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Our Ref 18 OVA V00

14 December 2020

Dear Mr Palmer,

**SOLIHULL LOCAL PLAN DRAFT SUBMISSION PLAN OCTOBER 2020 REGULATION 19
CONSULTATION - REPRESENTATION IN SUPPORT OF SITE KN2 SOUTH OF KNOWLE**

Cushman and Wakefield (C&W) is appointed by SMBC Strategic Land and Property (acting in the Council's capacity as landowner) to submit representations in support of the allocation of Site KN2 South of Knowle for residential development as part of the Solihull Local Plan Draft Submission Plan (October 2020).

This representation is supported by a Preferred Concept Masterplan and RIBA Stage 1 Brief Document prepared by Building Design Studio (BDS), which develops the project brief, related feasibility studies and concept design. Analysis provided within the Stage 1 Report has informed the Preferred Concept Masterplan (ref. 19023-BDS-XX-XX-VS-A-0001-S2_P01).

The Plan-Making Process and Policy Context

Regulation 19 consultation measures the Draft Submission Plan against the prescribed tests of soundness defined by the National Planning Policy Framework (NPPF, 2019), and these form the basis of this representation:

- 1) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is consistent with achieving sustainable development;
- 2) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 3) Effective – deliverable over the plan period; and
- 4) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

We consider the residential allocation of Site KN2 South of Knowle within the Local Plan Draft Submission (October 2020) to be sound – positively prepared, justified, effective and consistent with national policy. Site KN2 forms an important and entirely appropriate allocation which will contribute materially to the Local Planning Authority's housing land supply, and which will support a conclusion that the Plan is sound.

We fully support the proposed allocation of Site KN2 South of Knowle for development of at least 600 new homes. The site will make a significant and necessary contribution towards the objectively assessed

housing need and requirement for 15,017 additional homes over the Plan period.

The site is exceptionally well located, close to Knowle, and will support new housing in a location that is accessible and consistent with achieving sustainable development. It is deliverable within Phases I and II of the Plan period (0-10 years) as per the Allocated Sites Summary Table at paragraph 226, and in accordance with the NPPF Annex 2 Glossary definition and PPG (paras 007 Ref ID: 68-007-20190722, and 019 Ref ID: 68-019-20190722).

The proposed amendment of the settlement boundary to accommodate housing on Site KN2 South of Knowle is appropriate and in accordance with the strategic objectives of the Draft Submission Plan and NPPF paragraphs 136 and 137. We request, however, that Policy KN2 South of Knowle (and the Summary Table at para 226) and the Concept Masterplan Document, refer to the site's capacity being 'at least' 600 dwellings (to allow for flexibility at the outline planning application stage) which the Preferred Concept Masterplan and Stage 1 Report confirm is achievable.

Meeting Housing Needs and Site KN2 South of Knowle

The Draft Submission Plan sets out several challenges to be addressed. Challenge B refers to meeting housing needs across the Borough, *'including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall'*, and a key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

We agree with this objective.

Draft Policy P5 Provision of Land for Housing states *'the Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver 15,017 additional homes in the period 2020-2036'*. Paragraph 226 includes a summary table of residential allocations. Site KN2 South of Knowle is included as a 49 ha site with capacity for at least 600 new homes to be delivered during Phase I (0-5 years) and II (5-10 years).

Work commissioned confirms the proposed allocation of the site for at least 600 dwellings, redevelopment of the Arden Academy secondary school and new primary school to provide an 'all through' school is achievable. The development will:

- Retain important landscape features and respect the setting of heritage assets.
- Give priority to pedestrians and cyclists, provide safe and direct routes throughout the development linked to existing and proposed footway/footpath/cycleway networks.
- Provide suitable SuDS and flood risk management and consider opportunities to reduce flood risk.
- Provide 4.9ha of open space including Doorstep, Local and Neighbourhood Play areas.
- Retain the Local Wildlife Site.
- Provide biodiversity off-setting as necessary.
- Retain the MIND Garden.
- Provide accommodation for older people in accordance with the requirements of draft Policy P4E.
- Provide for Self and Custom Build Plots in accordance with the requirements of draft Policy 4D.

Paragraph 237 confirms *'it is important that efficient use is made of the land available to ensure delivery of sufficient new homes in the Plan period.'* Paragraph 240 recognises dwelling figures for the Allocated Housing Sites have been informed by concept masterplans, but that the eventual capacity will depend on detailed design and layout which may mean totals fall outside the indicative range. The Indicative Density table following suggests density of 30 - 40 dph within *'significant extension of urban or larger village edge'* areas, such as Site KN2 South of Knowle and apartments as appropriate.

The Preferred Concept Masterplan submitted with this representation demonstrates that the site could deliver at least 600 new dwellings in line with the requirements of Policy P5 and the Draft Submission Plan.

The site is capable of being delivered within Phase I and II (0-10 years) to ensure a supply of housing is available throughout the plan period, especially in the early period of the Plan (Challenge B, page 13).

Site KN2 South of Knowle is an appropriate site and will provide new housing land consistent with the aim of the Plan to achieve sustainable development (Challenge B objectives, page 14). The site will provide a range of house types to widen the local housing offer and ensure a range of market and affordable housing is delivered (Challenge B, page 13), including an opportunity for self-build (draft Policy P4D) and accessible house types for older and disabled people (draft Policy P4E).

SMBC Illustrative Concept Masterplan Document (October 2020)

The Concept Masterplan submitted with the Draft Submission Plan includes the following Site Analysis of Site KN2 South of Knowle:

The 49-ha site is currently within the Green Belt. If the site is allocated for development, Warwick Road and Grove Road will form the new Green Belt boundaries. The 2016 Draft Local Plan suggested an indicative capacity of 750 new dwellings for this site.

Current land uses include the Arden Academy buildings and playing fields, a garden on the western boundary used by the charity MIND, and several large residential properties (Stripes Hill House, Lansdowne House, Lansdowne Farmhouse and paddocks). There are marshy grasslands around Cuttle Brook some of which is designated as a Local Wildlife Site and several arable fields in the southern and south eastern parts of the site. The listed Rotten Row Farm and Grove Farm east barn lie adjacent to the site therefore the site forms part of their setting. Development should avoid encroaching upon their setting, and if it does so, exceptional design and quality together with full regard for context would be necessary and expected.

The site's topography is varied; there is an overall fall to the south east. The site contains several low-lying areas around its main water bodies, such as the Cuttlebrook stream and ponds, and the former boat lake in the grounds of Lansdowne House. Likewise, development must have regard to potential flood risk areas.

The Illustrative Concept Plan makes the following reference:

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 this includes the need to preserve or enhance the character and appearance of Knowle Conservation Area, which includes Station Road opposite the site. Arden Academy has been moved further into the site and rebuilt alongside a new primary school. 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. An integrated drainage, landscape and ecological strategy should be developed for the site. Public open space should provide a green link to the neighbouring Middlefield development, this development will require 4.9ha of public open space. A Doorstep, Local and Neighbourhood Play area will be required. Additional tree planting is promoted across the site.

The current proposal suggests 2 points of access onto the Warwick Road one of these is to serve the new school. There is 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 several bus stops which serve the local area. The site should utilise opportunities to maximise green/blue infrastructure and include linear conveyance SuDS in green routes and optimise layouts to ensure extreme flood flow paths are not impeded.

We agree with and support the conclusion that the site has the capacity to deliver at least 600 new dwellings to contribute towards local housing need, the redevelopment of Arden Academy and new primary school to create an 'all through' school.

Relocation of Arden Academy

The existing site of Arden Academy, a 10FE secondary and sixth form school, is included within the site boundary. The draft allocation proposes the relocation and re-provision of a new combined primary, secondary and sixth form campus within the site.

Provision of new primary school places as part of a combined campus Academy

The Draft Submission Plan sets out a schedule of infrastructure requirements to support the delivery of ca. 600 new homes at Site KN2, and the provision of increased primary school places is a key priority. This requirement is supported by the Council's adopted School Organisation Plan 2019/20 (approved by the Cabinet Member for Children, Education and Skills on 18 December 2019), which identifies a need for an additional 420 primary school places in the Knowle and Dorridge area over the Local Plan period.

To make efficient use of land, in terms of the operation of the school and development density achievable across the remainder of the allocation, these places will be provided on a new a combined campus comprising primary, secondary and sixth form provision allowing shared school facilities including playing fields and supporting infrastructure.

An opportunity to enhance the provision of secondary school places in Knowle and utilise full capacity

Draft Policy KN2 South of Knowle includes the redevelopment of the Arden Academy secondary school and new primary school to provide an 'all through' school. Draft Policy KN1 Hampton Road. Knowle allocates land for 180 new homes and includes '*financial contribution to new and improved education provision in Knowle, as proposed on Site Allocation KN2 South of Knowle (Arden Triangle)*'.

Paragraph 700 refers to new education provision required for Knowle, Dorridge and Bentley Heath:

'Whilst the provision of secondary school places is theoretically sufficient, the current infrastructure constraints of Arden Academy affect how efficiently it can be used in the future. It is recognised that the academy has some up-to-date and modern teaching space; however, it's supporting infrastructure including kitchens/dining space and other supporting facilities does not match this and the secondary school places that may be available cannot be accessed without these supporting facilities. It is therefore proposed that a new purpose built, and modern facility must be provided for the academy within the allocation site. Additional primary school provision is also required to support the level of growth in the settlement and this can be provided as a stand-alone school with shared facilities, or as part of an 'all-through' school with the academy'.

Arden Academy has been expanded in the past to provide additional teaching space, but this has not been supported by additional school infrastructure, particularly assembly and kitchen/dining space. The current Academy has been assessed as deficient in such space, which will be further exacerbated by the proposed expansion of the Sixth Form provision to support the Knowle community.

In addition, the Academy has identified that the bulk of the school premises are no longer fit for purpose and hinder the potential for student attainment and wider community use, in particular:

- Much of the site is over 60 years old. For example, the school hall and dining area are largely the same as when built in 1957.
- Additions and extensions over the years have led to a patchwork of development without clear definition of spaces.
- Energy efficiency of the building is poor due to single glazing and poorly insulated cladding. Six of the blocks have poorly insulated external envelopes and a further three exhibit only moderate thermal performance.
- Four multi-storey blocks within the school have no accessible passenger lift, which excludes wheelchair users from upper floors.
- The existing buildings have multiple areas of "high-risk" Asbestos Containing Materials which require constant management and maintenance.
- As surface water is not permitted to enter the main drain on Station Road, the building is built on large reservoir tanks that feed into the existing school system. Due to the expansion of the school over time, this drainage system is now inadequate and cannot cope during heavy rainfall events, resulting in frequent surface flooding to the site. Access to the main block is obstructed by flood water 4 to 5 times per year as a result.
- An Education Funding Agency Survey undertaken in 2013 identified the following elements of the main school blocks that would fail sooner: electrical power and lighting, heating, water systems, IT and communications infrastructure, drainage, gas distribution and all external doors and windows.

A feasibility study undertaken by Building Design Studio in February 2020 identifies demolition and

replacement of the four worst performing original blocks (Blocks A, B, C and D) is required to improve the Academy to modern standards, alongside the refurbishment of retained buildings.

These four original blocks provide ca. 5,340 sq. m of floor space, including 40 classrooms, the inadequate kitchen, assembly and dining halls, management and administration offices and staff rooms. It is anticipated that a replacement facility within the site would need to be 5 storeys and provide c. 6,421 sq. m of floor space.

Development of a modern new Academy, purpose-designed for the required number of pupils on the school roll and incorporating the required supporting infrastructure, is the most appropriate and cost efficient way of resolving the range of issues identified above, when taken in conjunction with the other factors set out in this representation.

Density and maximising the efficient use of land

The draft masterplan identifies the Station Road frontage as a key opportunity for higher density development. Technical surveys have identified a significant number of potential constraints within other parts of the allocation, including the Local Wildlife Site towards the south, TPOs, ecology and an area of flood risk in the north eastern part.

The relocation and re-provision of the Academy will help to ensure that the development is deliverable by maximising the development potential of the Station Road frontage, with higher density development closer to Knowle to ensure efficient use of land.

Alleviating traffic congestion and safety concerns on Station Road

The Draft Submission Plan identifies a likely requirement for highway capacity and access improvements along the A4141 (Warwick Road) and B4101 (Station Road). Arden Academy has for a number of years expressed concerns around identified safety hazards relating to on-street parking on Station Road during school drop off and pick up times, and pedestrian, cycling and vehicular conflicts in respect of the narrow footpaths and large numbers of pupils walking to and from the school during the day.

Relocation of the school within Site KN2 provides an opportunity to resolve these concerns and improve transport outcomes for Knowle village, through the creation of new principal points of access off Warwick Road (rather than Station Road) to serve the school. The new access points would in turn serve a carefully considered road layout designed to modern highway safety standards, incorporating foot and cycle paths. The development would also enable the creation of sufficient car parking to serve the school, including drop-off and pick-up facilities, removing a significant level of on-street parking from Station Road and improving air quality for pedestrians and residents.

Opportunity for community use of new facilities at the Academy, to support sustainable development and growth in the local population

Arden Academy has committed to supporting community use of the facilities in the proposed new school. Community access to modern, high quality sports facilities at Arden Academy will support the Council's wider Playing Pitch Strategy. In accordance with SMBC and Sport England policy, this is proposed to

include the development of up to five new sports hubs across the Borough. An in principle proposal for the acquisition of land through negotiation or Compulsory Purchase Order to facilitate delivery of these sports hubs was approved by the Cabinet on 13 August 2020, and will help to enable increased participation in sport, meet the demands of current and future residents, and create a vibrant, healthy, sustainable community in Knowle.

Sustainability and the Council's carbon neutral commitment

In October 2019, the Full Council unanimously approved a Climate Change Emergency Statement of Intent. In March 2020, Cabinet approved the refreshed Climate Change Prospectus 2020/21, which sets out the Council's approach to demonstrating the key actions taking place or which are due to take place in support of Solihull's transition to a sustainable, low carbon borough. These objectives have now been incorporated into the Council Plan, with a target for the Council to be net zero carbon by 2030 and for the Borough to be net zero carbon by 2041.

Re-provision of the Academy provides an opportunity to improve sustainability towards the net zero carbon target. The existing buildings are dated, and initial feasibility prepared by BDS identified significant constraints in improving the existing buildings to zero carbon standards, compared with the opportunity to deliver a modern purpose-built Academy designed to the latest energy efficiency standards and incorporating the latest sustainable technologies. There is opportunity to adopt modern methods of construction during the delivery of the development, ensuring that carbon neutral objectives are prioritised throughout the construction process.

Funding and Viability

The Council has identified funding sources for the cost of constructing the new Academy, and has engaged closely with Homes England, the government's national housing development accelerator to support the project.

Preferred Concept Masterplan Development and Phasing

The Preferred Concept Masterplan submitted with this representation illustrates how the site could be developed to provide at least 600 new homes with new education provision. This is informed by detailed technical assessment and on-site surveys. The Preferred Concept Masterplan confirms the proposed allocation is positively prepared, justified, effective and consistent with national and local policy.

The site is a sustainable and accessible location, within 1km of Knowle and 4km of Solihull Town Centre, and is well connected to Solihull and the wider region. The nearest train station is Dorridge Station which lies just over 1.5km to the southwest and provides direct rail routes into Birmingham and London Marylebone, and Birmingham Airport is located 8km to the north. Access to the M42 is just over 2km from the site via the A4141. There is currently limited cycling infrastructure within the area.

Current land uses include a mix of agricultural land, semi-improved landscaped grasslands, a mixture of paddocks, pasture and arable fields, sports pitches with the Arden Academy site and residential use. On the western boundary is a garden run by the charity MIND. The most prominent built form on the site is Arden Academy which includes natural and artificial external play areas.

The site is predominantly surrounded by existing residential development and a mix of further arable fields to the south east.

The boundary of the site is only partially visible from Station Road and includes the current school access and frontage. The site is further hidden behind the residential properties along Station Road and Milverton Road to the west, south west and north of the site respectively. A mixture of fences and natural hedges provide separation between the site and gardens. The eastern and southern site boundaries comprise of natural hedges and trees with setback entry points into the site. Views into the site are limited from both Warwick Road and Grove Road as a result of these natural features.

Topographical information identifies a fall across the site to the south east and a natural shallow valley within the Local Wildlife Site (reference SP17S7) which in turns accords with the presence of the natural water course and pond. Levels to the west and northern boundaries are higher.

The site achieves a positive/neutral score against most objectives set out in Sustainability Appraisal (Aecom, 2020) submitted with the Draft Submission Plan. The assessment recognises proximity to Knowle, existing leisure and play facilities and existing physical infrastructure including regular bus and train services to reduce the need to travel. For the purposes of the Green Belt Assessment (Atkins, 2016), the proposed allocation includes parcel RP39 (Land between B4101 Station Road and A4141 Warwick Road). The site scores 5 against the Green Belt tests set out in the NPPF. The highest scores are against 'Purpose 2 – to assist in safeguarding the countryside from encroachment', scoring 2 which is considered to be 'moderately performing'.

We consider this potential impact can be mitigated through the masterplan.

Concept Design and Preferred Concept Masterplan (Building Design Studio, December 2020)

Consideration of the full extent of the opportunity that the site presents to achieve sustainable and high quality development has been informed by site and context assessment prepared by SMBC to support the Local Plan process, and a complete and robust 'evidence base' of environmental and technical assessments commissioned.

The following technical work has been completed to inform the masterplan, and a summary is set out below:

- Access Appraisal (Hub Transport Planning)
- Arboricultural Survey and Tree Constraints Plan (Aspect Arboriculture)
- Ecological Surveys and Hedgerow Assessment (Aspect)
- Flood Risk and Drainage Strategy (WYG)
- Geo-environmental Desk Study (Wardell Armstrong)
- Heritage Statement (RPS)
- Landscape and Visual Impact Assessment (Lathams)

Access and Highways (Hub Transport Planning)

The site is located to the south of Knowle Village Centre and benefits from good access to local facilities within the centre of Knowle as well as local schools in the area such as Arden Academy. The proposed development also benefits from good public transport links surrounding the site.

Primary and secondary vehicular access off Warwick Road, as well as access provision off Grove Road have been considered. Access options have considered the horizontal and vertical alignment of the existing roads, traffic flows and speeds, extent of the adopted highway and the potential impact on trees/hedges along the frontage of the site. Several pedestrian access points have also been identified to ensure the site is permeable in nature and encourages sustainable trips to and from the site.

Ecology – updated Phase 1 Habitat Survey and Hedgerow Appraisal (Aspect Ecology)

Phase 1 Habitat and Hedgerow Appraisal has been prepared for most of the site and highlights significant ecological habitats. A designated Local Wildlife Site (reference SP17S7) is shown and remains an important natural green corridor to be retained as an integral aspect of the masterplan.

Hedgerow corridors, veteran and mature trees, water courses and ponds are identified and positively contribute towards the ecology diversity within the site, and the Green and Blue Corridor for the wider area. Protection buffers to natural features are reflected in the illustrative masterplan, including to the woodland, watercourses, ponds and intact hedgerows.

The site has two large notable ponds; one an ornamental fishpond set within the grounds of Lansdowne House and the other within the LWS and partially hidden by unmanaged dense scrub. This pond is located within in the some of the lowest sections of the site and is considered as part of the future SUDs strategy.

The Phase 1 Habitat Survey and Hedgerow Survey identify several smaller ponds within the site for detailed surveys and mitigation as necessary. A balancing pond is also located to the south of the site as part of the SUDs strategy for the adjacent Taylor Wimpey estate.

Flood Risk Assessment (Wardell Armstrong)

The site is located within Flood Zone 1, and at low risk of flooding from rivers or the sea. The EA Flood Risk from Surface Water map identifies that areas within the site adjacent to watercourses are at risk of flooding. The site is at low risk of flooding from groundwater, sewers, reservoirs and canals.

The site contours fall to the south east. The Cuttle Brook, which flows eastwards across the site and drains to the north. There are several ordinary and manmade tributaries on site. A public foul pumping station is in the south west of the site. The rising main conveys flows southwards to Grove Road.

To ensure that the development does not have any adverse offsite impacts or increase flood risk elsewhere, surface water runoff will be sustainably managed and disposed of using SuDS techniques. The surface water drainage strategy will consider other SuDS and incorporate SuDS principles wherever possible.

Given the underlying ground conditions, the preferred method of discharge from the proposed developed site would be to Cuttle Brook. Attenuation located near to the Cuttle Brook and its tributaries would allow integration into public open space areas, providing a use for the areas at surface water flood risk. A range of surface SuDS features could be used, including swales and detention basins/ponds.

The assessment demonstrates the proposals are compliant with NPPF, PPG and local planning policy, taking predicted climate change allowances into account, and will remain safe from flood risk and can be suitably drained for the development lifetime.

Heritage (RPS)

There are no designated heritage assets located within the Site. As the proposed development also has the potential to affect the significance of heritage assets through changes within their settings,

Designated and non-designated heritage assets within a 1km search area from the site have been considered. Two Listed Buildings within the search area may be sensitive to the proposed development due to their inter-visibility with parts of the site. Rotten Row Farmhouse and Barn on North-East Side of Grove Road are Grade II listed. The proposed development has potential to cause less than substantial harm through the loss of part of their undeveloped settings, however land within the site provides a negligible contribution to significance and the masterplan can reduce or mitigate any harm.

The northern part of the site comprises a neutral element of the setting of the Knowle Conservation Area, and the proposed development can similarly be designed to avoid any harm to the significance of the Conservation Area.

The Heritage Appraisal confirms no heritage constraints to the proposed allocation. The Site has a negligible to low potential for significant (i.e. non-agricultural) archaeological evidence of all dates. There is no suggestion that the site is likely to contain archaeological remains that are nationally important or would prohibit development.

Landscape and Visual Impact Assessment (Lathams)

The site is assessed as having medium Visual Sensitivity and Landscape Character Sensitivity, and medium Landscape Sensitivity and Landscape Value.

Opportunity for landscape enhancement and mitigation measures particularly toward the south east of the site, and a development structure to reflect the pattern of existing field structure enclosure to maintain existing trees vegetation cover are considered within the masterplan.

Tree Survey and Constraints Plan and Hedgerow Assessment (Aspect Arboriculture)

A Tree Survey and Hedgerow Assessment has been prepared. TPO's (reference TPO 01150) have been identified within the site owned by Landsdowne Property Developers Ltd. A tree condition survey in line with BS5837:2012, has also been produced by Aspect Arboriculture highlighting the condition of the existing individual and group of trees within the Trentham site ownership.

An expanded conditional tree survey and decay investigations will be required for the remainder of the site in order to fully assess the condition of the existing tree assets, woodland and hedgerows and their potential integration or loss as part of the emerging master plan for the whole site.

Planning Policy Framework

Draft Policy P5 Provision of Land for Housing allocates land for *at least 5,270 net additional homes to ensure sufficient housing land supply to deliver 15,017 additional homes in the period 2020-2036*, including Site KN2 South of Knowle with capacity for at least 600 new homes to be delivered during Phase I (0-5 years) and II (5-10 years).

The draft policy framework is relevant to development of the masterplan, including the following:

- Draft Policy P5 – Provision of Land for Housing confirms the appropriate density will be informed by the need to maximise the efficient use of land, the appropriate mix of housing, local character and distinctiveness and the scale, type and location of development.
- Draft Policy P4A Meeting Housing Needs – Affordable Housing requires the provision of 40% affordable housing on sites of 10 units or more.
- Draft Policy P4C – Meeting Housing Needs - Market Housing requires a mix of market dwellings having regard to local need, with 30% 1 or 2 bedrooms, 50% 3 bedrooms and 20% 4 or more bedrooms.
- Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding requires a contribution of 5% of open market dwellings on allocated sites of 100 or more as Self and Custom Build Plots.
- Draft Policy P4E Meeting Housing Needs – Housing for Older and Disabled People requires all developments of 300 dwellings or more to provide specialist housing or care bed spaces in accordance with the Council's most up to date statement of need on older person's accommodation.
- Draft Policy P20 Provision for Open Space, Children's Play, Sport, Recreation and Leisure requires new housing developments to provide or contribute towards new open spaces or the improvement of existing provision in the area, in line with the minimum standard of 3.57 ha per 1,000 population.
- Policy KN2 South of Knowle allocates the site for 600 dwellings together with the redevelopment of the Arden Academy secondary school and new primary school to provide an 'all through' school.
- The Open Space Assessment (2019, Ethos Environmental Planning) submitted with the Draft Submission Plan requires sites of more than 200 homes to provide the required open space on site.

Preferred Concept Masterplan (Building Design Studio, December 2020)

The Preferred Concept Masterplan submitted shows how at least 600 new homes, a new secondary school and new primary school could be delivered consistent with national, local and emerging planning policy. The site is a sustainable location with good local and regional access and strong links to Knowle.

The site provides a development density of 35-40+ dph.

Access is provided from Station Road, Warwick Road and Grove Road, with clear connections and

improved pedestrian and cycle connectivity through the site and links to local infrastructure and amenities. The school is accessed from Warwick Road, with pedestrian access from the west of the site. Notional access routes are provided and illustrate how the plots can be subdivided and accessed.

The masterplan seeks to contribute to the wider Green Corridor Strategy for the local area. Ecological sensitivities have been assessed, and mitigation is provided. Natural assets contribute to an integrated landscape masterplan, physical and visual connectivity. Green spaces are provided through the site, with a 'green spine' creates a green link of open space, green streets and hedges to connect routes between public open space and enhance local character. The concept of the green spine accords with SMBC Concept Masterplan for the site and option to relocate the school.

The Preferred Concept Masterplan provides 5.2 ha formal and informal open space, excluding the Local Wildlife Site.

The proposed density of development reflects the nature and current character of the local area. Higher density development of up to 45 dph is provided to the north and west of the site closer to Knowle, with lower density development to the east and south.

The masterplan provides a proposal which is appropriate to the character of the area and its surroundings, is environmentally sustainable, meets the future educational provision and conforms to current national and local planning policies.

The design concept is based on the following key considerations (BDS Stage 1 Report):

- 1) The relocation of Arden Academy and a new 2 FE Primary School – by relocating and offering up the existing school site for residential development
- 2) Creating a series of green open spaces and corridors, and public realm through a landscaped led masterplan approach
- 3) Site permeability by way of physical and non-physical interventions to facilitate a good social structure for both new and existing residents.
- 4) Spatial structure looking at the existing surrounding site density patterns, frontages and scale for a more integral masterplan proposal
- 5) Identity and character

Viability and Deliverability of the Allocation

We can confirm that it is the shared objective of the landowner group to bring forward the future delivery of development on Site KN2 South of Knowle in a policy compliant manner.

Development Phasing

Draft Policy P5 Provision of Land for Housing states capacity for 600 new homes to be delivered during Phase I (0-5 years) and II (5-10 years). The Preferred Concept Masterplan illustrates opportunity for land to be brought forward in phases within Phase I (0-5 years) and Phase II (5-10 years).

Financial Viability Appraisal (Cushman & Wakefield, 2020)

A viability assessment has been undertaken by Cushman & Wakefield. Paragraph 34 of the NPPF confirms Plans should set out the contributions expected from development, including affordable housing and other infrastructure. Such policies should not undermine the deliverability of the plan.

A scheme compliant with the Draft Submission Plan has been tested and confirms that no viability barriers to delivery of the site have been identified on the basis that a comprehensive funding arrangement will be available for the delivery of the new Academy.

Summary

We support the allocation of Site KN2 South of Knowle within the Local Plan Draft Submission (October 2020) for residential development, redevelopment of the Arden Academy secondary school and new primary school to provide an 'all through' school. We consider the proposed amendment to the settlement boundary, as shown on the Policies Map to include Site KN2 South of Knowle, to be sound. We consider Policy KN2 South of Knowle of the Draft Submission Plan (October 2020) to be sound – positively prepared, justified, effective and consistent with national policy

Site KN2 South of Knowle will provide land for at least 600 new homes to contribute towards the objectively assessed housing need and requirement for 15,017 additional homes across the Plan period to ensure sufficient housing land supply. It is consistent with achieving sustainable development and appropriate in planning terms.

The site is demonstrated as an effective allocation that is deliverable over the Plan period for the reasons set out in this representation. It will be delivered in accordance with a high-quality masterplan-led vision. The proposed development is consistent with national and emerging local planning policy.

Yours sincerely



Clare Lucey MRTPI

Associate, Development & Planning
Cushman & Wakefield

