



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan:

KN1 - Hampton Road, Knowle Concept Masterplan

1 Summary

The new Green Belt boundary on the northern part of the site should be formed by retention and strengthening of the existing hedgerow. The outer limit of residential development on that part of the site should be pulled back so as to avoid breaching the ridgeline that crosses the site. This could be compensated for by higher density development on the other (football club) site, but only in the form of a care village or retirement complex. Other modifications are needed to make the document succinct and to include or amplify details relating to the objective / aim of the development, phasing and delivery, household types and other key principles.

2 Representations

Savills Architects Site Proposal

Interpretation of the concept masterplan for Hampton Road, Knowle is confused by inclusion of "Savills Architects Site Proposal". This proposal has been superseded by the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road". However, the inclusion throws into question the role and status of the Council's proposals. Additionally, the superfluous addition does not contribute to a succinct Local Plan.¹ For the avoidance of doubt, the Forum would strongly oppose the Savills proposal. The Savills Architects Site Proposal should be deleted. See **Mod 1**.

Objective / Aim

Para 242 of the draft Submission Plan identifies matters that will be included in concept masterplans. First is "*A clear objective / aim for what is intended to be achieved in the overall development*". In this regard, the fundamental aim of the Hampton Road allocation is to build a new sports pavilion and pitches for Knowle Football Club, facilities that could be used by the public. This would be funded by new housing. However, this is not stated in the Plan.

The club would vacate the existing premises and pitch on the smaller southern site and develop new facilities on the larger northern site. There would be new housing on the western part of the northern site and on the southern site. The southern site could be developed as a care village or retirement complex.

Inclusion of the objective / aim is an important matter. As well as meeting a requirement of Para 242, it is part of the justification for the selection and allocation of this site. In addition, certain safeguards are necessary in meeting the objective / aim. As such, a statement of the objective / aim should be included at the start of the description of the Council's proposals. See **Mod 2**.

Different Land Uses / Proposals

A second matter identified under Para 242 is reference to different land uses / proposals. Whilst the concept masterplan includes a general reference to housing, and to the proposed sports provision, the possibility of a care village or retirement complex on the existing site of Knowle Football Club is not mentioned. It will be important to mention this option and to be cognisant of the possible effects on the overall density of development. See **Mod 3**.

¹ NPPF Para 15



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As regards the sports provision, the concept masterplan shows a cricket pitch. The Forum understands that the existing Knowle Cricket Club has no intention of relocating. It is not clear if this is a proposed new facility, bearing in mind that the Council has identified the Knowle Dorridge and Bentley Heath area as a search area for a new sports hub. Clarity is required, as such a proposal would have an impact on the scale of associated facilities such as car parking and floodlighting. It would also have implications for scheme viability if Council funding is envisaged.

Phasing and Delivery

A third matter identified in Para 242 is the necessity for a clear phasing and delivery programme. This is absent from the current document. However, the replacement sports facilities will be needed before the existing use is lost. In addition, and in cross-funding the relocation of the sports facilities, early provision of housing on the northern side of the site will be necessary, together with a mechanism to ensure that the pitches are established before an appropriate percentage of the houses are occupied. See **Mod 4**.

Household Types

Policy P4C of the Plan (Meeting Housing Needs - Market Housing) indicates that concept masterplans will include details of the likely required profile of household types. This is missing from the Hampton Road concept masterplan. In including this information, attention should also be drawn to the Neighbourhood Plan provisions with regard to housing mix (Policy H3) and affordable housing (Policy H2). See **Mod 5**.

Other Key Principles

In specifying and amplifying key principles, other modifications to the concept masterplan are necessary:

- to ensure that harmful visual impacts as a result of engineering works to create the housing and playing fields are minimised (**Mod 6**);
- to secure retention of the public footpath along its current alignment (**Mod 7**);
- to clearly identify the vehicular site access, including the proposed access and car parking area to the sports facilities; (**Mod 7a**)
- to refer to necessary highway improvements and regard for safety and the character and appearance of the Knowle Conservation Area (**Mod 8**);
- to protect all trees on the site in accordance with the Tree Preservation Orders (**Mod 9**); and
- to avoid significant harm to Grimshaw Hall (**Mod 10**).

Extent, Location and Density of Development

There remains the matter of the extent, location and density of development to be carried out at the site, as depicted in the Council's concept masterplan and described in the accompanying text. In this regard, the site has been the subject of a landscape and visual appraisal carried out on behalf of the KDBH Neighbourhood Forum.² The consultants advised that the site, which is crossed by a ridgeline, forms part of the rural setting of Knowle. The ridgeline and highpoint, in conjunction with existing mature boundary hedgerows and trees, form a natural landscape limit to any development. The consultants identified the second mature hedgerow as defining the extent of housing on the site.

² Landscape and Visual Appraisal, Crestwood Environmental Ltd, 2019



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In marked contrast, the housing shown on the Council's concept masterplan would breach the ridgeline and extend beyond the second hedgerow. Moreover, a road with street lighting and a sports pavilion would be located at this sensitive and prominent high point. Both would have an unacceptable and detrimental impact on the visual setting of Knowle. In the circumstances, no development should take place on the highpoints or along the ridgeline. This necessitates revisions to the north easterly extent of development as currently shown.

Contours should be added to the plan to highlight the topographical constraints. However, the extent of the proposed housing development will need to be reduced. By way of compensation, and in the event of development by a suitable care village or retirement complex, the southern part of the site could be shown for higher density housing. Nevertheless, modification of the proposed layout will be necessary.

The concept masterplan indicates the new road (across the ridgeline) would form the new Green Belt boundary. The Forum objects to this because of its visual impact, referred to above, and also because it is not a defined feature and could be subject to a revised position. In this regard the Council's proposals fail to meet national policy.³ The Forum's preferred Green Belt boundary would be the second hedgerow crossing the site, as advised by the landscape consultants. However, if this is not acceptable for viability reasons, the red line housing site boundary (as shown on the site analysis and landscape assessment plans) should remain, but the new Green Belt boundary should be defined by the retained existing third hedgerow just to the north of the red line boundary. This hedgerow is well defined but should be strengthened by additional planting between this hedgerow and the red line site boundary. See **Mods 3a 11 and 12**.

The highest housing density on the site should be restricted to 30-35 dph, consistent with the indicative densities for small extensions to villages as set out in the Local Plan table at para 240. This would also better reflect the character of the surrounding area and reflect Neighbourhood Plan policy H1 and D1 on density. A higher density may be appropriate for a purpose-built scheme for the elderly. The medium density in the key should be amended accordingly. **(Mod 11a)**

3 Modifications

Delete "Savills Architects Site Proposal" - plan and text. **(Mod 1)**

Add a new paragraph at the start of the text on the page headed "SMBC Illustrative Concept Masterplan: KN1: Hampton Road": The objective / aim of the proposals is to build a new sports pavilion and pitches for Knowle Football Club, facilities that could be used by the public. This would be funded by new housing. The site of the club's existing premises could be used as a care village or retirement complex. **(Mod 2)**

Add a new paragraph after Mod 2 above: The possibility exists for development of a care village or retirement complex on the southern part of the site (site of the existing football club). **(Mod 3)**

After the above, amend the original first paragraph in respect of the new green belt boundary as follows: a road the existing hedgerow along just beyond the northern perimeter of the housing site will be supplemented by additional planting and will define the new green belt boundary.....(Mod 3a)

³ NPPF para 139



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Insert a clear phasing and delivery strategy, including reference to a legal mechanism to ensure delivery of the community benefit. **(Mod 4)**

Include details of the likely required profile of household types. Add: Regard should also be paid to Policy H3 of the Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Plan. In terms of affordable housing, Policy H2 of the Neighbourhood Plan will apply. Further, the Neighbourhood Plan (Page 39) indicates a strong preference for a higher percentage of shared ownership. **(Mod 5)**

At the end of the first paragraph of text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road", add the following: In order to avoid harmful visual effects, particular care will need to be taken in the engineering works necessary to create the housing and playing fields. **(Mod 6)**

At the end of the second paragraph of text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road", add the following: The public footpath crossing the site is to be retained on its current alignment. **(Mod 7)**

After Mod 7, add the following: With regard to off-site highway works, safety will be a prime consideration at the junction of Arden Vale Road with Warwick Road and at the Hampton Road / High Street junction. However, traffic lights at the High Street junction will be avoided to protect the character of Knowle Conservation Area. **(Mod 8)**

At the end of the third paragraph of text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road", amend the wording as follows: Likewise, the trees and hedgerows along Hampton Rd and across the site must be retained, and the Tree Preservation Orders respected, to ensure the character of this ~~approach to~~ part of Knowle is conserved. **(Mod 9)**

Amend the final paragraph of the text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road" to read: Harm to the setting of the Grade 1 listed Grimshaw Hall should be avoided. Only if harm cannot be avoided should mitigation be considered, and then it should be fully justified and demonstrated to be successful in significantly reducing harm. **(Mod 10)**

On the concept plan, amend the north eastern extent of the housing such that it does not extend across the ridgeline and highest points; define the Green Belt boundary as the hedgerow just beyond the housing site allocation: show the northern site as medium (30 -35dph) and low density housing; show the southern site as medium density for housing (30 to 35 dph) or higher density if for specialist housing; and show contours on the plan. In addition, show the key points of access, including to the sports facility and relocate the sports building away from the ridgeline. **(Mod 11)**

Amend the key so as to define medium density as 30-35 dph. **(Mod 11a)**

Amend the second paragraph of text relating to the "SMBC Illustrative Concept Masterplan: KN1: Hampton Road" to read: The density of the housing ranges from 30 (or less)-35 dph, reducing towards Grimshaw Hall and the edge of the Green Belt where views should be protected and development transitions towards the countryside. Higher density development may be appropriate on the southern site for specialist accommodation. **(Mod 12)**