

SOLIHULL LOCAL PLAN REVIEW

PREFERRED OPTIONS CONSULTATION

The Arden Triangle

A Strategic Opportunity for Major Community Benefit and Growth

LPR Reference: Site 9, Land south of Knowle

Response on behalf of Arden Academy, Station Road, Knowle



1. Introduction

- 1.1. On behalf of our clients, the governors of Arden Academy and Mr Ved Goswami, we wish to make the following representations in respect of the Draft Local Plan Review, currently the subject of public consultation. This document outlines our support for the proposal to allocate land south of Knowle for housing and associated infrastructure, including a new secondary school. The site is defined as Site 9 in the Summary Table of Allocated Sites, as referenced in Policy P5 Provision of Land for Housing. Further detail is also provided in Appendix C of the Draft Local Plan.
- 1.2. We initially sought to promote our strategic vision for the site through submissions in January 2016 on the Local Plan Review -Scope, Issues and Options consultation document and the Call for Sites. A further submission was made to the Council in July 2016 which provided further details regarding the community benefits that could be achieved through the development of a new Arden Centre for Community Learning (ACCL) and the release of the existing school site and surrounding land for much needed housing development. This material was also utilised, by way of a series of display boards at a Developer Showcase event, hosted by the Knowle, Dorridge, and Bentley Heath Neighbourhood Forum on 16th July. Both submissions referred to the site as 'The Arden Triangle- A Strategic Opportunity for Major Community Benefit and Growth.' The content of both remains extant.
- 1.3. Paragraph 224 of the draft Local Plan indicates that further work will be undertaken in conjunction with site owners and their representatives and the local community to bring together a concept Masterplan for each of the proposed housing allocations. The purpose of this exercise will be to illustrate the form the development will take and to demonstrate that the site is deliverable.
- 1.4. We have had an initial meeting on 7th February 2017 with Council officers to discuss the scope of this exercise and share information and we look forward to further dialogue over the next few months.
- 1.5. Discussions have been held between the school and neighbouring private landowners with a view to achieving the assembly of an accessible site of sufficient size to accommodate the new school (ACCL) and ensuring its financial viability as part of a broader land deal on which it relies. Section 4 below provides further details on funding arrangements. The accompanying Block Plan shows the proposed location of the new School and associated open space and playing fields, together with details of the location, type and density of housing proposed. Other land to the north and south, that also forms a part of Site 9, offers additional scope for housing development but this will be a matter to be pursued by the respective landowners and/or their representatives.
- 1.6. The following sections of this representation provide an overview of salient factors that demonstrate the need for a new school and how this aspiration can be realised through the proposed release of land from the green belt that would make a significant contribution towards meeting the housing land target for the plan period, whilst enabling

major community benefits to be provided.

2. The Case for a New School

2.1. The catalyst underlying the 'Arden Triangle' initiative is the desire of Arden Academy governors to vacate the existing school site and to relocate to another site that allows the creation of a new school, appropriate for a contemporary 21st century teaching environment that also provides a major resource for community activity and interaction. A recent increase to a 10- form entry means that the school role will be approaching 2000 in five years time. However, the existing site is tightly constrained and offers minimal scope for further expansion and growth.

2.2. There is a very strong case for the development of a new fit –for- purpose school in this part of the Borough. The remodelling of the existing school has been carefully considered but is not deemed to be viable because:

- The bulk of the premises are no longer fit for purpose and hinder the incredible potential for student attainment and wider community use;
- Additions and extensions over the years have led to a patchwork of development without a clear definition of spaces;
- Much of the site is over 50 years old. For example, the school hall and dining area are largely the same as when built in the late 1950's.
- The investment required to update the present site is around £18m. These sums of money from the public purse are no longer available. Even if they were, Arden would be a building site for over 10 years, actually hindering student attainment.
- The energy efficiency of the building is poor and costs over £100,000 more per annum than a modern school.
- Annual maintenance alone in the existing school costs £150,000 p.a.

3. Creation of Better Community Facilities

3.1. It is proposed to build a new 3 storey, 10 form entry school (as now) that will be able to accommodate all the children in the Arden catchment area.

3.2. The development of the new school provides a one off opportunity to design into the new school a series of improved community facilities to engage young and old alike both during and outside school hours. The requirement for such facilities has been identified by residents via public consultation exercises, including the KDBH Neighbourhood Plan Residents Survey undertaken in 2016.

3.3. The Facilities proposed to be incorporated into the new school include:

- A Sports Centre with a possible swimming pool.

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- A Gymnastics/Fitness Centre
- Outdoor recreational open space and playing fields
- Conference /meeting facilities.
- A 50 place Day Nursery(privately managed by the school)
- Multi Games all weather floodlit pitches.
- MIND garden/ reflection area.
- A 600 seat Performing Arts Theatre.
- Drama/ dance/Music practice/recording rooms.
- STEM curriculum facilities for post 16 learning linking to local skilled employment locally.
- Better Community Safety when travelling to and from school with a significant reduction in traffic and parking on journey to school routes.
- A Youth Zone. A safe place for young people to meet, be active, happy and learn.
- A Hair Salon
- Potential to co-locate a new Primary School..

4. How the new school will be funded

- 4.1. Funding a major new school from the private purse is not an option. It is therefore proposed that the school is funded using a “land swap” arrangement. This entails a private developer fully funding the design and construction of the new school in return (on completion of the new school) for the sale of SMBC land that the existing school currently occupies, to develop for new housing. The value of this land is broadly comparable to the cost of the design and development of the new school. A potential investor/ developer has expressed interest and their robust and detailed modelling has indicated that this proposed funding model is both viable and achievable.
- 4.2. The introduction of further land into this model (in the ownership of Mr V.Goswami) substantially improves the overall financing deal. It has the effect of accelerating the construction and sale/rent of new houses by enabling them to be constructed simultaneously with the new school. In addition, the main vehicular access to the new school will be secured through the release of this land and Mr Goswami will gift to the school an area of land to be used as playing fields.
- 4.3. As Arden Academy is publicly regulated all relevant private services and construction works contacts will be procured in full compliance with the Public Procurement Regulations.

5. Features of the proposed new housing development

- 5.1. The proposed housing development on the site of the existing school will take the form of apartments, townhouses and detached dwellings with a higher density at the northern part of the site, reducing towards medium density to the south of the site. This takes into consideration the existing scale and height of buildings on the existing school site and the desire to ensure that the residential environment created will relate well to the

surrounding neighbourhood.

- 5.2. It is proposed that land owned by Mr Goswami will be developed at a lower housing density than the existing school land to reflect, and retain as far as possible, the green and rural character of that location. The existing lake and its immediate surroundings will also be retained to preserve the bio- diversity of the site and present an attractive visual amenity for local residents.
- 5.3. Key features of the existing landscape will be retained, for example the existing mature tree lined and hedgerow boundary between the existing school site and land owned by Mr Goswami.
- 5.4. The accompanying Block Plan shows further details.
- 5.5. The modelling work undertaken has made provision for 40% affordable dwelling units and this shows the project is viable at this level. Any higher contribution than this will put the viability of the scheme at risk. For this reason, we consider that the factors to be taken into account in assessing development proposals, as defined in Policy P4A, are critical, and should be reinforced to recognise the contribution that the development proposals will make on-site in providing major community benefits and infrastructure. Please refer to our response to Qu. 12 in Appendix 1.

6. Green Belt Considerations

- 6.1. At present, all the land within the 'Arden Triangle' is in the Green Belt. NPPF is clear that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open but recognises that in exceptional circumstances the boundaries of the Green Belt can be altered through the preparation or review of the Local Plan.
- 6.2. With regard to the spatial strategy, we support the Council's conclusion, following detailed assessment, that land south of Knowle is one of the locations within Growth option G (Significant Expansion of Rural Villages/Settlements) where growth should be focused and land released from the Green belt (paragraph 108).
- 6.3. We consider that the opportunities presented by the Arden Triangle for major community benefits and housing growth have great merit and provide a strong basis to support green belt land release to facilitate development in this location.
- 6.4. The Arden Triangle sites present additional characteristics that, in combination, support the release of land from the Green Belt:
 - The existing Arden school was originally built in 1957. It therefore preceded the designation of the site as green belt and has always been a developed site within it.
 - The site is well contained and forms an integral part of the settlement form of Knowle; its release from the green belt would not intrude upon open countryside.

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- The potential site for the Arden Centre for Community Learning and land beyond would have limited visibility from properties along Station Road by virtue of mature boundary trees and vegetation along their rear boundaries;
- The entire Arden Triangle area is almost entirely obscured from view from Warwick Road to the east, due to boundary vegetation and/or development along the entire route. In consequence, there is no visual perception of openness or awareness of countryside from this direction, that would be compromised adversely by the release of land from the Green Belt;
- There is significant scope to ensure that any development release from the green belt is interspersed by retained open land/school playing fields and open space linked to housing development to maintain a rural aspect and sense of openness;
- Warwick Road and Grove Road would form new, highly defensible boundaries should land be released from the Green Belt;
- Whilst located within the Meridian Gap, the Arden Triangle does not fulfil a role in retaining the separation of settlements and the release of land would not result in the coalescence of Knowle/ Dorridge with any neighbouring settlement.

6.5. Development aspirations for the Arden Triangle and the constituent land parcels within it present potential strategic opportunities to derive major community benefits through growth within this part of the Borough. Continuing dialogue with Council officers is seen as imperative as the Local Plan Review process moves forward and high priority will continue to be placed upon continuing efforts to gain the support of local people, landowners and key business contacts for these proposals.

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Responses to Consultation Questions

Question 1: Do you agree that we've identified the right challenges facing the Borough? If not why not? Are there any additional challenges that should be addressed?

Question 2: Do you agree with the Borough Vision we have set out? If not why not, and what alternative would you suggest?

Response

We support the approach taken by the Council.

Question 3: Do you agree with the spatial strategy we have set out? If not why not, and what alternative would you suggest?

Response

The spatial strategy is firmly supported insofar as it recognises the sustainable growth potential of identified Rural Villages/Settlements within Growth option G, including land south of Knowle, where growth should be focused and land released from the Green belt (paragraph 108).

Question 4: Do you agree with Policy P1? If not why not, and what alternative would you suggest?
Question 5: Do you agree with the key objectives that development is expected to meet as identified in Policy P1 are appropriate? If not why not? Are there any others you think should be included?

Response

We have no specific comments in response to these questions.

Question 6: Do you agree with Policy P1A? If not why not, and what alternative would you suggest?

Relevant policy:

- Page 48 - Policy P1A Blythe Valley Business Park

Response

We have no specific comments in response to this question.

Question 7: Do you agree with Policy P2? If not why not, and what alternative would you suggest?
Question 8: Do you believe the right scale and location of development has been identified? If not why not?

Relevant policy:

- Policy P2 Maintain Strong, Competitive Town Centres

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- Unnumbered policy - Solihull Town Centre Masterplan Opportunity Sites

Response

We have no specific comments in response to these questions.

Question 9: Do you agree with Policy P3? If not why not, and what alternative would you suggest?

Question 10: Do you believe the right scale and location of development has been identified? If not why not?

Relevant policy:

- Policy P3 Provision of Land for General Business and Premises

Response

We have no specific comments in response to these questions.

Question 11: Do you agree with Policy P4? If not why not, and what alternative would you suggest?

Question 12: Do you agree with the level of affordable housing being sought in Policy P4? If not why not, and what alternative would you suggest?

Question 13: Which option for delivering self and custom housebuilding do you favour and why? If neither do you have any other suggestions?

Relevant policy:

- Policy P4 Meeting Housing Needs

Response

The development aspirations for the Arden Triangle include a significant amount of residential development. In order to create a mixed community, we are supportive of the principle of providing affordable homes and therefore broadly supportive of Policy P4. and is supportive of the threshold for provision being in conformity with Planning Practice Guidance as 11 units or more. It does however recommend that the wording of the square metre threshold is clarified to avoid future confusion, requiring contributions as set out below, amending the wording from:

'The Council will require developers of allocated and unidentified sites to make a contribution to affordable housing on residential sites of 11 units or more, or which have a maximum combined gross floor space of more than 1,000sqm...'

to the following:

'The Council will require developers of allocated and unidentified sites to make a contribution to affordable housing on residential sites of 11 units or more, or which have a combined gross floor space of 1,000sqm or more...'

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The provisions of Policy P4 requiring 50% of affordable dwellings is noted. However, we consider that a degree of flexibility must be exercised in the implementation of the policy and consequently support policy recognition of the factors to be taken into account in assessing development proposals, as set out in paragraph 3 of Policy P4. It is however requested that the level of contributions towards affordable housing being sought should additionally take into account on-site, and enabling infrastructure provision, and that the policy should be amended to include the following wording:

- 'The cost of infrastructure that is provided as part of developing the site'; and
- 'The community benefits of new infrastructure that are provided as part of the development'

With regard to Policy P4 D on the topic of Self and Custom Housebuilding we favour Option 1, as it felt that this will provide a more effective route for delivering these types of dwellings.

Question 14: Do you agree that we are planning to build the right number of new homes? If not why not, and how many do you think we should be planning to build?

Question 15: Do you believe we are planning to build new homes in the right locations? If not why not, and which locations do you believe shouldn't be included? Are there any other locations that you think should be included?

Question 16: Do you believe we have identified the infrastructure required to support these developments? If not why not? Are there any additional facilities you believe are required, if so what are they?

Relevant policy:

- Policy P5 Provision of Land for Housing

Response

We welcome the proposal to release Site 9: Land south of Knowle, from the Green Belt to enable the provision of new state of the art 'Arden Centre for Community Learning', and residential development which will help to provide capital receipts to fund the delivery of the Arden Centre and make a significant contribution towards meeting the Borough's housing land requirements.

It is noted that an up-to-date Infrastructure Delivery Plan (IDP) has not been prepared in conjunction with the emerging Local Plan; it is best practice to develop this information in conjunction with preparing the Local Plan, rather than 'bolting it on' at the end. For a Local Plan to be effective, it needs to draw and influence the investment strategies and infrastructure programmes within the local authority and other organisations in the area. The council should have an understanding of the costs required to bring forward allocations to ensure the plan is effective and deliverable.

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We note the contents of Appendix C in relation to the likely types of infrastructure required to bring forward the site referred to as 'South of Knowle', and wish to continue the dialogue with the Council and other land owners, to determine the likely needs and costs required to make the allocation acceptable in planning terms.

Question 17: Do you agree with Policy P6? If not why not, and what alternative would you suggest?

Relevant policy:

- Policy P6 Provision of Sites for Gypsies and Travellers

Response

As currently worded, policy P6 uses a criteria based approach for allocating new sites. As allocations can only be made by a Development Plan Document, which requires a lengthy development and adoption process, it is suggested that Policy P6 is amended and expanded to include a criteria based approach for the assessment of planning applications on sites that have not been allocated, to allow a more responsive approach.

Question 18: Do you agree with the policies for improving accessibility and encouraging sustainable travel? If not why not, and what alternatives would you suggest?

Relevant policies:

- Policy P7 Accessibility and Ease of Access
- Policy P8 Managing Travel Demand and Reducing Congestion
- Policy P8A Rapid Transit

Response

The proposed development of the Arden Centre for Community Learning seeks to overcome the accessibility issues currently experienced by the school and the relief of congestion along Station Road. The policies provide a strong basis for improving accessibility and encouraging sustainable travel and the proposed release of Site 9 would be compliant with policy objectives. The site is close to bus routes and to the railway station at Dorridge.

We regard as excessive the need for non-residential development to provide access to bus services offering 'at least a 30 minute daytime frequency within 400m of the site.' The majority of travel to and from school is needed during specific morning and afternoon periods, rather than every 30 minutes throughout the day, so requiring such a service may not be necessary to make the development acceptable in planning terms. It is also noted that a size threshold for non-residential development is not included, which may result in the onerous application of the policy on planning applications for smaller developments, or extensions to existing facilities, creating a requirement that is not fairly related to the scale of development. It is therefore suggested that this text (3rd

bullet of Policy P7) is amended to make it more responsive to the accessibility needs of different types of development.

Question 19: Do you agree with the policies for protecting the environment? If not why not, and what alternatives would you suggest?

Relevant policies:

- Policy P9 Mitigating and Adapting to Climate Change
- Policy P10 Natural Environment
- Policy P11 Water Management
- Policy P12 Resource Management
- Policy P13 Minerals
- Policy P14 Amenity

Response

Regarding water use under Policy P11, subheading 'Recycling/reuse', it is felt that imposing consumption limits of: '110 litres per person, per day' is overly prescriptive. Furthermore, it is not explicit whether this standard should be imposed on all forms of development or residential development only. It is therefore suggested that the instead of imposing a limitation, SMBC should rely on the standards required by Building Regulations which are in any case mandatory, and signpost towards this within the policy. The benefit of this approach is that if standards for efficiency increase, there will be no conflict between local policy and national standards.

With regard to developer contributions, Policy 11 and supporting text stipulate that:

"Developers are required to contribute towards the cost of planned flood risk management schemes through Section 106 or Community Infrastructure Levy charging schedules."

As currently worded, this policy implies that all developers are required to enter into a Planning Obligation for flood risk management schemes, but this is not in compliance with the provisions of regulation 122 of the Community Infrastructure Levy Regulations (2010) (as amended). Regulation 122 states that:

'(2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—

(a) necessary to make the development acceptable in planning terms;

(b) directly related to the development; and

(c) fairly and reasonably related in scale and kind to the development.'

It is therefore requested that the wording of Policy 11 is amended to make it clear that contributions will be required in line with regulation 122.

Regarding Policy P13, it is overly prescriptive to require all developments to demonstrate that they will not result in the sterilisation of mineral resources. It is therefore suggested that an appropriate

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threshold for development size for requiring such information should be included for proposals for non-mineral development, or that development within defined settlement boundaries should be exempt from this requirement.

Question 20: Do you agree with the policies for quality of place? If not why not, and what alternatives would you suggest?

Relevant policies:

- Policy P15 Securing Design Quality
- Policy P16 Conservation of Heritage Assets and Local Distinctiveness
- Policy P17 Countryside and Green Belt

Response

Subject to the continued approach of releasing the 'Arden Triangle' from the Green Belt to enable the provision of a new state of the art 'Arden Centre for Community Learning' together with residential development, we are fully supportive of the policies as currently drafted and wish to support SMBC in achieving their aspirations for high quality, well-designed developments.

Question 21: Do you agree with the policies health and supporting communities? If not why not, and what alternatives would you suggest?

Relevant policies:

- Policy P18 Health and Wellbeing
- Policy P19 Range and Quality of Local Services
- Policy P20 Provision for Open Space, Children's Play, Sport, Recreation and Leisure

Response

We are fully supportive of the policies as currently drafted and consider that the proposed development of the Arden Centre for Community Learning and the intention to retain as much open land and existing landscape features as possible as a green framework to residential development will help to support SMBC in achieving their aspirations for improving health and wellbeing, and securing major community benefits through development.

Question 22: Do you agree with the Policy P21? If not why not, and what alternatives would you suggest?

Relevant policies:

- Policy P21 Developer Contributions and Infrastructure Provision

Response

We are supportive of the appropriate use of developer contributions but consider that SMBC should provide additional justification and detail regarding developers being required to provide additional

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contributions towards 'digital infrastructure'. Telephone, internet and mobile telephony infrastructure is normally provided on a reactive basis in response to market demands and consumer expectations. Furthermore, the Government has worked with Openreach and the Home Builders Federation (HBF) on an agreement which aims to deliver superfast broadband connectivity to new build properties in the UK; fibre based broadband is offered to all new developments registered to be built from 5th February 2016 onwards, either for free or as part of a co-funded initiative for all new housing developments of 30 or more homes. We therefore believe that the development of the Arden Triangle should only be expected to contribute towards infrastructure that is fairly and reasonably related in scale and kind to the development.

Question 23: Are there any other comments you wish to make on the Draft Local Plan?

Response: Please refer to main body of this statement.