



**Q1. Do you believe that there are exceptional circumstances that would justify the Council using an alternative approach, if so, what are the exceptional circumstances and what should the alternative approach be?**

### **KDBH Neighbourhood Forum Answer - Summary**

**Use of the 2014 based household projections, together with a contribution of 2,000 dwellings towards the Housing Market Assessment (HMA) shortfall, would lead to a required annual delivery rate of 885 dwellings. This is double the rate achieved over the last 10 years and is unrealistic. If the contribution to the HMA shortfall were to increase, this rate would be even higher and well above the Government cap. It would be undeliverable. Bearing in mind also the unsuitability of the sites proposed to be allocated in KDBH, the housing requirement and the HMA contribution will need to be reduced.**

Use of the Government's methodology (2014 based household projections) produces an annual rate of house building for the Borough of 885 dwellings per year, allowing for a contribution of 2,000 dwellings to the HMA shortfall. This rate of delivery is above the highest rate that has been achieved in the Borough in one year, which was in 2005 leading up to the height of the boom. It is double the average rate of delivery over the last 10 years and above the cap that would apply if the calculation related solely to Solihull's housing need.

It is inconceivable that such a high rate of delivery can be sustained as an average over the life of the Local Plan, not least because the house building industry does not have the resources to deliver such a rate even if planning permissions were quickly forthcoming.

It is noted that there is no change in the assumption that the draft Local Plan will make a contribution of 2,000 dwellings to meeting the HMA shortfall. This will not be reviewed until the Submission version of the DLP. It is widely believed that the Council will have to increase this number. If this number is increased, it will lead to a further, potentially significant, increase in the housebuilding rate

per annum, which will be at a rate well in excess of the Government cap. How will this be achieved without substantial further loss of Green Belt and ruining the character of the Borough? More practicably, how can such a high number be delivered year on year? It is simply not credible or realistic.

It is considered that the cap that is applied to housebuilding in respect of Borough's need should take account of any HMA shortfall contribution. It is illogical to do otherwise. Such considerations justify the Council making a case of exceptional circumstances to the Government. In any event, the Council should reduce the proposed contribution to the HMA shortfall. This is because of the strategic value of the Borough's Green Belt when compared with other parts of the wider conurbation and the need to achieve more realistic annual housing delivery rates.

The exceptional circumstances case should demonstrate the substantial harm that would result from such a scale of development on the character and distinctiveness of the Borough's communities arising from the large scale loss of Green Belt and unacceptable transportation and infrastructure impacts. The SMBC housing requirement should be capped.



## Response to SMBC Draft Local Plan Supplementary Consultation

**Q2. Do you agree with the methodology of the site selection process, if not why not and what alternative/amendment would you suggest?**

### **KDBH Neighbourhood Forum Answer - Summary**

**No. There are significant flaws in both the methodology and its application. The site selection process must be set in the context of the overall housing need and Spatial Strategy, neither of which have been updated for this consultation but should be in the light of new evidence.**

**In testing the appropriateness of sites, consideration must be given to the impact of new development on the physical, economic and social infrastructure of the settlement and on its character and distinctiveness. The methodology does not do so. There are also significant variations in the scoring assessments of sites which require justification.**

The representations of the Knowle Dorridge and Bentley Heath (KDBH) Neighbourhood Forum (NF) to the 2016 DLPR raised objections, inter alia, on the basis that;

- The Council's spatial strategy is not clear or coherent.
- There were inconsistencies in the site selections with the Spatial Strategy, the Strategic Transport Strategy and with the Council's own evidence base, particularly the Landscape Assessment, the Interim Sustainability Appraisal and the Green Belt Assessment.
- There was inadequate consideration of infrastructure impacts, particularly traffic impacts.

These comments still apply. In addition:

**Spatial Strategy:** The Supplementary Update does not revisit the Spatial Strategy. Both the HMA shortfall contribution and the alternative considerations raised by the Strategic Growth Study necessitate revisiting the Spatial Strategy. It is unacceptable to leave these fundamental issues to the Submission stage.

The Spatial Strategy and the site hierarchy assessment refer in places to sites in KDBH being consistent with Option G of the Spatial Strategy. However, this Option was one of the **worst** performing in the Interim Sustainability

Appraisal. It is not clear which of the Options is the basis of the Spatial Strategy – it appears to be a mix of all the Options with no clear approach. Notwithstanding this, the aim of the Spatial Strategy is to ensure a sustainable pattern of development and to protect the character and distinctiveness of the Borough. This is inconsistent with the proposed scale of growth in KDBH.

As noted above, there is no change in the assumption that the Local Plan will make a 2,000 house contribution to meeting the HMA shortfall. This will not be reviewed until the Submission version of the DLP. It is widely believed that the Council will have to increase this number, which could have significant implications for the overall Spatial Strategy. At present it appears that the Council is considering the amber sites as possible further releases. However, bearing in mind the flaws in the Spatial Strategy outlined in the previous response of the Neighbourhood Forum (NF), it is even more important to revisit the Spatial Strategy should the HMA number increase. Simply adding more amber sites will not provide the strategic approach that is necessary.

It is also to be noted that the estimated housing supply figure is higher than is necessary. The excess is of the order of 11%. To achieve this margin, allocations would



## Response to SMBC Draft Local Plan Supplementary Consultation

have to be made on Green Belt land. Related exceptional circumstance for the re-drawing of Green Belt boundaries have not been demonstrated.

**Methodology:** There are flaws in the methodology and in the application of the methodology.

Step 1 of the hierarchy identifies those sites with a score of 1 to 4 as green. However, the Step 2 diagram appears to concentrate on refining only the yellow and blue sites. This is confirmed in para 68 which says that Step 2 is principally concerned with confirming whether the yellow and blue sites should be reallocated in the hierarchy. This suggests that if a site is assessed as green in Step 1, there is no proper assessment of how such sites fit with the overall spatial strategy or of site constraints.

The methodology gives insufficient weight to the impact and mitigation of site constraints, particularly in respect of 'green' sites. Step 2 must apply to all sites and should be given equal weight to Step 1, as compliance with strategy and the assessment of constraints are of vital importance to the assessment of all sites.

There are significant inconsistencies in the application of the methodology which undermine the integrity of the whole selection process. The following are a few examples where further explanation of the conclusion of the assessment process is required:

- Arden Triangle sites (nos. 148, 149, 150, 151, 152, 153 and 154 and 157 excluding the Academy site) all appear in to score 6 in step 1 and be assessed as blue (ie 'unlikely allocations'), but are then assessed as green via Step 2. Without sight of impacts and proposed mitigation, it is not possible to understand how these sites fall into the green category, ie that they have no or relatively low impact on relevant considerations; or that severe impacts can be mitigated. Such information is essential to enable residents and businesses to make informed responses to this consultation.
- Further apparent anomalies within the Arden Triangle include parcel 148 Lansdowne, assessed as medium/high accessibility; and parcel 157 Land east of Knowle forming part of the Arden Triangle, assessed as very high accessibility. Similar issues arise in the Interim Sustainability Appraisal in which the Arden Triangle is assessed as highly positive in terms of proximity to buses and trains and to convenience stores; positive in terms of healthcare and leisure; and neutral in relation to landscape. However, most of the Arden Triangle site lying beyond the Academy is not easily accessible and has valued landscape characteristics, as demonstrated by both the Council's Landscape Assessment and the Landscape Study commissioned by the KDBH NF.
- Site 213 north of Hampton Rd is assessed as blue in Step 1 and then becomes green, despite performing highly in terms of purpose 1 of Green Belt. It is also assessed as having medium/ high accessibility even though there is no bus service and large parts of the site are a long walk from the High St. The other two northern parcels (sites 214 and 215) are assessed as red, ie not suitable for development, although they would become the site of the sports hub development.
- Yet further questions arise in respect of Site 244, part of Copt Heath Golf Course, which is only assessed as medium accessibility despite being close to a bus route. It is assessed as yellow in Step 1,



## Response to SMBC Draft Local Plan Supplementary Consultation

but is red after Step 2: Jacobean Lane sites 323 and 324 score reasonably well, but one is red and the other amber: and site 413 Land at Oak Green, Dorridge performs well with high accessibility but is assessed as amber.

These are a few examples which aim to demonstrate the point that many of the sites around KDBH have very similar scores, but vary considerably in their assessment as green, red or amber. A clearer explanation is required of the assessment process to justify the draft allocation sites. Without this, the credibility and robustness of the process is undermined.

It is also noted that the assessment excludes a number of smaller sites from the Sustainability Appraisal. The Strategy continues to focus only on large scale Green Belt releases around KDBH which is not consistent with Government advice that a mix of sites should be encouraged. Some of the smaller sites should be reassessed to see if they could contribute to housing growth in a more sensitive way which has less overall impact on the Green Belt and on local character.

**Infrastructure impacts and mitigation.** See answer to Q22, 23 and 24.

**Q22. Do you agree with the infrastructure requirements identified for Knowle, Dorridge and Bentley Heath, if not why not: or do you believe there are any other matters that should be included?**

### **KDBH Neighbourhood Forum Answer - Summary**

**The Council has identified most of the infrastructure requirements for the KDBH Area - but only in vague terms with no information on how such needs can be met or consideration of whether such development will be harmful to the settlement. Impacts on doctor's surgeries, pre school facilities and the capacity of Dorridge Station should be included. The lack of evidence on infrastructure impacts and mitigation is a serious omission.**

Concerns about the capacity of existing infrastructure and the additional pressure that large scale new development would place on it was one of the top issues raised by residents during the Knowle Dorridge and Bentley Heath (KDBH) Neighbourhood Plan (NP) process. This was reflected in the Neighbourhood Forum's objections in 2016 (see below) and is now also reflected in a number of the NP policies and Community Actions.

The Forum agrees with the infrastructure requirements listed, some of which have been highlighted through the NP work and its policies, subject to the following qualifications:

- **Improved public transport**  
Given the location of the selected sites (one not on a bus route and the other largely on a very poor rural route), it is difficult to see how such improvement will be viable. Even if bus services to the draft allocation sites are improved, there will still inevitably be considerable additional car borne traffic adding to the already acknowledged congestion within KDBH.
- **Parking improvements**  
Additional parking to serve Dorridge Station will be essential as the selected sites will lead to more car borne traffic and additional commuter demand.



## Response to SMBC Draft Local Plan Supplementary Consultation

However, considerable care will be required with double decking to ensure no harm to the Conservation Area. Consideration should be given to decked parking for long stay parking at the rear of Sainsburys petrol filling station.

- **Highway improvements**

The proposed scale of growth will necessitate these, but to date there is no indication of what they will be, what their impact will be and therefore how acceptable they will be to residents and businesses. (see further comments in response to questions 23 and 24.)

- **New primary school**

Yes, this is required, but is it a replacement for St George and Teresa or a new primary school to meet the additional need arising from new development? If the former is to be replaced locally, then two new primary schools will be required given that the existing schools are all at capacity. It is not clear how existing traffic congestion will be alleviated by a new school given that the existing primary schools are at capacity and will presumably remain so, together with attendant parking issues.

- **Sport and Recreation**

This requirement is in line with national, local and Neighbourhood Plan policies. The latter also supports in principle improved sports and leisure facilities with better community access. See response to Q 23 re sports provision on Hampton Rd.

- **Concept masterplans**

Very supportive, *provided that* the NF is involved in meaningful engagement, particularly now that it has the benefit of its own Landscape Study, Heritage and Character Assessment and Masterplanning/Design and Design Coding Study. These will enable the Forum to make informed inputs to the

masterplanning process, with a view to achieving significantly amended and improved masterplans. See further comments below and in response to questions 23 and 24.

- **Affordable housing and more small market houses**

This is supported in the NP.

The following **additional** infrastructure requirements have been identified through the NP process:

- Additional doctors and dental practices
- Pre school facilities
- The capacity of Dorridge Station to meet increased demand.

With regard to infrastructure issues generally within KDBH, there are two further points:

Firstly, looking at the proposed infrastructure priorities listed by the Council, it appears that there will be very limited benefits from such large scale development to KDBH residents, particularly if a new Arden Academy is not delivered. This was the main rationale for such large scale development to the east of Knowle. The community sports hub is the other main community benefit, although that appears to be principally a relocation of existing facilities offering expansion and improvements.

Secondly, the Neighbourhood Forum's response to the 2016 DLPR consultation was critical of the lack of information on infrastructure impacts within KDBH and how they would be mitigated. Transport issues were a top local concern in the NP process. The NF's 2016 objection in respect of infrastructure concluded:

*'It is unreasonable to expect residents to accept any substantial further development in KDBH without any indication as to how the wider infrastructure impacts would be overcome'.*



## Response to SMBC Draft Local Plan Supplementary Consultation

The Forum asked for more information to be made available on the infrastructure impacts of the scale of additional housing in KDBH to enable an informed response to be made. Very little information has been forthcoming, and it appears no real progress has been made over the last 2+ years as far as informing residents is concerned.

The Forum is aware that the Council subsequently commissioned a Borough wide Transport Study and a Car Parking Study. The Council agreed to work collaboratively with the Forum on the transport and car parking work in relation to the KDBH Area to avoid duplication of cost and effort by the Forum. The Forum is aware that the Council has had a draft report on both the traffic implications and car parking study since early 2018, but there has been no involvement or discussion of the findings with the Forum despite repeated requests. The Forum has been informally advised that there are indeed measurable impacts at various junctions which can be mitigated, but how this can be achieved is not known.

The 2019 DLP Supplementary Update provides no further information on these matters, other than the reference above to

various undefined highway improvements. The Council has indicated that the Transport and Car Parking Studies will not be published until the Submission version and the concept masterplans provide little further information as to how the wider infrastructure issues referred to above will be addressed.

**Therefore, until such time as the Council provides sufficient information and evidence as to the impacts of this scale of development on the physical and social infrastructure of KDBH, and how it can be satisfactorily mitigated, the original objections of the NF to the draft site allocations are maintained. Further information is also required in respect of the various other issues raised in the Forum response relating to, inter alia, inconsistencies with the Council's own evidence base and its spatial strategy.**

**Without prejudice to this 'in principle' objection, detailed comments are made in response to Q 23 and Q24 on the allocations and masterplans, taking account of the Forum's own Studies into Landscape Strategy, Heritage and Character Assessment and Masterplanning /Design and Design Coding.**

***Q23. Do you believe that Site 8 Hampton Road should be included as an allocated site, if not why not? Do you have any comments on the draft masterplan for the site?***

### **KDBH Neighbourhood Forum Answer - Summary**

**This allocation would be a large scale encroachment into the countryside and Green Belt extending well beyond the built limits and natural topography of Knowle. The topography and substantial changes in levels are not addressed in the masterplan. Without information on levels, infrastructure impacts (particularly highways/junction impacts/mitigation), impacts on Knowle Conservation Area and clarity on the GB and LWS boundaries, it is not possible to support this allocation and the draft concept masterplan. The issues raised by the NF Landscape Study and Masterplanning/Design and Design Coding Study need first to be addressed before any allocation can be supported.**



## Response to SMBC Draft Local Plan Supplementary Consultation

The response to Q22 sets out why an 'in principle' objection to this allocation should be maintained pending further information from the Council on infrastructure and other matters raised in the Forum's original objection.

This is expanded upon below having regard to the information in the Neighbourhood Forum's (NF) own Landscape Study by Crestwood Environmental and the Heritage and Character Study and Masterplanning/Design and Design Coding work by Urban Vision Enterprise CIC.

In its submission to the 2016 DLPR consultation, the NF made comments on these two sites that raised questions over the allocations given the Council's own evidence base. This showed that:

- the sites are at the least accessible end of the scale and are poor in locational terms, with no public transport access
- development would be a significant encroachment into the Green Belt and countryside
- the parcels are 'best performing' and, arguably, 'moderately performing' Green Belt
- the impacts of additional traffic, particularly on the High St junction need to be explained, as well as potential impacts on the Conservation Area
- further work is needed to understand the impact of topography on development, both housing and sporting, and of development on trees, hedgerows and Local Wildlife Sites.

Since then, the Forum has had three meetings with site promoters and the Council when their baseline studies have been shared. Whilst this was welcomed by the Forum, there has been no substantive responses or progress on the above matters. In particular:

1. The Council states that this allocation is consistent with Option G of the Spatial Strategy for the significant expansion of rural villages. However, the Spatial Strategy does not appear to favour any one Option and this option was one of the worst performing in the Interim Sustainability Appraisal.
2. The Council has not shared transport study findings with the NF as promised. However, the NF has been made aware of the 'measurable impact' that the Council's own Transport Study has shown at the High St junction. Despite this, the impacts of proposed development on traffic flow, junctions, village centre, Conservation Area and station parking are not mentioned in the Supplementary Update. Nor is there any indication of how impacts can be mitigated or how a bus service to this site can be achieved.
3. The Council considers that the main parcel of land at Hampton Rd would be a 'rounding off' of the settlement. A site visit demonstrates that this is not the case. Development here would be a major incursion into the countryside and Green Belt setting of Knowle.
4. The Atkins assessment of the larger parcel of Green Belt (parcel 36) as moderately performing is questionable. It is scored only as a 2 in terms of safeguarding the countryside from encroachment, even though it meets the criteria to score 3, as does parcel 37. In terms of preserving the setting of the historic village it scores a 0, despite the fact that the landscape and topography play an important role in protecting the rural and historic setting of the village. The 'considerations' set out in the table on p7 of the GBA state that an assessment of topography has been taken into account in the scoring of this GB purpose, but it is not evident in the scoring of this parcel. The scoring needs



## Response to SMBC Draft Local Plan Supplementary Consultation

to be revisited. See also comments in our response to Q2 on inconsistencies in scoring.

5. The Council refers to providing a defensible Green Belt (GB) boundary to the smaller parcel of land and continuing the GB boundary on the larger parcel by extending the GB boundary on from the rear of properties along Wychwood Avenue down to Hampton Rd. However, there is no existing definitive boundary on site where shown on the masterplan - it is proposed to create a new boundary through road construction. This appears to be a novel approach to creating new GB boundaries and is inconsistent with the insistence elsewhere by the Council that sites cannot be reduced in size because strong existing defensible boundaries must be adopted. A number of other large sites may perform better in the Council's assessments if some areas can be excluded by creating new GB boundaries.
6. More information is required to explain how the Council has concluded that this is a 'green' site. Without this, it is not possible to accept the Council's conclusion that development will only have no, or relatively low impact on relevant considerations, or that a severe impact can be mitigated.

As regards the Masterplan, the draft report from Crestwood Environmental for the NF, together with the Heritage and Character Assessment and the Masterplanning/Design and Design Coding by Urban Vision Enterprise CIC, provide clear evidence and advice on what the masterplan for these sites should contain if development in these locations is confirmed. Below we summarise the key landscape and design considerations that need to be taken into account and are not reflected in the concept masterplan at present:

### 1. Levels and topography

The masterplan fails to reflect the significant levels issues across the northern parcel and how they will be addressed both for housing and for sports pitch provision. The image of the masterplan is highly misleading without any indication of how the change of levels will be accommodated. This is a sensitive issue locally given that changes in levels across the recently completed Taylor Wimpey development at Middlefield Spring were not taken into account, leading to extremely poor relationships between houses at the lower level being dominated by 3 storey apartments on the higher level.

There is a 17m change in level across the site with the ground rising to a high point on a ridge. The masterplan shows residential development extending beyond the ridge line, thus impacting on the Green Belt and on views on the approach into Knowle from Hampton Rd. The NF Landscape Study advises that development on this parcel should be contained by the existing hedgeline of the second field to: a) provide a definitive GB boundary; and b) sit properly within the landscape, such that the natural topographical containment of the settlement of Knowle is respected without any adverse impact on its character.

The change of levels must also have regard to the relationship to existing properties, particularly those in Whateley Hall Rd and Alveston Grove.

The change in levels will necessitate some significant engineering work to accommodate residential development and also to create level sports pitches. This will lead to terracing, which will alter the landscape and rural character, particularly of the Green Belt approach to Knowle. The provision of car parking, a sports building near the high point of the land, floodlighting and the erection of high netting (necessary for the cricket ground adjacent to Hampton Rd) will all add to a



## Response to SMBC Draft Local Plan Supplementary Consultation

significant adverse impact. This is a particular concern raised in the NF Landscape Study, which concludes that other sites should be preferred to the larger parcel because of its adverse impacts.

If development is to be accommodated on these parcels of land, the masterplan should be amended to show how the levels are to be taken into account and to ensure that residential development is restricted to the natural topographical containment of Knowle. The extent of earth works to accommodate the community sports hub, and more information on the location and size of the sports hub building, need to be made available to residents before further comment on the suitability of this area to accommodate sports pitches and related uses can be assessed.

### 2. Densities

The Council needs to be clearer about the definition of high, medium and low densities.

High density on the whole area of the east side of Hampton Rd is not acceptable, bearing in mind:

- i) The Council's own evidence that states both parcels have low landscape capacity. The evidence of the NF Landscape Study, Heritage and Character Assessment and Masterplanning/Design and Design Coding Study all recommend that any new development on the edge of built settlement should make a sensitive transition between the built development and the open countryside or Green Belt by adopting lower densities towards the rural edge. This is to avoid the appearance of overdevelopment and to maintain the rural character;
- ii) The sensitive relationship to Grimshaw Hall, a Grade 1 Listed Building;
- iii) Criticisms from local residents about the density of the adjoining recent residential development, which is around 36 dph; and

iv) Such a large area of high density would be out of keeping with the local character and be inconsistent with both LP and NP policies which aim to respect local character. High density on part of the site may be acceptable for some dwellings, such as specialist accommodation for the elderly.

Development on the larger parcel, which is also described as having low landscape capacity, should be of medium density transitioning to low density as it reaches the retained Green Belt and open countryside.

### 3. Public open space and structural green framework

Both sites should have a clear structural green framework that should be in place early during any development, and preferably before house building commences. The current masterplan needs to be much stronger on this. The larger northern parcel contains Local Wildlife Sites (LWS), as well as hedgerows, protected trees, a green buffer to Grimshaw Hall, protected footpaths and the sports facilities. All these, together with a green buffer to houses in Whateley Hall Rd and Alveston Grove, should be shown as structural open space for any development on this site.

Levels information is again necessary to an understanding of the functionality and attractiveness of the Public Open Space (POS). It appears from the masterplan that the existing LWS is to be treated as POS to serve this development. If that is correct, it is not acceptable, as this development must meet its own needs, not utilise existing protected wildlife sites. For clarity, the masterplan should exclude the existing LWS at Purnells Brook.

It is not acceptable for there to be no Public Open Space to serve the southern area.



## Response to SMBC Draft Local Plan Supplementary Consultation

Public access to the community sports hub in the retained Green Belt corridor also needs to be clarified. Will the sports area be fenced off preventing access along the green corridor?

#### 4. Design Coding

The Landscape Study's recommendation that any allocation at Hampton Rd be subject to a Supplementary Planning Document or Design Code to inform development, which should be consulted on with the Neighbourhood Forum, is supported. In addition, matters relating to levels, green infrastructure, landscape and visual impacts and floodlighting, together with transportation and heritage impacts, should be properly considered **in advance** of any allocation.

#### Concluding comments on this allocation and the masterplan

Without information on levels, infrastructure impacts (particularly highways/junction impacts/mitigation), and clarity on the Green Belt and Local Wildlife Site boundaries, it is not possible to support this allocation and the draft concept masterplan in its current form. The issues raised by the NF Landscape Study and Masterplanning/Design and Design Coding Study need first to be addressed.

**This is not to say that these sites are not capable of some development. It is acknowledged that these sites, particularly the Football Club and Cricket Ground, may have the potential for some sympathetic residential development; but at present what is being proposed is not justified by either the Council's methodology, its evidence base or that of the Neighbourhood Forum.**

**The potential benefits of sports-related development are recognised. However, the viability needs to be examined and justified in the light of Green Belt, countryside, landscape and other matters. The impact and proportionality of the sports development needs appraising, as well as the optimum location for such development.**

**The Council's consultation indicates that the concept masterplans will refer to important features that may need to be retained and to give certainty over key aspects of development. In this regard, the concept masterplan need strengthening so as to safeguard important landscape assets, secure new structural planting and limit the extent of development. Similar comments apply in the case of Site 9 land south of Knowle.**

***Q24. Do you believe that Site 9 land south of Knowle should be included as an allocated site, if not, why not? Do you have any comments on the draft concept masterplan for the site?***

#### **KDBH Neighbourhood Forum Answer - Summary**

**There remain too many outstanding issues regarding the justification for development in this area to be able to support this allocation in principle. The studies undertaken on behalf of the NF raise significant concerns about the scale of development, particularly the development of the southern area. Fundamental issues regarding the future of Arden Academy and the impacts of this scale of development on local infrastructure have still not been addressed. If Arden Academy is not relocated, there is no real wider community benefit from such a scale of development and no justification for the release of the land to the east of the Academy.**



## Response to SMBC Draft Local Plan Supplementary Consultation

Responses to Questions 2 and 22 above set out why an 'in principle' objection to this allocation should be maintained, pending further information from the Council on infrastructure and other matters raised in the Forum's original objection.

This is expanded upon below in relation to the Site 9, the 'Arden Triangle'.

In its submission to the 2016 DLPR consultation, the Neighbourhood Forum made comments on this site that raised questions over the allocations given the Council's own evidence base. The NF asked for further information on a range of matters including:

- the scoring on this parcel of Green Belt should be revisited
- the findings of the Council's own Landscape Character Assessment says that the area is suitable only for small scale development
- the findings of the Accessibility Study that large parts of this site are not accessible, even with a relaxation of standards
- additional information on the case for relocating Arden Academy, including viability vis a vis housing numbers, funding, alleviation of traffic congestion, location and role of new primary school
- the future of the MIND garden
- engagement of residents in masterplanning.

Since then, Arden Academy has confirmed that the future of the MIND garden is secure in its current location; and the Supplementary Update now proposes 600 houses, rather than 750. Both these changes are welcomed. In addition, the imposition of a Tree Preservation Order around Lansdowne House is welcomed - although it only followed the loss of mature trees and was not imposed, as requested by

the Neighbourhood Forum, on the whole site area.

Progress on resolving the other matters has been minimal. The future of the Academy has not been resolved; there have been no masterplanning meetings on the site as a whole, although the promoters of the southern part have invited the NF to attend some meetings; and virtually no information has been forthcoming on transportation impacts.

The following comments are made in the above context and having the benefit of the studies undertaken for the Neighbourhood Forum on Landscape, Heritage and Character Assessment and Masterplanning/Design and Design Coding. These have helped shape the Forum's response on the draft concept masterplan for this site.

1. The Council states that this allocation is consistent with **Option G of the Spatial Strategy** for the significant expansion of rural villages. However, the Spatial Strategy does not appear to favour any one Option, and this option was one of the worst performing in the Interim Sustainability Appraisal.
2. Without the original rationale for large scale housing in this location, ie **the relocation of the Academy**, there is no longer term community benefit from this allocation and no overriding justification for developing this site over and above others on the eastern and southern edges of the area. All these are assessed as performing the same Green Belt role, and some perform better in terms of integration with existing built area and have better access to the rail station and to Dorridge centre. A decision on the future of the Academy is required, and either a new building or significant improvements to the existing buildings should be an outcome that benefits existing as well as new residents.
3. If development of the scale proposed can be justified in this location, then only Option 2 makes any sense.



## Response to SMBC Draft Local Plan Supplementary Consultation

**Option 1** offers no wider community benefits and places large tracts of new housing in a location that does not integrate at all well with the existing built area since the Academy would act as a barrier to achieving any satisfactory integration of old and new. The new development would effectively turn its back on the rest of Knowle and Dorridge, contrary to the principles of achieving good integration with the existing community and good accessibility. If the Academy stays in its current position, the remainder of the area should be reassessed as one parcel in the site hierarchy as it would score differently.

**Option 2** offers the potential for new Academy premises, although significant question marks remain over the size of the site to accommodate the new school and over its suitability given the topography of part of the proposed Academy site. In particular, extensive car parking areas are required for staff and 6<sup>th</sup> formers as existing on-site provision is inadequate.

Whichever Option is chosen, improvements to the existing school buildings and facilities will be necessary, and the questions previously raised by the NF relating to viability, scale of enabling development and range of facilities for shared use still remain to be satisfactorily addressed.

4. The masterplans show no indication of **the location of a new primary school**, nor of a small local centre (shop, health facilities etc previously referred to). Also, it is not clear if this is a replacement school (for St George and Teresa); or a primary school to meet the additional demand from new development. This is an important point, as a relocation would not achieve the additional places necessary to accommodate new development.

5. There is no mention of **transport impacts**, other than that Station Rd congestion will be alleviated if the Academy relocates. There is no indication in the Supplementary Update of what the assessed traffic impacts are and how

they will be addressed. There is also no indication as to how public transport will be improved, particularly to those parts of the site that are furthest away from village centres. It is unacceptable to be asked to comment without such vital information which the NF knows the Council has.

6. There is no mention of **topography and levels**. The levels rise significantly up Stripes Hill into Knowle, and also rise gently from the Warwick Rd up towards Lansdowne Farm, increasing the visibility of the site. The masterplan must demonstrate how development will take account of the topography, particularly on the rural approach into Knowle and its nearby Conservation Area.

7. Based on recommendations in the NF Landscape Study, Heritage and Character Study and Masterplanning/Design and Design Coding, **the southern part** of the Arden Triangle site is the most sensitive and should have only very limited development, if at all. The Council's own assessment, as well as that of the NF's Landscape Study and Masterplanning/Design and Design Coding work, is that this part of the site has low development capacity. The Landscape Consultants for the NF have strongly advised that the site should be masterplanned as a whole, and that development should commence in the north and extend southwards. Development in the sensitive southern part needs further justification. The acknowledgement in the Supplementary Update that this site must be dealt with in a comprehensive masterplan is welcomed.

8. **Densities:** The areas of low density housing should flow not only north to south, as shown on the masterplan, but also west to east, creating a transition towards the retained countryside. The area to the south should be primarily devoted to the Local Wildlife Site and public open space, with only minimal housing on the southern boundary as it leads towards



## Response to SMBC Draft Local Plan Supplementary Consultation

the rural character of Grove Rd and the open countryside.

The densities of both options are shown as 30-40dph. This cannot be correct, as Option 2 has an area of high density housing on the Station Rd frontage. Densities above 40 dwph will be out of character with the area, contrary to the layout and design policies of the NP, unless they include specific areas of purpose built housing (such as sheltered accommodation for the elderly). Densities of 30 to 40 dph on the rural edges of development sites will not achieve the transition to countryside advocated in the NF Landscape and Masterplanning studies. It will also not accord with the Council's own Landscape Assessment of low capacity to accommodate new development.

9. It is unclear if the area of significant local wildlife value is being treated as public open space. If it is, this is not a satisfactory way forward. The provision in of public open space looks very limited for 600 houses.

10. The area of **significant ecological value** is shown as extending to the Warwick Rd frontage adjoining the public open space. If this southern area is to be developed, these linkages are essential. However, information from the promoters of this area indicates that delivery of this link is not achievable due to ownership issues. In addition, a wider buffer area is required on the northern side of the LWS to protect it from adjoining development.

11. The future of **Lansdowne House** in not clear. Whilst its retention as shown would be welcomed, as it would help retain the existing parkland setting around the house, it is on the brownfield land register and therefore is presumably available for redevelopment.

12. The masterplans show very little new tree planting. If this area is to be developed, the masterplans should incorporate a **strong structural planting scheme** within which new development would sit. The masterplans are

inadequate in this respect. It is known, for example, that all the trees on the Warwick Rd frontage south of the access to Jacknetts farm will be removed; yet there is no indication of a strong replacement boundary with trees along the Warwick Rd. (It should be remembered that the promoters of this site stated in 2016 that development of the site would be almost entirely obscured from view from the Warwick Rd).

13. **Design Coding:** The Landscape Study recommendation that any allocation at the Arden Triangle site should be subject to a Supplementary Planning Document or Design Code to inform development, and should be consulted on with the Neighbourhood Forum, is supported. In addition, matters relating to levels, green infrastructure, landscape and visual impacts and floodlighting should be properly considered in advance of any allocation.

### **Concluding comments on the Arden Triangle draft allocations and draft masterplans:**

**There remain far too many outstanding issues regarding the justification for development in this area for the NF to be able to support this allocation in principle.**

**The studies undertaken on behalf of the NF raise significant concerns about the scale of development, particularly the development of the southern, most sensitive landscape area.**

**Fundamental issues regarding the future of Arden Academy and the impacts of this scale of development on local social and physical infrastructure have still not been addressed.**

**It seems clear that if Arden Academy is not relocated, there is no real benefit from such a scale of development to the wider community; and that there is no justification for the release of the land to the east of the Academy, as it performs worse than other sites in and around KDBH. If it is feasible to**



## Response to SMBC Draft Local Plan Supplementary Consultation

relocate the Academy, that would be the better option - subject to satisfactory justification of deliverability, accessibility,

traffic impacts, site size and suitability, as well as addressing the other matters raised above in relation to masterplanning.

**Q 38. Are there any sites omitted for inclusion which you believe should be included; if so, which ones and why?**

### KDBH Neighbourhood Forum Answer - Summary

In its 2016 DLP consultation response, the NF objected to the scale of 1000+ houses in KDBH. As none of the matters raised then have been satisfactorily addressed, the Forum cannot see how a further 590 houses can be accommodated in the Area without substantial harm to the character and appearance of the KDBH Area, contrary to the aims of the Spatial Strategy and the Draft KDBH NP. Whether parts of these sites can be brought forward as *alternatives* to all, or part, of the draft allocations would require further consideration based on a clearer understanding of the site hierarchy assessments and site impacts/proposed mitigation.

#### Representation

The Council is seeking views on two new 'Amber' sites in the KDBH Area.

It appears that these are put forward as possible *additional* sites if the Council has to make further site allocations. It is not clear if they are candidates to *replace* sites which are currently draft allocations. However, if the Council is persuaded that any draft allocations are unacceptable, then it is assumed that these sites will either be possible alternative or additional sites.

It is clear from the KDBH Neighbourhood Forum (NF) objections to the 2016 DLPR that residents were opposed to that scale of development for the reasons set out in its 2016 response and summarised below:

- 1400+ houses in Knowle is disproportionate and unsustainable
- 1400+ houses in Knowle is inconsistent with the spatial strategy, which itself is inconsistent with other Council strategies and Draft Local Plan policies

- the scale of development proposed in Knowle is not justified by the Council's methodology and study findings
- the site selection methodology is unclear and its application seriously flawed
- the scale of development proposed in KDBH fails to take into account the impact on services and infrastructure
- the views of residents, as expressed in the KDBH Residents Survey, have not been properly taken into consideration
- there has been inadequate consideration of reasonable alternative patterns of distribution, either Borough wide or at the KDBH level
- the proposed scale of growth will lead to an unacceptable loss of village intimacy, identity and character, with adverse impacts on the Knowle Conservation Area and the wider KDBH Area.

These comments still hold good. Therefore, the suggestion of any additional housing in KDBH, over and above the scale that is already opposed, is not acceptable.



## Response to SMBC Draft Local Plan Supplementary Consultation

Whether parts of the amber sites could be developed as *alternatives to* all, or parts, of the draft allocations, may merit some consideration. Once again, however, the Supplementary Update provides no indication of possible impacts or community benefits on which to make a proper assessment.

### **Golden End Drive, Kenilworth Road**

As a highly performing parcel of Green Belt (open countryside), it would be contrary to the Council's assessment criteria to allocate this site. Although in principle it may appear to have some advantages because of its proximity to the centre of Knowle, it could only be considered if small scale rounding off were possible that retained views of the church/Conservation Area and protected the canalside environment by a substantial green buffer.

### **Blue Lake Road, Dorridge**

When the original, much smaller, submission was displayed at the NF Developer Day, it attracted a number of positive comments. The original part (site 104) and part of 413 are on less well performing Green Belt. However, there is no bus access and the far parts of the site are similar to the Arden Triangle site in terms of distance from shops and services.

It is unclear if site 109 Land south of Grove Rd is intended to be included in the now much wider proposal.

The western end of the Blue Lake Rd site is lower performing Green Belt, so in principle could be considered if an **alternative** to the Arden site needs to be found (not in addition to it) - and **only** in the event that the Academy is not relocated. For the reasons previously given, the current KDBH infrastructure cannot accommodate even the 900 plus houses proposed without serious harm to village life and character. The Council could consider the possibility of taking only parts of some of these sites out of the Green Belt.

The Council should also review its assessment of sites. In our earlier response to Q2, reference is made to apparent inconsistencies in the assessment of several sites. In particular, many of the small sites were not included in the Interim Sustainability Appraisal; and some appear to perform reasonably well but are placed in the red category. Consideration of some smaller sites could enable more 'rounding off' or infill of the built area in some places, as well as spreading the impacts across a wider area. A mix of large and smaller sites in a more dispersed pattern would have less impact on the Green Belt, be more consistent with government guidance and potentially be less damaging to village character and infrastructure.



**Q39 Are there any red sites omitted which you believe should be included; if so which one(s) and why?**

### **KDBH Neighbourhood Forum Answer - Summary**

**The Council should review its site assessments as there are inconsistencies regarding several sites. Examples in KDBH include those referred to in Q2, but also smaller sites. Some of these perform well on a number of criteria, and some of the concerns may be able to be overcome. A mix of large and smaller sites in a more dispersed pattern would have less impact on the Green Belt, be more consistent with government guidance and potentially be less damaging to village character and infrastructure.**

The Council should review its assessment of sites. In the response to Q2, reference is made to apparent inconsistencies in the assessment of several sites. In particular, many of the small sites were not included in the Interim Sustainability Appraisal, and some appear to perform reasonably well but are placed in the red category. Some of these perform well on a number of criteria and may be able to overcome concerns. Consideration of some

smaller sites could also enable more 'rounding off' or infill of the built area in some places, as well as spreading the impacts across a wider area. A mix of large and smaller sites in a more dispersed pattern would have less impact on the Green Belt, be more consistent with government guidance, and potentially be less damaging to village character and infrastructure.