

Representations to Solihull Local Plan - Draft Submission Stage, October 2020

Representations Submitted on behalf of IM
Properties

December 2020

Contents

1.	Introduction	1
2.	Approach to Strategic Employment Land Provision	2
3.	Blythe Valley Park	9
4.	Mell Square	11
5.	Fore Business Park	14
6.	Summary and Conclusions	15
Appendix 1: Land to the East of BVP – Site Location Plan		17

Angela Reeve

Client

IM Properties (BVP3) Limited

Our reference

IMPQ3016

10 Dec 2020

1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of IM Properties Limited (hereafter referred to as 'IM') in response to the Solihull Local Plan, Submission Draft (SLPSD) which was published for consultation in October 2020.
- 1.2 IM has a number of important assets within the Solihull area, including Blythe Valley Park, Mell Square, and Fore Business Park which now contains the International HQ of IM.
- 1.3 IM Land also has existing and emerging land interests within the Borough, and these are the subject of separate representations.
- 1.4 Each of IM's assets has the opportunity to assist the Council in delivering its vision for the Borough through the creation of new jobs, an enhanced town centre offer, investment opportunities, and new residential development to meet the identified need for housing.
- 1.5 Having undertaken a detailed review of the SLPRSD, these representations set out IM's position in terms of the Council's approach to strategic employment (and more specifically industrial) land matters, drawing on the supporting evidence where necessary, and providing specific commentary on those policies that relate specifically to IM's key assets.
- 1.6 The report is structured as follows:
 - Section 2: Approach to Strategic Employment Land Provision – this section identifies the key strategic concerns that IM have with the approach that has been taken to strategic employment land matters.
 - Section 3: Blythe Valley Park – sets out comments relating specifically to Blythe Valley Park, the evidence base for this allocation, and proposed wording of related policies. This includes commentary on land located to the east of the M42.
 - Section 4: Mell Square – this section sets out IM's comments in respect of the evidence base documents (notably the draft Solihull Town Centre Masterplan (2020)) and proposed policies relevant to Mell Square.
 - Section 5: Fore Business Park – provides comments that relate specifically to Fore Business Park and surrounding land within IM's control.
 - Section 6: Summary and Conclusions
- 1.7 It is relevant to note that IM has made representations to all previous stages of the Plan preparation. They remain keen to be engaged with SMBC on the topics outlined within these representations and would welcome the opportunity to present their case at Examination as appropriate.

2. Approach to Strategic Employment Land Provision

- 2.1 IM strongly supports the statement at paragraph 25 of the Submission Draft:

“Solihull is at the heart of the national rail and motorway network with direct rail services to London, Birmingham and the north along the West Coast and Chiltern Mainlines and has excellent access to other regions in the UK through the M42, which links the Borough to the M6 at the northern boundary of the Borough and the M40 to the south. This strategic transport infrastructure, together with Birmingham Airport, has ensured the Borough is the principal national and international gateway to the GBSLEP area and the wider West Midlands area.”

- 2.2 This is to be consolidated with the arrival of HS2 and UK Central (UKC) is quite rightly at the heart of the Council’s Vision for the economy by 2036, stating *“It will have taken advantage of the unique opportunity to maximise the economic and social benefits of the High Speed 2 rail link and interchange both for the Borough and wider area; reflecting the Borough’s location at the heart of the national rail and motorway network.”*

- 2.3 IM Properties strongly supports this as three of its assets in Solihull form part of UKC – Blythe Valley Park (BVP) and Fore Business Park at J4 of the M42 and Mell Square in the town centre. It is evident from the strong occupier interest IM has experienced since acquiring BVP and Fore that the statement in paragraph 71 of the Submission Draft chapter on Sustainable Economic Growth is also true:

“The attractiveness of the Borough to businesses and investors is set to take a significant leap forward with the arrival of the high speed rail link and the Interchange station that is to be accommodated in the Borough.”

- 2.4 This is on top of an already buoyant industrial market in the M42 corridor, which IM Properties has experienced at BVP (Connexion) and its other sites such as Birch Coppice at J10 and Peddimore, off J9. IM also moved its headquarters from its Coleshill Manor Office Campus between J7 and J8 due to the line of HS2 cutting through the site, to Fore Business Park in Solihull. It is a market the company knows very well and it has seen a marked upturn in the last decade for both offices and industrial/warehousing.

- 2.5 The Submission Draft plan sets out SMBC’s proposals for the ongoing supply of employment land in Policy P3 which adopts a plan-monitor-manage approach, confirming the allocation of remaining plots on existing sites including Blythe Valley and Fore (which we comment on elsewhere in these representations) and allocating two wholly new sites as a part of the UKC Hub – land at the HS2 Interchange (Policy UK1) and land at Damson Parkway (Policy UK2).

- 2.6 Together these two new allocations at 140ha and c94ha respectively far outweigh the relatively modest supply from existing sites of around 12ha.

- 2.7 Part of the UK2 site is being developed by JLR for a despatch centre and the balance is *“allocated for employment development to meet local employment needs, needs associated with the key economic assets in the UK Central Solihull Hub Area, and for a potential relocated Household Waste and Recycling Centre and Depot”* (Policy UK2).
- 2.8 The supporting text at paragraph 859 says that the site will meet ‘local’ needs including for JLR and JLR related activities and ancillary development for the Airport.
- 2.9 To understand more how this allocation has come about and contribute towards the vision in the local plan, it is necessary to look at the HEDNA.

Evidencing the need for industrial and warehousing land

- 2.10 The NPPF makes explicitly clear the importance of providing for *‘storage and distribution operations at a range of spatial scales and in suitably accessible locations’* through *‘planning policies and decisions’* which *‘recognise and address the specific locational requirements’* of the sector¹.
- 2.11 The PPG further emphasises that:
- “The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)”²*
- 2.12 It recognises that these requirements range from *‘strategic facilities serving national or regional markets’* through to *‘last mile facilities serving local markets’*, with the former in particular requiring *‘significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled labour’³*.

The HEDNA’s calculation of local need

- 2.13 The Council’s Sustainable Economic Growth Topic Paper, dated October 2020, cites the conclusion of the Housing and Economic Development Needs Assessment⁴ (HEDNA) that *‘there is a shortfall of 26,300 square metres of industrial/warehousing floor space, equating to between 5.2 and 6.6 hectares of land’⁵*.
- 2.14 The conclusion that there exists a shortfall of land to meet the needs of businesses requiring industrial and warehousing space in Solihull is considered to accurately reflect evidence of market need and demand, and anticipated requirements over the

¹ MHCLG (2019) National Planning Policy Framework, paragraph 82

² PPG Reference ID 2a-031-20190722

³ *Ibid*

⁴ GL Hearn with Icen Projects (2020) Housing and Economic Development Needs Assessment: Solihull Metropolitan Borough Council

⁵ Solihull Metropolitan Borough Council (2020) Sustainable Economic Growth Topic Paper, paragraph 75

plan period. Indeed, the scale and immediacy of this demand is recognised in the HEDNA which states that:

“Market feedback and intelligence shows a very strong demand for warehousing and industrial needs across the spectrum but focused on mid to larger units rising from 10,000 sqft and notably at 50,000 sqft to 100,000 sqft. This is concentrated in the M42 reflecting the national rise in e-commerce and the connectivity of the Midlands. This is not solely B8 but also a range of technology related and supported B Class employment uses that also seek the Solihull skilled labour offer”⁶

- 2.15 This sentiment is reflected in IM’s recent experience of the logistics market in Solihull, however, IM is concerned that the calculation of need presented within the HEDNA serves to underestimate – by a potentially significant amount – the full local need for warehousing and industrial land.
- 2.16 In calculating the shortfall, the HEDNA notably relies heavily on one of its three modelled scenarios of need and demand, which suggests a need for 16 hectares (ha) of such land. This scenario is based on an extrapolation of historic change in the stock of employment space over the longer-term (2001-19) using publicly available data from the Valuation Office Agency (VOA). A flexibility margin is also applied, equivalent to two years’ average growth in stock.
- 2.17 Such an approach is considered to be justified in the context of the PPG, in principle, albeit there are unfortunately a number of shortcomings to the specific method used by the HEDNA namely:
- Tables 101 and 102 appear to contain errors, incorrectly transposing the VOA data cited at Table 100;
 - The decision to use only a two year margin is insufficiently justified where it is commonplace to apply a more generous five year margin, to ensure sufficient flexibility in the supply calculated as being needed; and
 - There is insufficient justification for the dismissal of recent evidence of much stronger growth in the industrial stock, when focusing on the period back to 2011 rather than the longer-term period back to 2001.
- 2.18 More recent growth is a reflection of structural changes in the distribution and retail/ e-commerce markets which, as noted above, are acknowledged within the HEDNA. In this context, it must be recognised that the UK has emerged as the third largest online shopping market in the world and the largest in Europe⁷. Take-up continues to grow to the extent that the internet has accounted for as much as 33p in every pound spent on retail in Great Britain, and while this peak occurred in the midst of the pandemic (May

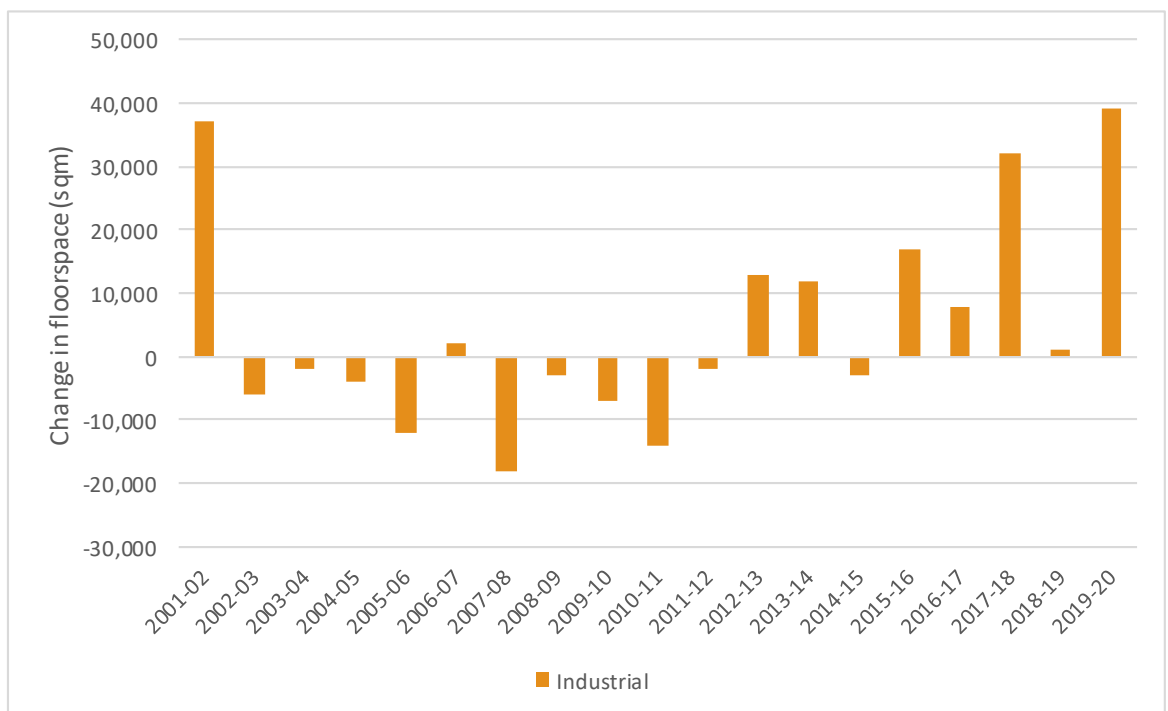
⁶ GL Hearn with Icen Projects (2020) Housing and Economic Development Needs Assessment: Solihull Metropolitan Borough Council, paragraph 12.57

⁷ Ofcom (2019) Online Nation: 2019 report

2020), the rising trend has been evident for some time; around 21p/£ was spent online in December 2019, for example, compared to 7p/£ ten years earlier⁸.

- 2.19 It is also important to recognise in this context that the demand for logistics space is directly related to changes in the size of the population. The HEDNA confirms, with reference to various scenarios, including one developed to incorporate the impact of investment at the UKC Hub, that the population of Solihull is projected to increase significantly. The link between homes and warehousing, both in terms of quantum and location has recently been evidenced in research published by the British Property Federation⁹. As the population grows, there is likely to be a corresponding increase in consumer demand and the need for warehouse space. Figure 2 of the HEDNA confirms that the population of Solihull has grown at a greater rate over more recent years, with Figure 9 suggesting that the rate of growth will increase to an even greater extent when meeting even the minimum need for housing implied by the standard method.
- 2.20 The impacts of these shortcomings are considered below using VOA data, as deployed in the HEDNA, albeit noting that an additional year of data – running to March 2020 – has become available since its analysis was completed. This latest year of data has been included here to ensure our analysis is up-to-date.
- 2.21 Figure 1 shows the annual net change in industrial/warehouse floorspace over the period from 2001 to 2020.

Figure 1: Change in industrial floorspace (sqm)



Source: VOA

⁸ ONS (2020) Retail Sales Index internet sales, October 2020

⁹ BPF (2019) What Warehousing Where? Understanding the relationship between homes and warehouses to enable positive planning

- 2.22 With the exception of 2001/02, it is clear that this shows a rising trend in the past decade. Indeed, last year’s data (2019/20) shows a new record level of growth, with a net increase of 39,000sqm of industrial floorspace. This means that a continuation of the short-term trend would see more pronounced growth than the longer-term trend, as indeed was observed by the HEDNA in comparing its own short-term average – calculated over the period from 2011 to 2019 – with the considerably lower long-term average, which looks back to 2001 and thus incorporates a period of stasis.
- 2.23 Accounting for the record growth seen last year would raise the annual average presented in the HEDNA to **4,700sqm** over the long-term (2001-20) and **13,000sqm** over the short-term (2011-20).
- 2.24 Extrapolating these annual rates in a comparable manner to the HEDNA, to produce its estimates of future need at Tables 101 and 102, suggests a greater need for industrial and warehousing land. Even a continuation of the longer-term trend could generate a need for 19ha of such land, but this rises to 52ha where the increasingly positive short-term trend is assumed to continue.

Table 1: Range of employment land need – VOA long / short-term scenarios

	Long-term trend (2001-20)	Short-term trend (2011-20)
Average annual growth	4,700	13,000
Extrapolated over 16 year plan period	75,800	208,000
Extrapolated over <u>18</u> years, to provide a flexibility margin of two years	85,300	234,000
Associated need for land¹⁰	19.0	52.0

Source: VOA; Turley analysis

- 2.25 This clearly suggests a greater need than the 16ha concluded in the HEDNA. Even where it was considered that the trend based on the short-term will not be sustained in the long-term, it would be reasonable to conclude that a more representative position would fall somewhere within this range. It is considered, however, that in the context of the evidence relating to sustained growth of e-commerce and a projected strong local growth in population that the upper end is more likely to represent a reasonable level of need to be planned for, to ensure the plan’s resilience.
- 2.26 Even the lower end of this range more closely aligns with the outcome of another of the scenarios presented in the HEDNA - based on an adjusted economic forecast and presented as the “Labour Demand Growth Scenario”. This suggests a need for 19.1ha across industrial and warehousing uses (B1c/B2/B8) and is intended to take a more positive economic outlook, which reflects local sector strengths and builds upon a baseline forecast. The alignment between the two scenarios and the positive economic

¹⁰ Applying blended plot ratio (0.45) understood to have been used in the HEDNA

objectives of the Plan further reinforce the importance of considering such a level of need as an absolute minimum from which to build, in ensuring that the supply of land will support the borough's growth potential.

- 2.27 Furthermore, it is commonplace to apply a more generous flexibility margin equivalent to five years of past take-up. If this was applied to the updated VOA scenarios presented above, this would elevate the range to between 22.1 and 60.7ha.
- 2.28 This strongly indicates that the shortfall in industrial land to which the Plan should respond, in quantitative terms alone, is much higher than concluded in the HEDNA. This would in turn suggest that the Plan should take a more positive and flexible approach in identifying additional land to accommodate such uses over the plan period.

Strategic needs

- 2.29 The analysis within the HEDNA is presented as representing a calculation of 'locally derived' needs for new commercial floorspace and employment land with reference to the three scenarios presented.
- 2.30 The inference is that the UKC Hub employment growth scenario and related developments at UK1 and UK2 are intended to accommodate a combination of both local and strategic needs, thereby generating a greater need and also to an extent providing for larger than local demand. This is recognised on the final page of the HEDNA which advises the Council to:
- "...continue to provide supply according to the demand figures supplied in this study, as the floorspace provided in the UK Central Growth Hub will be more regional in focus although it is expected to facilitate some local employment growth above the baseline"¹¹*
- 2.31 The HEDNA sets out assumptions around the employment floorspace to be developed as part of the UKC Hub at Table 25. This confirms that the majority of space is assumed to be either Office / R&D (201,602 sqm) or Industrial (131,414 sqm). A relatively small proportion is expected to be Warehouse space (92,900 sqm), with this understood to relate in no small part to the expansion of the JLR distribution centre.
- 2.32 The HEDNA also confirms its assumption that 10-25% or 10-25,000 sqm might be delivered as general industrial / warehousing floorspace for the market post 2025. It concludes in this regard that *'this will be subject to change but could assist in absorbing some unmet local warehousing needs as forecast'*¹². As such, while there is clearly a component of strategic provision accounted for within the floorspace planned at UKC Hub, this is comparatively modest when accounting for growth plans.
- 2.33 This is important when considered in the context of an acknowledged sub-regional shortage in the provision of strategic employment sites in this market area. This

¹¹ GL Hearn with Icen Projects (2020) Housing and Economic Development Needs Assessment: Solihull Metropolitan Borough Council, page 211

¹² *Ibid*, paragraph 12.52

reflects the conclusion of the 2015 West Midlands Strategic Employment Sites Study¹³ (WMSESS) which highlighted an immediate need for additional sites across the region to address the exhaustion of existing supply, much of which was originally allocated in the 1990s and early 2000s (including Birmingham Business Park and Blythe Valley Park). It was noted in the study that these sites were expected to be over and above provision to meet local needs.

- 2.34 As the HEDNA recognises, an updated second stage of the WMSESS is awaiting publication with a final draft in circulation. It is anticipated that this will reaffirm the immediate shortage of strategic employment sites, with a specific focus on the M42 corridor including Solihull.
- 2.35 The draft Plan does not adequately acknowledge or respond to this need for strategic sites and when the study is published and identifies such a need, it will be necessary for the Plan to engage with the issue positively.

Conclusion on Strategic Employment Land

- 2.36 IM is fully supportive of the Council's economic vision and the role of UKC at its heart. However, it considers the employment land supply set out in Policy P3 to be inadequate to meet the longer term needs of the borough for industrial and warehousing land. This is based on two premises:
- (a) The HEDNA underestimates local industrial and warehousing need by some margin
 - (b) The plan does not address the acknowledged need for strategic employment sites based on the 2015 study
- 2.37 The plan is unclear about the role of the land at Damson Parkway in Policy UK2 which, at one level, is significant in terms of site area when measured against the HEDNA's assessment of local need, but in policy terms is identified as capable of meeting the specific and unique needs of JLR and/or the airport. What proportion is expected to meet local needs or, whether as part of UKC Hub, it is in effect a strategic site requires clarification.
- 2.38 In either event, market evidence points to a need to identify a more robust supply of industrial and warehouse land as there are very unlikely to be any windfall sites and the only other option would be to consider removal from the Green Belt which should take a plan-led approach.

¹³ PBA/JLL (September 2015) West Midlands Strategic Employment Sites Study

3. Blythe Valley Park

- 3.1 IM acquired Blythe Valley Park (BVP) in 2015, and secured hybrid planning permission for a major mixed use scheme in 2017. Since this time the site has proven incredibly successful, and permission has been secured for all residential plots on the wholly residential part of the site, and on the majority of the commercial plots.
- 3.2 The commercial elements of the scheme have attracted industry leading occupiers, a number of which have now made BVP their Headquarters location. These include Gymshark, Lounge Underwear, ZF, and Prologis. The buildings that have been developed are of the highest design quality and are set within landscaped surroundings that provide exceptional well-being benefits.
- 3.3 BVP therefore makes a significant contribution towards meeting Challenge D as set out within the SLPDS. It also forms a critical part of the wider UK Central Solihull Hub area and has a proven track record in demonstrating delivery of new jobs. Following significant development in the past five years, BVP currently supports in excess of 3,500 jobs.

Existing BVP Site

- 3.4 IM are pleased to see that the SLPRDS Plan continues to provide policy support for the ongoing development of Blythe Valley. In particular, Policy P1A and its supporting text outline what is expected of future development.
- 3.5 It is important that, given current market uncertainties, maximum flexibility is contained within policy P1A to enable the development to continue to evolve to reflect market demand. As drafted, the policy makes reference to a broad range of the types of uses that could be brought forward, but it is important that this is not seen as an exhaustive list. In particular, it should be made clear within the policy wording that a wide range of employment activities will be supported including offices, industrial and warehousing, but also including research and development and other 'non-traditional' employment uses.
- 3.6 We note that reference is made in clause (5) to the expectation that "*new facilities, including the residential element of Blythe Valley Park, to be developed...*". However, as noted above, the wholly residential part of the site is now subject to reserved matters approvals. It may therefore be appropriate to remove reference to "the residential element of Blythe Valley Park" from this policy.
- 3.7 Within the supporting text to Policy P1A, reference is made at Paragraph 110 to "*an area of land of some 7 ha remaining to be developed*". It should be noted that this figure is incorrect, and should instead read 3 hectares. Amendments should be made to the Plan in this regard to ensure that it is sound, and any references within the Council's evidence base updated accordingly. IM are already formulating plans to develop out the remaining land at BVP during 2021, at which point there will be no developable employment land along the A34 corridor, which Solihull regard as one of their primary economic corridors.

- 3.8 Paragraphs 111 and 112 of the supporting text make reference to various expectations that the Council have of any development at BVP. Given the extent of development that has now been brought forward, we consider that this supporting text should be updated to better reflect the current position with the site.

Land to the East of the M42

- 3.9 As has been set out in previous representations to the Plan, IM also control an area of land to the east of the M42. This land is bound by the BVP estate road to the south, the A3400 to the east, and the M42 to the west. To the north is the Monkspath Interchange (M42 Junction 4). It is relevant to note that there remains a live application to the north east of the roundabout for a new motorway service station. A site location plan is provided at **Appendix 1** of these representations.
- 3.10 Whilst the site lies within the Green Belt, it is considered to be in a suitable location for further employment uses. In particular, the ease with which the motorway network can be reached would make it attractive to a number of potential occupiers, and would contribute to the cluster of high quality employment uses that have developed in this location, based at both BVP and Fore Business Park.
- 3.11 Whilst the site was not specifically considered within the PBA Employment Land Review report in 2017, it has many of the same characteristics as the wider BVP site. It therefore has strong potential to form part of the wider BVP scheme, and benefit from the facilities provided within the Park. Furthermore, the site's location adjacent to the M42 would further support the case for Solihull capturing demand from beyond the Travel to Work Area.
- 3.12 Following representations made to previous versions of the Plan, it would appear that the site has now been assessed within the draft 2020 SHELAA (forming part of sites 346a and 346c). It is noted that the site has the potential to deliver a strategic distribution park of circa 3.99 hectares in size. The SHELAA confirms that there would be 'good' demand attractiveness to occupiers.
- 3.13 Based on our representations contained in Section 2 of this report, it is considered that there is a greater need for employment sites within the Borough than have currently been identified. It is therefore respectfully requested that further consideration is given to the potential of this site to meet the need identified within Section 2.

4. Mell Square

- 4.1 IM own Mell Square in Solihull Town Centre and have invested significantly in the asset during their ownership. This includes the redevelopment of part of the scheme to provide for new retail, restaurant and commercial uses.
- 4.2 IM are committed to continuing to improve and reinvigorate Mell Square and contribute towards wider improvements to Solihull Town Centre. This will be increasingly important as the high street recovers from the impacts of Covid, and the acceleration of a trend towards increased online shopping.
- 4.3 A key part of any improvements to Mell Square will need to be driven through a diversification of the uses that are currently found there. IM are therefore supportive of the principles set out within Challenge D in the Plan that relate to Solihull Town Centre as a whole. In particular, references to the need for *“widening the range of uses and activities to main and enhance attractiveness...”*, and to *“allow for restructuring post Covid and the new economic landscape”*, provide a clear basis upon which future redevelopment proposals will be considered.
- 4.4 The role of the Town Centre in supporting the wider UK Central Hub area is also set out within Policy P1 of the Plan. The supporting text to this policy, at paragraph 85 further reinforces the importance of flexibility in the context of the likely delivery timescales, however, this flexibility should be equally applied in the context of changing investor and occupier demands.
- 4.5 Solihull Town Centre is specifically addressed within Policy P2, and its supporting text. It is noted that no specific reference is made to Mell Square within this policy.
- 4.6 Clause (7) of Policy P2 states that *“A range of opportunity sites will be identified under this policy”*. However, it is not clear where these sites will be identified. There seems to be no link made to the emerging Town Centre Masterplan, and it is not clear whether it is intended that the Masterplan will contain relevant information about these ‘opportunity sites’.
- 4.7 IM would suggest that clause (7) is clarified, and that reference is made to the Town Centre Masterplan or any other documents as appropriate.
- 4.8 The supporting text to Policy P2 provides further detail. As an overarching comment, we would note that this supporting text is inconsistent in how it refers to the ‘Town Centre’. For example, at paragraph 116, bullet four, reference is made to the ‘Heart of Solihull’ area, but it is not clear from the text what area this relates too.
- 4.9 Paragraph 116 of the Plan sets out a list of the *“primary retail frontages”* where retailing activity should remain the main street level use. Specific reference is made within bullet four of point two to ‘Mell Square’.
- 4.10 In the context of the changing retail market, IM are concerned that this approach to protecting retail frontage is too restrictive to allow delivery of the flexibility that is referred to within the main Policy. The NPPF is clear that policies should (paragraph

85) allow for town centres to “*grow and diversify in a way that can respond to rapid changes in the retail and leisure industries*”.

- 4.11 In IM’s view, it would be more appropriate for this supporting text to refer to ‘active uses’ rather than ‘retail use’. This would allow for alternative uses to be brought forward that would retain street level activity, and thereby contribute to the vibrancy of the centre.
- 4.12 The remainder of the supporting text refers to the Town Centre Masterplan. This is a document that has been prepared in the period since 2016, and which was most recently (November 2020) considered by SMBC’s Cabinet for incorporation as part of the evidence base for the Local Plan.
- 4.13 IM welcome the preparation of the masterplan, and the additional guidance that this gives in terms of more specific proposals and high level design parameters for Mell Square.
- 4.14 For the avoidance of any doubt, we would suggest that reference to the Masterplan being “updated by the end of the year” (paragraph 120) are removed. This will avoid any confusion once the Plan and the Town Centre Masterplan document are adopted.
- 4.15 There appear to be inconsistencies between figures quoted within the SLPDS Plan, and the Town Centre Masterplan. In particular, at paragraph 128 of the Plan states that:
- “The Draft Local Plan then went on to identify which of the 1,500 new homes could reasonably be expected to be delivered in the plan period, and by identifying particular opportunity sites concluded that 861 homes would be deliverable in the plan period,”*
- 4.16 The presence of a comma at the end of this paragraph may indicate that it was intended to further clarify the position with further text. This would be welcomed by IM, to avoid any confusion regarding what level of delivery is anticipated during the Plan period. Any clarification should also flow through to the “*Solihull Housing Land Supply 2020-2036 (As of 1st April 2020)*” table on page 69 of the Plan.
- 4.17 It is relevant to note here that IM have had some early feasibility work undertaken to look at the potential capacity for residential development as part of a new scheme for Mell Square. This early work has indicated that early phases of the development alone (broadly aligning with the ‘Northern Quarter’ identified in the Solihull Town Centre Masterplan) could deliver approximately 400 units. This could potentially make a significant early contribution to the reinvigoration of the Town Centre.
- 4.18 Paragraph 129 of the supporting text makes reference to an economic appraisal and market analysis undertaken by Amion in 2020. IM were not directly consulted as part of the 2020 Masterplan Refresh, but having reviewed Amion’s report it is noted that reference is made to the potential for 50,000 sq metres of office floorspace to be brought forward within the Town Centre. In the context of current and forecast market conditions IM consider this to be an ambitious target. It is therefore important that the Plan and the Town Centre Masterplan contain sufficient flexibility to allow for this to ‘shift’ to other uses if it can be demonstrated that there is a need for them.

- 4.19 More widely within the SLPDS Plan, Policy P4a and the supporting text to Policy P4c make specific reference to the fact that town centre residential development may result in a different mix, type or size of housing being provided by new development in these locations. This acknowledgement is welcomed by IM, and further supports the importance of providing overall flexibility within the Plan to respond to market conditions.
- 4.20 Policy P9 ‘Mitigating and Adapting to Climate Change’ sets out an expectation that development within the Town Centre should contribute towards “*existing or planned district energy and/ or heat networks*”.
- 4.21 Given the pace of change within the sustainable energy sector, IM would suggest that to ensure this policy is future-proofed over the life of the Plan period, text should be added to the end of clause (2iv) that reads “*or other suitable sustainable/ low carbon energy solution*”. This would support the ambitions of the Government, as set out within the NPPF (paras 149 – 151).

Conclusions in respect of Mell Square

- 4.22 IM welcome the proposed Policies in respect of Mell Square, and particularly the intention to build flexibility into the policies and supporting text to allow for the continued evolution of this important part of the Town Centre.
- 4.23 A number of amendments are proposed to the wording of Policies and supporting text within the Plan to provide further clarity and flexibility. These amendments are proposed in the context of a changing retail and commercial market, and to ensure the longevity of the Plan.

5. Fore Business Park

- 5.1 Fore Business Park is a major office development, located off Junction 4 of the M42. It has been in IM's ownership since 2014. The site comprises a number of office buildings, and a Country Park which is maintained and managed by IM.
- 5.2 IM relocated their Campus Headquarters from Coleshill Manor to a new purpose built campus at Fore Business Park in 2019. The HQ buildings are of the highest design quality and have won awards both for their internal and external design. Visitors to the building often arrive from international destinations, and therefore makes a significant contribution to delivering the aspirations of the UK Central Hub.
- 5.3 More widely the park is home to a broad range of commercial occupiers. The most recent addition being an additional building for Collins Aerospace, which combines research and development activities with more traditional office space.
- 5.4 Fore Business Park is an existing allocation in the Plan, under Policy P1. It is noted that page 233 of the SLPDS Plan sets out that those parts of Policy P3 of the 2013 Solihull Local Plan that relate to Fore Business Park are also proposed to be retained as part of the new Plan.
- 5.5 Whilst IM are very supportive of this allocation, it is relevant to note that given the success of the current park, and that much of the floorspace approved through previous planning permissions has been built out, it is unlikely that any significant further floorspace would be brought forward within this location. This is further reinforced by the presence of Green Belt to the north of the site, preventing any significant future expansion in this direction.

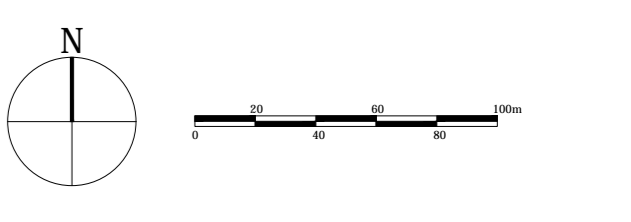
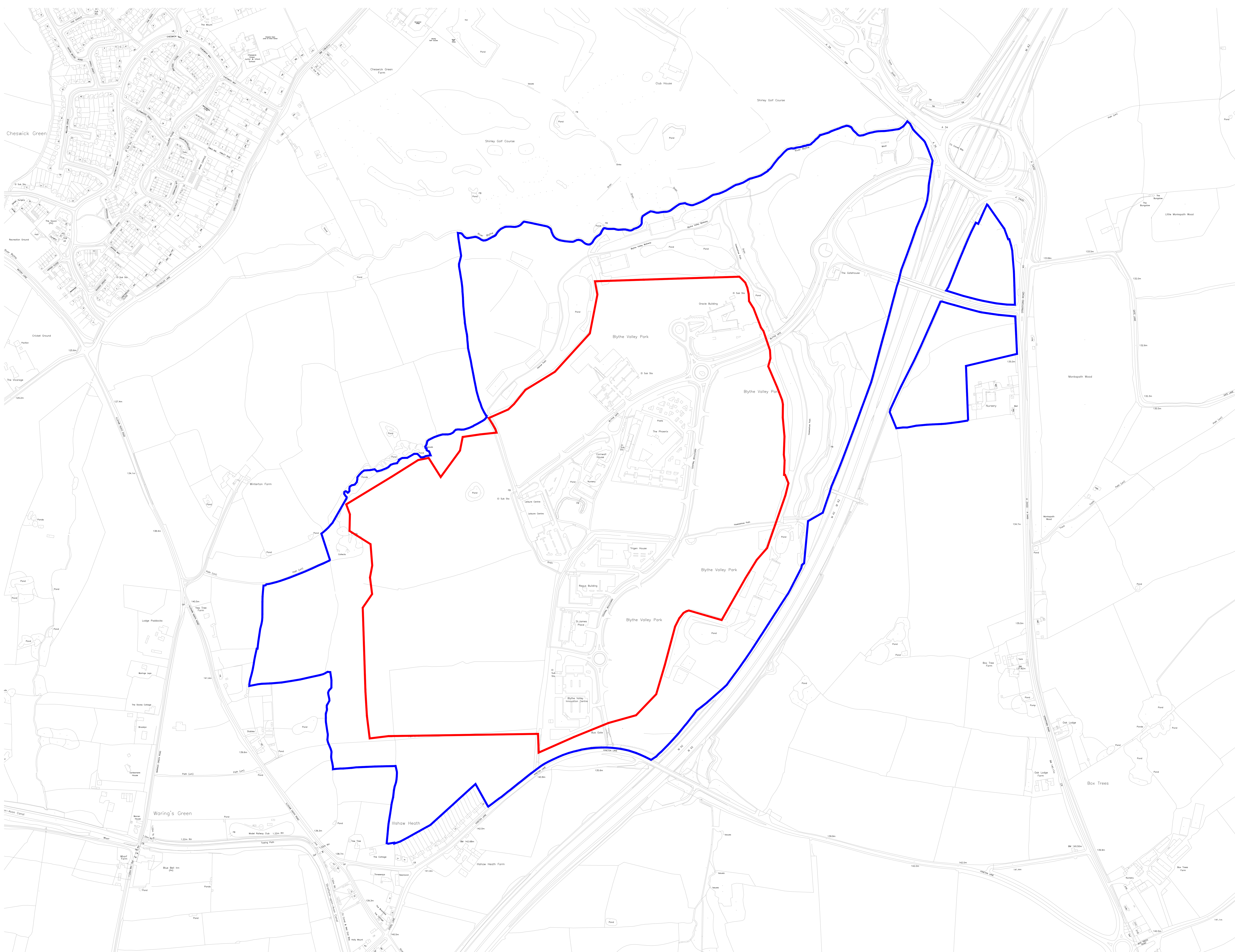
6. Summary and Conclusions

- 6.1 These representations are submitted on behalf of IM in response to the Solihull Local Plan Draft Submission Plan consultation. The representations consider the strategic issue of employment land provision, and then specific commentary in respect of IM's existing assets in Solihull.
- 6.2 The representations are based on a review of the Council's updated evidence base, as well as the Policies and supporting text set out within the draft Plan.
- 6.3 In broad terms, IM are supportive of the broad direction of travel of the Plan. However, the representations set out a number of comments that it is considered are necessary to be addressed to make the Plan sound.
- 6.4 IM is fully supportive of the Council's economic vision and the role of UKC at its heart. However, it considers the employment land supply set out in Policy P3 to be inadequate to meet the longer term needs of the borough for industrial and warehousing land. This is based on two premises:
 - (a) The HEDNA underestimates local industrial and warehousing need by some margin
 - (b) The plan does not address the acknowledged need for strategic employment sites based on the 2015 study
- 6.5 The plan is not clear about the role of the land at Damson Parkway in Policy UK2 which, at one level, is significant in terms of site area when measured against the HEDNA's assessment of local need, but in policy terms is identified as capable of meeting the specific and unique needs of JLR and/or the airport. What proportion is expected to meet local needs, or whether as part of UKC Hub it is in effect a strategic site requires clarification.
- 6.6 In either event, market evidence points to a need to identify a more robust supply of industrial and warehouse land as there are very unlikely to be any windfall sites and the only other option would be to consider removal from the Green Belt which should take a plan-led approach.
- 6.7 IM are pleased to see that the SLPRDS Plan continues to provide policy support for the ongoing development of Blythe Valley. In particular, Policy P1A and its supporting text outline what is expected of future development.
- 6.8 It is important that, given current market uncertainties, maximum flexibility is contained within policy P1A to enable the development to continue to evolve to reflect market demand. As drafted, the policy makes reference to a broad range of the types of uses that could be brought forward, but it is important that this is not seen as an exhaustive list.

- 6.9 Within the supporting text to Policy P1A, reference is made at Paragraph 110 to “*an area of land of some 7 ha remaining to be developed*”. It should be noted that this figure is incorrect and should instead read 3 hectares.
- 6.10 As has been set out in previous representations to the Plan, IM also control an area of land to the east of the M42. Whilst the site lies within the Green Belt, it is considered to be in a suitable location for further employment uses.
- 6.11 The site has been assessed within the draft 2020 SHELAA (forming part of sites 346a and 346c). It is noted that the site has the potential to deliver a strategic distribution park of circa 3.99 hectares in size. The SHELAA confirms that there would be ‘good’ demand attractiveness to occupiers.
- 6.12 Based on our representations contained in Section 2 of this report, it is considered that there is a greater need for employment sites within the Borough than have currently been identified. It is therefore respectfully requested that further consideration is given to the potential of this site to meet the need identified within Section 2.
- 6.13 IM welcome the proposed Policies in respect of Mell Square, and particularly the intention to build flexibility into the policies and supporting text to allow for the continued evolution of this important part of the Town Centre.
- 6.14 A number of amendments are proposed to the wording of Policies and supporting text within the Plan to provide further clarity and flexibility. These amendments are proposed in the context of a changing retail and commercial market, and to ensure the longevity of the Plan.
- 6.15 IM remain keen to engage with SMBC on the topics outlined within these representations, and would welcome the opportunity to present their case at Examination as appropriate.

Appendix 1: Land to the East of BVP – Site Location Plan

Legend:
Land Ownership Boundary (Blue line)
Local Plan Allocation Boundary (Red line)



Project
Blythe Valley Park

Drawing Title
Site Location Plan

Date 22.01.16	Scale 1:2500@A0	Drawn by KU	Check by CJB
Project No 25365	Drawing No 9001	Revision A	

BARTON WILLMORE
Planning • Master Planning & Urban Design
Architecture • Landscape Planning & Design • Project Services
Environmental & Sustainability Assessment • Graphic Design
bartonwillmore.co.uk

Turley Office
9 Colmore Row
Birmingham
B3 2BJ

