbourhood Area housing number in Para 234.



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Representations on Solihull Council's Submission Draft Local Plan:

Policy P5 - Density

1 Summary

The content of the Plan in relation to density is not clear and unambiguous. The application of Policy P5 and the indicative density tables are inherently inconsistent with site allocation policies KN1 and KN2 and their respective concept masterplans. The provisions do not reflect the Neighbourhood Plan policies nor the published evidence base relating to local character and masterplanning.

2 Representations

On density, Paragraph 6 of Policy P5 and Paragraphs 237-240 of the justification recognise the need to consider *"in particular, the prevailing character, identity and setting of the surrounding areas"*. The opportunity to increase densities *"in more sustainable locations which are highly accessible by public transport, as well as cycling and walking"* is also recognised.

Policy P15 Securing Design Quality repeats the importance of conserving local character and distinctiveness:

"In delivering high quality design, development proposals will be expected to:

i. Conserve and contribute positively to local character, distinctiveness and streetscape quality and ensure that the scale, massing, density, layout, territory (including space between buildings), materials and landscape of the development is sympathetic to the surrounding natural, built and historic environment;"

These policies are supported. They are consistent with Policies H1 and D1 of the Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Plan. However, their application as indicated in the density table and in the Concept Masterplans for KN1: Hampton Road, Knowle and KN2: South of Knowle is inherently inconsistent with these policies.

The density table at Paragraph 240 indicates that mixed development should be at a density of 40-50 dph for limited or significant extensions at the edge of larger villages. However, proposed densities in Knowle above 40 dph on site allocations would be out of character with the area and its surroundings and would be unacceptable.

This is an example of the need to be clear about which Neighbourhood Plan policies provide *"a more appropriate local expression"* (refer to Forum representation on the Introduction).

3 Modifications

None required to the policy.

See proposed amendments to densities in representations to Policies KN1, KN2 and the concept masterplans.



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KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy P5 - Concept Masterplans

1 Summary

Concept masterplans are discussed in the justification to Policy P5. However, they are not addressed within the policy itself. Given their importance, key provisions should be included within the strategic policy. The provisions also need to be strengthened so as to give confidence to the public and a clear steer to developers. The status of the concept masterplans as part of the Local Plan needs to be confirmed.

2 Representations

Concept masterplans are discussed under the justification for Policy P5 - Provision of Land for Housing (at Paras 242 and 243). However, unlike all other matters in the justification, they are not mentioned within the policy itself. Their formal role and status are uncertain. The Plan is lacking in clarity.¹

The concept masterplans are central to the delivery of housing development under the Solihull Local Plan 2020. Each of the allocated housing sites has a concept masterplan. The development of some 5,270 dwellings is dependent upon their provisions. As such, it is important that their contribution in meeting the Borough's housing requirement is recognised in the policy; also, for local communities to be confident that what is shown in the concept masterplans is broadly what will be delivered and will not be subject to material change.

As written, the status of the concept masterplans within the Local Plan is uncertain and ambiguous. There is reference to the Concept Masterplan document being read alongside the allocation policies;² but the text does not confirm that the concept masterplans are part of the Plan itself. In this regard, the Council has provided clarification in an email dated 11 November 2020.³ This states that, "*The concept masterplans are intended to be part of the Draft Submission Plan...*". However, the matter needs to be clear from a reading of the Plan.

A further point of concern is the permanence of the concept masterplans. The allocation policies allow for departure from the concept masterplan principles by indicating that any significant departure would need to be justified and applications demonstrate that the overall objectives for the site and its wider area are not compromised.⁴

However, all important development principles should be a matter of policy. The Plan should not relegate to the concept masterplans the identification of the principles with which the development should be consistent. All important matters should be set out in policy and tested through the examination process. Later material changes would not be acceptable and would undermine public confidence.

¹ NPPF Paras 16 d) and 35 d) refer

² For example, see Policy KN1 7

³ Email dated 12 November 2020, Policy and Spatial Planning unit, Solihull Council

⁴ See, for example, Policy KN1 7



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy P5 - Concept Masterplans

For further clarity, amended policy should refer to the essential matters to be included within concept masterplans including key principles. Although referred to in the text⁵ (and in the allocation policies with regard to principles⁶), fundamental requirements should be determined by the strategic policy. Thus, for example, all key development principles relating to the development of sites Policies KN1 - Hampton Road, Knowle and KN2: South of Knowle (Arden Triangle) should be set out in those policies and demonstrated within the respective concept masterplans. See **Mods 1 and 2**.

Changes necessary to ensure consistency with national policy, introduce clarity and avoid ambiguity are set out below. Consequential changes to the allocation policies are dealt with in other representations, notably to Policies KN1, KN2 and their respective Concept Masterplans.

3 Modifications

Policy P5 - additional paragraph (Para 7)

Concept Masterplans

7. Development on allocated housing sites shall be carried out in accordance with the related concept masterplan and the principles set out in the housing allocation policies. The content shall be as prescribed in the Local Plan.⁷ **(Mod 1)**

Para 242 - addition to text

- 242 The Council has prepared a concept masterplan for each site to ensure confidence on capacity and deliverability. These form part of the Local Plan and are to be found in X.⁸ Concept masterplans include details on: **(Mod 2)**

⁵ See Paras 242 and 243 and Policy P4C

⁶ See, for example, Policy KN1 7

⁷ See Paras 242 and 243 and Policy P4C

⁸ Insert location of Concept Masterplans (eg appendix or separate volume)



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: 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.



KDBH Neighbourhood Forum

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

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 its policies. This evidence base has also informed the Forum's responses to the Local Plan consultation.

This response has also taken account of residents' views on the published Draft Local Plan proposals, as expressed in feedback via the Forum's web site and from a short online survey the results of which are summarised in Appendix 1. In view of the timescale and Covid limitations, the Forum has also had regard to views expressed in previous resident consultations.

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.



KDBH Neighbourhood Forum

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

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

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 Centre¹. 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)**

¹ '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.'



KDBH Neighbourhood Forum

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

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.

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 stated² 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 Study³ 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)**

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

³ Knowle Transport Study, October 2020, Section 5.2.3



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

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.*⁴ 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.⁵ 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.

⁴ "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": 'The New Centre for Community Learning', Presentation by Arden Academy on the Arden Centre site, 7 December 2016

⁵ "...new pitches and clubhouse could be a community facility", Michael Davies of Savills on behalf of the Knowle Football Club, recorded in the minutes of the KDBH Forum meeting of 7 December 2016.



KDBH Neighbourhood Forum

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

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,⁶ 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. The lack of additional health care provision is a major issue of concern in residents' feedback.

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 three new GP practices are required across the Borough, but the Clinical Commissioning Group 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)**

⁶ NPPF Para 16 d)



KDBH Neighbourhood Forum

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

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.⁷*

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 where transition to countryside is important.

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)

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



KDBH Neighbourhood Forum

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

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)**



KDBH Neighbourhood Forum

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

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:

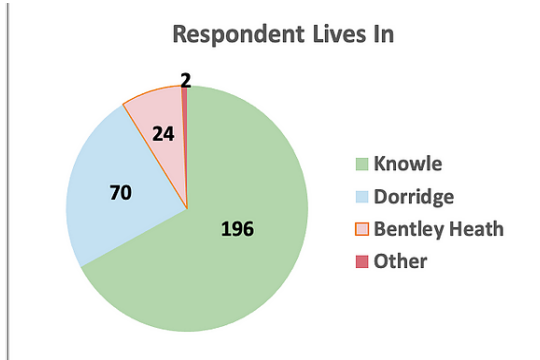
The density of future development will need to reflect a number of factors. It will be appropriate to make efficient use of land and exploit proximity to existing services and amenities. At the same time, avoidance of a cramped appearance will be important as will the characteristics and distinctiveness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



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

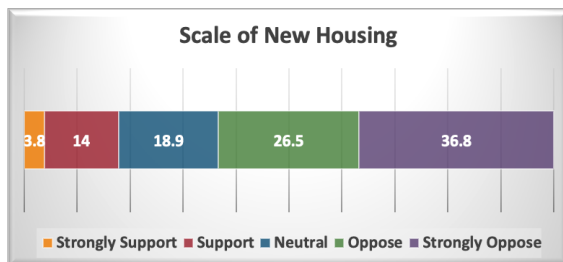
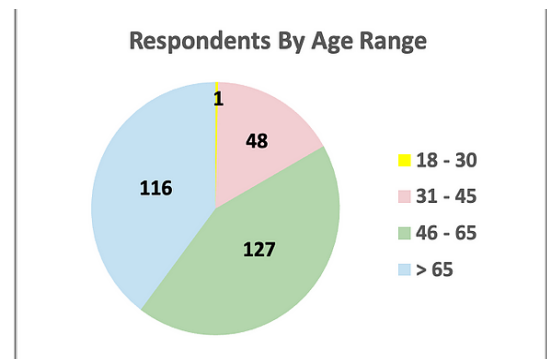
Appendix 1 - Residents' Survey



The Council's 6-week (the minimum legally allowed) consultation timescales severely limited the time that our on-line Residents' Survey could be available. Over just 6 days, the Forum received **814 detailed comments in nearly 300 responses**.

Unsurprisingly, perhaps, the majority of responses came from Knowle residents.

The Forum really appreciates the level of response in the challenging circumstances of lockdown and over a peak period in the run up to Christmas ('Black Friday!'). While ideally we would, of course, have wished for more time to seek views, we do also have the benefit of being able to draw on residents' responses to previous Local Plan consultations (both in support and objections); as well as the Residents' Survey undertaken during development of the KDBH NP Neighbourhood Plan.



6. What is your view on the proposed scale of new housing development (808) in KDBH?

While there is general recognition that some housing development is required, and the reduction from 1,040 homes is welcome, 63% of respondents still oppose or strongly oppose the scale of proposed development.

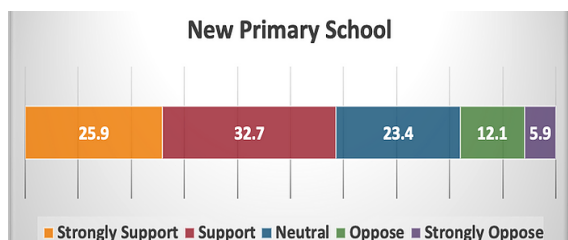


KDBH Neighbourhood Forum

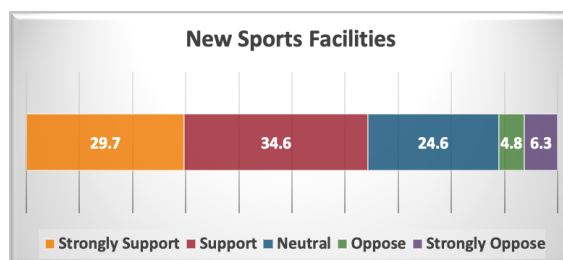
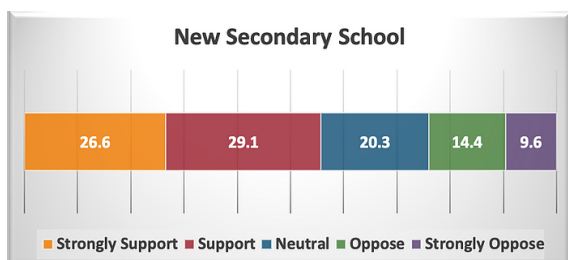
Representations on Solihull Council's Submission Draft Local Plan:

Appendix 1 - Residents' Survey

7. What is your view on delivery of new community facilities in KDBH enabled by new housing development?

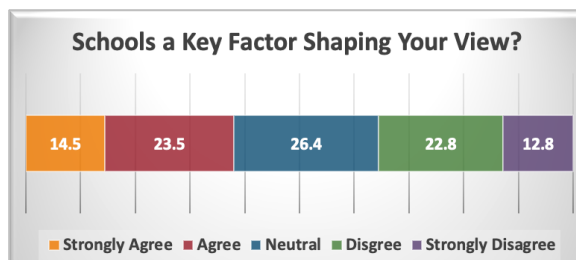
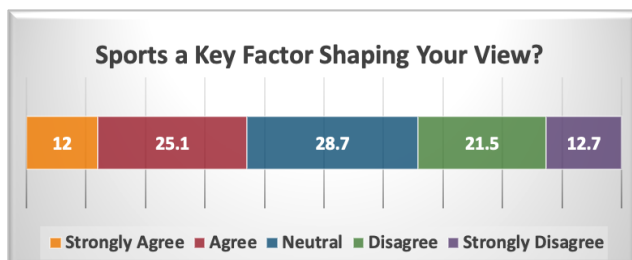


There was a majority - perhaps slightly less than anticipated? - in support of all three proposed new facilities. The sports facility was most supported at 64%; there was slightly greater support for a new primary school than a new secondary school, with the latter being most opposed at 24%.



8. The opportunity for new schools / new sports facilities is a key factor shaping my view

This was an interesting response in that there was no clear majority one way or another.



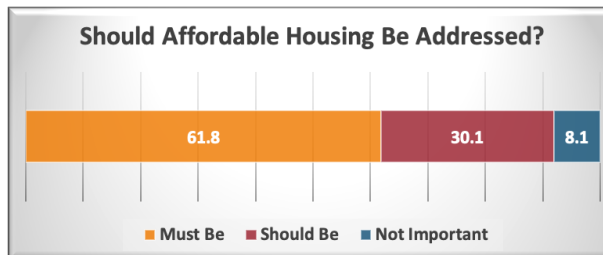


KDBH Neighbourhood Forum

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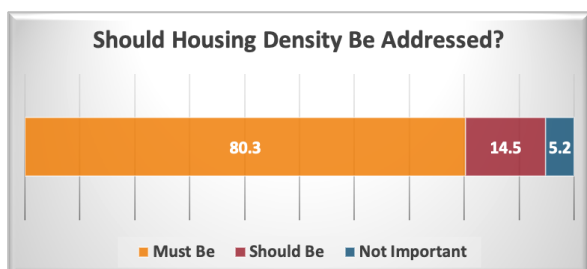
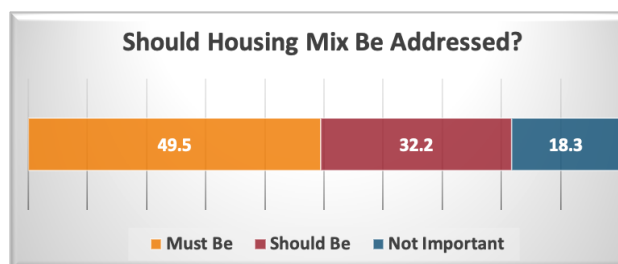
Appendix 1 - Residents' Survey

9. How important is it for the Council to clearly address proposed policies that are at odds with our KDBH Neighbourhood Plan policies and/or likely to affect village character and distinctiveness?



All three areas received a resounding majority of the view that the Council 'must' or 'should' address these aspects of policy. It comes as no surprise that the greatest concern relates to housing density, with 80% responding that this 'must be' addressed. There was slightly less concern regarding Housing Mix, with an 18% minority regarding this as 'not important'.

The Forum has created individual representations covering each of these areas - see R2, R3 and R5.

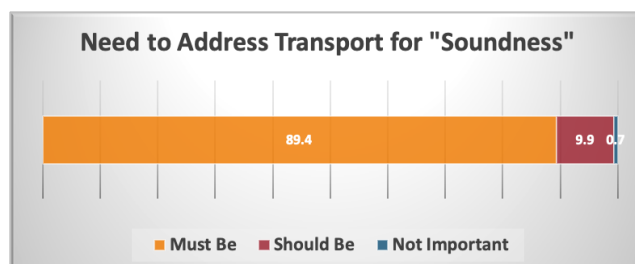
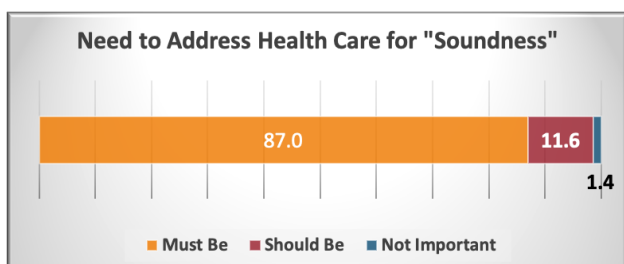


These matters are also addressed in other representations, notably the R7 'KDBH Settlement Chapter'; and in R8-R12 dealing with site proposals and Concept Masterplans.

10, 11. How important is it to the 'soundness' of the Council's proposals to have more certainty regarding provision of a) health care facilities and b) traffic, transport and parking in relation to new development?

The strength of feeling is as resounding as ever on what have always been two top priority areas for KDBH residents. The vast majority of responses were of the view that health and transport related matters 'must be' addressed in a way that provides a credible level of certainty for any development proposals to be considered 'sound'. Only 1% deemed health and transport matters to be 'not important'.

Your Forum has included representations on both these matters in R7 'KDBH Settlement Chapter' below, as well as R8-R12 that specifically relate to each of the sites.





KDBH Neighbourhood Forum

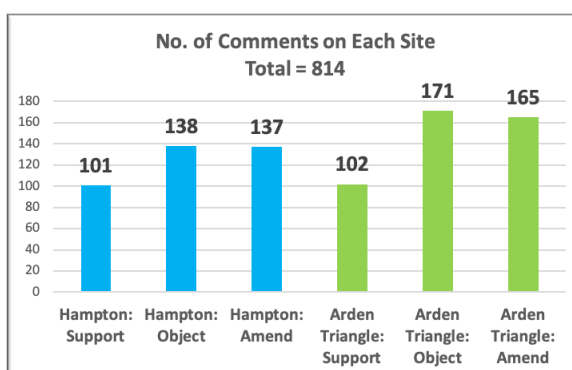
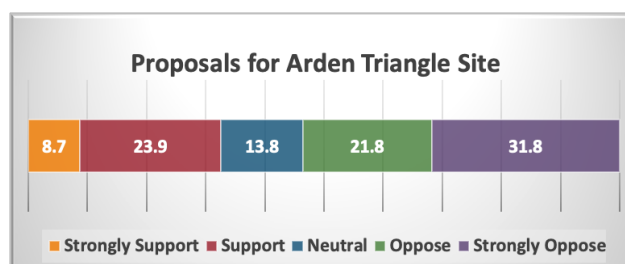
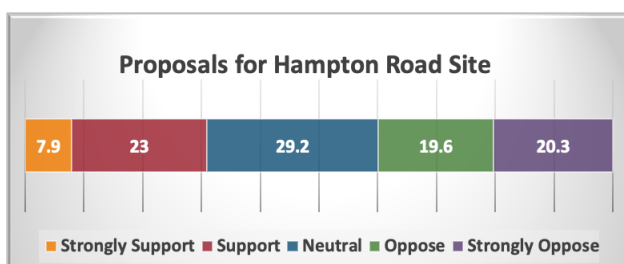
Representations on Solihull Council's Submission Draft Local Plan:

Appendix 1 - Residents' Survey

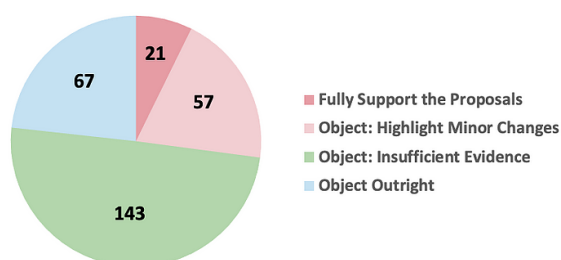
12,13 What is your view on the Council's proposals for a) the Hampton Road Site; b) the Arden Triangle Site?

Neither of the two sites could muster more than 1/3 of respondents in support of the new development, with a majority being against the proposals. It is noticeable that views are more strongly felt opposing the Arden Triangle development, there being far fewer 'neutral' than for Hampton Road site and 53% against.

As always, KDBH residents have provided us with a wealth of detail on what lies behind their views, contributing a total of 814 comments - which we value hugely and are still busy working our way through. Thank you!



Are the Proposals 'Sound'?



14. Taking everything into account what approach should be taken in making representations to the Council regarding whether their proposals are 'sound'?

This is the crunch question.

Nearly 3/4 of respondents are of the view that the Council's proposals are materially unsound. 23% indicated a preference for outright objection against 7% fully supporting the proposals.

A clear majority of 50% indicated that representations should object on the basis that the proposals lack sufficient evidence and require material changes. This is the approach that your Forum has taken in creating its 12 representations.



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

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KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

Policy KN1 - Hampton Road, Knowle and Justification

1 Summary

These representations address firstly, an 'in principle' concern about the lack of evidence to demonstrate the deliverability of this allocation: and secondly a raft of measures that are needed to add to or strengthen policy provisions in relation to site KN1: Hampton Road, Knowle. They concern densities; Grimshaw Hall; trees and hedgerows; footpaths; engineering works; community use; primary health care; highway improvements; and concept masterplans.

2 Representations

2.1 Policy KN1

These representations are in two parts. The first part addresses the Forum's concerns around the deliverability and effectiveness of the KN1 proposals, including the relocation of the existing pitches and facilities of Knowle Football Club.

The second part addresses the measures that are required to add to and strengthen the policy provision in relation to KN1 in the event that evidence is produced to demonstrate that the deliverability issues can be satisfactorily resolved.

2.2 Part 1: Deliverability and Effectiveness Representations

The Forum welcomes the reduction in housing numbers on this site from 300 to 180. This is positive in terms of protecting the setting of Grimshaw Hall, reducing the visual impact on the Hampton Rd approach into Knowle, creating a green setting and a development more in keeping with local character. The Neighbourhood Plan also contains policies (ECF3 and ECF5) that support the provision of new or improved sports facilities subject to criteria. Policy ECF 6 seeks Community Access Statements to provide for access by the community.

The Forum's concerns stem from the lack of credible evidence to demonstrate that this site allocation will be viable and deliverable. Such concerns should be addressed primarily at the Local Plan stage¹ rather than be left to potential pressure to significantly amend the extent and quantum of housing in an unacceptable manner at the planning application stage. Worse still would be the inability to provide the new sports provision. This is a fundamental point because the original rationale provided by the Council for selecting two large development sites in Knowle was the ability to deliver significant community benefit in the form of new education and sports facilities². The delivery of such benefits, to offset the loss of large areas of Green Belt, is therefore of critical importance to the local community.

¹ www.gov.uk/guidance/viability p2

² "...new pitches and clubhouse could be a community facility", Michael Davies of Savills on behalf of the Knowle Football Club, recorded in the minutes of the KDBH Forum meeting of 7 December 2016.



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

Policy KN1 - Hampton Road, Knowle and Justification

The National Planning Policy Framework requires³ that plans shall be deliverable. A key element is ensuring that necessary development contributions do not undermine deliverability.⁴ Further advice is provided in the Government's guidance "Viability and plan making".⁵ Proportionate evidence is also required.⁶

The Council's approach has been to examine the viability of various typologies. These include a Rural Greenfield (>200 dw) typology which is based on the Hampton Road site. However, the assessment ignores the fact that the proposed number of dwellings has now been reduced (from 300 to 180) and the site no longer fits into this typology.

It could be argued that a different typology should be applied, that relating to Rural Greenfield (<200 dw), based on a site at Frog Lane, Balsall Common. However, the site at Hampton Road, Knowle is subject to a large number of site-specific considerations, development requirements and abnormal costs.⁷ In addition to the physical constraints, there are land ownership and financial considerations which may impact on deliverability. The typology approach is not appropriate in this case and a bespoke assessment should be carried out.

With regard to land ownership and financial considerations, the Forum understands that Knowle Football Club has no legal interest in the land it occupies and that it is subject to restrictive covenants. Whilst the Forum is sympathetic to the Club's desire to improve its facilities, these raise significant concerns about the Club's ability to deliver, and to subsequently maintain, such a large new facility.

Without evidence to demonstrate that this housing allocation and associated sports benefits is deliverable, the effectiveness of the Council's Local Plan is in doubt and the requirements of the test of soundness have not been met. **In the absence of such evidence, Policy KN1 - Hampton Road, Knowle and related text should be deleted from the Plan.**

A second aspect in respect of deliverability relates to the effectiveness of proposed health and transportation mitigation measures. These are addressed in more detail in the Forum's comments on the Settlement Chapter. In summary, residents are particularly concerned at the lack of any firm proposals to create additional local health care provision, particularly local GP services which are already under pressure: and also at the very modest proposals to improve local transport infrastructure, particularly as regards improvements to bus services. The Forum has called for a step change in the provision of local bus services but the Council's Highways Officer has indicated that this is unlikely to be achieved as a consequence of the new development.⁸ Without more positive proposals, the outcome will inevitably lead to an increase in car borne trips, congestion and pollution, contrary to the sustainability aims of the Local Plan.

³ See, for example, Paras 16 b) and 35 c).

⁴ See NPPF Paras 34 and 57

⁵ www.gov.uk/guidance/viability

⁶ See NPPF Paras 31 and 35 b)

⁷ As before

⁸ Email from Walter Bailey, Highways Officer 27th November 2020



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

Policy KN1 - Hampton Road, Knowle and Justification

2.3 Part 2: Measures Required to Address Issues and Strengthen Policy KN1

Policy KN1 – Density Matters

The representations on the Knowle, Dorridge and Bentley Heath (KDBH) settlement chapter (general matters) address the matter of densities on the allocated sites. 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 out in Policy KN1 as an important development principle. **(See Mod 1)**

Policy KN1 2i

Reducing harm to the Grade 1 listed building, Grimshaw Hall: Reducing harm is not an appropriate action. The Plan should refer to *significantly* reducing harm. The requirement to enhance the setting of Grimshaw Hall by providing landscaped amenity areas (Para 716) needs to be added to the policy. **(See Mod 2)**

Policy KN1 2iii

Retention of trees and hedgerows along Hampton Road: The important hedgerows that cross the site should also be retained. These are the double hedgerow along the public footpath and the hedgerow to the east-northeast of this.⁹ **(See Mod 3)**

Policy KN1 4ii

Appropriate facilities associated with the provision of outdoor sport in the Green Belt: There needs to be clear reference to the acceptability or otherwise of a replacement sports pavilion. **(See Mod 4)**

Policy KN1 2 – New Matter – Public Footpath

The public footpath should be retained along its current alignment. **(See Mod 5)**

Policy KN1 –2 New Matter – Engineering Works

Engineering works necessary in creating the housing and playing fields: There needs to be reference to the need for sensitivity in the related engineering works to minimise visual impact. **(See Mod 6)**

Policy KN1 - 4 New Matter - Community Use of Sports Facilities

Sports pitches and pavilion: delivery of, and access to replacement sports provision: There needs to be an explicit commitment to community use and to the requirements of the Neighbourhood Plan policies ECF 5 and ECF6 - see above. **(See Mod 7)**

Policy KN1 - New Matter - Primary Health Care

There needs to be a commitment to use developer funding for related improvements to the local primary health care system. **(See Mod 8)**

⁹ See KDBH Masterplanning / Design and Design Coding, November 2017, p71



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

Policy KN1 - Hampton Road, Knowle and Justification

Policy KN1 5iii - Highway Improvement

Traffic lights should be ruled out in the Conservation Area. There also needs to be reference to the junction of Arden Vale Road with Warwick Road. **(See Mod 9)**

Policy KN1 7 - Concept Masterplans

The reference to concept masterplans should not suggest that there could be a departure from the stated principles. **(See Mod 10)**

Policy KN1 - New Matter - Phasing of Development

The replacement sports provision needs to be closely related to the phasing of housing to ensure that housing does not take place on the site without the delivery of the playing pitches. A legal mechanism is required and should be a policy requirement. This would also cover funding and the nature of development. **(Mods 10a and 10b)**.

Justification of Policy KN1

Para 713 and 714 - Sports Pavilion

Regarding sports pitches and associated facilities, the Local Plan states, "the relocation proposals may contain elements that would amount to inappropriate development". This, presumably, refers to the pavilion and to any floodlighting, car parking and fencing. There needs to be explicit reference to the acceptability or otherwise of the sports pavilion and associated facilities (Para 714). **(See Mod 11)**

Para 714 - Very Special Circumstances

Reference to very special circumstances: It is not possible to say that very special circumstances *will* exist, rather they *are likely to* exist. **(See Mod 12)**

Para 715 - Site Characteristics

Reference to rounding off the settlement: This is a poor description. The allocation represents a significant incursion into the open countryside beyond the build-up limits of Knowle. Only existing development to the southeast is contiguous. **(See Mod 13)**

Para 716 - Hedges

Development to be confined to the area between the former hedge lines (now removed) and Purnell's Brook: The significant hedges are still in place (see above). **(See Mod 14)**

Para 718 - Accessibility

This site, particularly the northern site, does not perform very well in accessibility terms by walking or public transport. This should be amended. (see **Mod 15**)



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

Policy KN1 - Hampton Road, Knowle and Justification

Para 719 - Spatial Option G

The reference to this allocation being consistent with Spatial Option G is incorrect. It should be Option F relating to the limited expansion of rural villages as set out in paras 62 and 69 of the Local Plan. **(Mod 16)**

3 Modifications

3.1 Policy KN1 - Hampton Road, Knowle

1. The site is allocated for 180 dwellings.

X Densities shall not exceed 35 dph other than in any care village or retirement complex developed on the southern part of the site. **(Mod 1)**

2. Development of the site should be consistent with the principles as shown in the concept masterplan, which include:

- i. Preserving the setting of the Grade 1 Listed Grimshaw Hall. Development should be set back from the immediate locality to avoid harm. The area between Hampton Road and the limits of the development shall be landscaped as amenity areas. Only if harm cannot be avoided should mitigation be considered, and then it should be fully justified and demonstrated to be successful in significantly reducing harm; **(Mod 2)**
 - ii. Provision of 1.4ha public open space. Any formal play features will need to be sympathetic to the historic setting of Grimshaw Hall;
 - iii. Retention of on-site trees and hedgerows and along Hampton Road to conserve the character of this approach into Knowle; **(Mod 3)**
 - iv. Retention of Local Wildlife Sites and provision of an appropriate buffer to Purnells Brook Woodland Local Wildlife Site. No development will be permitted on the Local Wildlife Site.
 - v. Provision of suitable SuDS and flood risk management. Development should be located outside of the areas identified as being higher risk flood zones.
 - vi. Pedestrian and cycle connectivity within and beyond the site boundary
 - vii. 5% of open market dwellings to be provided in the form of Self and Custom Build Plots in accordance with Policy 4D
 - viii. Relocation of the existing sports pitches and sports pavilion currently occupied by Knowle Football Club; **(Mod 4)**
- X Retention of the public footpath along its current alignment. **(Mod 5)**
- X Minimising harmful visual impacts as a result of the engineering works necessary to create the housing and playing fields. **(Mod 6)**



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

Policy KN1 - Hampton Road, Knowle and Justification

3. The land currently accommodating Knowle Football Club has been identified as a potential site for the development of a care village or retirement complex. Subject to other policies in the Plan, the principle of older persons' accommodation in this location would be supported.
4. Replacement sports provision:
 - i. The current site of Knowle Football Club will not be available for redevelopment until the existing pitches have been re-provided and are ready for use, within the vicinity of the existing site.
 - ii. Appropriate facilities associated with the provision of outdoor sport will be permitted in the Green Belt, provided they preserve the openness of the Green Belt and do not conflict with purposes of including land within it.
 - iii. The preferred site for the relocation of the existing playing pitches is between the new development and the canal, as shown on the concept masterplan.
- X Community access shall be in accordance with terms agreed in accordance with Policies ECF5 and ECF6 of the KDBH Neighbourhood Plan. (Mod 7)
- X Developer contributions will be required for related improvements to the local primary health care system. (Mod 8)
5. Infrastructure requirements should include:
 - i. Financial contribution to new and improved education provision in Knowle, as proposed on Site Allocation KN2 South of Knowle (Arden Triangle);
 - ii. Reprovision of the existing sports pitches;
 - iii. Highway improvements as required including speed reduction measures and access improvements along Hampton Road, and highway capacity improvements at the A4141 junction and at the junction of Arden Vale Road with Warwick Road; **(Mod 9)**
 - 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.
6. Green Belt enhancements should include:
 - i. Woodland planting;
 - ii. Improved landscaping;
 - iii. On site green and blue infrastructure that is multifunctional and accessible;
 - iv. Public open space;
 - v. Access improvements to the wider Green Belt beyond the site boundary;
 - vi. Delivery of, and access to replacement sports provision;
 - vii. Biodiversity enhancements;
 - viii. Any other compensatory improvements that are considered acceptable.



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

Policy KN1 - Hampton Road, Knowle and Justification

7. The Concept Masterplan document should be read alongside this policy. Whilst the concept masterplans 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 outlined for Site KN1 will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised. there shall be no departure from the principles and other requirements applying to Site KN1 as set out in this policy. (Mod 10)
8. There shall be no commencement of development until a planning obligation has been executed governing the nature of the development; its timing and phasing; and the funding of all aspects. No more than 20% of the housing shall be occupied before the playing fields and sports pavilion are brought into use. (Mod 10a)

Justification

Paras 710 - 712 No change

Para 713 The current playing pitches will need to be re-provided and available for use prior to the redevelopment of the existing football club. The "nature of the development" referred to in the planning obligation shall include the number of houses, details of the proposed sports facilities and provision for use by the community. The funding provisions shall show how the housing will pay for the development of the sports facilities. (Mod 10b)

Commence para 714 'The preferred area of relocation is.....'

Para 714 (cont) The Council therefore believe that 'very special circumstances' will are likely to exist to support the relocation of the sports pitches and associated facilities and a sports pavilion of proportionate size. Notwithstanding this, development proposals should be sympathetic to its Green Belt location, local context and character, in accordance with other policies in the plan. **(Mod 11)**

Para 715 Delete **(Mod 12)**

Para 716 The northern part of the site is located immediately opposite the front elevation of the Grade I listed Grimshaw Hall. Evidence from the Council's Heritage Impact Assessment recognises the significance of this important heritage asset and identifies potential harm to its setting as a result of development in the immediate vicinity. It is therefore recommended that development should be confined to the western part of the site (as shown on the Concept Masterplan) between the former existing hedge lines (now removed) and Purnell's Brook. The areas between Hampton Road and limits of any new development should be landscaped as amenity areas to enhance the setting of the Hall. In making the recommendations, the guiding principle is to ensure that development cannot be seen from within the grounds of Grimshaw Hall and the concept masterplan for site 8 seeks to reflect this. **(Mod 13)**



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy KN1 - Hampton Road, Knowle and Justification

Additional para after Para 716

Given the need to respect the setting of Grimshaw Hall, and the density characteristics of the surrounding area, low and medium residential densities (up to 35dph) will be appropriate on the northern part of the site. The southern part of the site is closer to the amenities of Knowle village and to higher density development at Wootton Close. Given also the prospect of a care village or retirement complex on the site of the existing football club, a higher density would be acceptable in this location for such a use. (Mod 14)

- Para 718 The site performs very well in overall accessibility terms and there is good access to all key facilities in Knowle.
Amend to: the site is accessible to all key facilities in Knowle. (Mod 15)
- Para 719 Amend to: Development of Site 8 at Hampton Road is consistent with Option F of the Spatial Strategy for the limited expansion of rural villages. **(Mod 16)**



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy KN2 - Land South of Knowle (Arden Triangle) and Justification

1 Summary

These representations address firstly, an objection to the lack of evidence regarding the deliverability of this allocation: and secondly, a raft of measures that are needed to add to or strengthen policy provisions in relation to site KN2: South of Knowle (Arden Triangle). They concern densities; community access; highway access; trees and hedgerows; structure planting; primary health care; bus services; footpaths; and concept masterplans.

2 Representations

2.1 Policy KN2

In common with Policy KN1, these representations are in two parts. The first part addresses the Forum's concerns around the deliverability and effectiveness of the KN2 proposals, including the relocation of Arden Academy and creation of a 'through school'.

The second part addresses the measures that are required to add to and strengthen the policy provision in relation to KN2 in the event that evidence is produced to demonstrate that the deliverability issues can be satisfactorily resolved.

2.2 Part 1: Deliverability and Effectiveness Representations

The Forum recognises the benefits that a new Academy could offer the community. Neighbourhood Plan policies ECF 1 and 2 are relevant to the provision of school places and to support for new schools where identified criteria are met. The Forum also recognises that the proposals are controversial locally. They have previously generated both strong support for a relocated Academy and strong opposition on the grounds of loss of Green Belt and impact of the scale of housing on local infrastructure. Recent responses to the Forum's survey on Local Plan proposals indicates that this remains the position, although some who support a new Academy building have also expressed concern about the number of houses.

In common with the Hampton Road Site, the *raison d'être* for this site selection was that it would be of a scale to deliver significant community benefit. Confidence that such benefits will be achieved is therefore a key Forum objective.

The National Planning Policy Framework requires¹ that plans shall be deliverable. A key element is ensuring that necessary development contributions do not undermine deliverability.² Further advice is provided in the Government's guidance "Viability and plan making".³ Proportionate evidence is also required.⁴

The Forum is aware that the Council is working with Homes England and the other landowners on a package of measures to deliver the new schools and housing. However, no evidence has yet been produced to demonstrate that this site is viable.

¹ See, for example, Paras 16 b) and 35 c)

² See NPPF Paras 34 and 57

³ www.gov.uk/guidance/viability

⁴ See NPPF Paras 31 and 35 b)



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy KN2 - Land South of Knowle (Arden Triangle) and Justification

The Council's approach to viability has been to examine the viability of various typologies. The closest typology to the Arden Triangle site is Rural Greenfield (>200 dw) which is based (erroneously) on the Hampton Road site. However, the Arden Triangle site is atypical. The policy requirements show that the site would be subject to a large number of development requirements and abnormal costs (see footnote⁵). In addition to the physical constraints, particularly the challenge of locating the through school and sports pitches on sloping ground, there have been land ownership issues which have only recently seen a more comprehensive approach being adopted. Even then, landowner objections around viability were still being expressed in public immediately prior to the publication of this Submission Draft Local Plan. The typology approach is not appropriate in this case and a bespoke assessment should be carried out.

A specific assessment for this site would be consistent with government guidance on viability in plan making in view of its large size and education requirements⁶.

Delivery of this large housing allocation is integral to the effectiveness of the Local Plan. Without any credible viability evidence that it can be developed in a manner that meets the policy requirements, the effectiveness of the Local Plan is undermined and the test of soundness, required by national policy, has not been met. **In the absence of such evidence, the allocation should be deleted.** The Forum would, however, strongly prefer that such evidence is forthcoming and that the necessary confidence can be given to residents that the community benefits associated with the new schools will be achieved.

A further consideration in relation to viability is whether the policy requirements could be met with a reduced number of houses. Whilst the reduction in numbers from 750 to 600 is welcome, there are still considerable concerns that the densities proposed for development of this site are too high and not reflective of the area's character or its Neighbourhood Plan policies. These concerns are addressed below but are of relevance to site viability.

⁵ Identified development requirements and abnormal costs include:

- Reduced developable area / quantum of housing as a result of the necessity to:
 - mitigate effects on Rotten Row Farm (Grade II listed);
 - exclude the Local Wildlife Site;
 - exclude the MIND site; and
 - respect housing density considerations.
- Public Open Space provision (4.9ha) and green link to Middlefield Development.
- Provision of replacement Arden Academy including additional engineering works (levelling for playing fields) and advanced funding.
- Provision of new two-form entry primary school.
- Affordable housing provision.
- Highways improvements.
- Measures to promote and enhance sustainable modes of transport including pedestrian and cycle connectivity.
- Raft of Green Belt enhancements.
- Biodiversity offsetting.
- Financial contribution to primary health care (not mentioned).
- Need for enhanced public transport provision.
- Need for structural (screen) landscaping along Warwick Road (not mentioned).
- Provision of SuDS, flood risk management and de-culverting of water course in an integrated drainage / landscape / ecological scheme.

⁶ www.gov.uk/guidance/viability 'It is important to consider the specific circumstances of strategic sites'- p3 and 'It is important that costs and land requirements for education provision are known to inform site specific typologies and site-specific viability assessments' p4



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy KN2 - Land South of Knowle (Arden Triangle) and Justification

A second aspect of concern over deliverability relates to the effectiveness of proposed health and transportation mitigation measures. These are addressed in detail in the representations to the Settlement Chapter. In summary, however, residents are very concerned at the lack of any firm proposals to create additional local health care provision, particularly to local GP services: and also at the very modest proposals to improve local transport infrastructure, particularly to bus services. The Forum has called for a step change in the provision of local bus services but the Council's Highways Officer has indicated that this is unlikely to be achieved as a consequence of the new development.⁷ Without more positive proposals, the outcome will inevitably lead to an increase in car borne trips, congestion and pollution contrary to the sustainability aims of the Local Plan.

2.3 Part 2: Measures Required to Address Issues and Strengthen Policy KN2

Policy KN2 - Density Matters

The representations on the Knowle, Dorridge and Bentley Heath (KDBH) Settlement Chapter (general matters) address the matter of densities on the allocated sites. 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 out in Policy KN2 as an important development principle. This may have implications for the overall number of dwellings to be delivered on the site. It should be noted that in the event that lower densities lead to a reduction in housing numbers, the Forum would strongly oppose the release of any further Green Belt land within the area to compensate. The housing requirement for the Knowle, Dorridge and Bentley Heath Neighbourhood Area in para 234 of the Local Plan would need to be amended accordingly. **(See Mod 1 and Mod 8)**

Policy KN2 - New Criterion after Point 1 - Community Use of New Schools

There should be a policy commitment to community use of the new schools. **(See Mod 2)**

Policy KN2-2i) Retention of important landscape features

A Tree Preservation Order protects a number of trees on the Lansdowne parcel of land. There are also other trees, including veteran trees, and hedgerows which should be retained to protect the character of the site and the approach into Knowle. **(see Mod 3a)**

Policy KN2 2 - New Matter - Structural Planting

There should be a requirement for a structural landscape strategy to include screen planting along the Warwick Road boundary. **(See Mod 4)**

Policy KN2 2 - New Criterion after Point 2 - Primary Health Care

There needs to be a policy commitment to use developer funding for related improvements to the local primary health care system. **(See Mod 5)**

⁷ Email from Walter Bailey, Highways Officer 27th November 2020



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy KN2 - Land South of Knowle (Arden Triangle) and Justification

Policy KN2 2 - New Criterion after Point 2 - Public Transport

There should be a requirement in the policy for enhanced provision of public transport. (See Mod 6 and Mod 9)

Policy KN2 2 - New Criterion after Point 2

There should be a requirement to retain public footpaths including the public bridleway on their existing alignment. (See Mod 6a)

Policy KN2 5 - Concept Masterplans

Concept Masterplans: The reference to concept masterplans should not suggest that there could be a departure from the stated principles. (See Mod 7)

Policy KN2 6 - New Matter - Planning Obligation

There needs to be a legal mechanism to ensure that the objectives of this allocation are met and the new educational facilities are built alongside the construction of new housing. (See Mod 7a)

Justification of Policy KN2

Para 724 - Access to Station Road

It is not clear from the Knowle Transport Study and the Solihull Traffic Impact Assessment that relocation of Arden Academy has been properly assessed. Although the studies state that both the retained in-situ and relocation options for the Academy have been assessed, this does not appear to be the case. For example, no housing trip generation figures have been assigned to Station Road.⁸ This would be expected assuming higher density mixed development with access off Station Road. Similarly, no allowance appears to have been made for schools traffic using Warwick Road and Grove Road. This suggests only the in-situ option has been considered.

It is therefore not clear that the relocation of the Academy will reduce congestion on Station Road, particularly as much congestion is caused by dropping off along the road. It is understood from the Council's Highways Officer⁹ that traffic flows along Station Road will increase, but it is expected that congestion will be alleviated by diverting school gate drop-offs to the Warwick Road entrance. However, school drop offs are likely to continue near pedestrian access routes along Station Rd.

The transport evidence needs to be revisited and justification of this statement is required.

Access to new school away from Station Road. This requirement should be contained within the policy. (See Mod 3)

⁸ See table 6.4 Solihull Traffic Impact Assessment and Figure 2.12 Knowle Transport Study re traffic generation and trip distribution

⁹ Email 27th November 2020 from Walter Bailey, Council Highways Officer



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy KN2 - Land South of Knowle (Arden Triangle) and Justification

Para 726 - Site Constraints

The 'other valued landscape features' include mature hedgerows, other tree cover and the Cuttle Brook. These features, together with the protected trees, are intrinsic to the character of the various land parcels within the site and should be retained¹⁰. They should be referenced in the justification.

In addition, no reference is made to the topography of the site. There are significant levels changes, particularly on that part of the site proposed for the new schools. This should be recognised in this paragraph. (See Mod 7b)

3 Modifications

3.1 Policy KN2 - South of Knowle (Arden Triangle)

1. The site is allocated for 600 dwellings together with the redevelopment of the Arden Academy secondary school and new primary school to provide an 'all through' school.
 - X Densities shall be low in the south and east rising to a maximum of 40dph on the Station Rd frontage. (Mod 1)
 - X Community access to the schools shall be in accordance with terms agreed in accordance with Policies ECF2 and ECF6 of the KDBH Neighbourhood Plan. (Mod 2)
 - X There shall be no vehicular access to the schools off Station Road. (Mod 3)
2. Development of the site should be consistent with the principles as shown in the concept masterplan, which include:
 - i. Retention of important landscape features, including trees and hedgerows, to conserve the character of the site and the approach into Knowle; and the setting of heritage assets; (Mod 3a)
 - X A structural landscape strategy to include screen planting along the Warwick Road boundary; (Mod 4)
 - ii. A site layout designed to give priority to pedestrians and cyclists, providing safe and direct routes throughout the development linking to existing and proposed footway/footpath/cycleway networks;
 - iii. Provision of suitable SuDS and flood risk management. Careful design consideration should be given to the opportunities to reduce flood risk within the site boundary. Deculverting the watercourse passing through the site will be required to provide flood alleviation and environmental benefits;
 - iv. Provision of 4.9ha of open space. Doorstep, Local and Neighbourhood Play areas will be required. Public open space should provide a green link to the neighbouring Middlefield Development;

¹⁰ Arden Triangle, Site Specific Landscape and Visual Appraisal, Crestwood Environmental 2019



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy KN2 - Land South of Knowle (Arden Triangle) and Justification

- v. Retention of the Local Wildlife Site. No development will be permitted on the Local Wildlife Site;
 - vi. Biodiversity off-setting for the loss of semi-improved grassland;
 - vii. Retention of the MIND Garden;
 - viii. On site accommodation for older people in accordance with Policy P4E;
 - ix. 5% of open market dwellings to be provided in the form of Self and Custom Build Plots in accordance with Policy 4D;
 - X Developer contributions will be required for related improvements to the local primary health care system; (Mod 5)
 - X Provision shall be made for access to enhanced bus services; (Mod 6)
 - X Existing rights of way, including the bridleway, shall be retained along their present alignments. (Mod 6a)
3. Infrastructure requirements should include:
- i. Financial contribution to the provision of an 'all through' school to provide a facility for both primary and secondary education on the site;
 - ii. Highway improvements as required;
 - iii. Appropriate measures to promote and enhance sustainable modes of transport including pedestrian and cycle connectivity to the surrounding area including Knowle village centre, Dorridge Railway Station and the wider Green Belt.
4. Green Belt enhancements should include:
- i. Woodland planting;
 - ii. Improved landscaping;
 - iii. On site green and blue infrastructure that is multifunctional and accessible;
 - iv. Public open space;
 - v. Access improvements to the wider Green Belt beyond the site boundary;
 - vi. Biodiversity enhancements;
 - vii. Any other compensatory improvements that are considered acceptable.
5. The Concept Masterplan document should be read alongside this policy. Whilst the concept masterplans 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 outlined for Site KN2 will need to be justified and demonstrate that the overall objectives for the site and its wider context are not compromised. there shall be no departure from the principles and other requirements applying to Site KN2 as set out in this policy. (Mod 7)



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy KN2 - Land South of Knowle (Arden Triangle) and Justification

6. There shall be no commencement of development until a planning obligation has been executed governing the nature of the development; its timing and phasing; and the funding of all aspects. (Mod7a)

3.2 Modifications to Justification

Para 720 No change.

Additional para after Para 720

That part of the site adjacent to Station Road is closer to bus routes and to the amenities of Knowle and Dorridge. Higher densities would be appropriate. Elsewhere, the landscape setting and proximity to the listed Rotten Row Farm dictate a lower density of housing, reducing in a southerly and easterly direction reflecting the transition to countryside. (Mod 8)

Para 721 - 724 No change.

Additional para after Para 724

Policy KN2 requires access to enhanced bus services. As a minimum, applicants will be expected to negotiate with providers to achieve a meaningful diversion of existing services into the site. Increased frequency and the provision of new services shall also be considered and addressed where feasible. (Mod 9)

Para 726 The site as a whole includes a number of constraints including changes in levels, a Local Wildlife Site, protected trees and other valued landscape features, such as the mature hedgerows, other trees and Cuttle Brook. (Mod 7b)

727 - 729 No change.



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

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KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Concept Masterplans, General Matters

1 Summary

It should be made clear that the concept masterplans are an integral part of the Local Plan and that adherence to key principles will be required; also, that only minor changes are envisaged in the future.

2 Representations

See also Forum representations on Policy P5 - Concept Masterplans.

In addition to containing detailed masterplans, the volume "Solihull Local Plan Concept Masterplans", October 2020 has general material in the form of an Executive Summary, Introduction and Methodology. These representations relate to that part of the volume.

Executive Summary

The Executive Summary to the volume of concept masterplans states that the masterplans have been published "alongside" the Local Plan Draft Submission. This is ambiguous and lacking in clarity.¹ In fact, as confirmed by the Council², "*The concept masterplans are intended to be part of the Draft Submission Plan...*". For the avoidance of doubt, this fact should be made clear in the Executive Summary.

The Executive Summary continues by saying that the masterplans are "*illustrative*" and "*subject to change*". This phrase is also used elsewhere in the text. However, as part of the Local Plan, the concept masterplans are subject to the presumption in favour of the development plan. They cannot be subject to material change outside the examination process. Further, the public would expect to have confidence this is a document that has been tested and adopted after a thorough examination process.

Essential matters and key principles of development should be clearly stated requirements and distinguished from any material that might be illustrative. In this way, the concept masterplans will give a clear steer to developers and confidence to the public. See **Mods 1 and 2**.

Introduction

Reference to "*illustrative*" masterplans is repeated in the Introduction. Related modifications will be necessary, as evidenced above. See **Mods 3 and 4**.

Methodology

There is a reference to "*illustrative*" masterplans in the Methodology section. This will need correction, as indicated above. See **Mod 5**.

Stage 5 of the methodology states that some emerging plans were shared on an informal basis with Parish Councils and Neighbourhood Forums. The Forum has not, however, had an opportunity beyond the formal consultations to actively contribute to developing the concept masterplans as now proposed, despite repeated requests. Indeed, the Hampton Road concept masterplan is markedly different to earlier versions; early, proactive engagement could have reduced the extent of these representations.

¹ NPPF Para 16 d)

² Email dated 12 November 2020, Policy and Spatial Planning Unit, Solihull Council



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Concept Masterplans, General Matters

The definition of densities differs from that in the table at para 240 of the Local Plan. The Local Plan table indicates housing densities of 30-35 dph for limited extensions to villages (into which category the Hampton Road site falls); and 30-40 for larger expansion of villages (into which category the Land South of Knowle site falls). The indicative mixed density for both is 40-50 dph. These are not aligned with the low (<30), medium (30-40) and high (40+) of the Concept Masterplan documents. The Local Plan and accompanying Concept Masterplan documents are unclear. Modification is required to provide clarity. **(Mod 6)**

3 Modifications

Executive Summary

The Local Plan supplementary housing allocations document seeks to provide over 5,300 dwellings on new sites to be allocated for development. ~~This volume of concept masterplans has been published alongside the Local Plan Submission Draft.~~ The Council's analysis and requirements are set out in this volume of concept masterplans which forms an integral part of the Local Plan. **(Mod 1)**

This study has tested the capacity of sites for housing delivery. The ~~illustrative concept~~ masterplans were developed, with consideration of planning policy and best practice guidance. They are subject to minor change as further infrastructure survey work will need to be carried out at the application stage. However, developers will be required to adhere to the key principles. **(Mod 2)**

Introduction

The Masterplan approach is born out of the Council's ambition to accommodate growth with place-making providing the central theme. The ~~illustrative~~ concept masterplans are therefore intended to demonstrate how sites could be brought forward for development in a form which both seek to respond to the Borough's needs and safeguards the long term desirability of Solihull Borough as a place to live and work. **(Mod 3)**

Each concept masterplan sets out at a broad level how the sites ought to be developed and the likely housing capacity. The concept plans have been developed in collaboration with the site owners and/or promoters.

Once allocated in the Local Plan all sites will need to be brought forward in a manner which reflects both national and local plan policies. This will require additional survey work which is current at the time of application. This may result some minor changes to the ~~illustrative~~ masterplans. **(Mod 4)**

Methodology

These stages are reflected in the methodology outlined, however due to the complexity of the sites and the need to engage and involve stakeholders throughout the process, the stages are more iterative reflecting the level of review of the ~~illustrative~~ masterplans. **(Mod 5)**

Clarify and align the terminology relating to densities in paragraph 240 of the Local Plan and the Concept Masterplan methodology. **(Mod 6).**



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

KN1 - Hampton Road, Knowle Concept Masterplan

1 Summary

The new Green Belt boundary on the northern part of the site should be formed by retention and strengthening of the existing hedgerow. The outer limit of residential development on that part of the site should be pulled back so as to avoid breaching the ridgeline that crosses the site. This could be compensated for by higher density development on the other (football club) site, but only in the form of a care village or retirement complex. Other modifications are needed to make the document succinct and to include or amplify details relating to the objective / aim of the development, phasing and delivery, household types and other key principles.

2 Representations

Savills Architects Site Proposal

Interpretation of the concept masterplan for Hampton Road, Knowle is confused by inclusion of "Savills Architects Site Proposal". This proposal has been superseded by the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road". However, the inclusion throws into question the role and status of the Council's proposals. Additionally, the superfluous addition does not contribute to a succinct Local Plan.¹ For the avoidance of doubt, the Forum would strongly oppose the Savills proposal. The Savills Architects Site Proposal should be deleted. See **Mod 1**.

Objective / Aim

Para 242 of the draft Submission Plan identifies matters that will be included in concept masterplans. First is "*A clear objective / aim for what is intended to be achieved in the overall development*". In this regard, the fundamental aim of the Hampton Road allocation is to build a new sports pavilion and pitches for Knowle Football Club, facilities that could be used by the public. This would be funded by new housing. However, this is not stated in the Plan.

The club would vacate the existing premises and pitch on the smaller southern site and develop new facilities on the larger northern site. There would be new housing on the western part of the northern site and on the southern site. The southern site could be developed as a care village or retirement complex.

Inclusion of the objective / aim is an important matter. As well as meeting a requirement of Para 242, it is part of the justification for the selection and allocation of this site. In addition, certain safeguards are necessary in meeting the objective / aim. As such, a statement of the objective / aim should be included at the start of the description of the Council's proposals. See **Mod 2**.

Different Land Uses / Proposals

A second matter identified under Para 242 is reference to different land uses / proposals. Whilst the concept masterplan includes a general reference to housing, and to the proposed sports provision, the possibility of a care village or retirement complex on the existing site of Knowle Football Club is not mentioned. It will be important to mention this option and to be cognisant of the possible effects on the overall density of development. See **Mod 3**.

¹ NPPF Para 15



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

KN1 - Hampton Road, Knowle Concept Masterplan

As regards the sports provision, the concept masterplan shows a cricket pitch. The Forum understands that the existing Knowle Cricket Club has no intention of relocating. It is not clear if this is a proposed new facility, bearing in mind that the Council has identified the Knowle Dorridge and Bentley Heath area as a search area for a new sports hub. Clarity is required, as such a proposal would have an impact on the scale of associated facilities such as car parking and floodlighting. It would also have implications for scheme viability if Council funding is envisaged.

Phasing and Delivery

A third matter identified in Para 242 is the necessity for a clear phasing and delivery programme. This is absent from the current document. However, the replacement sports facilities will be needed before the existing use is lost. In addition, and in cross-funding the relocation of the sports facilities, early provision of housing on the northern side of the site will be necessary, together with a mechanism to ensure that the pitches are established before an appropriate percentage of the houses are occupied. See **Mod 4**.

Household Types

Policy P4C of the Plan (Meeting Housing Needs - Market Housing) indicates that concept masterplans will include details of the likely required profile of household types. This is missing from the Hampton Road concept masterplan. In including this information, attention should also be drawn to the Neighbourhood Plan provisions with regard to housing mix (Policy H3) and affordable housing (Policy H2). See **Mod 5**.

Other Key Principles

In specifying and amplifying key principles, other modifications to the concept masterplan are necessary:

- to ensure that harmful visual impacts as a result of engineering works to create the housing and playing fields are minimised (**Mod 6**);
- to secure retention of the public footpath along its current alignment (**Mod 7**);
- to clearly identify the vehicular site access, including the proposed access and car parking area to the sports facilities; (**Mod 7a**)
- to refer to necessary highway improvements and regard for safety and the character and appearance of the Knowle Conservation Area (**Mod 8**);
- to protect all trees on the site in accordance with the Tree Preservation Orders (**Mod 9**); and
- to avoid significant harm to Grimshaw Hall (**Mod 10**).

Extent, Location and Density of Development

There remains the matter of the extent, location and density of development to be carried out at the site, as depicted in the Council's concept masterplan and described in the accompanying text. In this regard, the site has been the subject of a landscape and visual appraisal carried out on behalf of the KDBH Neighbourhood Forum.² The consultants advised that the site, which is crossed by a ridgeline, forms part of the rural setting of Knowle. The ridgeline and highpoint, in conjunction with existing mature boundary hedgerows and trees, form a natural landscape limit to any development. The consultants identified the second mature hedgerow as defining the extent of housing on the site.

² Landscape and Visual Appraisal, Crestwood Environmental Ltd, 2019



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

KN1 - Hampton Road, Knowle Concept Masterplan

In marked contrast, the housing shown on the Council's concept masterplan would breach the ridgeline and extend beyond the second hedgerow. Moreover, a road with street lighting and a sports pavilion would be located at this sensitive and prominent high point. Both would have an unacceptable and detrimental impact on the visual setting of Knowle. In the circumstances, no development should take place on the highpoints or along the ridgeline. This necessitates revisions to the north easterly extent of development as currently shown.

Contours should be added to the plan to highlight the topographical constraints. However, the extent of the proposed housing development will need to be reduced. By way of compensation, and in the event of development by a suitable care village or retirement complex, the southern part of the site could be shown for higher density housing. Nevertheless, modification of the proposed layout will be necessary.

The concept masterplan indicates the new road (across the ridgeline) would form the new Green Belt boundary. The Forum objects to this because of its visual impact, referred to above, and also because it is not a defined feature and could be subject to a revised position. In this regard the Council's proposals fail to meet national policy.³ The Forum's preferred Green Belt boundary would be the second hedgerow crossing the site, as advised by the landscape consultants. However, if this is not acceptable for viability reasons, the red line housing site boundary (as shown on the site analysis and landscape assessment plans) should remain, but the new Green Belt boundary should be defined by the retained existing third hedgerow just to the north of the red line boundary. This hedgerow is well defined but should be strengthened by additional planting between this hedgerow and the red line site boundary. See **Mods 3a 11 and 12**.

The highest housing density on the site should be restricted to 30-35 dph, consistent with the indicative densities for small extensions to villages as set out in the Local Plan table at para 240. This would also better reflect the character of the surrounding area and reflect Neighbourhood Plan policy H1 and D1 on density. A higher density may be appropriate for a purpose-built scheme for the elderly. The medium density in the key should be amended accordingly. **(Mod 11a)**

3 Modifications

Delete "Savills Architects Site Proposal" - plan and text. **(Mod 1)**

Add a new paragraph at the start of the text on the page headed "SMBC Illustrative Concept Masterplan: KN1: Hampton Road": The objective / aim of the proposals is to build a new sports pavilion and pitches for Knowle Football Club, facilities that could be used by the public. This would be funded by new housing. The site of the club's existing premises could be used as a care village or retirement complex. **(Mod 2)**

Add a new paragraph after Mod 2 above: The possibility exists for development of a care village or retirement complex on the southern part of the site (site of the existing football club). **(Mod 3)**

After the above, amend the original first paragraph in respect of the new green belt boundary as follows: a road the existing hedgerow along just beyond the northern perimeter of the housing site will be supplemented by additional planting and will define the new green belt boundary.....**(Mod 3a)**

³ NPPF para 139



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

KN1 - Hampton Road, Knowle Concept Masterplan

Insert a clear phasing and delivery strategy, including reference to a legal mechanism to ensure delivery of the community benefit. **(Mod 4)**

Include details of the likely required profile of household types. Add: Regard should also be paid to Policy H3 of the Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Plan. In terms of affordable housing, Policy H2 of the Neighbourhood Plan will apply. Further, the Neighbourhood Plan (Page 39) indicates a strong preference for a higher percentage of shared ownership. **(Mod 5)**

At the end of the first paragraph of text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road", add the following: In order to avoid harmful visual effects, particular care will need to be taken in the engineering works necessary to create the housing and playing fields. **(Mod 6)**

At the end of the second paragraph of text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road", add the following: The public footpath crossing the site is to be retained on its current alignment. **(Mod 7)**

After Mod 7, add the following: With regard to off-site highway works, safety will be a prime consideration at the junction of Arden Vale Road with Warwick Road and at the Hampton Road / High Street junction. However, traffic lights at the High Street junction will be avoided to protect the character of Knowle Conservation Area. **(Mod 8)**

At the end of the third paragraph of text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road", amend the wording as follows: Likewise, the trees and hedgerows along Hampton Rd and across the site must be retained, and the Tree Preservation Orders respected, to ensure the character of this ~~approach to~~ part of Knowle is conserved. **(Mod 9)**

Amend the final paragraph of the text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road" to read: Harm to the setting of the Grade 1 listed Grimshaw Hall should be avoided. Only if harm cannot be avoided should mitigation be considered, and then it should be fully justified and demonstrated to be successful in significantly reducing harm. **(Mod 10)**

On the concept plan, amend the north eastern extent of the housing such that it does not extend across the ridgeline and highest points; define the Green Belt boundary as the hedgerow just beyond the housing site allocation: show the northern site as medium (30 -35dph) and low density housing; show the southern site as medium density for housing (30 to 35 dph) or higher density if for specialist housing; and show contours on the plan. In addition, show the key points of access, including to the sports facility and relocate the sports building away from the ridgeline. **(Mod 11)**

Amend the key so as to define medium density as 30-35 dph. **(Mod 11a)**

Amend the second paragraph of text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road" to read: The density of the housing ranges from 30 (or less)-35 dph, reducing towards Grimshaw Hall and the edge of the Green Belt where views should be protected and development transitions towards the countryside. Higher density development may be appropriate on the southern site for specialist accommodation. **(Mod 12)**



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1 Summary

To reflect the character of the area, future housing on the Arden Academy site should be no higher than medium density. In addition, and to effect a transition between built development and countryside, the housing along the southern and eastern sides of the site should be low density. Other modifications are needed to make the document succinct and to include or amplify details relating to the objective / aim of the development, phasing and delivery, household types, landscaping and highway matters.

2 Representations

Landscape Assessment

The Landscape Assessment plan is lacking in a number of important respects:

- It does not show all the existing school sports pitches.
- It does not show the group of mature trees on the Arden Academy frontage to Station Rd.
- It does not identify the parkland character of the Lansdowne site. The Forum's landscape consultants identified Lansdowne as having its own specific landscape character constraints where any development should retain existing key landscape features and its parkland character.¹
- It does not indicate the slope direction across the Lansdowne and Stripes Hill land parcels.
- It does not indicate the views out towards the canal from the centre of the site.
- Although shown on the Site Analysis plan, the landscape assessment does not show the semi-improved grassland.
- The opportunity to link existing habitats is shown, but no opportunities are indicated as regards structural landscaping.

It will be important for the development to have full regard to the constraints and opportunities offered by the site and for key features to be illustrated on the landscape appraisal plan. In this way, they can be taken into account in a successful design and layout. See **Mod 1**.

In terms of the text, the concept masterplan calls for an integrated drainage, landscape and ecological strategy to be developed for the site. However, there is no guidance on key landscape principles. Illustration of structural landscaping will be particularly important. As advised by the Forum's landscape consultants,² there is a need to establish a strong green framework for the new development. This would include a substantial screen buffer to the Warwick Road frontage. Such matters should be addressed in the text. See **Mod 7**.

¹ Arden Triangle: Site Specific Landscape and Visual Appraisal Crestwood Environmental Ltd 2019

² Arden Triangle: Site Specific Landscape and Visual Appraisal Crestwood Environmental Ltd 2019



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Developer Proposals

The concept masterplan next addresses developer proposals and engagement, including earlier proposals by Capita and by the Building Design Group. These proposals have been superseded by the "SMBC Illustrative Concept Masterplan: KN2 Arden Triangle". However, inclusion of the earlier proposals throws into question the role and status of the Council's proposals. Additionally, the superfluous addition does not contribute to a succinct Plan.³ The material on the pages headed "Developer Proposals and Engagement" and "BDG Illustrative Concept Masterplan" should be deleted. See **Mod 2**.

Objective / Aim

Para 242 of the draft Submission Plan identifies matters that will be included in concept masterplans. First is "A clear objective / aim for what is intended to be achieved in the overall development". In this regard, the fundamental aim of the South of Knowle allocation is to build a replacement for Arden Academy, a facility that could be used by the public.⁴ This would be funded by new housing. However, this is not stated in the Plan.

Inclusion of the objective / aim is an important matter. As well as meeting a requirement of Para 242, it is part of the justification for the choice and allocation of this site. In addition, certain safeguards are necessary in meeting the objective / aim. As such, a statement of the objective / aim should be included at the start of the description of the Council's proposals. See **Mod 3**.

Phasing and Delivery

A second matter identified in Para 242 is the necessity for a clear phasing and delivery programme. This is absent from the current document. However, this is particularly important given the different land ownerships and the obvious difficulties of joint working in the past. In particular, it will be important to ensure that the development does not proceed in two halves, based around the northern area and the southern area. The Forum is determined to ensure that if such large-scale housing and loss of Green Belt is to take place, the educational and other infrastructure benefits are provided and the community is not left with only a large housing development starting in the south and working northwards. It will therefore be necessary for the delivery of housing to be related to satisfactory progress of delivery of the new schools. A suitable legal mechanism such as a Planning Obligation should be entered in to govern the rate of delivery of housing alongside construction of the education facilities.

A phasing and delivery diagram should be part of the concept masterplan. See **Mod 4**.

Household Types

Policy P4C of the Plan (Meeting Housing Needs - Market Housing) indicates that concept masterplans will include details of the likely required profile of household types. This is missing from the Arden Triangle concept masterplan. In including this information, attention should also be drawn to the Neighbourhood Plan provisions with regard to housing mix and affordable housing. See **Mod 5**.

³ NPPF Para 15

⁴ Call for sites submission Parcel 153 'the catalyst underlying the Arden Triangle is the desire of Arden Academy governors to vacate the existing school and relocate to another site...'



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Density

In terms of density, for the area of the existing Arden Academy and its playing fields, the concept masterplan indicates high density housing at 40+ dph. This is higher than anywhere in the designated area, where the highest densities are around 38 dph, including mixed housing and flatted development.⁵ Further, the area is not characterised by high density housing or by flats or mixed uses. In addition, it is not an area that is “highly accessible by public transport”.⁶ Buses are hourly. The highest density on the Arden Academy site should be “medium”.

For the remainder of the site, the concept masterplan proposes medium density housing across the centre of the site with low density housing towards Grove Road. This is partially in line with the specialist studies carried out by the Forum's landscape consultants.⁷ However, densities should reflect the character of the area. The Forum's landscape consultants have stressed the importance of a transition between built development and the countryside, not only in a north to south direction but also from west to east. The concept masterplan should therefore also show low density housing along the eastern side of the site. Such densities would be consistent with the densities shown on the BDG masterplan, prepared by the Council's in-house design team. **(See Mod 6)**

Highway Matters

The concept masterplan states that there will be one point of access onto Grove Road. However, two are shown on the diagram. Clarification is needed. More particularly, the concept masterplan should advise on the treatment of Grove Road and its junction with Warwick Road (where residents have raised safety concerns as a consequence of additional traffic accessing the new schools). Grove Road is a road of rural standard that is not suitable for large vehicles and high volumes of traffic. Advice should be included within the document. **(See Mod 8)**

3 Modifications

Annotate the Landscape Assessment plan such that it shows all the school playing fields; the trees at the front of Arden Academy; the area of parkland character (Lansdowne site); contours across the site including towards Stripes Hill; the view from the centre of the site towards the canal; the extent of the semi-improved grassland; and structural landscaping opportunities. **(Mod 1)**

Delete the two pages of the concept masterplan that show “Developer Proposals and Engagement” and “BDG Illustrative Concept Masterplan”. **(Mod 2)**

Add a new paragraph at the start of the text on the page headed “SMBC Illustrative Concept Masterplan: KN2 Arden Triangle”: “The objective / aim of the proposals is to build a new through school funded by housing. The through school would comprise a community academy, available for use by the public, and a two-form entry primary school.” **(Mod 3)**

⁵ See KDBH Neighbourhood Plan, Appendix 1

⁶ Draft Submission Plan Para 239

⁷ Arden Triangle: Site Specific Landscape and Visual Appraisal Crestwood Environmental Ltd 2019



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Insert a clear phasing and delivery diagram. In addition, add: A planning obligation (or similar binding legal agreement) will be necessary to secure the objectives of the site. **(Mod 4)**

Include details of the likely required profile of household types. In addition, add: "Regard should also be paid to Policy H3 of the Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Plan. In terms of affordable housing, Policy H2 of the Neighbourhood Plan will apply. Further, the Neighbourhood Plan (Page 39) indicates a strong preference for a higher percentage of shared ownership." **(Mod 5)**

Amend the first paragraph on the page headed "SMBC Illustrative Concept Masterplan: KN2 Arden Triangle" so that it reads: "The density of the housing (including mixed housing/flats) ranges from ~~30-40+~~ 30-40 dph, reducing towards Grove Road and Warwick Road." Make consequential changes to the concept plan. **(Mod 6)**

Include the following text in the third paragraph on the page headed "SMBC Illustrative Concept Masterplan: KN2 Arden Triangle": "An integrated drainage, landscape and ecological strategy should be developed for the site. This should feature a strong green framework for the development and include screen planting along the Warwick Road frontage. Public open space...". **(Mod 7)**

Clarify the position regarding access onto Grove Road (one access point or two). At the end of the fourth paragraph on the page headed "SMBC Illustrative Concept Masterplan: KN2 Arden Triangle", add the following text: "Sensitive improvement of Grove Road and its junction with Warwick Road will need to be considered." **(Mod 8)**