

14 March 2019
Hampton Road Representations FINAL



Michael Davies



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Gary Palmer
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Dear Gary,

**Representations to the Solihull Draft Local Plan Review Supplementary Consultation
Land at Hampton Road**

On behalf of our client, Hampton Road Developments Ltd (previously Codev Homes), we have prepared the following response to the Solihull Draft Local Plan Review Supplementary Consultation.

Hampton Road Developments Ltd is promoting land to the north and south of Hampton Road, Knowle, for residential development and the proposed relocation of the existing Football Club and Cricket Club.

The site was identified in the Draft Local Plan (2016) as proposed Housing Allocation 8, Hampton Road, Knowle.

This submission includes answers to the following questions which are referenced in the consultation document:

- Question 1
- Question 2
- Question 22
- Question 23
- Question 37
- Question 40
- Question 41
- Question 42
- Question 43
- Question 44

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Local Plan Review Consultation Responses

Question 1: Do you believe that there are exceptional circumstances that would justify the Council using an alternative approach, if so what are the exceptional circumstances and what should the alternative approach be?

We do not believe that there are exceptional circumstances that would justify the Council using an alternative approach to the new standard methodology as set out.

We note the Council's intention to respond to the potential additional support towards the Greater Birmingham Housing Market Area ('HMA') will be dealt with at the Regulation 19 Pre-Submission stage.

Question 2: Do you agree with the methodology of the site selection process, if not why not and what alternative/amendment would you suggest?

We generally agree with the approach taken to the site selection process at Hampton Road. However, we consider the scoring of sites 214 and 215 to be inconsistent in step 1 of the site selection process.

Both of these sites are located directly adjacent to site 213 but have been scored differently. Site 213 scored 6 in the Site Hierarchy Criteria and is described as "greenfield in accessible moderately performing Green Belt location." However, sites 214 and 215 have both been scored 9 which is described as "greenfield in isolated lower/moderately performing Green Belt location." Given the limited distance between both sites and the proposal to connect them with a new road and footpath, we consider it illogical to score the northern parcels lower in terms of accessibility. Furthermore, site 215 is accessible on foot via the canal towpath and is close to the public footpath that links Wychwood Avenue with Hampton Road. If anything, the scoring may vary between the existing houses and the canal, depending on how the site is accessed.

We acknowledge that the further away the site is from the urban area, footpaths and roads, the site may become decreasingly accessible. However, it could be argued that accessibility also increases from the parts of site 213 the closer you get to the canal.

Secondly, the commentary for sites 214 and 215 highlights that "residential development of the site would represent an incursion of urbanising development into the open countryside." We are not seeking residential development on these sites but are proposing sports pitches which, although do not constitute inappropriate development, need to be supported by built facilities and structures; such structures could be absorbed sympathetically into the landscape. We consider that if site 213 is allocated for residential development then the southern edge of sites 214 and 215 would become significantly more accessible, including providing suitable access to the proposed new sporting facilities.

We therefore consider that a priority score of 6 rather than 9 is more appropriate for site 215 which is consistent with the score attributed to neighbouring site 213; although we do appreciate the northern parcels do not themselves "constitute a 'rounding-off' of the settlement in a logical manner", they would be accessible for sports use (commentary for site 213).

Question 22: Do you agree with the infrastructure requirements identified for Knowle, Dorrige & Bentley Heath, if not why not; or do you believe there are any other matters that should be included?

We have reviewed the infrastructure requirements set out in paragraphs 222 – 233 and consider that this represents a reasonable list of measures that need to be addressed to support future development. A further detailed review of these requirements is anticipated at the planning application stage.

Question 23: Do you believe that Site 8 Hampton Road should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

We support the inclusion of Hampton Road as an allocated site for residential and sports uses. However, we consider that the parts of the site identified as “potential area of development subject to heritage assessment” should also be included as part of a comprehensive allocation.

We note that the Site Analysis plan identifies the land to the south of Grimshaw Hall as a “zone of significance on the setting of the listed building” and the Illustrative Emerging Masterplan as a “potential area of development subject to heritage assessment.” We have provided technical reports that show how the setting of Grimshaw Hall can be appropriately taken into account as part of the development proposals and using the existing topography and landscaping, together with new structural landscaping then any perceived heritage impacts can be satisfactorily mitigated. Upon receipt of the Council’s heritage report we will provide further comments and responses as appropriate at the Submission Stage of the Draft Local Plan.

We understand the Council is preparing a Heritage Assessment and this will need to be taken into account alongside other assessments, such as landscaping. We would welcome it if the Council’s reports will take account of the technical reports previously submitted in support of this site. The Heritage Review (dated October 2017), prepared on behalf of our client and submitted to the Council in November 2017, concludes that the impact of development on the setting of Grimshaw Hall will be negligible due to “ample dense screening provided by both existing and proposed tree planting and under planting of appropriate species within those buffer zones and along Hampton Road.”

We have previously acknowledged the Council’s concerns over the impact of the proposed development on the Green Belt, in particular the visual impact of the sports facilities and the potential security fencing around the pitches. We consider the inclusion of green infrastructure in and around the sports pitches would provide an effective mitigation to reduce its impact on the Green Belt and rural setting. We also note the Council’s willingness to accept further detail to minimise the overall impact and will continue to consider further design solutions at the application stage and this is welcomed.

We welcome the Council’s description in the consultation document that “the site performs very well in overall accessibility terms” but consider it unreasonable to describe accessibility to public transport as “currently low” for two key reasons:

1. The Accessibility Study in the Site Assessment document considers site 166 (the southern parcel) scores very high in public transport provision. Conversely, site 213 is afforded a low/medium score despite its immediate proximity with site 166. We consider site 213 should be afforded a higher score for public transport provision to accord with site 166.
2. We note that the Site Analysis plan describes the allocation as a whole as being located just under one kilometre from the centre of Knowle and its services. Whilst we do not disagree with this statement, and consider it is more relevant to consider the distances from the “Future Access” points, within the

Illustrative Emerging Masterplan, to Knowle High Street. The High Street of Knowle offers a number of existing bus services which would be relatively accessible to the proposed development. In this respect, the "Future Access" point of site 166 (identified in the Concept Masterplan at **Appendix 1** as point 1) is no more than 400 metres to the High Street, the proposed access point of site 213 (point 2) no more than 700 metres, and the proposed access point of site 215 (point 3) no more than 900 metres to the High Street. All of these distances are considered to be accessible and could be improved as part of the development proposals.

Question 40: Would the above approach of requiring affordable housing contributions of 40% of total square meterage or habitable rooms/floorspace incentivise developers to build more smaller market housing?

We consider this approach to be unconventional and could lead to a greater than 50% of housing units being provided for affordable housing, where the mix for private includes more 2 and 4 bed houses than is required for affordable. This could negatively affect the overall site mix. We object to this approach until further evidence can be provided to justify a habitable room/floor space requirement. We consider that where the Council seeks to pursue an unconventional approach and a departure from a % of overall dwellings, then a clear justification should be provided.

Question 41: If so, what is the most effective approach? Is it to calculate affordable housing as: (a) 40% of bedroom numbers, (b) 40% of habitable rooms, or (c) 40% of habitable square meterage?

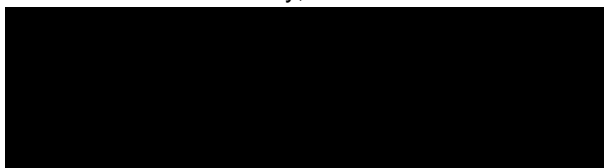
Please see response to question 40.

Question 42: What is the best way of measuring developable space for this purpose: bedroom numbers, habitable rooms or habitable floorspace?

Please see response to question 40.

We look forward to engaging with the council's policy team regarding these matters in due course. Please contact me should you have any queries.

Yours sincerely,



Michael Davies
Planning Director

Appendix 1 – Amended illustrative concept masterplan showing access points

