



## Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For  
official use  
only)

Name of the Local Plan to which this representation relates:

Solihull Draft Submission Plan

Please return to [psp@solihull.gov.uk](mailto:psp@solihull.gov.uk) or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14<sup>th</sup> December 23:59

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

1. Personal Details*	2. Agent's Details (if applicable)
<i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i>	
Title	Mr
First Name	Joseph
Last Name	Cramphorn
Job Title (where relevant)	Senior Planner
Organisation (where relevant)	Savills UK
Address Line 1	55 Colmore Row
Line 2	
Line 3	
Line 4	Birmingham
Post Code	B3 2AA
Telephone Number	
E-mail Address	

(where relevant)

## Part B – Please use a separate sheet for each representation

Name or Organisation: Hampton Road Developments

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

As written item 6 of the policy goes beyond the requirements set out in the PPG by requiring that developments “should” provide the list of eight enhancements identified.

We have reviewed the Concept Plan that is proposed to be taken forward in relation to allocation KN1 – Hampton Road, Knowle. We have the following comments to make in relation to the Concept Plan:

**Heritage Buffer:** We **object** to the size of the buffer proposed and have had technical work undertaken in relation to this which evidences there is no heritage based justification for a buffer of this size. An alternative buffer informed by heritage and landscape assessments has been devised to provide a suitable buffer, whilst ensuring the setting of Grimshaw Hall is respected. An assessment has been undertaken by two heritage specialists on behalf of HRD and this demonstrates that the Council’s heritage work is unsound and are available for review on request.

We also note that the buffer area is proposed to be used as open space / amenity area. We disagree that this is the most suitable use for this land. It should either be taken forward as development land or left in its current state as farmland.

**Green Belt Boundary:** The boundary shown by the Council follows an existing hedgerow, separating the residential area of the site from the proposed sports fields. We disagree with the Council’s emphasis on the proposed Green Belt boundary providing a “rounding off” of the settlement (paragraph 715 of the Submission Plan). Rather, regard should be had for NPPF paragraph 139 f) states “When defining Green Belt boundaries, plans should... define bounda-

ries clearly, using physical features that are readily recognisable and likely to be permanent”.

On this basis we object to the new Green Belt boundary proposed by the Council. It is clear that Grand Union Canal, having been in place since 1799, can be considered a more permanent feature than a hedgerow which is not currently established the full width of the site. Furthermore, where Knowle Football Club relocate to the area shown as sports pitches, then they will require policy support for structures and facilities which would otherwise be considered “inappropriate development” in the Green Belt. HRD have undertaken a range of technical work including landscape and green belt assessments prepared by Atkins. This technical work concludes the Green Belt boundary should be taken to the Canal as it is a defensible boundary, as defined by the NPPF paragraph 139 f) which references the need to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

We also consider that the Green Belt boundary for the southern site should be extended to the edge of woodland on the boundary of Grimshaw Hall. With the existing football ground planned for residential development the context of the remaining land to the north significantly changes and the remaining land cannot be considered to meet the 5 purposes of including land in the Green Belt. Suitable Green Belt compensation and heritage buffer could be provided here. This no clear defensible Green Belt boundary between the Football Club and the field adjacent to Grimshaw Hall which to justify the Council’s proposed boundary.

We consider that the number of dwellings proposed for the site should read as a minimum, rather than a total. A range of 250 – 275 dwellings could be delivered on the site, as evidenced by a range of technical work. The reduction from the previous 300 capacity proposed is due to the removal of the cricket club site and taking account of the flooding and drainage constraints. With a proper review of the Green Belt boundaries and the site characteristics we consider that an increased capacity should be considered in delivering the Council’s housing need which, as stated in reference to Policy P5, is increasingly (and unnecessarily) reliant on windfall opportunities.

We have submitted a heritage response with these representations. Landscape, Transport and Flooding & Drainage work have also be undertaken to evidence our position.

We note that the Knowle, Dorridge and Bentley Heath Neighbourhood Forum have made representations to the consultation and published them on their website. We note that this makes reference to having regard to the rural setting of Knowle in relation to site KN1. We disagree with this, as the draft allocation sits on the edge of the settlement of Knowle and is visually linked to existing housing across the majority of the site.

We note that 2 ii of the policy sets out a need for provision of 1.4 ha of public open space. We **object** to this requirement being included in the policy, as it not something that can be agreed to a stage without negotiation and progression of the final masterplan.

We **object** to 2 vii and consider this should be deleted, as per our representations to policy 4D.

We note that section 3 of the policy confirms acceptance of the principle of a care home on the site. We support this, but consider that it should be made clear that the provision of C3 dwellings is equally as acceptable in principle.

The reduction of the proposed allocation from 300 dwellings to 180 will have implications on the contributions that can be made to improving, public open space, extra sports facilities and other community improvements.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with

the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The wording in item 6 should remove the word “should” and replace with “could”.

The conclusions drawn by the technical work should be taken into account in the formation of a revised concept plan, as submitted with these representations. It is this concept Plan that we consider the Council should take forward to guide development of the site going forward. Whilst we support the draft allocation of 180 dwellings, we consider that if the Green Belt boundaries were amended to more permanent features then the allocation would be more effective and deliver a further 70 – 95 dwellings.

The policy should be amended taking on board the findings of this technical work, which demonstrates in a concept plan the potential to deliver A range of 250 – 275 dwellings

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To provide oral evidence and engage in the Examination discussions on this matter.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

[Redacted Signature]

Date:

14/12/20