

## **Submission on behalf of Golden End Farms**

### **Solihull LPR Draft Submission Plan**

**December 2020**

#### **Policy KN1: Hampton Road, Knowle**

##### **Q5. General comments on soundness of policy**

1. The soundness of this policy is uncertain as there are important questions and clarifications required relating to ensuring a comprehensive development of the site and the consequent viability of the proposal. It is clear that the key benefit of the KN1 allocation and the reason it was selected is the ability to secure a new improved Knowle Football Club. This is made clear in both the policy and supporting text itself and from all the supporting promotional material for the site produced during the various stages of the local plan review to date. The site promoter has focussed throughout the plan preparation stages on this key benefit, as has the Council in allocating the site.
2. However, there is concern in the manner in which the Policy and text is drafted that this key benefit could not be realised and that in fact only the housing North of Hampton Road is ever delivered, leaving the football club issue unresolved. Neither the text or the policy wording itself does anything to prevent this.
3. Given the importance of the above, and the fact that the allocation area is controlled by 3 different landowners, there has to be a concern over delivery and viability of this site, and its soundness should be questioned as a consequence. Paragraph 709 of the Draft Submission Plan already signals this issue noting that some of the Knowle sites have multiple and potentially complex land assembly issues. In fact, both the sites selected in Knowle have this issue.
4. The KN1 proposal could well be unviable, but certainly at the very least it is complex. It is clear from the Policy and the Concept Masterplan produced that the site has some challenges, and most notable are the following:
  - Topography – The site topography is very challenging for the relocation of a football club. Very little of the site is level and the land falls away particularly steeply on its western side towards Purnell's Brook. Significant and costly earthworks will therefore be involved in forming the necessary plateau's for the playing fields. Such earthworks will mean that most of the existing trees and hedgerows on this part of the site will all have to be removed.
  - Site Capacity – The required mitigation to protect the setting of Grimshaw Hall and the Local Wildlife Site has resulted in the site capacity being much reduced from the 2016 Draft Plan. This has to raise viability concerns.

- Timing of club relocation – Any housing on the existing Football Club site on the south side of Hampton Road will not be able to commence until the replacement facilities are constructed and ready for use. This puts a significant cost burden on the early stages of the development.
5. Even if the site is viable, it is clear that it is complex and that much of the housing will not be delivered until the later stages of the local plan period. In circumstances where the site promoters cannot demonstrate during the examination a co-ordinated approach to delivery of the whole site and a high degree of confidence that the relocation of the Football Club is viable, then the site allocation should be considered not sound and removed.
  6. In circumstances where sufficient confidence on deliverability and viability is provided, and in order to then ensure the policy is sound and will secure a comprehensive development of the site, there should be a clear control mechanism in the policy to secure the timing and delivery of the Football Club relocation prior to commencement of any housing development. Given the stated importance of this to the justification for the site coming forward, and the way it has been presented throughout the local plan review process, it is essential that such a secure mechanism is included in the policy to ensure this key benefit is delivered. At planning application stage this will be dealt with through a s106 obligations but the Local Plan must signal more formally that this is a policy requirement.

## **Q6. Specific modifications requested**

1. In circumstances where the site promoters cannot demonstrate during the examination a co-ordinated approach to delivery of the whole site, and a high degree of confidence that the relocation of the football club is viable, then the site allocation should be considered not sound and removed.
2. In circumstances where the above can be satisfied and the policy is retained, the wording of Policy KN1 and accompanying text should be amended to ensure the club relocation is delivered. In these circumstances Policy KN1 be amended as follows:
  - Policy KN1 paragraph 1 should be amended as follows: ***“The site is allocated for 180 dwellings together with the re-provision of Knowle Football Club”***.
  - Policy KN1 paragraph 4(iii) should be amended as follows: ***“The preferred site for the relocation of the existing football club is between the new development and the canal as shown on the concept masterplan. No housing development on any part of the site shall be allowed to commence until such time as the final football club site has been selected, and a commitment and timescale for re-provision is secured.***