

5<sup>th</sup> January 2018



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Dear Chair of the Knowle, Dorridge and Bentley Heath Neighbourhood Forum

### **Arden Academy's Response to KDBH Neighbourhood Forum (KDBHNF) Draft Neighbourhood Plan<sup>1</sup>**

I am writing on behalf of Arden Academy Board of Governors in response to the published Draft KDBH Neighbourhood Plan. We appreciate all the work involved in pulling such a comprehensive document together and thank all of those involved for the time and effort they have invested in developing this draft plan. We welcome such engaged community activity and it is this community spirit that Arden seeks hard to support through its excellent education programme for our young people and its support of the wider community. We are certain that our excellent and vibrant school sits at the very heart of community and we continue to be extremely supportive of the energy of the KDBHNF.

We are delighted to see that continued high-quality education, access to schools of choice, opportunities for life-long learning and community facilities continue to be a priority for local residents and are given a high-profile in the draft Plan. As you know, the Arden 2020 Vision has been specifically developed to help address these issues and we look forward to working with you to turn this vision into reality for the good of the whole community<sup>1</sup>.

### **One major point that we feel needs to be raised at this stage and relates to the proposal in Section 6.5 of the Draft Neighbourhood Plan: to designate land in front of the school as a Local Green Space.**

This is a significant proposal to our community school and it is important that we comment on this. We were unaware that this had been discussed or raised at any point during our dialogue or at community meetings. This area was not identified in either (1) the 'Summary of Residents Feedback' report (dated 30 April 2015), or (2) 'KDBH NP Residents Survey Results 2016 FINAL' Report (dated August 2016). We note that there is no mention of this proposal within the main narrative (section 1- 5) of the Draft Plan but only within the Detailed Neighbourhood Plan Policies. Since the KDBH-NF website identifies Section 1-5 as "essential reading", there is a real danger that many busy residents may take the website's guidance at face-value and therefore do not review the full policy suite. As a result they would be unaware of this proposal and its possible implications for the continued effective operation of the school. This appears to be a weakness, however unintentional, in the consultation document.

Consequently, we wish to object to the inclusion of "Land at the front of Arden Academy"<sup>2</sup> being designated as a Local Green Space for the reasons given below.

1. In the KDBH NF Residents' Survey Questionnaire<sup>3</sup> 'Green Spaces' are defined as

<sup>1</sup> "Knowle, Dorridge and Bentley Heath Neighbourhood Plan 2018-2033 | Pre Submission Draft | November 2017" accessed via [www.kdbh-np.org](http://www.kdbh-np.org), January 2018 ("the Plan")

<sup>2</sup> NDBHNF Draft Neighbourhood Plan. Section 6.5, page 19.

*“...any open spaces of land that are accessible to the public. This can include: playing fields and sports pitches, wildlife areas, parks, community gardens, greens, playgrounds and cemeteries.”*

We believe that the area of land does not fall into any of these categories. The land in question is on the school premises and should not be routinely accessed by the public for student safeguarding reasons. We therefore contend that it falls outside your definition (above) and hence any general responses and comments made in response to Questions 57 and 58 of the questionnaire should not be taken as applying to this area of land unless they explicitly make reference to it.

2. Section 6.5 of the Plan also states that the designation of the area in front of Arden Academy as a Local Green Space is in line with the National Planning Policy Framework (NPPF). Paragraph 77 of the NPPF provides the following information on Local Green Space Designation:

*77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:*

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land.*

We believe that the area in question is not demonstrably special to the local community in general. A small part of the proposed area contains memorials to alumni and staff. These are of great significance to the school community and afforded great respect though rarely, if ever, visited or utilised by the general public. It is the firm intention of the school governors to ensure new memorials are incorporated within any future school plan. The water feature is not visible from the road nor routinely accessed by the public. Finally, the area, which directly borders Station Road (an area of concern raised in this Draft Neighbourhood Plan for “existing traffic congestion and safety”) has no local significance in terms of beauty, tranquillity or richness of wildlife. We therefore contend that your designation does not meet the criteria given in paragraph 77 of the NPPF and rather the opening statement that *“the Local Green Space designation will not be appropriate for most green areas or open space”* is true in this case.

3. Paragraph 76 of the NPPF states that:

*76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.*

Earlier we made reference to Arden 2020, the Academy’s vision to support our community and address many of the priorities identified in the Plan via a new school build. Should this new build not be possible, the Academy would need to find ways of replacing and/or renovating the oldest

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<sup>3</sup> KDBH NP Residents’ Survey Questionnaire (dated 23 May 2016), p15, questions 57 & 58

buildings whilst continuing to deliver a high-quality, safe and secure learning environment. This would require use of existing school land to accommodate new and/or temporary buildings whilst renovation work was undertaken. Given the limited space available on the site, this would likely include the area to the front of the current school. At present there are no plans to do so but as this may be the only viable way that we can continue to deliver a high-quality, safe and secure learning environment going forward we object to the proposed designation of this land as Local Green Space on the grounds that it is *"consistent with the local planning of sustainable development and complement investment in ... essential services"* as set out in paragraph 76 of the NPPF; education is an essential service to the community and designating this site as a Local Green Space could inhibit the Academy's ability to invest in and continue to deliver high-quality education to its current and future pupils.

In summary, we contend that the proposal to designate "Land at the front of Arden Academy" as Local Green Space has not and, because of its omission from the main body of the Draft Plan (which KDBHNF designate as Essential Reading), may not be subject to proper local consultation and, furthermore, does not meet the criteria set out in paragraphs 76 and 77 of the NPPF.

We remain, as always, firmly committed to the support of our community and are happy to discuss this letter and any other issues in full detail with you in the firm belief that there are viable future developments possible within our community that meet the needs of all.

Yours sincerely



**Mr G Harley-Mason**

For and on behalf of the Local Governing body of Arden Academy

cc. SMBC  
Arden Academy Parents & Guardians

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<sup>i</sup> The vision to create a new state of the art educational facility with major new community facilities for young and old supports and will complement the vision, objectives and goals of the Draft KDBH Neighbourhood Plan. Specifically its provisions will directly address the objectives detailed in Sections 6.1; 6.2; 6.3; 6.5; 6.6; 7.1; 7.3; 7.4; 7.5; 7.6; 7.7; 8.1; 8.2; 8.3; 9.1; 9.2; 9.3; 9.5; 9.6; 9.7; 9.8; 9.11; 10.1; 10.2; 10.3; 10.4; 10.5; 10.6 and 10.7 of the Draft Neighbourhood Plan. We would welcome the opportunity to discuss with you how we can best realise these for the good of the whole community for the period of the Neighbourhood plan and beyond.