

Solihull Local Plan – Draft Submission Plan (October 2020)

Representations on behalf of Taylor Wimpey in
respect of land west of Warwick Road, Knowle

December 2020

Turley

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1. Introduction

- 1.1 These representations are submitted in response to Solihull Metropolitan Borough Council's Local Plan – Draft Submission Plan (DSP) (October 2020) and are made on behalf of Taylor Wimpey UK Ltd (Taylor Wimpey) in respect to circa 8.4 ha of land that they have interests in to the west of Warwick Road, Knowle (the site). The site is identified in the site location plan enclosed at **Appendix 1**. The site has been identified by Solihull Metropolitan Borough Council (SMBC) as part of a wider allocation at 'KN2: South of Knowle (Arden Triangle)'.
- 1.2 Taylor Wimpey's interests relate to the land owned by Lansdowne Property Developers Ltd.
- 1.3 These representations are generally supportive of the proposed allocation at 'KN2: South of Knowle (Arden Triangle)' (the allocation) and confirm that the site has the ability to deliver a high quality residential scheme as part of the wider allocation. The purpose of these representations is to support SMBC in delivering a robust plan capable of being adopted.
- 1.4 The representations are structured as follows:
 - **Section 2:** Provides our response to the Local Plan – Draft Submission Plan (DSP) (October 2020).
 - **Section 3:** Provides commentary on the emerging concept masterplan for proposed allocation KN2.
 - **Section 4:** Provides a conclusion to these representations

Taylor Wimpey

- 1.5 Taylor Wimpey are a national house builder with a wealth of experience of delivering high quality developments within Solihull and throughout the rest of the UK. Taylor Wimpey have delivered 25,719 new homes in 2019/2020.
- 1.6 With their consultation team, Taylor Wimpey will work closely with SMBC, statutory consultees and other stakeholder through the development plan process, and as 'deliverers' will ensure careful attention is given to quality and creation of place.

2. Response to the Local Plan – Draft Submission Plan (DSP) (October 2020)

Borough Vision - Overview

- 2.1 Taylor Wimpey supports SMBC’s vision to provide a range of quality homes across the Borough by 2036 whilst also setting out the opportunity to maximise the economic and social benefits of the High Speed 2 rail link and interchange both for the Borough and wider area.
- 2.2 The vision could however be strengthened by identifying the important link between the provision of new employment opportunities and the requirement to deliver new homes within the Borough. The two are intrinsically linked and together will ensure a prosperous future for SMBC. It is in this context that the DSP should be viewed.

Spatial Strategy

- 2.3 Taylor Wimpey support the spatial strategy as set out in paragraphs 63 to 67 of the DSP and its focus for significant development in locations that are, or can be made, accessible and sustainable. This approach is supported by National Planning Policy Framework (February 2019) (NPPF) paragraph 103.
- 2.4 The spatial strategy appears to be based on a settlement hierarchy as per paragraph 65 and the growth options identified at paragraph 69. The site selection paper (October 2020) also refers to a hierarchy. The plan would however benefit from establishing a **clear and prescriptive settlement hierarchy**, informed by qualitative evidence as to the sustainability of each settlement based on its provision of services and facilities etc. to demonstrate that the spatial strategy is **justified**.
- This approach would also assist in the overall development management and delivery of windfall sites during the plan period, which are expected to deliver 2,800 new homes by 2036.

Providing Homes for All

Policy P4C Meeting Housing Needs – Market Housing

- 2.5 Taylor Wimpey support the overall thrust of the policy which recognises that the Council will negotiate the housing mix on allocated sites. This is a proactive approach that enables the plan to be flexible and adapt to rapid change, as required by paragraph 11, and ultimately effective in meeting the borough’s housing needs.
- 2.6 However, part 2 could be read as conflicting with this proactive approach given it appears to seek to secure a profile of household types, as identified by the latest HEDNA, through the concept masterplans which will form part of the Local Plan. Similarly part 3 could be read this way given it appears to prescribe the mix for market housing based on the HEDNA.

- 2.7 This matter could perhaps be resolved through the policy being clear that ultimately the housing mix for any allocated site will be agreed at the development management stage when an application is submitted and that any mix assumed for the concept masterplans and the HEDNA mix at part 3 are just indicative and starting points.

Policy P4D – Meeting Housing Needs – Self and Custom Housebuilding

- 2.8 Taylor Wimpey appreciate the flexibility built into the policy to enable an applicant to negotiate the amount and type of provision of self and custom homes at the point an application is submitted.

Policy P4E – Meeting Housing Needs – Housing for Older and Disabled People

- 2.9 Taylor Wimpey support the requirement for all homes to be built to Category M4(2) of approved Building Regulations Document M Volume 1, all their developments provide this as standard.
- 2.10 Taylor Wimpey welcome the flexibility within the policy to take into account site specific factors when applying Policy P4E to any planning application but would welcome an additional factor to be included within the list.
- 2.11 The Policy requires developments of 300 dwellings or more to provide specialist housing or care bedspaces in accordance with the Council's most up to date statement on older person's accommodation. The factors to take into account should include *'Where the Council's up to date statement on older person's accommodation does not identify a local need in the local area of the proposed development'*. This would prevent the oversupply of older person's accommodation within a specific local area.

Policy P5 – Provision of Land for Housing

- 2.12 To ensure policy P5 is justified and effective and clear to the reader, it should refer to the total amount of housing to be delivered on allocations identified by the plan. Part 1 of the policy refers to 5,270 dwellings between 2020 and 2036, but does not include the total number of homes to be delivered at the UK Central Hub Area (2,740 new homes). If this were to be included the total number to be delivered by allocations would be **8,010 new homes**.

National Space Standards

- 2.13 Taylor Wimpey's house types are all national space standard compliant, however to ensure the policy is proposal should retain some flexibility in instances where the character or surrounding context indicate

Concept Masterplans

- 2.14 We comment further on the Council's concept masterplans document in section 3 of these representations.

Knowle, Dorridge and Bentley Heath

Policy KN2: South of Knowle (Arden Triangle)

- 2.15 Taylor Wimpey support in principle the proposed allocation of land south of Knowle for 600 new homes. Specifically, the following requirements are welcomed and are clearly supported by the Borough's Vision:

- Retention of important landscape features and the setting of heritage assets;
- 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;
- 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;
- 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;
- Retention of the Local Wildlife Site. No development will be permitted on the Local Wildlife Site;
- Biodiversity off -setting for the loss of semi-improved grassland;
- Retention of the MIND Garden;
- Enhancements to the Green Belt through additional planting; onsite green and blue infrastructure; public open space; improved landscaping; and, access improvements to the wider Green Belt; and
- Inclusion of infrastructure requirements to deliver the required highways improvements; contribution to an all through school; and, appropriate measure to promote and enhance sustainable modes of transport.

2.16 Section 3 of these representations provides a review of the emerging concept masterplan.

3. Policy KN2 ‘Arden Triangle’ - Concept Masterplan

- 3.1 In this section we consider the proposed concept masterplan for the emerging KN2 allocation.
- 3.2 As set out below in response to the Council’s most recently published concept masterplan for the allocation (included in the Solihull Local Plan Concept Masterplans document dated October 2020), Taylor Wimpey is concerned the masterplan is not based on sound evidence, not does it appropriately respond to the site’s constraints and opportunities and therefore needs to be developed further.
- 3.3 The only evidence in the public domain regarding proposed allocation KN2 is that which informed the supplementary consultation document in January 2019. Since then no further evidence regarding the site has been published.
- 3.4 We are aware that the Council has prepared a site specific evidence base including surveys and assessments, however these have not been published into the public domain.
- 3.5 The concept masterplan (contained in the Solihull Local Plan Concept Masterplans document dated October 2020) represents a significant change from the two options presented in the previous version of the document published in January 2019 as part of the draft Local Plan supplementary consultation. In that document:
- **Option 1** proposed for Arden Academy to be retained in its current location and extended at the western extent of the allocation adjacent to Middlefield Spring development on land owned by the Council, with the new primary school located immediately to the south of the extended Arden Academy on land in separate ownership (an extract showing option 1 is enclosed at **Appendix 2**).
 - **Option 2** proposed for Arden Academy to be wholly relocated to the western extent of the allocation adjacent to the Middlefield Spring development on land partly in Council ownership and in separate ownership, including land which Taylor Wimpey has interests in, with the new primary school located on the existing playing fields at the Arden Academy (an extract showing option 2 is enclosed at **Appendix 3**).
- 3.6 Both options are capable of delivering the number of dwellings required as part of the allocation – **a minimum of 600 new homes**. These two options reflected an appropriate starting point in response to the constraints and opportunities exercise undertaken in the January 2019 document, the western extent of the allocation represents the least constrained land. The remaining land is constrained by tree preservation orders and other green infrastructure worthy of retention, and heritage assets.
- 3.7 Taylor Wimpey and the wider allocation consortium were therefore surprised when the October 2020 concept masterplan document proposed for the school to be

relocated on the land immediately to the south of the current Arden Academy school location (including land which Taylor Wimpey has interests in), contrary to the two previous options presented. As set out above, no site specific evidence has been published since the supplementary consultation in January 2019, so no justification has been provided in respect to relocating the school as proposed.

- 3.8 We are aware separately that there are seven broad reasons for re-providing the school elsewhere within the proposed allocation:
- (i) Provision of a new primary school as part of a combined campus academy
 - (ii) Resolving infrastructure deficiencies within the existing academy, in particular assembly and kitchen / dining space.
 - (iii) Density and maximising the proposed allocation, in particular releasing land on the Station Road frontage for higher density development and greater permeability
 - (iv) Alleviating traffic congestion and safety concerns along Station Road
 - (v) The ability to open up new facilities at the Academy for community use, such as a gym or swimming pool
 - (vi) Sustainability and the Council's carbon neutral commitment
 - (vii) Funding and viability

3.9 These seven broad reasons do not appear to be evidenced for the reasons set out below:

- It is possible to deliver a single campus without the need to entirely relocate the school. Option 1 of the January 2019 concept masterplans document would enable the opportunity for a combined campus academy.
- There is no evidence exploring whether additional facilities can be provided within the school's existing demise.
- The deficiencies with the academy appear to be **assembly and kitchen / dining space**. No evidence has been submitted considering whether this could be provided within the current school grounds or even as a small extension to the current campus.
- There is no evidence as to why higher density development is necessary in order to deliver the quantum of development identified for the proposed allocation. Indeed the January 2019 concept masterplans document is clear that both options presented are capable of achieving a minimum of 600 new homes.
- There appears to be no evidence as to whether the traffic issues along Station Road represent an unacceptable impact on highways safety. There is no evidence either exploring whether there are any measures that could be implemented at the existing site to resolve any perceived issues. Furthermore

the Council's draft Infrastructure Delivery Plan (IDP) (October 2020) does not identify any issues which cannot be resolved through mitigation. The only scheme it identifies for Station Road near the school is a new simplified junction with footway improvements at the Lodge Road junction estimated to cost £330,000 to £610,000.

- There is no evidence that there is a compelling need for additional community facilities in the area. The IDP refers at page 93 to currently there only being a demonstrable need for additional youth community provision in Knowle. In any case, the Council's approach should be first to explore whether the current cold facility can be improved. In terms of leisure provision, the IDP does refer to a 'Playing Pitch Mitigation Strategy' being undertaken, but without this the IDP only seeks to protect existing sports provision, it does not identify any additional needs. Even if shortfalls are identified, page 89 is clear that this does not equate to the need for new provision. At page 141 the IDP does establish the plan will seek to deliver a new sports hub in Knowle / Dorridge, this is to include football pitches, rugby union pitches and a cricket pitch.
- There is no evidence as to whether the existing premises could achieve the Council's carbon neutral commitment through adaptation, nor the carbon impact of demolishing the existing school and rebuilding it elsewhere.
- There appears to be no evidence demonstrating that it is financially viable to relocate the school.
- The proposed relocation of the secondary school does not appear to be justified or indeed motivated by a need or desire to further enlarge the capacity of Arden Academy, which is already relatively large – with 10 forms of entry – and is one of two secondary schools in a planning area that is now set to see a slight decline in pupil numbers over the next five years. Solihull's own School Organisation Plan (2019) identifies at page 51 a circa 2,571 pupil forecast across Arden Academy and Heart of England school in September 2020, **reducing** slightly to 2,565 by 2025. It is therefore agreed that no such rationale or justification exists to support the proposed relocation. While it is understood that the forecast of declining numbers does not account for the impact of proposed allocations, the Council has expressed confidence that the relatively recent expansion of Arden Academy, itself reflecting investment in the existing school buildings, will provide sufficient capacity to accommodate further demand (page 34 of the School Organisation Plan). Such a conclusion is only enhanced when it is recognised, as the Council has done, that nearly a quarter (23%) of the 2,446 children currently filling places at the two secondary schools in this area live outside Solihull, and the Council has in this context expressed a firm ambition that *'these places will in future years be used to absorb the increase in demand from within Solihull'* (page 34 and 51 of the School Organisation Plan). As such, there appears no evidence to suggest that the future demand for 114 secondary school places that could arise from 600 new homes – based on the approach favoured by the Council – cannot be adequately met by the existing school, in its current form. This is particularly the case where the Council has emphasised that its approach to estimating demand produces maximum figures given the implicit assumption

that all children are new to the area, which is very rarely the case (page 6 of the School Organisation Plan). We intend to submit further evidence on this in due course.

- Beyond the above reasons, no evidence is provided as to how the school would respond to on site constraints. There are a number of ecological features that are worthy of retention, such as trees and hedgerows. These features also provide an opportunity to enhance ecological connectivity throughout the site. Residential development can respond to these features by designing the layout accordingly to include smaller blocks of development around the ecological features and providing opportunities for enhancement. However, schools are governed by much more stringent guidelines as to what the layout should include and the openness and visibility of their playing fields and open space. It is highly unlikely the tree belt running centrally from north west to south east through the proposed school site could be retained at all. There is also no evidence the school could be delivered on land with a varied topography where there are significant changes in land level.

3.10 On the basis of the above there is no compelling evidence demonstrating a need to re-provide the school within the proposed KN2 allocation and ultimately the concept masterplan proposed for the allocation in the October 2020 concept masterplans document.

3.11 Taylor Wimpey agree with SMBC's statement at paragraph 243 of the DSP that the concept masterplans for each site should *"...show a coordinated and comprehensive approach to the development of the site that is supported by relevant site promoters/developers so that piecemeal development is avoided"*. Given the concerns raised above we therefore encourage SMBC to continue this coordinated and comprehensive approach and engaging with landowners and promoters throughout preparation of the plan to reach agreement on the concept masterplan to ensure the plan is positively prepared, justified, effective and ultimately capable of meeting the borough's housing needs in full.

Alternative Site Masterplan

3.12 Based on the evidence available a revised concept masterplan is being prepared on behalf of a number of parties promoting land as part of the proposed KN2 allocation. The emerging revised concept masterplan will respond to the site's constraints and opportunities, and ultimately the Council's aspirations and principles for how it should be delivered.

3.13 The revised concept masterplan has sought to retain and enhance the ecological features on site by illustrating a series of smaller development blocks around the key ecological areas. This provides the opportunity to create green infrastructure connections throughout the wider site and beyond. The proposed Local Wildlife Site has been included within the revised concept masterplan and it responds to the recommendations within the landscape and heritage reports.

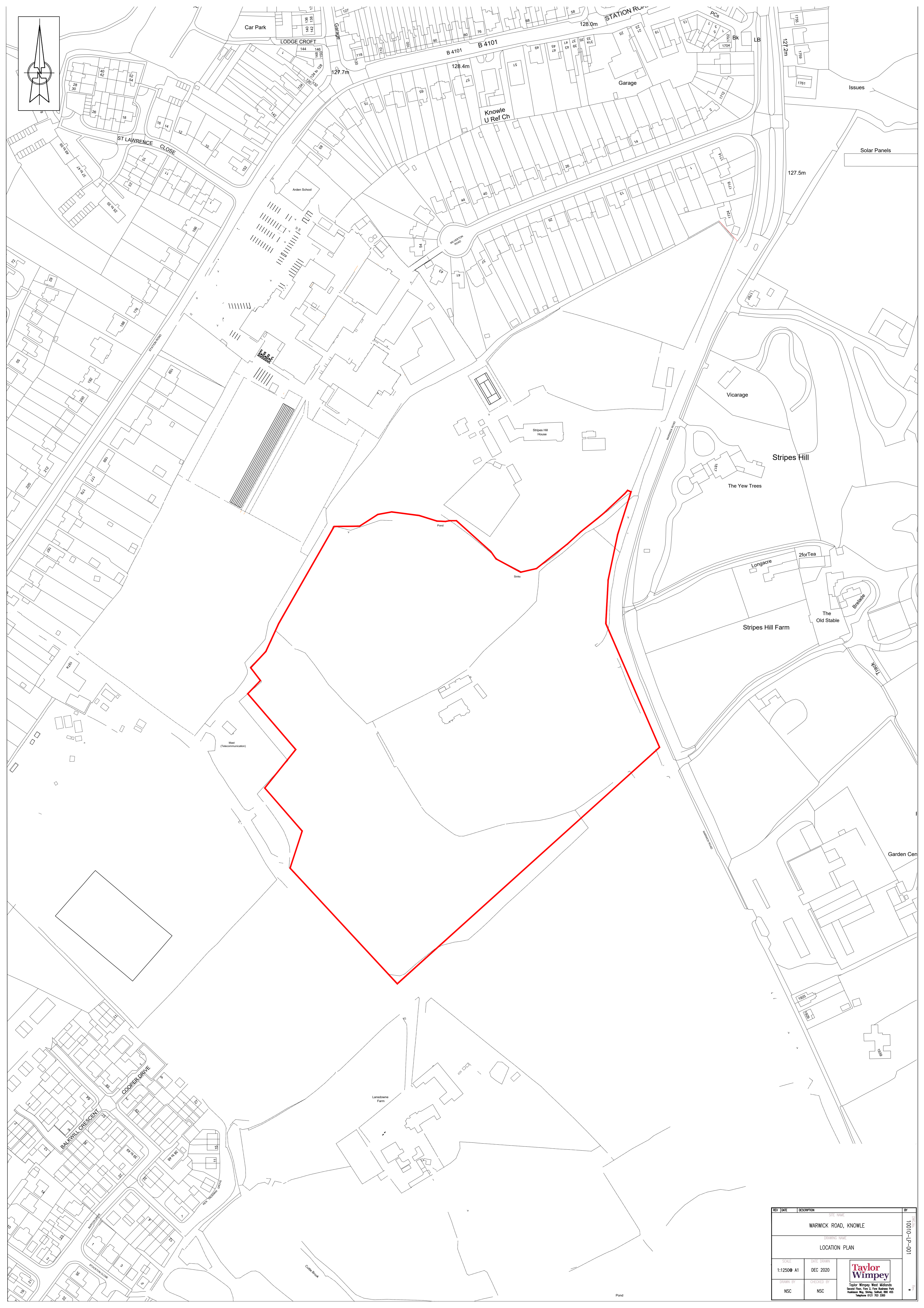
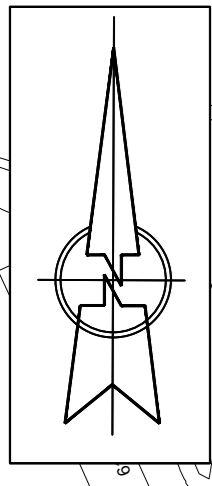
3.14 An early draft of a revised concept masterplan has been shared with officers at SMBC prior to the submission of these representations. Taylor Wimpey will seek to continue

engaging constructively and collaboratively with the SMBC (as a land owner and the local planning authority) and other land owners to agree an appropriate and deliverable concept masterplan.

4. Conclusion

- 4.1 Taylor Wimpey welcomes the opportunity to engage with and respond to the draft submission plan.
- 4.2 Taylor Wimpey support SMBC's Vision for the DSP and have highlighted, through these representations, areas where the DSP could be strengthened.
- 4.3 These representations are generally supportive of the proposed allocation at 'KN2: South of Knowle (Arden Triangle)' and confirm that the site has the ability to deliver a high quality residential scheme of as part of the wider allocation. The purpose of these representations is therefore to support SMBC in delivering a robust plan capable of being adopted.
- 4.4 Taylor Wimpey agree with SMBC's statement at paragraph 243 of the DSP that the concept masterplans for each site should "*...show a coordinated and comprehensive approach to the development of the site that is supported by relevant site promoters/developers so that piecemeal development is avoided*". Given the concerns raised in these representations we encourage SMBC to continue this coordinated and comprehensive approach. Engaging with all the landowners and promoters throughout preparation of the plan to reach agreement on the concept masterplan for proposed allocation KN2 to ensure the plan is positively prepared, justified, effective and ultimately capable of meeting the borough's housing needs in full.
- 4.5 Taylor Wimpey would welcome the opportunity to continue discussions with SMBC and to discuss these representations in further detail.
- 4.6 We also request that we are able to attend the Local Plan examination hearing sessions to make our case in front of the Inspector.

Appendix 1: Site Location Plan



REV	DATE	DESCRIPTION	SITE NAME	BY
			WARWICK ROAD, KNOWLE	10010-1P-001
DRAWING NAME				
LOCATION PLAN				
SCALE	DATE DRAWN			
1:12500 A1	DEC 2020			
DRAWN BY	CHECKED BY			
NSC	NSC			
		<small>Taylor Wimpey West Midlands Second Floor, Fox 2, Fox Business Park Hallgate Rd, Shirley, Solihull, B39 4JZ Telephone 0121 703 3200</small>		

Appendix 2: January 2019 Concept Masterplan – Option 1

SMBC Illustrative Emerging Concept Masterplan: Site 9 Arden Triangle - Option 1

Medium to low density housing is appropriate in this semi rural location. 600 homes can be accommodated on the site. The density of the housing ranges from 30–40dph, reducing toward Grove Road. The layout promotes perimeter block development to maximise natural surveillance and encourage active streets.

This layout seeks to retain important landscape features, and the setting of the built heritage assets. Arden Academy remains in its current position which also helps to minimise the potential impact of development on the setting of the MIND Garden.

Biodiversity off-setting will be required due to the loss of semi-improved grassland. Public open space should provide a green link to the neighbouring Middlefield development, with any future development. Based on 600 homes this development will require 3.9 Ha of public open space. A Doorstep, Local and Neighbourhood Play area will be required.

The current proposal suggests 3 points of access onto the Warwick Road and one access point onto Grove Road. This will promote permeability of the site. Green links through the site provide safe walking and cycle routes to the school and to Station Road where there are a number of bus stops which serve the local area.



















**Appendix 3: January 2019 Concept Masterplan –
Option 2**

SMBC Illustrative Emerging Concept Masterplan: Site 9 Arden Triangle - Option 2



Illustrative Masterplan

-  Future Access
-  Road
-  Existing hedgerow
-  SuDS Feature
-  Existing trees
-  Footpath
-  High density housing
-  Medium density housing
-  Low density housing
-  Public Open Space
-  Local Wildlife Site (LWS)
-  Potential area of development subject to heritage assessment
-  Primary School
-  Listed building
-  Arden School
-  Areas of significant ecological value

The site can accommodate 600 homes. There are opportunities for higher density development along Station Road. The density of the housing ranges from 30–40+dph, reducing toward Grove Road. The layout promotes perimeter block development to maximise natural surveillance and encourage active streets.

This layout seeks to retain, important landscape features, and the setting of the built heritage assets. Arden Academy has been moved further into the site and rebuilt to make more efficient use of land. Housing has been located along Station Road where it is closer to Knowle's amenities.

Biodiversity off-setting will be required due to the loss of semi-improved grassland. Public open space should provide a green link to the neighbouring Middlefield development, with any future development. Based on 600 homes this development will require 3.9 Ha of public open space. A Doorstep, Local and Neighbourhood Play area will be required.

The current proposal suggests 3 points of access onto the Warwick Road and one access point onto Grove Road and Station Road. This will promote permeability of the site. Green links through the site provide safe walking and cycle routes to the school and to Station Road where there are a number of bus stops which serve the local area.

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