

**SOLIHULL LOCAL PLAN 2020**  
**DRAFT SUBMISSION PLAN**  
**LAND SOUTH OF KNOWLE (ARDEN TRIANGLE)**  
**REPRESENTATIONS ON POLICY KN2**  
**AND JUSTIFICATION**

**Summary**

The Local Plan is unsound in that it has not provided the evidence to demonstrate that this large, strategic site is viable and deliverable. Comprehensive delivery of the new Academy alongside the new housing is essential in view of the rationale for the site's selection. Further concerns relate to accessibility; the effectiveness of proposed infrastructure mitigation measures; and unacceptable impacts of proposed densities on layout and design having regard to the character of the area.

**Representations**

Whilst I can appreciate there may be benefits in providing a new Academy for the KDBH area, I do not think the Council has justified the proposed allocation of the Arden Triangle site for the following reasons:

1. The Council's reason for selecting a large housing site in Knowle was that it enabled the community benefit of a new Academy to be delivered. The Academy was the catalyst for the whole development. The new education facilities were thus the carrot to appease residents' concerns about the loss of such a large swathe of Green Belt. They were the rationale for this site's selection. If it were not for the community benefit, an alternative strategy based on smaller and more dispersed housing sites, supplemented by windfalls, would have offered a solution far less damaging in terms of landscape impacts and traffic congestion. That is why the delivery of the education facilities is so important.
2. Yet there is no credible evidence of scheme viability. Without the confidence that the new schools will be viable, and hence deliverable, the Plan is not sound. Also, without this evidence, it is not possible to understand if the Academy and new primary school can be provided with a lesser number of houses. This is a crucial point bearing in mind opposition to the large scale of housing proposed and the concerns around density. The amount of housing should involve the minimum loss of Green Belt necessary to enable its provision. No evidence has been provided to demonstrate this

3. The levels on site are challenging, particularly the area identified for the new schools. This is evident from the BDG version of a concept masterplan for the site which is included in the Concept Masterplan document. Whilst it may be feasible to construct a building that accommodates the changes in levels, it is difficult to see how playing fields/astro turf facility with floodlights and other sports provision can be accommodated without completely ruining the attractive landscape setting of this approach into the village. Policy KN2 seeks retention of important landscape features: this is inconsistent with the siting of sports facilities that require a large level surface. They will require extensive engineering works in an area that is characterised by a parkland setting, protected trees and other mature trees and hedgerows. The Council will no doubt argue that such matters are details for later consideration, but if these significantly affect viability and also dramatically conflict with the policy requirement to respect the landscape, then they are fundamental to whether the site is suitable for its proposed use. The school already has a separate playing field used as a rugby ground which was levelled when it was acquired and which could still serve the school. It would remain in a convenient location close to the relocated Academy. Why spend so much money levelling an unsuitable site when a perfectly good site already exists? The former school site and playing fields could still come forward for housing with more individually designed housing, better able to fit into such a landscape, being sited on parts of the former Lansdowne parcel if necessary.
4. The location is not as accessible as the Accessibility Study would suggest. The bus service is not good, being only hourly. The study adopts various relaxation of criteria to try to demonstrate accessibility but as regards public transport, even with the relaxations, it is still not good. The assessment of bus services in the Study adopts an approach based on the average number of services per hour per bus stop. Those with a cumulative daytime frequency of 30 minutes or better (relaxed criteria- see para 3.3 Accessibility Study) were identified. This, however, appears to take no account of direction of travel; if a bus is not going to your destination, it is not accessible. The output therefore appears to flatter the level of accessibility. The south of the site in particular is not easily accessible to shops, services, buses or rail other than by car. The scoring also fails to take account of changes in the Arden masterplan which delete the provision of a new GP practice and shop, both of which had been assumed in the Accessibility Study. The accessibility of the site should therefore be revisited.
5. The proposed infrastructure mitigation measures in respect of transport and health are minimal. Contributions from developers to bus services will not secure any significant upgrade in services. Proposals to introduce 'quiet lanes' on key roads such as Lodge Rd and dedicated cycle routes are not supported by any indication as to how these could be achieved. They are more in hope than expectation. The Council should be honest and admit that the outcome of these proposals will be an increase in car borne traffic, contrary to the sustainability objectives of this Local Plan. More comprehensive and realistic measures are required.

As regards healthcare, it is inevitable that such a large increase in population will necessitate additional provision. It is not acceptable to leave such an important impact to a later date. Provision should be made in the Local Plan if a new site is required.

6. Scheme design and layout: recent developments in Knowle at higher densities have been poor. These are at densities of 36-38 dph. The recent Taylor Wimpey development failed to take account of site levels. The density is such that there is no room for trees or significant greenery along the main roads- a feature that is very characteristic of the whole Knowle, Dorridge and Bentley Heath area. Moreover, recent high density developments at Blythe Valley give little comfort that good quality design, compatible with local character, will be achieved. This is a key objective of the Neighbourhood Plan, as well as of the Local Plan and government guidance. The latter states, in relation to neighbourhood planning, that it will give communities 'direct power' to 'shape the development and growth of their local area'. The value of the KDBH Neighbourhood Plan is at issue here if the Council imposes densities that will clearly lead to layouts that fail to reflect the local character and distinctiveness of the area. These concerns must be addressed now as they have implications for the capacity of the site and viability.

### **Modifications required**

The KN2 Policy allocation needs to be properly considered through the Examination process. If by then the Council has not been able to address these issues in a manner that gives confidence an acceptable scheme incorporating the new educational facilities alongside a good quality, less dense housing layout can be achieved, it should be deleted on the grounds it is undeliverable and unsound.