

CONSULTATION RESPONSE
to the
SOLIHULL LOCAL PLAN
DRAFT SUBMISSION PROPOSALS
of
SOLIHULL METROPOLITAN BOROUGH COUNCIL
by
THE KNOWLE SOCIETY
December 2020

Introduction

The Knowle Society (KS) represents just under 2,800 Members, the vast majority of whom live in Knowle. From its foundation in 1962 it has always attempted to maintain the character of the Village and to see that pressures for development and change do not engulf and destroy its unique character.

KS has limited this Response to Solihull Council's current draft Submission Local Plan "A plan for people and places where wellbeing and the environment matter" of their October 2020 Proposals (the Proposal) to those individual matters which have a direct impact on Knowle, its Conservation Area, its residents, traders and businesses.

The Knowle, Dorridge and Bentley Heath Neighbourhood Forum (NF) has, in its Response to the Proposal, also included comments on the impact on Knowle which KS wholeheartedly support in this respect. References to the Neighbourhood Plan (NP) are also included.

The Council had previously engaged in open discussions and consultations with Residents in respect of their earlier draft submissions. However, it is noted that despite representations to the contrary, this Proposal retains the two principal development sites which are anticipated to provide a total of 780 dwellings (180 off Hampton Road and 600 off land to the south of Knowle known as the Arden Triangle).

The NF have undertaken a Survey (supported by KS) of all residents in the Plan Area and has received more than 360 responses. The two most important questions in that Survey however, both in respect of the Council's proposed inclusion of these two sites for development, resulted in the greatest percentage of responses received being 'strongly against' their inclusion. This was represented by just over half of all the surveys returned in the short time available so to do.

It is noted that in addition to the two subject sites allocated to be provided in Knowle, it is understood the provision includes those from a smaller site not included in any previous proposal for 20 dwellings located off the Warwick Road/Wychwood Avenue roundabout.

There are also to be an additional further 8 dwellings to be located on sites from the Brownfield Site Register which, in view of the lack of their identity being made known, may also include Dorridge and Bentley Heath locations. Unfortunately access to the Register proved difficult for a check to be made of their actual locations.

However, it now transpires the full requirement being made available of sufficient land for new dwellings for Knowle is, in fact, a total of 808 dwellings.

It is expected that during the Plan Period, other windfall sites are likely to come forward which could increase the supply by a further 400 dwellings, if not more.

This Proposal makes it clear that the greater extent of open areas of land taken for housing are located to the south and east of the Borough. The overall requirement is for a total of 15,017 new dwellings. This provision is based on the current availability of land set aside for housing which the Proposal demonstrates will be achieved from now until 2036.

The Proposal indicates the decision-making process has identified Knowle as having a full range of facilities including infant, junior and senior schools, health services, shops and other businesses. Despite the limited existing opportunities for new housing, the Proposal requires a consequent loss of Green Belt to the south and east of the village – albeit argued being behind new ‘defensible boundaries’. The separation from Solihull and other settlements (other than for Bentley Heath and Dorridge), however, is to be maintained.

The existing accesses to motorways and other main roads are thus considered to be good and, notwithstanding the expected increase of congestion to the existing road network around Knowle arising from the new housing, the belief stated in the Proposal is that the simple relocation of Arden Academy will ease existing congestion. It is however, considered that Arden’s existing position now causing considerable congestion in Station Road will hardly be eased by the proposed future access to Arden being from Warwick Road.

It seems the Proposal has omitted the fact that the existing public footpath/bridleway from Station Road (virtually opposite the junction with Purnells Way) to the land on which the new Academy will be located will ensure there will be no such easing of the Station Road congestion. This is due to the majority of the students now walk on the currently inadequate width of public footpaths necessitating from time to time by the use of the road on their way to/from the Academy which impedes traffic flows in both directions, hence resulting in congestion. Consequently, the existing pattern of ‘drop-offs’ and ‘collections’ around the Station Road/Purnells Way junction, which already causes considerable congestion, will be exacerbated as the bridleway will become a much easier – and more convenient – shortcut through to the new schools.

However, one aspect which has been identified in the Masterplan for KN2 is the existing footpath from Grove Road itself which runs alongside the Middlefield development into the development site which is included as it will be upgraded for pedestrian access therein. Its inclusion should be highlighted insofar it could attract those students who live in Widney Road, Grove Road, Norton Green Lane, Dorridge Road and Avenue Road as well as Middlefield itself, by their use of the upgraded footpath, could reduce the overall number of those using Station Road from its roundabout with Widney Road.

This deficiency in the Proposal should therefore be rectified.

The preferred access for pedestrians to the new Academy will therefore remain along Station Road although it can be accepted there might be some benefit gained from the proposed vehicular access off Warwick Road close to the bottom of Stripe's Hill.

Indeed, it is considered the increased traffic from the proposed two sites will bring the existing road network to a virtual standstill at peak periods. Bearing in mind how congested the roads are now, the new housing created on these sites alone will result in additional congestion potentially lasting during other, or longer periods, than are currently experienced.

The suggestion that Knowle's 'historic core' will 'continue to be protected and enhanced' is also considered unrealistic insofar even a simple change of use having been approved in the Conservation Area, regardless of concerns raised by KS particularly in respect to the consequent – adverse – impact on current parking availability.

Consequently, noting the proposed 'highway improvements at various locations without traffic lights' considered necessary in the Proposal as a result of the increase in housing numbers, it is suggested these 'improvements' should be carried out now, rather than later. It is accepted such improvements will be funded by receipts from the developers of the sites but nonetheless, initial Council-funding will eventually be repaid by those receipts. Therefore any argument suggesting this cannot be done sooner, rather than later, is unacceptable.

Such 'forward-funding' would give the Council the advantage of being able to know if the result of these 'improvements' will be such as to demonstrate they will actually be capable, from their existing use, to cater for the anticipated increased traffic *without traffic lights* (the italics are those of KS) rather than wait until after the new housing has been delivered.

The consequent adverse impact arising from this additional traffic will mean Knowle's recent 'long-running' problem of existing parking arrangements - a matter with the Council which recently resulted in what, perhaps, the majority of traders and residents might feel is a relatively satisfactory solution to Knowle's parking problems - is the current level of charging to park cars but only commencing after the first two hour free period.

Although there are other proposals being considered to improve the problem of unrestricted street parking in some areas, there is no indication if, when undertaken, they will be adequate or effective. The Proposal is therefore deficient by its non-inclusion for the provision of additional parking facilities which will be required to ensure no adverse harm otherwise directly arises to the Conservation Area as a consequence of the increase in the local population.

It is noted that none of these facilities will be provided immediately for the anticipated increase in car usage in Knowle which are otherwise anticipated to be addressed in the Proposal. The Proposal, however, makes it clear that 'traffic...is set to increase over the Plan period' therefore responsibility for any adverse consequence arising from this delay in implementation of the necessary improvements to the network before any new housing is actually provided must rest entirely with the Council. However, as argued above, by the Council forward-funding these facilities before payment is received from the developers, especially if these Proposals come into being as Policy, this situation could be mitigated.

At the same time public bus services have been reduced on some routes/destinations but continue to be relatively well served on others although they have continued to ensure bus and train connectivity is very poor, especially when considering commuter demand and school timings. The Proposals includes little by way of encouragement the situation will improve notwithstanding the anticipated increase in the local population.

Other aspects of potential improvement are included in the proposal and our comments thereto are all included with those addressing the two sites in detail. It is to be noted that the following comments are made on both the Knowle site allocations and together with the two relevant extracts from the Council's Masterplans.

Proposed Allocation KN1 – Hampton Road

The criteria used as the basis of the Council's arguments for bringing this site out of the Green Belt to accommodate a development for 180 dwelling are listed under seven headings with no less than a total of 22 sub-headings. The following comments attempt to respond to those that are considered to have the greatest impact - adverse or otherwise - on Knowle and its Conservation Area. Comments arising from the relocation of the existing football club are included at the end of this part of this Response.

The Proposal stresses the need for many general factors to be incorporated in any scheme design to maintain the status quo in respect of its appearance and content of the site. These include the proximity of Grimshaw Hall and its setting in relation to the site, trees, hedgerows and Local Wildlife Sites that exist on the site. In addition, consequential improvements that would be required as part of the development include the provision of woodland planting, improved landscaping, multifunctional and accessible green and blue open space, on-site surface water management systems and both pedestrian and 'cycle connectivity'. This 'connectivity' is intended, presumably, to link with the existing roads and footpaths together with improved access to the remaining Green Belt. Also mentioned are 'biodiversity enhancements' but no mention has been made to off-set to the loss of any biodiversity. Unfortunately, a now frequently-adopted approach of the developer is to make a cash payment to the Council through a S106 Agreement between them but which does nothing to replace the biodiversity lost on the site.

Other matters as a part of general policy changes within the Proposal of the total number of homes achieved on site in the final design of the scheme include 5% of the open market number to be 'Self and Custom Build' plots, a care village or a retirement complex and highway improvements.

Whilst acknowledging the justification made in the Proposal for this site being brought out of the Green Belt, very little of it is supported by definitive proof that such requirements will be necessary during the Plan Period. For example there is a care village/retirement complex just completed in Eastcote, no more than 2 miles away. Before this new site in Hampton Road is set aside for such a proposal, a detailed analysis should be undertaken by the Council to demonstrate there is, in fact, a specific need for such a development be carried out.

Suitable – or even appropriate - market conditions are continually variable in respect of such developments therefore if a relevant analysis does not indicate there is such a need at the time the site becomes available, the site should be made available for a shared market/affordable housing scheme.

This could benefit the Council if it was found necessary to make up any shortfall in the required numbers that are to be provided during the Plan Period

In addition, noting the use of italics is by KS, ‘very special circumstances *will* exist’ to support the loss of additional Green Belt to provide replacement pitches and facilities for the football club, although it is acknowledged that such use for the Green Belt is acceptable as started in NPPF 2019 Paragraph 145 (b). There are provisos, however, including provision of the ‘facilities’ are deemed ‘appropriate’ for their proposed whilst preserving the openness of the Green Belt’s and such use does not cause conflict with the very reason for the land to be part of the Green Belt in the first instance.

However, at this time no such ‘very special circumstances’ have been proven save of using the word ‘*will*’ suggesting they are not in existence now in any event. The Proposal does not indicate how these ‘very special circumstances’ will come into play although clearly indicating the method which will be adopted to facilitate the land being made available for residential development. This appears to be a most incorrect procedure.

Whilst accepting the above stated argument for the pitches to be an acceptable Green Belt use, does this extend to more than just a small spectator stand with changing facilities accommodated within plus a small car park on the grass around the pitch as now exists? If the relocation were to be limited to such provision, that is one matter but, if the relocation is to include practice pitches, more extensive built facilities, hard-surfaced car parking, security fencing, flood lights etc, it must beg the question that surely the provision of these new homes in Solihull cannot alone justify such situation arising in the future?

Should this Proposal be approved, the provision of ‘green buffers’ around Grimshaw Hall to maintain its setting and minimise any potential harm arising from the new development in its immediate vicinity are welcomed insofar harm would not result to its Green Belt setting.

That said, however, the so-called ‘defensible boundary’ extension with the Green Belt between the rear of Wychwood Avenue and Hampton Road will, to all intents and purposes, disappear should the relocation of the football club of pitches and built facilities actually take place by taking up yet more land beyond this ‘boundary’ leading down to the canal.

Consequent adverse and increased impact on Knowle and its Conservation Area will therefore be created by still further traffic movement for which absolutely no provision to rectify this situation is included in the Proposal.

It should be noted the proportion of the number of dwellings (780) proposed in the Green Belt for Knowle is approximately 15% of the total number of dwellings to be provided in the Green Belt (5,250). We consider this both unjustified and unfair and the Council is challenged to support this imposition.

Summary

The commentary above within this Response therefore demonstrates the Proposal in general terms, specifically in respect of KN1 – Hampton Road, does not provide sufficient and adequate evidence to justify the scale of the development of this site/s for Knowle and thus is considered to be wholly unsound. It is also considered the commentary indicates additional provisions required to be included in the future Local Plan before it is submitted to the Inspectorate prior to the Public Hearings being held in its continuation of due process.

Consideration of the Masterplan Proposal for KN1.

The area of the whole site is indicated as being of 13 hectares split into two areas, both of which front Hampton Road. That land to the north of Hampton Road includes the old Thacker's Nursery and arable farming land located on both its south-east and north-west boundaries whilst that to the south is the current ground of Knowle Football Club.

The larger site of the two includes Thacker's disused nursery and is bounded as follows:

on the most north western side by the rear gardens of Wychwood Avenue houses and Purnell's Brook (the Brook) including the land protected by The Streamside Trust, privately owned woodland between the Brook, and open farming land to the canal;

on its south eastern side by Hampton Road;

on its southwestern side the rear gardens of houses on the Arden Vale estate;

and on its north eastern side by open fields which extend down to the canal.

The site slopes uphill away from Knowle and its north eastern boundary is located on one of Knowle's highest points. The impact of two or three-storey dwellings on that boundary will create an unacceptable skyline in Knowle.

There are other 'gateways' to the heart of Knowle to its north and south located on the A4141 which clearly identify the north/south limits of Knowle's Conservation Area.

A concentration of mixed development to the east will create the image of a town emerging, rather than a Village, which will significantly detract from the Conservation Area status.

This concept of living and/or working in a Village is seen as an important feature which is valued by all. Its loss as a direct consequence of such a vast increase in its population with the necessary infrastructure requirements is that the Village will become a small town. This outcome would be severely detrimental to the setting of the historic Village of Knowle.

The detailed proposals suggest a density of between 30 to 40 dwellings per hectare being achieved. They will include those of a low density to much of the properties behind Wychwood Avenue extending to almost entirely encircle the central area of medium density housing save for an initial area between the north-west to south-east public footpath and those properties fronting Alveston Grove and Chantry Heath Crescent.

There are areas to be set aside over both parcels totalling 1.4 hectares as open space identified as 'green buffers'. Those on this part of the site are between the proposed houses and the Brook and Hampton Road itself as well as to the north-east on land that is expected ultimately to be occupied by the relocated Football Club.

At present, there is the public footpath which extends parallel to the Brook and as far as the Canal, the Brook itself and a large 'field' pond which is under water for the majority of the year. It is not entirely clear in the Proposal if this 'field' pond is to be retained as part of the 'linear conveyance SuDS' to ensure the non-impeding of 'extreme flood flow paths' with the proposed built development. At present the 'field' pond acts as a most successful means of ensuring the land surrounding is kept reasonably dry throughout the year therefore it would not make any sense whatsoever for it to be ignored and built over as part of the overall development.

Furthermore the Brook includes an existing buffer area to retain the existing wildlife, ecology and flood plain of the Brook as well as access for maintenance. Retention of the ancient hedgerows that cross the site coupled, despite the two Tree Preservation Orders covering all the trees on the site, are all at risk should the Proposal be approved without a clear and concise delineation of the precise location of the areas proposed for the new houses.

The Public Footpath linking Wychwood Avenue with Hampton Road crosses the Brook at the only point possible taking into account the current route of the footpath between the houses on Wychwood Avenue.

The smaller site of the two is home to the existing Knowle Football Club which is located with its existing access/egress point being virtually opposite the junction of Arden Vale Road with Hampton Road and some 10 metres or so from the adjacent junction which also accesses the recently completed housing estate via Wootton Close.

A direct consequence of this recent development was the provision of no less than 13 speed cushions in Hampton Road between the raised zebra crossing near its junction with the High Street and the end of the current 30mph speed limit just past the south-west access/egress point with the Grade I listed Grimshaw Hall. Unfortunately, their type and spacing are such as to allow some vehicles to continue using Hampton Road at an almost unabated speed in excess of the posted 30mph limit.

Nonetheless, alternative restrictions such as reducing the road width so that no more than one vehicle at a time can pass through in either direction such restriction – thereby slowing the speed - at the position of the relocated 30mph restriction further along Hampton Road to ensure safe access/egress to the road itself from the new development are essential should it proceed.

This second Hampton Road site is expected to provide for medium density housing between the existing Cricket Club (set back from Hampton Road itself behind the Football Club but will be separated from Grimshaw Hall by another 'green buffer' from the 1.4 hectare open space allocation for these two areas thereby in maintaining a reasonable protection from harm to its siting arising from the new development.

It is noted with considerable concern that the Proposal fails to identify, in the existing road network in Knowle's Conservation Area, the location of each individual potential point which is expected to suffer as consequence of the anticipated increase in existing traffic flows. This potential adverse impact on Knowle and its Conservation Area is serious and therefore should be fully and properly addressed now.

The Knowle Transport Study proposes various solutions to traffic increases in the High Street including a double mini-roundabout (agreed to being preferable to traffic lights) together with several junction improvements which, although along the length of the High Street, the Council nonetheless suggests these will improve the Public Space. Unfortunately this is easy to say but the Council offers no explanation as to how – and what form – is this 'improvement' intended to be – why?

More effective – and perhaps extensive - traffic calming measures are most likely to be necessary, possibly extending to the Canal Bridge at which point the relocated Football Club will have its north-eastern boundary for their much larger sports complex including pitches and associated facilities. It is considered that there will be a definite increase in traffic levels, not only in Arden Vale Road due to its existing extensive use as a 'cut-through' between Warwick Road and Hampton Road, but also in Hampton Road itself, should either of the relevant Proposals be approved despite it still being considered to be inappropriate in this location. The ultimate completion of a new sports complex together with the new housing will overall produce an 'urban sprawl' on Hampton Road on its way into the Village which is completely out of character and size with Knowle and therefore both inappropriate and unacceptable.

Summary

Consequently before the Masterplan is adopted as part of the adoption of due process, it should be extended to include actual proposed densities of each indicated area. It should indicate road layouts together with their width to ensure there is no repetition of the mistakes made with the layout of the Middlefield development in order to achieve the Council's originally identified number of dwellings which they thought could be achieved. The Neighbourhood Plan makes clear the requirement of satisfactory estate development in Knowle and these requirements should be mandatory as part of this Proposal.

Otherwise, why have this Neighbourhood Plan which was adopted by the Council in the first place?

Proposed Allocation KN2 – South of Knowle (Arden Triangle)

The criteria used as the basis of the Council's arguments for bringing this site out of the Green Belt to accommodate a development for 600 dwellings are this time listed under just five headings with 19 sub-headings clarified below.

The following comments once more attempt to respond to those that are considered to have the greatest impact – adverse or otherwise – on Knowle and its Conservation Area. Comments arising from the relocation of Arden Academy from its existing location are included within the overall commentary of this particular part of our response.

The proposed development is to be considered with the important landscape features and heritage assets being retained and priority given to pedestrians and cyclists to reach existing relevant networks. Approximately 10% (calculated from the stated areas of the whole site and that of the public open space) of the whole site is to be given up to open space which will include multi-functional and accessible on-site green and blue infrastructure including play areas whilst retaining the Local Wildlife Site (LWS). However, the Proposal is not clear if this area is included as part of the stated open space area. Although the existing MIND garden will be retained, there will be on-site sustainable disposal provision for surface water. This provision, when coupled to any off-setting from the loss of semi-improved areas of grassland provided by 'biodiversity enhancements' - albeit without indicating how this may be done - it is suggested, could be achieved, perhaps, by the diversion of and possible improvements to Cuttle Brook, although would this therefore mean cash payments again through the facility of a S106 Agreement between the Council and developer? It is not clear, however, if the LWS might also be included in this calculation - if it was, it could cause it to suffer serious harm.

Provisions for Green Belt enhancements include woodland and improved landscaping but the Proposal itself states the existing landscaping is of only 'medium ...character' with 'low visual sensitivity' and has a 'low capacity to accommodate new development'. There should be included in the Proposal further and better detail how this overall number of 600 homes will be set out in the Master Plan.

Therefore the suggested 'improvement' would have to be extremely extensive across the development to achieve a satisfactory 'green-look' solution amongst the new housing, not least the change in existing levels particularly at the indicted location of the new Arden which will create a relatively substantial change that could create an adverse impact to the position/s of proposed drainage points across the site. The proposal also means that such improvement would have to be in addition to any other acceptable compensatory improvements across the site. Unfortunately the Proposal is bereft of any supporting and/or clarifying of detail.

'Highway improvements' are stated to be included although not actually indicating the form they should take - this being determined with an appropriate traffic study undertaken by prospective developers. Traffic flows however, clearly suggest access onto the existing road network should be by the provision of new roundabouts. There is no further indication of their identity due to the large number of people who will live on the site which will, in turn, necessitate a directly consequential and essential improvement to the existing traffic flows in the Conservation Area. This notwithstanding the afore mentioned Knowle Transport Study which does include the Station Road/High Street junction being controlled by traffic lights even though the Proposal has indicated that traffic light 'improvements' to the High Street are to be avoided.

In any event, the use of traffic lights in any Conservation Area, let alone that of Knowle, is completely incompatible and should be avoided at all costs.

Once again there is to be provision of on-site accommodation for older people - rather than with a care village - although the final provision of which will be difficult to determine. The actual requirement target will change as a direct consequence of the overall numbers increasing due to the increase in the provision of new housing as these developments are completed.

Such calculation of future 'care' provision should therefore be subject to definitive Council-provided studies which could include 'trigger points' of identifiable need in Knowle.

However, the provision of 5% of the open-market number dwellings to be 'Self and Custom Build' plots should reflect the overall accommodation mix identified in the NP for market housing rather than the general mix identified in the Proposal. No such requirement is currently included in the Proposal.

In addition to the previously mentioned relocation of Arden Academy on site, there is also to be included a new primary school on site. It is suggested this may either be physically part of or separate to Arden. Whatever the built relationship, however, shared and modern facilities will be the result! The NP calls for all schools to be made available for the wider community but, due to the relative remoteness of the new schools being on the edge of Knowle, rather than within its centre, this is considered to result in a contrary situation.

At present the majority of Arden's student population – probably increasing to 2000 students of varying ages, most of whom now walk to Arden and other schools, are not mentioned in the Proposal therefore suggesting that as far as the Council is concerned, any related problem, arising to existing or future facilities including traffic impact, details of the provision of parking spaces on site for sixth-formers and that for staff is not mentioned in the Proposal insofar because the new Academy itself will be subject to its own planning application. Consequently this scenario is considered to be defective by limiting suggested improvements to those arising from solely the new housing. It is considered to be more appropriate if such future problems are at least acknowledged so that any relating improvement – particularly to the highway infrastructure generally – will have built in to such proposals for growth without the need for further changes after the new Academy - if approved – is completed.

This situation of the ever-increasing number of Arden students, however, does exist and causes a problem to traffic flows. Notwithstanding a change in the pedestrian access point to Arden close to Purnell's Way, and despite the main entrance is off Warwick Road for vehicles, the large number of student walking to Arden it will continue to cause problems to traffic flows. The resulting increased traffic movements at particular times of the day arising from that particular location being a drop-off point with the principal cause of that traffic congestion merely moved down Station Road towards Dorridge. It is considered that this will, no doubt, remain to be the cause of increased traffic congestion in the Conservation Area, especially at Station Road junctions with both Lodge Road and the High Street as already mentioned above.

Platitudes included in the Proposal, when identified with the resulting pedestrian chaos in Station Road caused by the proposed repositioning of the Academy, are completely incompatible with the stated intention of the Proposal, ie the alleviation of congestion on Station Road.

The Proposal also suggests that areas of the site closest to the settlement perform well from the point of view of access, key services and facilities and public transport. Whilst this may be true from the point of view of the existing housing, it is certainly untrue as from the point of view of the student numbers causing traffic congestion and a very limited bus service based on an hourly bus service. In normal times the existing road network of Station Road, Warwick Road and Grove Road are either at a virtual standstill in morning and evening rush-hours due to the vast number of students walking on Station Road to Arden.

This congestion – particularly at peak times – is not helped by students who are either walking in, or trying to cross, the road – whilst at other times principally due to the restriction arising from the huge volume of peak-time traffic attempting to pass through Knowle in both directions.

Although the Road Traffic Study suggests there is no heavy traffic use of Grove Road to avoid queues, the length of time cars queue to egress Grove Road on to the Warwick Road is known to be longer and more frequent, especially at busy times, than has been in the past. With the proposed housing expected to also use Grove Road, the capacity of the existing Warwick Rad junction, including as it does Norton Green Lane, will undoubtedly be found to require extensive alterations. However, the Proposal should be amended to clearly identify this being a potential problem with the consequence of any future work deemed necessary to improve the junction being included in any calculation that may be relevant for the cost to be met by the developer/s of the site especially when considering the setting of the listed Rotton Row farmhouse.

Regular but only hourly bus routes go beyond the junction between Warwick Road and Station Road at The Green – if at all – but there is no direct public transport on either Grove Road or Warwick Road to/from Warwick itself. It is considered the Proposal should address this deficiency to ensure residents are given alternative public means of accessing towns further afield without the need to take a train from Dorridge where the existing parking provision is severely limited from early morning.

The Proposal suggests measures on site for walking and cycling are to be encouraged both on and off the site as sustainable modes of transport. Unfortunately where this has already been provided elsewhere in Knowle, such facilities as bicycle lanes on the Warwick Road between the M42 and Knowle are completely ignored. Cyclists either ride outside their lane or, in fact, use the public footpath to whom pedestrians are forced then to give way and are therefore better omitted to optimise developable site areas whilst mitigating unnecessary expenditure.

With only a footpath to one side of Warwick Road and none at all in Grove Road from just beyond its roundabout with Knowle Wood Road relative to its existing traffic flow, never mind that arising from the development itself, the suggestion for a footpath be constructed is considered to be one which should follow the lead identified in the NP in its support for improved cycle and walking facilities and therefore should be included in the Proposal. A second footpath within the site following the boundary line with the two adversely effected roads would benefit pedestrian use – perhaps also shared by bicycles – by its incorporation within the Proposal. Furthermore crossing points via gates in the hedge to access the other side of the road would be most advantageous.

Summary

Once again, the above commentary demonstrates the Proposal in general terms does not provide sufficient and adequate – and sometimes arguably incorrect – evidence to justify the scale of this development scheme for Knowle. It is, therefore considered to be wholly unsound.

The Proposal make no case for the inclusion of a possible new Arden Academy which would be subject to its own Planning Application which would, no doubt, include the satisfying of any current concern as to its actual capability for delivery.

It is also considered the commentary indicates those additional provisions which have been detailed above which should be included in the future Local Plan before it is submitted to the Inspectorate prior to the Public Hearings being held in its continuation of due progress.

Consideration of the Masterplan for KN2.

The area of the site is indicated as being of 49 hectares extending from the north-east behind Milverton Road, occupying not only the extensive farming land but also the existing Arden Academy campus. It is bounded as follows:

to the rear of the houses to the south side of Milverton Road, Arden's campus and playing fields behind the Station Road housing – over the public footpath/bridleway from off Station Road virtually opposite Purnell's Way – as far as the NHS complex of Downing Close,

it then runs to the south-east behind the housing to Grove Road,

it then continues to the north side of Grove Road down to its junction at Stripes Hill Farm on the Warwick Road, and

finally, it returns to Knowle up on the western side of Warwick Road into Knowle at its starting point.

It should be noted here that not only the ownership of the majority of land included in KN2 is with several different parties, the scale of the Concept Masterplan makes it unclear if the site does, or does not, include up to five existing properties facing Warwick Road from the top of Stripes Hill up to the rear gardens located to the south of Milverton Road itself. If there is such doubt, consequently the Proposal should fully clarify the position in this respect.

It should also be noted that the Proposal does not address Arden's new complex in any detail save for the identification of a relevant area of land (size not identified) required to include not only the Academy but also the new primary school together with all necessary facilities for the provision of the most modern methods of education coupled to student well-being through sport and/or other external activities that is intended for the future.

Consequently, no comment is passed on the Proposal's provision for the facility in this Consultation Response save for any impact – adverse or otherwise – on existing traffic flows..

However, what this Response does do is to comment on the various statements included in the Proposal of their relevant provisions deemed necessary for the 600 dwellings which are considered – by the Council – which can be satisfactorily developed on the remainder of the site.

The site generally slopes downhill away from Knowle towards its south west. There are several large houses and farms occupying the site including Lansdowne House and Farm and Stripes Hill House. None are apparently listed. There are just two major 'green' items of existing hedging which are listed but there are a number of trees worthy of being protected by a Tree Preservation Order.

Consequently any new development must ensure such features of listed hedging and trees that do exist, at the very least, are retained as far as possible noting veteran – non-protected trees should also be retained. In addition, any SuDS ‘linear conveyance green routes’ are essential to ensure extreme flood paths and if they exist, it is necessary to ensure they are not impeded whilst including adequate new drainage systems and water attenuation are provided on site.

The development will have vehicular access from just two existing roads - first that intended to access Arden Academy from Warwick Road at the bottom of Stripes Hill House by the bend and the other to the south of the adjacent existing access to Lansdowne Farm.

There are also shown two access points from Grove Road although only one is mentioned in the text.

As already indicated above, existing traffic flows indicate that the prudent solution at these point of access onto the existing road network should possibly incorporate the use of roundabouts. However, traffic studies will, no doubt, demonstrate the appropriate solution/s.

It is suggested that the permeability of the site with ‘Green Links’ will be achieved through the site which provide safe access to the Academy as well as Station Road and its bus stops. However, as has been proven by the recent new developments off Hampton Road and Grove Road, the use of cars by residents as their prime means of transport is still paramount with resulting inadequate provision for on-site parking. This is not helped by the banning of half-on/half-off pavement parking which in any event, is completely ignored. The resultant traffic chaos arises from the woefully inadequate width of estate roads to otherwise permit the safe passing of two-way traffic.

There is also mentioned the public footpath/bridleway from Station Road currently serving the rear access and parking to 195 and 197 Station Road respectively, the offices of Greswolde Construction and its various tenants (a capacity approaching 40 cars), the MIND premises, an electric sub-station and currently the alternative existing a second access to the arable farm land to the rear.

Although vehicular access to Arden is not intended to use the existing bridleway/footpath, noting the chaotic situation to existing Station Road traffic which will arise from 1800-plus students arriving/departing Arden at peak times during each school day using this point for pedestrian access/egress with the site, unless alternative access/egress points are fully integrated in the proposed layout.

Nonetheless, such additional use by students will certainly impede the current users of the track in their present, freely available access/egress to/from the relevant properties resulting in further congestion being unavoidable to Station Road traffic generally.

A particular deficiency in the Proposal is the lack of detail relative to that housing to be provided parallel to the rear of Station Road - are there likely to be any (including using the above mentioned Bridle Way) directly onto Station Road or are they likely to be limited to Warwick Road and/or Grove Road?.

The detailed proposals indicate an anticipated higher density of new housing located to the rear of existing Station Road low-density housing.

However, that housing which would occupy the existing Arden site on to Station Road is also indicated to be of a higher density which, wherever it is located, will be of up to 40+ dwellings per hectare.

Whether such a high density is, in fact, suitable for this location must be subject to the detail provided in its planning application being appropriate to their actual location particularly noting the proximity of the Conservation Area. This extremely high number of proposed dwellings at a density of 40 + must be reduced to ensure relevant NP Policies are met and was one of those which were identified in the NF survey as being unacceptable.

The text suggests that all new housing will access/egress the whole development site via the new Warwick Road junction which is proposed to be slightly further to the south and away from the bottom of Stripes Hill.

Whilst this solution assists existing Station Road traffic flows, it does nothing for the huge anticipated increase in traffic movements which would be direct from Warwick Road at the southern end of the High Street in Knowle's Conservation Area, particularly at peak periods. Concern remains that the Proposal provides no information on the increased traffic and its impact on Knowle and, in particular, its Conservation Area although other than that mentioned in the Knowle Traffic study to which reference has been made above. Pressure from such traffic requiring parking spaces in Knowle will also add to the already well-used parking facilities. Notwithstanding the Transport Study, these facilities, pre-pandemic, were reaching, in any event, almost saturation point on occasions as indeed appropriate Council Officers had been made so aware of the situation.

There is no reason at all to suggest that this situation which existed will not reappear once the pandemic crisis has either at the very least, eased or indeed entirely eradicated.

The open space provision is identified as 4.9 hectares overall to cater for play areas with a 'green link' to the adjacent Middlefield development. However, noting the Middlefield site is not currently enhanced by existing 'green assets', such areas should therefore be designed for inclusion in this KN2 proposed development site.

One final point is that the text indicates that the character and appearance of Knowle's Conservation Area is to be preserved or enhanced by the retention and setting of the built heritage assets principally those of the houses opposite Arden in its present position on Station Road. In fact, the limit of the Conservation Area at this point is the eastern side of St Lawrence Close is approximately 16 metres – a short distance away - from any direct overlooking from the development site. Consequently noting that new development that may be located just outside a Conservation Area, nonetheless such new development should reflect the historic assets of the Conservation Area. The Proposal is unfortunately silent on this most important point.

Summary.

Again as a consequence of the stated deficiencies in the Masterplan made above, before it is adopted as part of due process, it should be modified as both deemed necessary and stated above.

The lack of clear and concise details of the proposed junctions with both Warwick Road and Grove Road, in view of their importance, should not be left to the developer/s to undertake the necessary traffic flow studies (essential to be undertaken post-epidemic) to support their proposals – they should be undertaken by the Council and incorporated in the Local Plan before its submission to the Planning Inspectorate.

Housing densities also need to be further examined, in particular with the site's close proximity to the Conservation Area's eastern boundary coupled to the consequent impact arising from the development of this site and together in respect of traffic flow management on Lodge Road to the edge of the Conservation Area as well as both Station Road and High Street located in the Conservation Area itself.

Other Relevant Points identified in the Proposal

There is included as part of the Council's wish to 'Provide Homes for All' that the provision of affordable housing across all new sites included in the Proposal, subject to certain conditions being satisfied, will remain at the current 40% of the total. Of this number, the varying provisions of bedrooms included in individual dwellings will be 15% of one bedroom, 40% of two bedrooms, 40% of three bedrooms and 5% of four bedrooms. This provision is extremely gratifying but, although it will go a long way to off-set the non-provision of affordable homes from the mid-1960's to that of just a few years ago, it does not comply with the NP's current policy regarding estate design. The policies were introduced as a consequence of the poor design and layout of both the earlier Hampton Road and the later Middlefield development.

One point that should be made, however, is that the continuing use of Housing Associations as the principal provider of such accommodation should be reduced to avoid the effect of 'stair-casing'. Housing Associations provide their tenants (on a shared-ownership basis) the opportunity of removing the shared ownership by the Tenant's ability to purchase the balance of the Freehold during their Tenancy. This consequently results in a permanent reduction of the availability in the number of affordable homes for ever.

There are, however, private landlords who would willingly provide Leases of up to 70% of the value for shared ownership homes with the 30% withheld in perpetuity, this being subject to an annual rental charge included in their Lease. Consequently on re-sale the next purchaser would only be able to buy 70% of the market value ensuring no diminishing of the number of affordable homes.

Whilst Tenure is perhaps, not currently considered to be Local plan Policy, its importance cannot be over-stresses to ensure this situation does not happen here in Knowle otherwise younger local people whilst ultimately be forced to move away due the overall ever-increasing value of the housing stock. This situation must not be permitted to happen again.

It is noted that the Proposal includes the provision of a mix of the availability of new market homes with a pre-stated mix of accommodation. Based on the total of the development the mix of the whole is identified as 30% of one or two bedrooms, 50% of three bedrooms and 20% of four or more bedrooms.

Presumably these percentages are of the balance of the total number of dwellings after allowing for any other stated provision included in the Proposal, ie affordable dwellings follow the same mix ratios.

Omissions in the Proposal

In addition to the non-addressed traffic concerns, save for the accommodation being provided for those requiring nursing or other forms of care, there is no mention of any provision being included for relevant community services such as library, health and emergency services. At what point does this come to being in this Proposal?

Conclusion

The Regulations state that the only representations which relate to soundness and legal compliance are relevant and to both requirements and it is considered this Response is duly fulfils both requirements. KS's representations above relate to the soundness of the Local Plan and consequently it is considered the Proposals are unsound on the basis there is inadequate evidence included for the Proposals to be so justified.

This Response to the Council's Consultation on the draft Local Plan dated October 2020 by The Knowle Society is therefore submitted to the Council for full and due consideration.

In due course The Knowle Society would wish to attend any Public Hearings to make relevant representations to the Planning Inspector.

The Knowle Society
December 2020