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14 December 2020

Planning Department  
Solihull Metropolitan Borough Council  
Manor Square  
Solihull  
B91 3QB

Dear Sir / Madam

## **REPRESENTATIONS BY THE URBAN GROWTH COMPANY ON THE SOLIHULL LOCAL PLAN – DRAFT SUBMISSION PLAN**

### **Introduction**

The Urban Growth Company (UGC) is taking the opportunity to prepare and submit representations on the Draft Submission Plan (October 2020) in connection with the Solihull Local Plan prepared by Solihull Metropolitan Borough Council (SMBC).

The Draft Submission Plan was issued for consultation on the 30 October 2020 and representations can be made on this until the 14 December 2020. This consultation is undertaken pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and provides a final opportunity to make representations on the emerging plan prior to the plan being submitted to the Planning Inspectorate for independent examination.

Representations were made previously by the UGC in respect of the consultation on the draft Solihull Local Plan Review undertaken in December 2016 and the subsequent Supplementary Consultation in January 2019. **The UGC continues to fully support and welcome the Local Plan and corresponding policy and allocation for the UK Central Hub, without which the wider potential economic and social benefits presented by High Speed 2 (HS2) and Interchange Station would fail to be realised.** The purpose of these representations is to reiterate the comments made in the previous consultations in relation to the Draft Submission Plan and the updated evidence base.

Examination in Public (EiP) is currently expected to take place in 2021 and the UGC would like to reserve the right to attend the EiP and relevant Hearing Sessions pursuant to their interests in connection with the UK Central Hub and associated developments.

### The Urban Growth Company and the UK Central Hub

The UGC is a special purpose delivery vehicle formed by SMBC and supported by the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the West Midlands Combined Authority (WMCA). The UGC is a critical catalyst for growth and seeks to ensure that the full economic and development potential of the UK Central Hub is delivered to maximise investment potential and secure prosperity for local people and the wider region.

UK Central is a prime inward investment location and has a critical role in facilitating economic development across the West Midlands region and UK as a whole. UK Central consists of the following four interconnected economic opportunity areas across the Borough, as per Figure 1 below:

- Area 1** (The Hub)
- Area 2** (North Solihull)
- Area 3** (Solihull Town Centre)
- Area 4** (Blythe Valley Business Park)

The UK Central Hub is a 1,300-hectare site home to several national and regional operations, including Birmingham Airport, the National Exhibition Centre (NEC), Jaguar Land Rover, Birmingham Business Park, Birmingham International Station and the Arden Cross site. The UGC seeks to align the interests of these key stakeholders with their vision for the UK Central Hub as part of a partnership approach to regeneration and a programme of ongoing investment for improved connectivity in the area.

**Figure 1** The UK Central Hub



The UK Central Hub Growth & Infrastructure Vision (2019) and Framework Plan (2018) set out phased growth ambitions for The Hub up to 2032 and beyond, and form part of the evidence base for the Local Plan. It establishes a vision and necessary infrastructure requirements and concludes that The Hub has the potential to support the delivery of world class development.

The Growth & Infrastructure Vision explains that the UK Central Hub will be a major growth accelerator as a result of the unique cluster of national and international transport infrastructure. It also sets out the phased growth strategy for The Hub through the identification of key infrastructure requirements and development opportunities, which, because of their unique location, will result in the provision of the following benefits:

- The maximisation of transport systems;
- The utilisation of new systems for increased power generation;
- Improved economic competitiveness for global markets;
- Market leading digital technology;
- The creation of unique forms of sustainable housing and community facilities; and
- Well-connected, high-quality green and blue infrastructure.

The vision of the Draft Submission Plan seeks to build on Solihull's "*distinct reputation as an attractive and aspirational place to live, learn, invest, work and play*" over the next 15 years, with economic development, environmental sustainability and health and wellbeing moving forward together so that sustainable inclusive economic growth and opportunity for all can be realised. The plan clearly aligns with the Infrastructure Vision, Framework Plan and Arden Cross Masterplan, which reflect the phased growth ambitions for The Hub.

## **Policy P1 UK Central Hub**

Policy P1 relates to the UK Central Hub and seeks to secure sustainable economic growth in order to create jobs and prosperity, contributing to the economic growth objectives of the WMCA and GBSLEP. The purpose of Policy P1 is to provide an appropriate planning framework to encourage, guide and facilitate development in a phased manner. It seeks to support the future aspirations of Birmingham Airport, the NEC, Arden Cross, Birmingham Business Park and Jaguar Land Rover in a holistic, well connected way, together with the development of the HS2 Interchange Station at Arden Cross.

The UGC supports Policy P1 and the corresponding objectives, which seek to support the success of the key economic assets, maximise connectivity through integrated movement, safeguard strategic infrastructure and support a modal shift away from private car. It also welcomes the commitment to high quality design across the UK Central Hub, including a strategic green and blue infrastructure network, the creation of distinct and unique places, whilst maximising the efficient use of land, and recognising the importance of encompassing sustainability principles in development proposals. This includes minimising the use of natural resources and incorporating low (zero) carbon and renewable energy principles.



Policy P1 provides a flexible approach that supports the future development of each of the key assets within the UK Central Hub and facilitates this in a holistic and integrated manner to ensure that the associated economic and social benefits are realised. It also provides policy support for development of the Arden Cross site through release of the land from the Green Belt to capitalise on the unique opportunities presented by the UK Central Hub and Interchange Station. This is discussed in greater detail in below when discussing Policy UK1 which relates to the development of the Interchange Station site.

Previous representations made by the UGC in connection with the Supplementary Consultation reiterated the need to provide high-quality place-making across The Hub, consistent with the overarching place-making principles set out within the Framework Plan. They also requested a flexible based policy approach that enables the area to develop in a phased approach, consistent with the relevant evidence base, including the Infrastructure Plan, along with providing flexibility on the range of uses to be accommodated. The UGC is pleased to see that these elements are reflected within both Policy P1 and Policy UK1.

It is reiterated as part of these representations that the UGC is well positioned to deliver the vision for the UK Central Hub. The UGC has brought together the stakeholders within the area to align development interests and understand the supporting infrastructure required to maximise the growth opportunity. This is evidenced in the Framework Plan and Infrastructure Vision which identifies the growth aspirations of each asset and the potential infrastructure needed to support the delivery of the projects. This aligns with the respective individual masterplans produced by each of the development partners to ensure a co-ordinated approach to delivery.

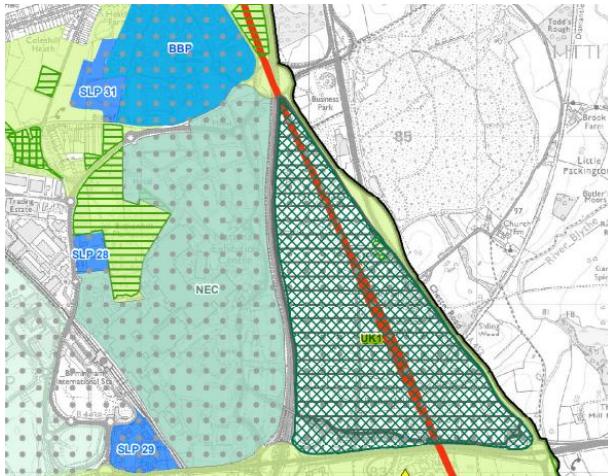
In addition to the support provided by the UGC, representations on previous consultations by other stakeholders are noted, including Birmingham City Council and Arden Cross Ltd, who confirm support for the approach being taken in respect of the UK Central Hub. They are also supportive of the development of the Arden Cross site and require that the plan supports the opportunity for major development in a sound and evidential manner. The UGC echoes these comments and acknowledge the formulation of the policy based on the evidence base presented.

### **Policy UK1 HS2 Interchange**

Policy UK1 relates to the development of the Arden Cross site, as per Figure 2 below, referred to as Site UK1 and illustrated on the accompanying Policies Map (October 2020). The dark green hatching relates to the site's identification as a Local Plan Review Proposed Mixed Use Site, with the red line intersecting the site representing the approved route for HS2. Policy UK1 confirms that the allocation is for a mixed use development which comprises the HS2 Interchange Station and ancillary infrastructure, commercial, residential and associated retail, leisure and cultural uses.



**Figure 2** Site Allocation UK1



**Source:** *SMBC Policies Map (October 2020)*

It is proposed within the Local Plan that the land referred to as the Arden Cross site is released from the Green Belt in order to capitalise on the opportunities presented within the UK Central Hub. Paragraph 136 of the National Planning Policy Framework confirms that established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. The exceptional circumstances for release of the land from the Green Belt are clearly demonstrated and evidenced in the Local Plan, recognising the location of Interchange Station, its performance within the Green Belt Assessment (2016) and the corresponding socio-economic benefits that would be realised through development of the wider Arden Cross site, which would be significant locally, regionally and nationally.

Policy UK1 confirms that the development of the Arden Cross site should be consistent with the place-making and development principles set out in the Framework Plan and Arden Cross Masterplan (2020). This includes, amongst other things, a high density strategy of a range of uses surrounding the main transport hub, movement corridors linking new urban quarters and neighbourhoods, the incorporation of sustainable movement patterns, and the integration of planned public transport systems, which could include HS2 (and the associated Automated People Mover), the Midland Metro and Sprint Rapid Transit. The UGC supports the evidence based approach to Policy UK1 which will provide for a range of uses to be accommodated, flexibility as to how the site will be developed and resilience to any future changes that may be required throughout the plan period.

A key component in realising the potential of the UK Central Hub and maximising the benefits presented by HS2 through the development of the Arden Cross site is the consolidation of surface-level car parking associated with Interchange Station. The UGC has an active leading role in facilitating this to ensure that economic and social benefits of HS2 and the UK Central Hub are realised, and further details on this are expanded upon in the next section of these representations.

## **UGC Projects in connection with the UK Central Hub**

The UGC is proposing a number of infrastructure investments to unlock the full development potential of the UK Central Hub. The interventions will improve the connectivity, place-making and visitor experience of the area by integrating the Interchange Station, along with releasing additional land for future development to maximise the opportunity.

The following seven priority projects are being led by the UGC with the support of public and private sector partners, to ensure that the full potential of the UK Central Hub are released:

1. Alternative car parking arrangement for Interchange Station
2. Birmingham International Connectivity Project
3. HS2 Automated People Mover realignment
4. Enhancements to the roundabout over the HS2 railway line
5. M42 and West Coast Main Line public transport and pedestrian bridge
6. Highways pinch points and traffic management
7. Energy network reinforcement

Several of the priority projects are already at an advanced stage, including the delivery of highway improvements to key junctions to provide sufficient capacity to accommodate the level of growth promoted through Policies P1 and UK1 of the emerging Local Plan. The design and development of the alternative parking arrangement for the HS2 Interchange Station and the potential redevelopment of Birmingham International Station are also well advanced to provide the required infrastructure to meet the economic growth objectives for the UK Central Hub.

A summary of current progress made in respect of car parking for the HS2 Interchange Station and the redevelopment of Birmingham International Station is provided below, and a further update on progress of all the priority projects will be provided in advance of the EiP of the emerging Local Plan.

### Alternative Car Parking Arrangement for Interchange Station

The High Speed Rail (London – West Midlands) Act 2017 provides powers for HS2 to acquire land and construct up to 7,500 car parking spaces to serve Interchange Station. The HS2 Act and associated documentation, including the Environmental Statement, confirms that the car parking provision would be laid out over a series of surface car parks on land on both sides of Interchange Station. This development would dramatically and adversely impact the ability to realise the development potential of the Arden Cross site and the corresponding benefits associated with the UK Central Hub.

The UGC has been advancing proposals and discussions regarding maximising the development potential and improved transport connectivity at Interchange Station since the HS2 Act achieved Royal Assent in 2017. The UGC, HS2 and other interested parties are in agreement regarding the approach to consolidation of the surface-level car parking into a land efficient arrangement, in order to maximise land for future development around Interchange Station.



This alternative arrangement would be through the provision of a multi-storey car parking arrangement that would release land for development to deliver the masterplan for Arden Cross.

This alternative design to consolidate surface-level car parking associated with Interchange Station is currently being progressed by the UGC, and a planning application under the Town and Country Planning Act 1990 will be submitted in due course to SMBC, as outlined in Figure 3 below. Significant work has already been undertaken in respect of the design of the alternative parking arrangement on site to the east of Interchange Station, alongside extensive stakeholder engagement, seeking a formal Scoping Opinion from SMBC for the Environmental Impact Assessment, and preparation of the technical information required to accompany the planning application.

**Figure 3** Current timeframe for the alternative parking arrangement



The alternative parking arrangement is an essential enabling element in bringing forward the development at Arden Cross to deliver the associated social, economic and environmental benefits presented by HS2 and Interchange Station. The UGC is committed to facilitating this through the delivery of this piece of infrastructure and work is underway to ensure that it is delivered alongside Interchange Station.

### Birmingham International Station (Birmingham International Connectivity Project)

The UGC is currently in the process of bringing forward a scheme to redevelop Birmingham International Station to accommodate additional passenger movement and increase passenger capacity to meet the forecast growth associated with the UK Central Hub. The redeveloped station will seek to address traffic congestion in the area through the creation of a multi-modal interchange that brings together multiple modes of transport, including existing rail, HS2, the Midland Metro, transportation associated with Birmingham Airport, bus, pedestrian and cycling transportation. The UGC's design ambition for this project was unveiled in July 2020, as per Figure 4 below.

Birmingham International Station will provide a high-quality gateway linking key assets in the area, including Birmingham Airport, the NEC, Interchange Station and Birmingham Business Park. The integration of Birmingham International Station with surrounding land uses, alongside the improvement of pedestrian and cycling infrastructure, will improve overall accessibility in the area, including to the Arden Cross site. This intervention will encourage an overall greater modal shift to that presented by current conditions, assisting to alleviate current traffic congestion issues in the area.



The significant investment in Birmingham International Station by the UGC and the development partners is subject to interim funding being approved in the first half of 2021 and the final business case approval in 2023 with completion in 2027.

**Figure 4** Birmingham International Connectivity Project design ambition unveiled July 2020



The justification text accompanying Policy P1 confirms that Birmingham International Station should be protected for its important interchange purpose, with ancillary or complimentary facilities for Interchange Station, Birmingham Airport or the NEC being allowed where they are justified. In addition, any proposed ancillary or complimentary facilities must demonstrate that they do not prejudice the use of the site for commuter parking which serves the railway. The UGC recognises the need to protect the station and is bringing forward proposals to enhance, expand and better integrate the facility as a multi-modal transport facility, along with the commercial opportunities this brings in supporting the economic development and place-making objectives of Policy P1. This is particularly important where development could support the deliverability of the station redevelopment proposals.

### **Summary and Conclusion**

The purpose of these representations is to reiterate the support and comments made in the previous consultations in relation to the Draft Submission Plan and the updated evidence base. The UGC supports the Local Plan and the corresponding policy and allocation for the UK Central Hub, including the development of the Arden Cross site, which seeks to capitalise on the economic and social benefits presented by HS2 and Interchange Station.







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