

**Submission on behalf of Prologis and Stoford Developments
Solihull LPR Draft Submission Plan
December 2020**

Policy P1 - UK Central Solihull Hub Area (and para's 104-107)

Q5. General comment and summary of minor modifications requested

1. As landowners and promoters of land within Site UK2 we support the UK Central concept as offering the greatest potential for economic growth in the Borough. The key objectives for development proposals set out in the policy fully align with our own proposals for Site UK2.
2. With specific regard to the text within the Policy relating to JLR and Site UK2, we fully support the release of this land from the Green Belt to accommodate employment development and generally agree with the exceptional circumstances case set out at paragraph 106.
3. The Concept Masterplan referenced at paragraph 107 is not included in the Draft Submission Plan. As site promoters we have included with these representations a Site Supporting Statement which sets out our vision for the site and contained within this is our Concept Masterplan which we put forward for consideration with the aim of having this agreed with Solihull MBC and included within the final plan.
4. There are some aspects of the detailed text we consider should be amended in order to make the policy clearer and which would further support the soundness of this aspect of the Local Plan. These are as follows:
 - The heading 'Jaguar Land Rover' above paragraphs xii-xv of Policy P1, as well as the heading which precedes paragraph 104 in the supporting text to Policy P1, should be amended to make it clearer that this policy and text covers both JLR and Site UK2, given that these sites are distinctly different areas on the Proposals Map and that different policies apply to the two areas. This will help with clarification in reading the plan.
 - Paragraphs xii-xv of Policy P1 which provides the details of Site UK2 should be amended to better align with Policy UK2. It would be clearer if there was a clear cross reference to Policy UK2 after the words 'employment development' on line 2, as this would help to define the proposals and by ensuring that it is Policy UK2 that ultimately sets out the site specific policy for Site UK2. It is important also to make clear that uses with links to JLR are not the only employment uses permitted on the site.
 - Within paragraph 104 of the supporting text to Policy P1 reference to 'local' should be removed in relation to employment uses. There is no definition of what 'local' means within the plan with reference to economic development and the term has no meaning, purpose or enforceability in employment land delivery terms, especially in a location like this which will clearly be a highly attractive location for both businesses relocating from within the District but also new inward investment and businesses relocating from within the wider

region. The subsequent text should also be amended to cross reference to Policy UK2 as the principal policy for Site UK2.

- We see no need for the first two sentences of Paragraph 105 to make more specific separate reference to land on the south eastern side of Damson Parkway being attractive to the automotive and motorsport industries. There is no reason why this area is any different from the rest of the allocation area. These two sentences should be deleted.
- In the third sentence of Paragraph 105 reference is made to part of the site also being identified for a relocated Household Waste and Recycling Centre (HWRC) and Council Depot. We would suggest that this reference be clarified to reflect the Council's stated position on this matter in Paragraph 353 of the Draft Plan which is that the site has been identified as one 'option' for the HWRC relocation and that no final decision has yet been taken on this proposal. Indeed, it is apparent from the Council's 2019 evidence base assessment report that there are other sites also in contention for this use which have a higher suitability scoring.
- In the fifth bullet point of Paragraph 106 reference to the primary highway infrastructure should also be included in the list of already committed development, together with that fact that this and the other committed development within Site UK2 have now been constructed not just permitted.
- Given there are other possible sites for the Council's HWRC we do not consider that the 8th bullet point of Paragraph 106 adds anything to the special circumstances case for UK2. The case for Green Belt release is compelling without this.

Q6. Specific Modifications Requested

The following specific changes to the Draft Submission Plan are requested in response to the issues above. Local Plan text is all shown in italics. Requested additions are shown in bold, and requested deletions in strike through:

1. The heading for and the text of paragraphs xii-xv of Policy P1 that relates to JLR and Site UK2 should be amended as follows:

"Jaguar Land Rover (JLR)/and Site UK2

xii. The Council will support JLR to compete and further its success in the global vehicles industry. To achieve this, the JLR site will need to continue to evolve and where necessary expand, with the only realistic opportunity for significant expansion being to the north east.

xiii. The Council will support and encourage the development of JLR within its boundary defined in this Local Plan. This will include a broad range of development needed to maintain or enhance the function of JLR as a major manufacturer of vehicles.

*xiv. Site UK2 on the Policies Map, will be released from the Green Belt to accommodate employment development **as set out in Policy UK2. This will***

include employment development to meet wider identified needs, together with that required to meet the additional needs of JLR and JLR related activities and ancillary development to Birmingham Airport.—”including that required for JLR operational needs or to enable JLR component suppliers, needed to directly support JLR operational needs, to be located close to the plant. The exceptional circumstances justifying the removal of the land from the Green Belt are set out in the justification to this policy.

xv. *It will be expected that proposals for the development of Site UK2 will be promoted in a comprehensive and coordinated manner that can make provision for a phased approach, if required”.*

2. Paragraphs 104 and 105 and the associated heading should be amended as follows:

“Jaguar Land Rover (JLR)/and Site UK2

*104. The Council will continue to support the further development and modernisation of the vehicles plant in order to enable its continued success in the competitive global vehicles market. JLR is constrained in terms of its ability to expand by its location within the main urban area. To reflect this and having regard to the vital importance of JLR to the region’s economy and to job creation, Policy P1 includes proposals to remove land at Damson Parkway from the Green Belt to support this aim. **As set out under Policy UK2, in addition to meeting JLR needs, Site UK2 this land will also provide for wider local employment opportunities to meet the needs identified in Policy P3, as well as for potential ancillary requirements for Birmingham Airport.***

*105. ~~The land indicated to be removed from the Green Belt includes land on the south eastern side of Damson Parkway/Old Damson Lane. Given its location it may be attractive to businesses and investments which support the automotive and motorsport industries. Part of Site UK2 this land has also been identified as a potential location for a relocated Household Waste and Recycling Centre and Council Depot~~ **subject to ongoing options assessment by the Council.** Further justification for this proposal is included in Policy P12.”*

3. The fifth bullet point of Paragraph 106 should be expanded as follows:

*“A significant part of the site already has planning permission **and has been constructed** for use as a despatch facility and logistics operations centre **for Jaguar Land Rover, as well as the associated primary road infrastructure works for the site. These proposals were** ~~which was~~ justified with very special circumstances”.*

4. The 8th bullet point of Paragraph 106 relating to the Household Waste and Recycling Centre should be removed entirely.