

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

**Policy P3 - Provision of Land for General Business and Premises (and paragraphs 142-145)**

***Q5. General comment and summary of modifications requested***

1. As landowners and developers of land within Site UK2 we fully support the inclusion of this site within the table of employment site allocations under Policy P3. The area quoted within the table should however be clarified. Although the gross area is c94 ha, that area includes substantial areas of land that are already committed/built out as well as substantial areas that will form part of the blue/green infrastructure. The actual net available area remaining is approximately 39 ha. Further details of this are provided in the Supporting Statement submitted with these representations. We would also make a similar comment in regard to Site UK1. Again the table uses the gross site area whereas the available employment land within that allocation is, according to the Arden Cross Masterplan, only approximately 30ha. Without these alterations the table is somewhat misleading.
2. At paragraph 142 the Draft Submission Plan makes a rather brief reference to the conclusions of the GL Hearn Housing and Economic Development Needs Assessment (HEDNA) 2020 and references the study conclusions that there is a shortfall of around 5.2 - 6.6 ha of employment land that the plan should provide for. We consider that this does not fully set out the whole picture with regard to employment land need which is far more extensive than simply the identified shortfall derived from the GL Labour Demand and past trends Modelling. That study appears to make no allowance for example in the past trends of JLR expansion itself (including the major LOC facility within Site UK2). It also specifically states that it makes no allowance to meet the very strong regional demand for employment space, in particular for logistics warehousing, as referenced at paragraphs 12.57-12.58 of the HEDNA. That wider need is evidenced through the West Midlands Strategic Employment Sites Study (WMSESS), part 2 of which is due to be published shortly.
3. Part 1 of that study however has already made clear that the M42 corridor is one of three areas within the West Midlands where there is an acute shortage of land supply set against the highest volume of demand, and that the case for allocating strategic employment sites is strong. On the back of this evidence, both Birmingham and North Warwickshire have released some Green Belt for strategic employment uses. It is evident from interim information arising from the Part 2 study that although this additional supply has come forward in recent years, the overall shortage of land remains and this situation further supports the allocation of Site UK2. We would suggest therefore that Paragraph 142 be expanded to provide a fuller picture of employment needs more clearly.
4. In line with our comments above and our response to Policy P1, reference to 'local employment' within paragraph 145 should also be removed and just the term 'employment' should be used. The text within this paragraph would also benefit from a cross reference to Policy UK2 itself as the principal policy for Site UK2. We also see no reason for reference being required to a plan-monitor-manage

approach in this case or repeated Green Belt justification which is provided for elsewhere in the plan under Policy P1.

### **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. Policy P3 Employment Allocations Table should be amended for Sites UK1 and UK2 to read as follows:

<i>Land at HS2 Interchange (UK1)</i>	<b>C140 (gross) c30(net available)</b>	-	See Policy P1 & UK1
<i>Land at Damson Parkway (UK2)</i>	<b>c94 (gross) c39(net available)</b>	-	See Policy P1 & UK2

2. The following additional sentences should be added to Paragraph 142:

***“The HEDNA 2020 also notes that market intelligence shows a very strong demand for warehousing and industrial units across the spectrum which is concentrated along the M42 corridor and forecasts point to a clear need for additional warehousing. This is likely to be reinforced by the West Midlands Strategic Employment Sites Study Part 2. Previous Regional Studies which have consistently shown a shortage of land for strategic employment sites across the West Midlands, with the M42 corridor in particular being an area that has historically had a high volume of demand but a constrained supply. The inclusion of site UK2 can therefore also help towards meeting this wider regional strategic land requirement.”***

3. Paragraph 145 should be amended as follows:

***“The above table also includes two allocations (Sites UK1 & UK2) which will necessitate land to be removed from the Green Belt. The justification for Policy P1 provides the exceptional circumstances for this approach. Whilst Site UK2 is partly intended to provide for JLR needs, much of this has already been committed in the form of the despatch area and logistics operations centre, approved under very special circumstances. The concept masterplan shows the development areas that are already committed and constructed and a number of phases remaining for development, which can meet wider general local employment needs together with that required to meet any additional needs of JLR and JLR related activities and ancillary development to Birmingham Airport as set out in Policy UK2. The site can also accommodate a potential need for a replacement Household Waste and Recycling Centre and Depot subject to ongoing options assessment by the Council as set out in Policy P12., as well as providing for any remaining JLR or Airport needs. This will provide flexibility in the provision of land to meet employment needs, avoid the necessity to allocate further Green Belt for development, and will be subject to the plan-monitor-manage approach. Evidence indicates that Site UK1 is likely to have a role to play in meeting local employment needs, especially later in the Plan period.”***