

# Planning Statement

## Fore Business Park, Solihull

June 2017

**Turley**

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# Executive Summary

1. This Planning Statement is submitted on behalf of IM Properties Longton Ltd and IM Properties Development Ltd (“the Applicant” / “IM Properties”) in support of a hybrid planning application for commercial development at Fore Business Park, Solihull.
2. The planning application seeks full planning permission for the new IM Headquarters ‘Campus’ which comprises two office buildings and ancillary buildings including an automotive training and testing facility, security gatehouse, and plant / servicing enclosure. The application also seeks outline permission for up to 10,930 sqm of B1 floorspace and associated parking across two ‘plots’. Some of the outline floorspace may be used for expansion to the IM campus in the future.
3. The site is allocated for employment development (preferred use B1) in the adopted Solihull Local Plan (2013) and the proposed development will help to meet the Council’s objectives (set out in Policy P3) for sustainable economic growth and the provision of a broad range of employment opportunities.
4. Nationally, the government is committed to ensuring that the planning system does everything it can to support sustainable economic growth, and the NPPF advises that proposals which accord with the Development Plan should be approved “without delay”.
5. A review of national and local policies has been carried out and this Statement confirms that the proposed development is acceptable and should be supported. Overall it is considered that the proposals represent sustainable development and will provide much needed employment in a high quality setting.

# 1. Introduction

- 1.1 This Planning Statement, prepared by Turley on behalf of IM Properties Longton Ltd and IM Properties Development Ltd (“the Applicant” / “IM Properties”), is submitted in support of a ‘Hybrid’ Planning Application for commercial development on land at Fore Business Park (‘Fore’), Solihull (‘the Site’). A site location plan is provided at **Appendix 1**.
- 1.2 The site is allocated for employment development in the adopted Solihull Local Plan (2013) and IM Properties is investing substantially in delivering a high quality development, building on the success of the existing Business Park, and incorporating its own headquarters campus into the park and surrounding landscape.
- 1.3 The planning application has been prepared following extensive pre-application consultation with Solihull Metropolitan Borough Council (SMBC), existing site occupiers, local residents and businesses, the general public and other statutory and non-statutory consultees (as detailed in Chapter 6 of this statement).

## Description of Development

- 1.4 The application is submitted in a ‘Hybrid’ format, with some elements submitted in detail for approval and some reserved for future determination through reserved matters applications. The description of development is as follows:

*“Hybrid planning application for employment development at Fore Business Park to comprise: in full; erection of two office buildings (Use Class B1) with ancillary automotive training and testing facility, security gatehouse, access road, car parking, landscaping and associated work; and in outline, with all matters reserved, up to 10,930 sq m (GIA) of office floorspace with car parking, landscaping, and associated works.”*

- 1.5 A detailed description of the proposed development is provided in Chapter 5 of this Statement.

## Content of the Application

- 1.6 The accompanying application is submitted to SMBC as the relevant Local Planning Authority (LPA).
- 1.7 The preparation of this statement follows detailed consideration of relevant national and local planning policy, an analysis of the site’s planning history, pre-application discussions with the officers at the Local Authority and other statutory stakeholders, and public consultation.
- 1.8 This statement accompanies and should be read in conjunction with the planning application documentation which comprises:

**Table 1.1: Schedule of Support Documentation**

Document
Planning Application Forms and Ownership Certificate
Design and Access Statement
Statement of Community Engagement (within Planning Statement)
Transport Assessment
Framework Travel Plan
Flood Risk Assessment and Drainage Strategy
Landscape and Visual Appraisal
Arboricultural Assessment
Ecological Appraisal
Lighting Impact Assessment
Archaeological and Heritage Assessment
Ground Investigations
Economic Impact Assessment

1.9 The planning application is also supported by the following drawings:

**Table 1.2: Schedule of Supporting Drawings**

Drawing title	Reference	Status
Site Location Plan	8461-P-001 Rev B	For information
Topographical Survey	8461-P-002 Rev B	For information
Illustrative Masterplan	8461-P-004 Rev C	For information
Parameter Plan and Site Layout Plan	8461-P-003 Rev C	For approval
Illustrative Landscape Proposals Plan	17-47-03-Rev B	For information
Site Axonometric Views	8461-P-005 Rev A	For information
Site Sections	8461-P-006 Rev A	For information
IM Headquarters Proposed Floor Plans	8461-P-100 Rev B	For approval
IM Headquarters Proposed Elevations	8461-P-101 Rev B	For approval
IM Headquarters Proposed Sections	8461-P-102 Rev B	For information

IM Headquarters Proposed Section & Perspective Views	8461-P-103 Rev B	For information
Christian Vision Proposed Floor Plans & Elevations	8461-P-200 Rev B	For approval
Workshop Proposed Plan and Views	8461-P-300 Rev A	For approval
Workshop Proposed Section and Elevations	8461-P-301 Rev A	For approval
Gatehouse Proposed Plans, Elevations, Sections & Views	8461-P-400 Rev A	For approval
Service Compound Proposed Plans, Elevations & Views	8461-P-401 Rev B	For approval
Cycle Shelter Proposed Plans, Elevations & Views	8461-P-402 Rev A	For approval
Proposed External Lighting Layout	CPW-16262-E-EX-600-P5	For approval
Proposed Levels Strategy	CWA-16-458-510-P1	For approval
Proposed Drainage Strategy	CWA-16-458-530-P1	For approval
Proposed Pond Swale Sections	CWA-16-458-532-P1	For information
Proposed Drainage Details	CWA-16-458-535-P1	For information
Proposed Tracking	CWA-16-458-630-P1	For information

## Environmental Impact Assessment (EIA)

- 1.10 It is not considered that the proposed development comprises EIA development and a request for screening opinion was submitted to Solihull Metropolitan Borough Council on 12 June 2016.
- 1.11 During pre-application discussions with the Council it was agreed that the proposed development was unlikely to result in significant effects on the environment and therefore unlikely to comprise EIA development.

## Document Structure

- 1.12 The remainder of this Planning Statement is structured as follows:

- **Section 2** sets out the project background

- **Section 3** describes the site and its surroundings
- **Section 4** establishes the site's relevant planning history
- **Section 5** provides an overview of the proposed development
- **Section 6** provides a summary of the community engagement undertaken
- **Section 7** sets out the relevant planning policy
- **Section 8** provides the planning analysis
- **Section 9** provides the justification for those elements of the scheme located in the Green Belt
- **Section 10** discusses planning obligations
- **Section 11** provides concluding comments

## 2. Project Background

- 2.1 The following Chapter provides background information on the Applicant and the development proposals at Fore Business Park.

### IM Properties

- 2.2 The Applicant IM Properties is part of IM Group. IM Group is an umbrella organisation based in the UK and Sweden. They use specialist skills and local market knowledge to help their various business partners. The IM Group consists of:
- **International Motors** - importing some of the most well respected far eastern car manufacturers' brands into the UK and Europe.
  - **IM Properties** - now one of the largest privately owned property companies, with an investment and development portfolio of circa £900 million across the UK, Europe and the USA.
  - **Spitfire Properties** - a forward thinking, modern, privately owned property developer specialising in the construction of high quality residential dwellings.
- 2.3 IM Properties owns a number of assets within Solihull including Blythe Valley Park, Fore Business Park, and Mell Square shopping centre. They have an excellent track record of delivering high quality developments across the UK.
- 2.4 IM Group's current headquarters building is located at Coleshill Manor Business Campus in North Warwickshire. Their current headquarters building is situated on the route of the new High Speed Rail link from London to Birmingham and IM have recently been served notice which confirms that they are required to vacate their current premises by June 2019.

### Fore Business Park

- 2.5 IM Properties acquired Fore Business Park in July 2014 and since then have been actively engaging with SMBC and other statutory and non-statutory consultees to inform the development proposals.
- 2.6 Fore Business Park currently comprises of 2 office buildings with a range of occupiers including UTC Aerospace, Taylor Wimpey, and BAM Construction. The remainder of the site is undeveloped and a Country Park runs along the southern and eastern boundary.
- 2.7 As set out in paragraph 2.4, IM Properties were recently advised that they would be required to vacate their current headquarters in North Warwickshire and therefore decided that they would relocate to one of their business parks in Solihull.
- 2.8 It was considered that Fore Business Park was the most suitable location for IM's headquarters building and IM have worked over the last 12 months to ensure that the proposed development positively enhances and complements the surrounding context.

### **3. Site Location and Description**

#### **Site Context and Location**

- 3.1 The Site is located on land at the existing Fore Business Park in Solihull. Fore Business Park is located off Junction 4 of the M42 motorway on the edge of the built up area of Monkspath.
- 3.2 Solihull town centre and Solihull Railway Station are approximately 3.5 km to the north of the site. Birmingham International Airport and Birmingham International train station are approximately 8km north of the site and Birmingham City Centre is approximately 14km north west. The site is therefore an excellent location for viable commercial development which is well connected via various transport modes.

#### **Site Surroundings**

- 3.3 The site is bound to the south east by the M42 motorway and Junction 4, beyond that lies open farmland and the settlements of Dorridge and Bentley Heath. To the south west of the site is the A34 Stratford Road and beyond that Blythe Valley Park, which has recently been granted planning permission for major mixed-use development including commercial and residential uses.
- 3.4 To the north of the site is the residential area of Monkspath and Widney Manor Golf Course. To the west is a Tesco Superstore, Notcutts Garden Centre, and other commercial outlets. Immediately adjacent to the western boundary of the site is Notcutts Path, a Public Right of Way (PRoW SL57) which leads from Monkspath to the A34. No works to this pathway are proposed as part of the development but a financial contribution to improve the path has been secured through the Section 106 associated with the proposed development at Blythe Valley Park.

#### **Site Description**

- 3.5 The site measures approximately 6.88 hectares and comprises partially undeveloped managed grassland, parts of the existing Country Park and associated pathway, and parts of the Provident Park Local Wildlife Site (LWS) and Provident Park potential Local Wildlife Site (pLWS).
- 3.6 Outside of the site boundary to the west is the Monkspath Meadow SSSI and to the east is the River Blythe SSSI. These areas of special interest will not be directly or indirectly affected by the proposed development.
- 3.7 Within the site are a number of native hedgerows and mature trees, the majority of which run along the north western boundary. A hedge also runs along the northern edge of the red line boundary. The majority of trees and hedgerows will be retained as part of the proposed development.
- 3.8 The existing Fore Business Park is accessed via Huskisson Way off the A34 Stratford Road. The site access is a left in / left out signalised junction with pedestrian crossings

on both the access and egress. The existing access will be retained and the access road extended to serve the new proposed development.

***The Country Park***

- 3.9 The existing Country Park is a valuable asset on the site. It was developed in association with the existing business park and includes the Sustainable Drainage System (SuDS). The Country Park does not currently surround the entire site and as part of the proposed development will be extended to the north east of the site.
- 3.10 The Section 106 agreement associated with the original planning permission for Fore Business Park sought to transfer the Country Park to Solihull Metropolitan Borough Council for future maintenance and management. However, it is now the preference that the ownership of the Country Park remains with IM for management. A deed of variation to the existing Section 106 agreement will therefore be required.

***Topography***

- 3.11 The site is gently undulating, falling gradually in a south-easterly direction towards the River Blythe and falling away in a north-easterly direction in the northern extent of the site. A levels strategy for the application site is submitted in support of this planning application.

## 4. Planning History

### Planning History

- 4.1 The site's development dates back to 1990 when the first outline planning application was submitted (1990/2362) for offices, associated parking, highway works, landscaping and balancing lake. Planning permission was granted on 6 August 1999 and was subject to a legal agreement of the same date.
- 4.2 An application under Section 73 to vary condition 3 of the outline to allow a further 2 years to submit reserved matters was submitted on 5 August 2002 (2002/1811). This was approved on 3 December 2002 and provided until 3 December 2004 for reserved matters to be submitted. This decision replaced the 1999 outline and attached all of the previous conditions.
- 4.3 Concurrently with the aforementioned 'extension to the outline', a reserved matters application for siting, design and landscaping were submitted (2002/1947). These were approved on 7 January 2003 and included phases 1 and 2. Further detail is provided below.
- 4.4 A further application to 'extend the outline' under Section 73 (2002/1181) was approved on 28 September 2004 (2004/1976), providing a further 2 years to submit reserved matters (i.e. by 28 September 2006). However, no further reserved matters were submitted.

### Operative permission

- 4.5 The site currently benefits from an extant planning permission for office development on the site. The operative permission for phases 1 and 2 of Fore comprises outline permission 2002/1811 and reserved matters 98/347 (for access) and 2002/1947 (for phases 1 and 2).
- 4.6 The permission is partially implemented (by virtue of the current buildings on site) and therefore remains extant; meaning that phase 2 in the form approved could be lawfully implemented infinitum.
- 4.7 The outline permission provides for 18,500 sq m GIA of floorspace. The reserved matters approval permits the erection of four buildings and associated car parking (which is approved in the Green Belt). A plan is provided at **Appendix 2** which shows the extant approved scheme.

## 5. Proposed Development

- 5.1 The accompanying planning application seeks hybrid planning consent for office development at Fore Business Park, comprising both Full and Outline elements.
- 5.2 Whilst the hybrid format is technically and legally an application for outline planning permission, there is a clear distinction between those parts of the site for which all matters of detail will be specified for approval, and those elements where all matters are reserved for subsequent approval (taken forward through future applications for reserved matters approval or standalone full applications).

- 5.3 The description of development for which planning permission is sought is as follows:

*“Hybrid planning permission for employment development at Fore Business Park to comprise: in full; erection of two office buildings (Use Class B1) with ancillary automotive training and testing facility, security gatehouse, access road, car parking and associated works; and in outline, with all matters reserved, up to 10,930 sq m (GIA) of office floorspace with car parking, landscaping, and associated works.”*

### **Full Elements**

- 5.4 Full planning permission is sought for the IM Campus. More specifically, full details are provided in relation to the following:
- A new office (Use Class B1(a)) headquarters building for IM Properties – 5,004 sq m GIA.
  - A new office building for Christian Vision (Use Class B1(a)) – floorspace 546 sq m GIA.
  - A training and automotive testing facility (ancillary to main building) – floorspace 200 sq m GIA.
  - A security gate house (ancillary to main building) – 15 sq m GIA.
  - Layout of associated parking and access road.

Each of these elements is discussed in further detail below.

### **IM Campus**

- 5.5 The IM Campus will be located to the north of the Business Park and will comprise two office buildings and an ancillary automotive training and testing facility and security gatehouse.
- 5.6 The campus will be approached from the south with a security lodge located on the proposed access road (an extension to the existing access road). The primary building on the campus is IM Group’s new office headquarters which sits on an angle in order to ‘face’ people approaching the building.

- 5.7 To the south of the IM headquarters building is a smaller headquarters building for Christian Vision. Christian Vision is a charitable organisation which was founded by the Chairman of IM Group. As this organisation has close links to the IM Group, they are to be located within the campus; however as they are separate organisation, two offices are required.
- 5.8 To the north of the IM headquarters building, an ancillary automotive training and testing facility is proposed. International Motors import cars and 'launches' of new models will often take place at the headquarters building. The cars being launched will often need to be 'prepped' and this work is undertaken within this facility. Employees on the automotive side of the business also often need training in order to understand features of the new car models; this is also done within the automotive facility.
- 5.9 Given the confidential nature of some of the car models stored within the automotive facility, this building has been located to the rear of the headquarters building. In addition there is only one elevation proposed to the front (south) with the remainder of the elevations 'banked' with earth and vegetation. Should IM Group ever vacate these premises, it is anticipated that this element of the scheme could be removed.

#### **IM Headquarters**

- 5.10 The IM Campus and headquarters building has been designed to meet the specific requirements of the end occupier. The proposals are therefore bespoke and unique in terms of design and layout.
- 5.11 The headquarters building is three storeys in height with the ground and first floors providing traditional open plan office floorspace. The upper floor will provide communal space for employees incorporating a restaurant, break out spaces, gymnasium and presentation suites. From the upper floor, staff will also be able to access external roof terraces.
- 5.12 At the ground floor level, a triple height reception area is provided. Designed as an extension to the reception there is a double height exhibition space which could be used to launch the latest vehicle models associated with International Motors.
- 5.13 The appearance of the building has been influenced by contemporary styling utilising a neutral colour pallet which helps to assimilate the building into the surrounding landscape.
- 5.14 The use of different colours, textures and materials reduces the perceived massing of the building and creates a unique appearance. In particular the Corten steel 'wrap' gives the building a defining feature and provides visual interest.

#### **Christian Vision Headquarters**

- 5.15 The proposed office building will be Christian Vision's new headquarters and again has been designed as a bespoke building to meet the needs of the end occupier.
- 5.16 The building is two storeys and the upper floor cantilevers over the ground floor to provide a distinctive architectural feature to the building. The building will be constructed from a simple pallet of reconstituted stone panels and full height glazing.

- 5.17 Each floor has been designed in a completely open plan configuration with a functional core containing circulation and main amenities.

### **Automotive Training and Testing Facility**

- 5.18 An ancillary automotive training and testing facility is proposed to the rear of the IM headquarters building. This is a specific requirement of International Motors and is required to prepare and test vehicles prior to product launch events.
- 5.19 The building has been designed to assimilate into the landscape as much as possible. There is only one elevation that is visible with the other elevations being 'banked' with earth and vegetation.
- 5.20 The building will mainly be workshop floorspace with a small office area.

### **Car Parking and Access**

- 5.21 The existing site access road (Huskisson Way) will be extended as part of the proposal and will comprise the new access to the IM campus.
- 5.22 The campus will be served by 249 parking spaces (of which 12 will be disabled) for the two office buildings and ancillary automotive facility. Some of these parking spaces will comprise reinforced grass and will be used for overflow parking during launch events, as well as car 'storage' associated with the automotive facility when required. Further information with regard to parking numbers and requirements is provided in Chapter 9 of this Statement.

### **Landscaping**

- 5.23 The landscaping scheme has been designed to integrate the proposed development into the surrounding landscape and extend the existing Country Park.
- 5.24 Both native and ornamental planting will be used in the landscaping proposals to reflect and define the different spaces. Ornamental planting and amenity grassland will be used around the buildings to enhance their setting and create a business park identity. Native planting and different types of grassland will be used in the extension / enhancements to the Country Park.
- 5.25 In order to separate the Country Park from the office buildings (and surroundings) a 'ha-ha' will be formed. This will provide IM with an element of security whilst maintaining an 'open' feel to the landscape.
- 5.26 It should be noted that the landscaping proposals associated with IM Campus are not submitted in full detail. Whilst the layout and approach is largely fixed, the detailed design will be completed at a later date and this will be secured via a condition attached to the grant of any planning permission.

### **Outline Elements**

#### **Office development**

- 5.27 This hybrid planning application also seeks outline permission for up to 10,930 sq m of office floorspace across two development 'plots'. The location of these plots is identified on the parameter plan submitted for approval with this application.

- 5.28 The buildings could be up to 5 storeys in height (plus roof plant and terrace), up to a total maximum height of 24 metres.
- 5.29 Associated with this office floorspace, 'zones' where parking will be accommodated have also been established on the parameter plan. Up to a maximum of 370 spaces can be provided within these identified areas.

### **Elements of the Proposal within the Green Belt**

- 5.30 Whilst the majority of the proposed development is located within the allocation line, it must be noted that the following elements of the scheme are proposed on land designated as Green Belt:
- Car parking and access road;
  - A security gate house;
  - A small corner of the main building;
  - A training and automotive testing facility;
  - Sustainable Drainage Infrastructure; and
  - Associated landscaping and footpaths.
- 5.31 Chapter 9 of this statement analyses these elements of the scheme against Green Belt policy and sets out Very Special Circumstances, the benefits of which outweigh and justify the less than minimal harm to the Green Belt.

### **Life of Planning Permission**

- 5.32 Given the nature of the proposed development and the potential for the outline elements to be used as future expansion land for IM, it is considered that the 'life' of the planning permission should be longer than the standard 3 years usually given. It is considered that a 10 year planning permission would be suitable in these circumstances and this will be discussed with SMBC during determination.

## 6. Community Engagement

- 6.1 The National Planning Policy Framework places an emphasis on community engagement as an important part of the planning application process in order to identify issues that can be resolved at the pre-application stage.
- 6.2 Solihull Metropolitan Borough Council's Statement of Community Involvement (2007) confirms that the Council will encourage developers of major development schemes to undertake pre-application consultation with stakeholders and local residents. Policy P15 of the Solihull Local Plan also expects developers of major schemes to demonstrate how the local community has been consulted and engaged in the design process.

### Consultation Approach

- 6.3 The approach to consultation on the proposed development is considered proportionate and provided a number of avenues for the local community and stakeholders to be informed of the proposals and have an opportunity to respond with their feedback.
- 6.4 Key stakeholders were identified and invited to attend a public exhibition (further detail below) as follows:
- Site Ward Members (and adjacent Site Ward Members) of SMBC.
  - The local MP for Meriden.
  - The existing tenants and occupiers on Fore Business Park.
  - Local residents and businesses.
- 6.5 Other statutory consultees have been engaged with during pre-application discussions, such as Highways England and The Environment Agency. Ongoing discussions have also taken place with SMBC officers since July 2016.

### Public Exhibition

- 6.6 To ensure relevant stakeholders were aware of the consultation exhibition, letters were sent to approximately 550 addresses within the vicinity of the site providing details of the event and the proposals. A copy of the invite letter is provided at **Appendix 3**. Details of the consultation event were also posted on a local Councillor's blog to ensure as wide a reach in the local area as possible.
- 6.7 The public exhibition was held at Monkspath Junior and Infant School on Tuesday 6 June 2017 from 4.30 pm – 6.30pm. At the event, banners displayed information about the proposals and members of the project team were available to answer questions (as seen in **Figure 6.1** below). The project team in attendance included representatives of Webb Gray (Architect), PBA (Highways), FPCR (Ecology), CWA (Flood Risk and Drainage), Turley (Planning) and IM Properties (the applicant).

**Figure 6.1: Consultation Event**



- 6.8 A copy of the public exhibition banners is included at **Appendix 4**. Consultees were able to submit comments to the team on feedback forms at the exhibition. Comment forms could also be taken away and posted or emailed back to the project team.
- 6.9 For those unable to attend the event, the consultation boards were available to view on the following website <http://www.foresolihull.co.uk/>. Copies of the boards could also be requested via email at [foreconsultation@turley.co.uk](mailto:foreconsultation@turley.co.uk).

## **Feedback**

- 6.10 A total of 26 people attended the public exhibition and four requests for a copy of the consultation boards were received via email. A total of six responses were received by the consultation deadline. Five of the responses were provided on the day of the exhibition and one was sent via email following the exhibition. A copy of the feedback form is provided at **Appendix 5**.
- 6.11 Of the responses received three supported the proposals, two were undecided and one raised some concerns / queries. The comments raised through feedback and at the exhibition can be summarised as follows:
- Support the formalisation of the pathway through the Country Park and moving this away from existing residential properties.
  - Support for the design of the scheme.
  - Suggested that the current proposed pathway 'joins' the Notcutts pathway at an inconvenient point by the bridge. This join should be moved further north.
  - Drainage issues along the Notcutts pathway.

- Requests for consideration of providing benches within the Country Park and opportunities for local groups (such as Scouts) to use this area.
- Inadequate parking on the site resulting in employees parking on local surrounding roads, ensure sufficient spaces are provided for new buildings.
- Concerns regarding the nature of the automotive testing facility and potential noise impacts for nearby residents.

## Applicant's Response

- 6.12 The focus of the consultation was on encouraging comments and suggestions on the proposals and any other issues which respondents consider should be taken into account when shaping the development.
- 6.13 Wherever possible community comments and suggestions have been fed into the final development proposals. The applicant's response to the comments received is set out in **Table 6.1** below.

**Table 6.1: Applicant's Response**

Comment	Response
Location of proposed pathway	<p>During the consultation event it was suggested the current route of the proposed pathway would see the pathway 'join' the existing Notcutts footpath at an inappropriate point where the path floods and a bridge has been put in place. It was suggested that the 'join' be moved further north.</p> <p>The design submitted as part of this application now shows the pathway 'join' further north than the original and it is now considered that the pathways join at a suitable point.</p>
Drainage Issues along Notcutts Pathway	<p>It was highlighted at the consultation event that the existing Notcutts pathway is subject to flooding issues.</p> <p>As part of the proposed drainage scheme IM have included additional capacity in the proposed drainage system to accommodate water from offsite. A chamber is also provided to the west of the site which would allow a connection to the adjacent pathway and SSSI. The connection itself is not proposed as part of this scheme.</p>
Requests for IM to consider benches and working with local community groups	<p>IM welcome the opportunity to work with local community groups and see how they might be able to utilise the Country Park. The Country Park will be open to all local residents and stakeholders.</p> <p>There are currently no proposals to include benches within the Country Park, however the detailed design of</p>

	the landscaping has not been completed and there may be future opportunities for seating to be included.
Inadequate Parking on Site	<p>IM have looked carefully at their own parking requirements and are confident that sufficient spaces are proposed for the IM campus.</p> <p>Further detail with regard to IM's parking requirements and numbers are set out in Chapter 9 of this statement.</p>
Noise concerns	<p>The entire scheme (including the automotive training testing facility) has been designed to ensure minimum noise implications for nearby residents.</p> <p>In particular, the automotive facility has been orientated away from residential properties and has only one open façade, the remainder are banked up with earth and vegetation in order to insulate noise as far as possible.</p> <p>A Noise Impact Assessment is submitted in support of this application which confirms that noise from the site can be maintained at a suitable level.</p>

## 7. Planning Policy

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004), states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. This statutory provision is confirmed by Paragraphs 11 and 12 of the NPPF, which continues to place importance on the plan-led approach.
- 7.2 At the heart of the NPPF is a 'presumption in favour of sustainable development'. For decision making this means approving proposals that accord with the development plan 'without delay' and where the development plan is absent, silent or out of date, granting planning permission unless *"any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole"*.
- 7.3 This chapter identifies the planning policies of relevance to the proposals, covering the Local Development Framework, National Policy and other relevant material considerations.

### The Development Plan

- 7.4 The site is within the administrative boundary of Solihull Metropolitan Borough Council. The Development Plan comprises the Solihull Local Plan, which was adopted in December 2013, and other Supplementary Planning Documents.
- 7.5 Other Material Considerations include the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

### Solihull Local Plan (2013)

- 7.6 The Solihull Local Plan was adopted in December 2013 and covers the plan period 2011-2028. The Local Plan was subject of a High Court and Court of Appeal Challenge in 2014, which had implications in respect of policy P5 and the Borough's housing numbers.
- 7.7 Notwithstanding, the majority of the Local Plan is fully adopted. This includes Policy P3 'Provision of Land for General Business and Premises' which identifies 2 hectares of readily available land at the Site suitable for employment development.
- 7.8 The adopted Proposals Map reflects this, allocating Fore Business Park as an 'Employment Site'. Outside of the allocation line, the surrounding land in most directions is designated Green Belt. The area of the site on which the majority of built development is proposed is allocated for development and is not within the Green Belt. This is discussed in further detail later in this statement.

### ***Policy P3 'Provision of Land for General Business and Premises'***

- 7.9 Policy P3 establishes the principal acceptability for the development of Fore Business Park for employment uses. The policy supports and encourages sustainable economic growth to provide a range of employment opportunities.

- 7.10 The Policy confirms that the Council will support development of the allocated sites for the purposes set out within the support text (a preference for B1 Use is identified in relation to Fore Business Park). In addition the policy states that small-scale supporting facilities may be allowed where needed to specifically enhance or complement business use in the locality.

***Other Relevant Policies***

- 7.11 The following policies are of relevance to the proposed development and have helped to inform the final development proposals. **Appendix 6** provides further detail on the content of each of the policies identified below.

- **Policy P7 ‘Accessibility and Ease of Access’** specifies that all new development should be focussed in the most accessible locations. The policy states that proposed offices should be within a 400m walking distance of a bus stop served by a high frequency bus service.
- **Policy P8 ‘Managing Demand for Travel and Reducing Congestion’** states that all development proposals should have regard to transport efficiency and highways safety. The use of sustainable modes of travel shall be promoted and encouraged in all developments.
- **Policy P9 ‘Climate Change’** establishes a broad ranging approach to reducing greenhouse gas emissions and increasing energy from renewable and low carbon sources. Developments will be expected to demonstrate the highest viable energy efficiency standards through the location and layout of developments and the use of materials and construction techniques that minimise emissions.
- **Policy P10 ‘Natural Environment’** recognises the importance of a healthy natural environment, and the economic and social benefits it provides to the Borough. Developers will be expected to incorporate measures to protect, enhance and restore the landscape. Where appropriate, development should seek to enhance the accessibility to the natural environment.

Developments likely to have an adverse effect on designated sites such as SSSI’s or Local Wildlife Sites will only be permitted if the reasons for the development clearly outweigh the nature conservation value of the site.

- **Policy P11 ‘Water Management’** states that all development should incorporate sustainable drainage systems.
- **Policy P14 ‘Amenity’** seeks to protect and enhance the amenity of existing and potential occupiers of houses, businesses and other uses in considering proposals for new development. Developers will be expected to locate and design new development to minimise visual and other amenity impacts.
- **Policy P15 ‘Securing Design Quality’** sets out a number of key principles for ensuring development proposals are good quality, inclusive, and of a sustainable design. Development proposals will be expected to contribute to, or create, a sense of place.

The policy confirms that major development proposals are required to demonstrate how the local community has been engaged in the design process.

- **Policy P17 ‘Countryside and Green Belt’** establishes that the Council will not permit inappropriate development in the Green Belt except in very special circumstances.
- **Policy P18 ‘Health and Well Being’** indicates that the potential for achieving positive health outcomes will be taken into account when considering all development proposals. Support will be given to proposals which provide opportunities for formal or informal physical activity, recreation and play and which contribute to the development of a high quality, safe and convenient walking and cycling network.
- **Policy P20 ‘Provision for Open Space, Children’s Play, Sport, Recreation and Leisure’** states that the council will require provision for and maintenance of appropriate open space as an integral part of new development. To promote healthy lifestyles in the workplace, major commercial development proposals will be required to provide new open space and/or contribute to enhancement of the green infrastructure network.
- **Policy P21 ‘Developer Contributions and Infrastructure Provision’** confirms that developers will be expected to provide, or contribute towards provision of measures to directly mitigate its impact and make it acceptable in planning terms.

### **Solihull Local Plan Review**

- 7.12 The Draft Solihull Local Plan Review was published for consultation in December 2016. The Local Plan Review confirmed that the Council do not intend to allocate any further employment land over the plan period. The Draft Local Plan Review continues to allocate 2 hectares of land at Fore Business Park for employment development.
- 7.13 IM properties submitted detailed representations in response to the Draft Local Plan Review Consultation setting out a case for the further release of land at Fore Business Park to reflect the previously approved scheme and the approach and areas proposed for development by the accompanying planning application. The content of these representations is referred to in greater detail in Chapter 9.

### **Supplementary Planning Documents (SPDs)**

- 7.14 Adopted Supplementary Planning Documents (SPDs) form part of the Development Plan for the purpose of making planning decisions. The following SPD’s are of relevance to the proposed development.
- **Vehicle Parking Standards and Green Travel Plans SPD (2006)** – This SPD confirms that developments that are likely to have significant traffic implications should be accompanied by a Travel Plan. The document also sets out parking standards by Use Class. For office developments of between 2,500 sqm and 24,000 sqm a maximum parking ratio of 1 space per 30 sqm is set. Disabled parking is in addition.

## National Planning Policy

### National Planning Policy Framework

- 7.15 The National Planning Policy Framework (NPPF) was adopted in March 2012 and provides the planning policies at a national level. The NPPF has established a '*presumption in favour of sustainable development*' and is a material consideration in the determination of all planning applications.
- 7.16 Paragraph 14 confirms that the "*presumption in favour of sustainable development*" is the "*golden thread*" running through the planning system. This means that local authorities should generally seek to approve development proposals that accord with the Development Plan without delay. Where the relevant plan is absent, silent or out of date, planning permission should be granted unless it would give rise to adverse impacts which would significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.
- 7.17 The Framework requires that an overall approach is taken to sustainable development, incorporating social, economic and environmental dimensions which should not be considered in isolation. The central issue is whether the proposal as a whole accords with the three dimensions and constitutes sustainable development.

### Core Planning Principles

- 7.18 Paragraph 17 of the NPPF sets out 12 core land-use planning principles which are intended to guide and under-pin development management. The NPPF also contains advice on the delivery of sustainable development across 13 key themes, of which, the following are considered of particular relevance:
- **Building a Strong, Competitive** - This section confirms the Government's commitment in supporting a strong, competitive economy which includes securing economic growth to create jobs and prosperity through the planning system. Paragraph 19 confirms "*The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth*".
  - **Requiring Good Design** – Paragraph 56 confirms that "*good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people*".
  - **Protecting Green Belt land** - The NPPF makes clear substantial weight is given to any harm to the Green Belt. Inappropriate development is, by definition, considered to be harmful to the Green Belt and should only be approved in very special circumstances. Very Special Circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness is clearly outweighed by other considerations.
  - **Conserving and enhancing the natural environment** - The NPPF states that the planning system should contribute to and enhance the natural environment by, amongst other things, protecting and enhancing valued landscapes and minimising impacts on and providing net gains to biodiversity where possible.

- **Decision-taking** - At paragraph 187, local planning authorities are encouraged to look for solutions rather than problems and states that applications for sustainable development should be approved, where possible. They are also encouraged to work proactively with Applicants to secure developments that improve the economic, environmental and social conditions of the area.

## 8. Planning Analysis

- 8.1 This chapter analyses the suitability of the proposed development in the context of local and national planning policy. Starting with the principle, this section demonstrates that the proposed development represents sustainable development which is fully in accordance with the Development Plan and that there are no other material considerations which outweigh the benefits of the scheme.

### Principle of Development

- 8.2 This section sets out how the proposed development is acceptable in principle in terms of uses, amount and form. It also considers the principle acceptability of those elements of the scheme which lie outside of the allocation boundary; in particular, those parts within the Green Belt.

### Proposed Uses

- 8.3 The principle acceptability of the proposed scheme is governed by the requirements of Policy P3 'Provision of Land for General Business and Premises' of the Solihull Local Plan. Policy P3 supports and encourages employment development at Fore Business Park, with a preference for B1 development identified. The Policy also confirms that *"small-scale supporting facilities may be allowed where needed to specifically enhance or complement business uses"*.
- 8.4 In terms of the office use proposed on site, this is acceptable in principle under Policy P3. It is also considered that the supporting ancillary uses are acceptable in principle under the provisions of the policy.

### Green Belt Considerations

- 8.5 The NPPF confirms that, in planning decisions, substantial weight should be given to any harm to the Green Belt, and 'inappropriate development' is by definition harmful. Chapter 9 of this Planning Statement addresses Green Belt considerations in detail and confirms that those elements of the proposed development located in the Green Belt are either not inappropriate, or there are Very Special Circumstances which justify them.
- 8.6 Paragraphs 89 and 90 of the NPPF establish circumstances under which development may be considered not inappropriate. These circumstances include, amongst other things, engineering operations and facilities for outdoor recreation, where the proposals would not impact on openness and would not conflict with the purposes of the Green Belt.
- 8.7 The analysis in Section 9 of this Statement establishes that the proposed sustainable drainage infrastructure and Country Park extension will not impact on openness and do not conflict with the five purposes of the Green Belt. They can therefore be considered 'not inappropriate'.
- 8.8 With regard to the security gatehouse, automotive training and testing facility, small section of the main headquarters building, and car parking, these are considered inappropriate development in the Green Belt. Very Special Circumstances are therefore

provided which justify these small elements of the scheme being located in the Green Belt. These can be summarised as follows:

- The delivery of an allocated employment site meeting the specific requirements of an identified end user with a need to relocate.
- The economic benefits associated with IM Group relocating into the Borough and associated job creation.
- Making the most efficient use of an allocated site in the context of a shortfall of employment land within the Borough and the wider West Midlands.
- An extant planning permission covering parts of the Green Belt and proposals which would largely not have any greater impact on openness than the extant.
- Historic development patterns dictating a logical and high quality design and layout of the site.

8.9 Further details in relation to the above are set out in Chapter 9 of this Planning Statement.

8.10 Paragraph 89 of the NPPF confirms that very special circumstances will not exist unless the potential harm to the Green Belt, and any other harm, is clearly outweighed by other considerations. This is a matter of planning balance, whereby the benefits of the scheme are weighed against any harm to the Green Belt, and any other harm which could be caused by the proposed development.

8.11 The following section analyses the other material considerations which are fundamental to this planning balance.

## **Other Material Considerations**

### **Architecture and Design**

8.12 The detailed elements of the proposed scheme have been designed to the highest quality specification available in terms of layout, design and materials. Further details with regard to the specification and design ethos are provided in Chapter 5 of this Statement and the accompanying Design and Access Statement.

8.13 It is considered that the proposed development fully meets the requirements of Policy P15 of the Solihull Local Plan.

### **Socio-Economics Benefits**

8.14 An Economic Impact Assessment is submitted in support of this application which confirms the following economic benefits associated with the scheme:

#### ***Construction Phase***

- **300** construction related full-time equivalent (FTE) jobs in Solihull and West Midlands.

- After accounting for displacement and leakage, **130** direct FTE jobs are likely to be held by residents in West Midlands, of which 60 will be held by residents in Solihull.
- **£11.8 million** productivity (GVA) contribution to the wider economy through construction, of which some **£7.5 million** could be local to Solihull.

#### ***Operational Phase***

- **1,000** direct gross FTE jobs on-site.
  - Taking additionality factors into account, circa **1,290** net additional FTE jobs (direct, indirect and induced) could be created within West Midlands, of which 570 FTE jobs could be local to Solihull.
  - An additional **£57.0 million** annual contribution to productivity (GVA) within the West Midlands economy once fully operational, of which **£25.1 million** per annum will be in Solihull.
  - Direct wage expenditure associated with the jobs is estimated to be circa **£7.6 million** per annum.
  - Circa **£1.1 million** business rate revenue per annum, of which the local authority is currently able to keep 50% (£540,000).
- 8.15 In addition to the economic benefits highlighted, the proposed development also includes an extension to the existing Country Park. It is considered this will encourage activity and improve health and well-being within the local community and for employees on the business park.
- 8.16 On the basis of the above, it is considered that the proposed development will have a positive effect on the economic and social well-being in the area in accordance with policies P3, P14, P18 and P20 of the Solihull Local Plan.

#### **Highways**

- 8.17 A full Transport Assessment and Framework Travel Plan are submitted in support of the planning application and the traffic and transport effects of the proposed development have been fully assessed.
- 8.18 The results of this assessment confirm that, cumulatively taking into account the nearby Blythe Valley Park planning permission, the local and strategic highway network has sufficient capacity to accommodate the increase in traffic which would be generated by the development, and that there would be no other significant impacts in relation to Transport and Traffic. On this basis, there is no requirement for offsite highways mitigation as a consequence of the proposed development.
- 8.19 A maximum of 619 additional spaces are proposed as part of the development (this includes 14 existing spaces to be transferred to the outline element). There are currently 278 spaces on site to serve the existing premises (excluding the 14 to be transferred to the outline element), meaning the total overall level of car parking for Fore Business Park would be 897; this includes the provision for disabled parking.

- 8.20 The maximum level of floorspace proposed across the site (existing and proposed) is 23,722 sq m. This means that site wide the proposed parking ratio is 27.7 spaces per sq m (excluding disabled parking), which is lower than the previously approved ratio of 1 space per 27 sqm.
- 8.21 If all floorspace approved by virtue of the extant permission (18,500 sq m) is implemented in accordance with the approved ratio of 1 space per 27 sq m and all net new floorspace is implemented in accordance with a policy compliant ratio of 1 space per 30 sq m, this would result in a total parking allowance of 905 spaces across the site. As a maximum of 897 are proposed, it is considered that this is an acceptable level of provision.
- 8.22 It is noteworthy that during the public consultation, concerns were raised that the current level of parking on the site was not sufficient and therefore the proposed scheme seeks to ensure that parking levels overall are sufficient to avoid on-street parking in nearby residential areas. Further detail with regard to parking numbers is provided in chapter 9 of this Statement.
- 8.23 The site is accessible by foot, cycle and public transport. The proposed development will connect the site via a footpath extension to Notcutts Path (PRoW SL57). Foot/cycleways around the site are also accessible via Huskisson Way, with good footpath provision to local destinations along the A34 Stratford Road.
- 8.24 There is an existing bus service on-site located to the south of the roundabout on Huskisson Way. This is served by a private bus service funded by IM Properties and provides access to Solihull train station and Birmingham International.
- 8.25 The nearest off site bus stop are located on the A34 Stratford Road. The eastbound stop is located approximately 385m from the site and the westbound stop is located approximately 436m from the site. These bus stops are served by the S2/S4 service which will be enhanced (to a 15 minute frequency) as part of the proposed development at Blythe Valley Park. There are opportunities for the eastbound service to be diverted into Fore Business Park.
- 8.26 A Framework Travel Plan is submitted in support of this application which sets out how future occupiers / employees of the business park will encourage alternative modes of transport. A Travel Plan Coordinator will be appointed and they will be responsible for promoting the travel plan. The Travel Plan will be monitored and this will be secured via a condition.
- 8.27 On the basis of the above there will be no adverse impacts on highways as a consequence of the proposed scheme and it is considered that the proposed development meets the policy requirements of Policy P7 and P8 of the Solihull Local Plan.

### **Ecology**

- 8.28 A full Phase 1 Habitat Survey and associated protected species surveys have been undertaken on the site and have been updated and monitored over a number of years. The results of these surveys have influenced the masterplan. Habitats of value have been retained and incorporated into the scheme where possible.

- 8.29 The site is partly covered by the Provident Park LWS and pLWS and the River Blythe SSSI and Monkspath Meadow SSSI are located to the east and west of the site respectively.
- 8.30 The area of the site which falls within the Provident Park LWS was first designated in 2012 as the grassland was identified as supporting a diverse floral characteristic. In order to facilitate the proposed development, approximately 1.5ha of the LWS will be lost. However, recent survey work including an LWS assessment (August 2016) undertaken by a member of the LWS Panel has identified that through lack of management the grassland has degraded significantly and no longer supports the diverse range of herbs and sward heights which were previously present.
- 8.31 The loss of areas of the LWS and pLWS would be compensated for through securing the long-term management of the proposed extension to the Country Park and the inclusion of grassland types from the adjacent Monkspath Meadow SSSI.
- 8.32 A full biodiversity offsetting calculation has been undertaken using the illustrative landscaping scheme in order to calculate any net loss / gain associated with the proposed development. As a best case it is considered that the proposed scheme could achieve an offsetting score of -2.53 which could be mitigated through offsite compensation to be discussed and agreed with the Local Plan Authority.
- 8.33 It is possible that through future reserved matters applications (for the outline elements) and discharge of conditions (for the full elements) this score could improve; albeit given the area of land available this is considered unlikely. Overall it is considered that this is an acceptable score given the nature of the proposed development, and we note that paragraph 109 of the NPPF states that developments should provide net gains in biodiversity “*where possible*” [emphasis added].
- 8.34 On the basis of the above, it is considered that the proposals accord with policies P10 and P15 of the Solihull Local Plan.

### **Landscape and Visual Impact**

- 8.35 The landscape forms an integral part of the proposed development at Fore Business Park. The proposals include an extension to the existing country park and the retention of key existing landscaping features on the site.
- 8.36 The planning application is supported by a full landscape and visual impact assessment (LVIA) which confirms that there will be a minor adverse impact on the landscape character of the site and its immediate context, through the introduction of urbanising elements in an area which currently comprises grassland. This is an expected consequence on a site which is allocated for development, and the LVIA confirms that the proposed landscaping will help to successfully assimilate the proposed development into its surroundings.
- 8.37 With regard to visual impacts, the LVIA confirms that views of the site are limited by the combined screening effect of trees, hedgerows and settlement edge. The number of potential visual receptors is therefore limited. At worst, there would be a minor-moderate adverse effects on those using footpaths within the vicinity of the site. However, the proposed built elements will largely be seen in the context of the existing business park

and adjacent settlement edge meaning the proposals are not uncharacteristic of the existing views.

- 8.38 Overall it is considered development would be readily assimilated into the receiving landscape and would not give rise to unacceptable landscape and visual harm. On this basis, it is considered that the proposed development meets the requirements of Policy P14 and Policy P15.

### **Flood Risk**

- 8.39 The majority of the site is located in flood zone 1. Some areas on the periphery of the site, where the River Blythe runs along eastern boundary, are located in flood zones 2 and 3; however no development is proposed in these areas.
- 8.40 Guidance suggests that surface water arising from a developed site should, as far as is practicable, be managed in a sustainable manner to mimic the surface water flows arising from the site prior to the proposed development, while reducing the flood risk to the site itself and elsewhere, taking climate change into account.
- 8.41 There is an existing SuDS system at Fore Business Park which was built to serve the approved phases 1 and 2. Only phase 1 of the office development was ever built however the drainage infrastructure was built to serve both. On this basis, and taking into account climate change allowances, the existing site SuDs system can serve the outline elements of the scheme.
- 8.42 The full elements of the scheme will be served by new SuDs infrastructure in the form of open swales and ponds, permeable paving and separators.
- 8.43 Through the public consultation and pre-application discussions with SMBC, the applicant was made aware that the adjacent Monkspath Meadow SSSI and Notcutts Footpath are subject to drainage issues. The proposed drainage scheme for the business park therefore includes additional capacity to attenuate water from these areas. A chamber is also provided on the edge of the site which would allow for a connection from these areas into the site's drainage infrastructure; however the connection itself does not currently form part of these proposals and the land falls outside of the Applicant's ownership.
- 8.44 The planning application is supported by a full Flood Risk Assessment and a drainage strategy which demonstrates that surface water run off arising as a result of the development can be managed sustainably through the proposed SUDS system and the proposed development would not increase the risk of flooding elsewhere.
- 8.45 On the basis of the above it is considered that the proposed development accords with policies P11 and P15 of the Solihull Local Plan.

### **Heritage and Archaeology**

- 8.46 There are no World Heritage Sites or battlefields within the vicinity of the site and no known archaeological sites within the site. The nearest Scheduled Monuments are the Tilehouse Green moated site 2km to the east and the Salter Street Farm moated site and fishpond 3km to the south west.

- 8.47 There are no nearby Conservation Areas and very few Listed Buildings within the vicinity; the nearest being the Grade II Listed Shelley Farmhouse to the north. This is within the built up area of Monkspath. All listed buildings lie some distance away and are protected by topography, distance and intervening features meaning there is no visual relationship. The proposed development will therefore not impact on the setting of any listed buildings.
- 8.48 Overall the available archaeological, historical and cartographic evidence indicates that there is low potential for prehistoric, medieval or Roman archaeology on the site. There would be a slight impact on the Historic Landscape Character, however the current setting between the M42 and Monkspath means this impact will be minor.
- 8.49 On the basis of the above, it is considered that the proposed development accords with Policies P15 and P16 of the Solihull Local Plan.

### **Ground Conditions**

- 8.50 A full set of intrusive ground investigations have taken place across the site and the assessment of chemical test data for the study area indicated it is suitable for commercial development. Overall the contamination risks for the whole site are determined to be low and there is a negligible risk to human health and controlled water receptors. No mitigation is considered to be required.
- 8.51 On the basis of the above, the proposed development is considered to meet the requirements of Policy P14 of the Solihull Local Plan.

### **Noise**

- 8.52 A Noise Assessment has been undertaken in support of this planning application. The assessment considers the three most likely sources of noise associated with the development as follows:
- Noise from external plant and generators (including proposed CHP);
  - Noise from traffic movements; and
  - Noise associated with the automotive testing facility.
- 8.53 At its closest point, the proposed development is approximately 70m away from the nearest residential receptor located on Elmbridge Drive to the north west of the site.
- 8.54 Given the proximity of the M42 motorway and the results of the noise survey undertaken, it is evident that the noise climate is dominated by background traffic noise. On this basis, additional traffic movements are not considered likely to have an impact on the existing noise conditions.
- 8.55 The automotive training and testing facility is not akin to a standard car servicing facility as only minor preparatory works will take place to ensure vehicles are fit for 'display'. The workshop has also been designed so it only has one 'open' elevation which is orientated away from the residential dwellings; the remaining elevations will be 'banked' with earth and vegetation which will minimise noise emissions. On this basis, it is

considered unlikely that this element of the scheme will give rise to unacceptable noise impacts.

- 8.56 Mechanical servicing equipment where possible is proposed away from nearby receptors on the further side of buildings from residential dwellings. Noise from this equipment will be restricted and it is considered that suitable mitigation can be achieved through the use of duct silencers, acoustic louvres, and acoustic barriers.
- 8.57 On the basis of the above, it is considered that the proposed development complies with the requirements of policy P14 of the Solihull Local Plan.

### **Sustainability and Energy**

- 8.58 A Sustainability Statement is submitted in support of this planning application which sets out the applicant's approach to carbon reduction in designing the scheme.
- 8.59 Each building has been designed to achieve BREEAM Very Good, EPC 'B' Rating, and between 10 and 15% carbon reduction through low carbon energy sources. Combined Heat and Power (CHP) alongside the use of photovoltaic panels are being considered to generate green energy for the scheme.
- 8.60 In addition to renewable energy sources, the proposed development has been designed in an energy efficient manner to reduce energy demand. This involves energy demand minimisation through efficient building form and orientation, good envelope design and proficient use of services.
- 8.61 It is considered that the proposed development is achieving the highest possible and feasible energy efficiency / carbon reduction and is therefore in accordance with Policy P9 of the Solihull Local Plan.

### **Summary and Conclusions**

- 8.62 Fore Business Park is allocated for employment development in the adopted Solihull Local Plan and the proposed development accords with the principles established in Policy P3. Paragraph 14 of the NPPF confirms that proposals which accord with the development plan should be approved 'without delay'.
- 8.63 There are elements of the proposed development which lie outside of the allocation boundary. Some of those elements which are located in the Green Belt are not considered by the applicant to be inappropriate as defined within paragraphs 89 and 90 of the NPPF and will not impact on openness nor the five purposes of the Green Belt. Those elements which are considered to be inappropriate are supported by Very Special Circumstances as set out in the following Chapter.
- 8.64 These Very Special Circumstances (as set out in Chapter 9 of this Statement) and the overall benefits of the scheme are not outweighed by the minimal harm to the Green Belt or any other harm, which is also minimal as confirmed by the analysis set out in this chapter.

## 9. Green Belt Justification

### Site Background

- 9.1 Part of the site was first removed from the Green Belt through the preparation of the Solihull UDP in 1991. This followed the submission of an outline planning application for office development in 1990.
- 9.2 Through the Solihull UDP (2006), the Green Belt Boundary was subsequently altered to include all land upon which buildings were permitted by virtue of the extant planning permission.
- 9.3 The 2006 UDP Inspector noted that *“the present Green Belt boundary follows an arbitrary line about 200m away from the M42”* and commented on that fact that *“the approved plans show much of the Green Belt land being used for parkland and car parking”*. However, he concluded that *“since no buildings [emphasis added] are planned on this part of the site, there is no justification to remove this land from the Green Belt”*.
- 9.4 It is not clear why the Inspector felt that the land which had been permitted for use as car parking should not be removed from the Green Belt, however this has led to an unusual linear shaped allocation which does not reflect the historic pattern of approved and built development on the site.
- 9.5 As set out in Chapter 4 of this Statement, the site benefits from extant planning permission for office development and associated car parking. The approved scheme has been partially implemented and therefore remains extant in part. **Appendix 7** demonstrates the extent of the extant planning permission in relation to Green Belt Boundary and the current proposed development.

### Planning Policy

- 9.6 Section 9 of the NPPF is concerned with protecting Green Belt land and sets out the purposes of the Green Belt and the circumstances in which development is considered to be “inappropriate” in the Green Belt.
- 9.7 Paragraph 87 confirms that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”*. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations (paragraph 88).
- 9.8 Paragraph 89 establishes that the construction of new buildings should be regarded as inappropriate. However there are a number of exceptions to what constitutes inappropriate development which are defined in paragraphs 89 and 90. The relevance of these exceptions is explored in more detail below.
- 9.9 In all circumstances where the proposal is acceptable ‘in principle’, as it accords with one of the exceptions considered ‘not inappropriate’, the consideration for the Local Planning Authority then hinges on the effect that the proposed development would have

on the openness of the Green Belt and on the purposes of including land within it, as set out in paragraphs 78 and 80 of the NPPF:

*“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

*Green Belt serves five purposes:*

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

9.10 By way of background it is noteworthy that the Solihull Strategic Green Belt Assessment (July 2016) assesses the contribution the site makes to the Green Belt as part of a wider parcel (RP43). The assessment confirms that the site scores only 4 points out of a possible 12 in terms of the contribution it makes to the purposes of the Green Belt. The site scores as follows in relation to each purpose of the Green Belt:

- Purpose 1. To check the unrestricted sprawl of large built-up areas – Parcel is moderately performing.
- Purpose 2. To prevent neighbouring towns merging into one another – Parcel is moderately performing.
- Purpose 3. To assist in safeguarding the countryside from encroachment – Parcel does not perform against this purpose.
- Purpose 4. To preserve the setting and special character of historic towns - Parcel does not perform against this purpose.

9.11 None of the sites included in the Strategic Green Belt Assessment were assessed against the fifth purpose - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

### **Determining whether the development would be “Inappropriate” in principle**

9.12 The proposed development at Fore Business Park is primarily located within the area allocated for development within the Solihull Local Plan (2013). It is noteworthy that the allocation boundary is unusual in that it is a long linear shape which does not accord with the layout and arrangement of approved and built development at the site (i.e. the access road and parking associated with the existing buildings is within the Green Belt).

- 9.13 The majority of the proposed built development is located on land which is not designated as Green Belt. However, some elements of the proposed development are proposed within the Green Belt on the periphery of the allocation. These elements are:
- Car parking and access road;
  - A security gate house;
  - A small corner of the main building;
  - A training and automotive testing facility;
  - Sustainable Drainage Infrastructure; and
  - Associated landscaping and footpaths.
- 9.14 It is considered that the proposed buildings (security gatehouse, automotive training and testing facility, and part of the main building) would comprise inappropriate development in the Green Belt and Very Special Circumstances are therefore necessary to justify these elements.
- 9.15 With regard to the proposed car parking and access road, appeal decisions have confirmed that these type of development could be considered an '*engineering operation*'<sup>1 2</sup> and therefore not inappropriate under paragraph 90 of the NPPF. However, there have been differing views given by inspectors with regard to whether roads and car parking can impact on the 'openness' of the Green Belt and whether by virtue of this they are therefore inappropriate. Very Special Circumstances are therefore provided by this application to support these elements of the proposed development.
- 9.16 Paragraphs 89 and 90 of the NPPF establish a number of exceptions to what constitutes inappropriate development in the Green Belt. These exceptions include inter alia "*provision of appropriate facilities for outdoor recreation*" and "*engineering operations*".
- 9.17 The appropriateness of each use proposed in the Green Belt is considered in turn below.

## **'Not Inappropriate' Elements of the Scheme**

### **Country Park / Footpaths**

- 9.18 In a 2015 Court of Appeal judgement<sup>3</sup>, a conclusion was reached that any development (including the material change of use of any land) within the Green Belt is considered to be inappropriate development, unless it is specifically referenced within paragraphs 89 and 90 of the NPPF.
- 9.19 However, in a more recent Secretary of State decision (October 2015) for residential development on land at Tidbury Green Farm, Solihull (PINS reference

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<sup>1</sup> Appeal Ref: APP/T3725/W/16/3150927 – Crackley Hall Sports Field, Princes Drive, Warwickshire, CV8 2FS

<sup>2</sup> Appeal Ref: APP/X4725/W/14/3001702 - Land at Ouchthorpe Lane, Wakefield

<sup>3</sup> R (Timmins and Lymn Family Funeral Service) v. Gedling Borough Council and Westerleigh Group Limited [2015] EWCA Civ 110

APP/Q4625/A/14/2220892) the Secretary of State concluded that use of part of the Green Belt as open space is not inappropriate in light of paragraph 89 of the NPPF, as this use amounts to the provision of facilities for outdoor recreation. Moreover the provision of open space would comply with paragraph 81 of the NPPF in providing opportunities for outdoor recreation.

- 9.20 The Secretary of State presents a clear view that open space in the Green Belt is not inappropriate. It is the applicant's view therefore that the extension to the Country Park and the associated landscaping and footpaths is not inappropriate development in the Green Belt.

### **SUDS Infrastructure**

- 9.21 The Tidbury Green Secretary of State decision also considered the provision of SUDS infrastructure in the Green Belt, and the Secretary of State confirmed that SUDS are an engineering operation within the scope of paragraph 90 and is therefore not inappropriate development in the Green Belt.
- 9.22 The SUDs infrastructure proposed in the Green Belt at Fore Business Park can therefore be considered not inappropriate provided it does impact on openness and does not conflict with the purposes of including land within the Green Belt.

### **Impact on Openness**

- 9.23 In terms of openness, the introduction of the Country Park extension (including footpaths) and SuDs infrastructure will all take place at or below ground level. As such, there is not considered to be any impact on the openness of the Green Belt associated with these elements.

### **Impact on Purposes of the Green Belt**

#### ***To check the unrestricted sprawl of large built-up areas***

- 9.24 Those elements of the proposed development which can be considered "not inappropriate" do not comprise traditional 'built' development. It is therefore considered that they will not result in a 'sprawling' of the existing built up urban area.

#### ***To prevent neighbouring towns merging into one another***

- 9.25 Fore Business Park lies on the edge of the built up area of Monkspath, a suburb of Solihull. By the nature of the surrounding uses (and in particular the M42 motorway to the east) the provision of landscaping, footpaths and SuDs infrastructure would not result in the merging of neighbouring towns.

#### ***To assist in safeguarding the countryside from encroachment***

- 9.26 The Solihull Green Belt Assessment (2016) confirms that this site does not perform against this purpose of the Green Belt and it is not considered that the proposed SuDs infrastructure and landscaping would result in encroachment in the countryside.

#### ***To preserve the setting and special character of historic towns***

- 9.27 The Green Belt in this location is not related to any historic towns. This area therefore does not assist in preserving the setting or special character of any historic towns.

***To assist in urban regeneration, by encouraging the recycling of derelict and other urban land***

- 9.28 Fore Business Park is allocated for employment development and the elements of the proposed development falling in the Green Belt will directly serve and enable the development of this site. The proposals will therefore not result a conflict with the fifth purpose of the Green Belt.

**'Inappropriate' Elements of the Scheme**

- 9.29 A set out in paragraph 9.14 and 9.15, it is considered that the proposed buildings (security gatehouse, automotive training and testing facility, and part of the main building) as well as the proposed access road and car parking, would comprise inappropriate development in the Green Belt and Very Special Circumstances are therefore provided by this application to justify these elements.

**Very Special Circumstances**

- 9.30 Paragraph 87 of the NPPF explains that inappropriate development should not be approved in the Green Belt except in 'very special circumstances'. On the basis of the above analysis, it is considered by the applicant that some elements of the proposed scheme are inappropriate development in the Green Belt.
- 9.31 Paragraph 88 of the NPPF states that *"Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations"*. This test comes down to detailed consideration of the planning balance and measuring the benefits of the proposals against *'any other harm'*.
- 9.32 As set out in Chapter 2 of this Statement, IM's current headquarters building is located along the route of the new High Speed Rail link from London to Birmingham and IM have recently been served notice which confirms that they are required to vacate their current building by June 2019.
- 9.33 IM therefore have an urgent need to relocate from their current premises and their preference is to relocate into Solihull Borough. As a major employer and landowner, their relocation will bring substantial economic benefits to the Borough. The significant economic benefits that the relocation of IM's office quarters and the development of this site for employment uses will bring is summarised in paragraph 8.14 of this statement and set out in full in the supporting Economic Impact Assessment.
- 9.34 Fore Business Park is an allocated employment site and is therefore identified as a suitable location for business growth. Employment development here is required in order to contribute towards Solihull's economic growth and Local Plan requirements.
- 9.35 However, the shape of the existing allocation and the layout and arrangement of approved and built at the site mean that, in order to deliver well-designed new employment development certain elements of the proposed development need to be located within the Green Belt. Without these elements being located in the Green Belt, it is considered that the allocation cannot be successfully delivered and the specific headquarter needs of IM cannot be accommodated.

- 9.36 In addition to IM's specific requirements, the wider proposals for the site have sought to make the most efficient use of an allocated site by maximising the opportunities for employment development on the allocated parts of the site, therefore further enhancing economic and employment opportunities within the Borough.
- 9.37 Where possible, elements of the scheme which are proposed within the Green Belt have been located within the part of the site which benefits from an extant planning permission (see **Appendix 7**). The principle of development on this part of the site is therefore already accepted in principle. The total amount of floorspace proposed within the Green Belt is 293 sq m out of a total 16,696 sq m proposed. This equates to only 1.75% of the total floorspace proposed.
- 9.38 On the basis of the above, the very special circumstances which it is considered justify the inappropriate elements of the scheme can be summarised as follows:
- The delivery of an allocated employment site meeting the specific requirements of an identified end user with a need to relocate.
  - The economic benefits associated with IM Group relocating into the Borough and associated job creation.
  - Making the most efficient use of an allocated site in the context of a shortfall of employment land within the Borough.
  - An extant planning permission covering parts of the Green Belt and proposals which would largely not have any greater impact on openness than the permitted development of the site.
  - A well-considered and rational proposed development layout that responds to existing and approved development on the remainder of the wider site.
- 9.39 These VSC's are further explored below in relation to each of the 'inappropriate' elements of the proposed scheme.

### **Car Parking and Access Road**

- 9.40 As set out in Section 4 of this Planning Statement, a large proportion of the site already benefits from an extant planning permission for car parking within the Green Belt. On this basis it is considered that the majority of the proposed parking is acceptable in principle and will not result in any greater impact on openness than the previously approved scheme. Indeed, it is considered that the additional areas of landscaping proposed within the car parking area will help to enhance the visual appearance of this part of the proposed development and 'break up' the car park layout thereby improving the 'openness' generally across this part of the site relative to the approved proposals.
- 9.41 As an extension to the existing access road (which is already located in the Green Belt) it is logical therefore that the access road to the headquarters building is also located within the Green Belt. Trying to locate the access road within the allocation would lead to an irrational site layout and would sterilise the majority of the allocation.

- 9.42 Only a small area of car parking is proposed within the Green Belt outside of the area which already benefits from an extant planning permission for car parking (see **Appendix 7**).
- 9.43 By way of background, the previously approved scheme was approved at a car parking ratio of 1 space per 27 sq m, instead of a policy compliant 1 space per 30 sqm. If all floorspace approved by virtue of the extant permission (18,500 sq m) is implemented in accordance with the approved ratio of 1 space per 27 sq m and all net new floorspace is implemented in accordance with a policy compliant ratio of 1 space per 30 sq m, this would result in a total parking allowance of 907 spaces (accounting for disabled) across the site. As a maximum of 897 are proposed across the site, it is considered that this is an acceptable level of provision in principle to support the proposed development in the context of the extant permission.
- 9.44 IM are keen to ensure that the scheme will meet their operational requirements. In particular, IM have very specific requirements in terms of parking. As well as the standard requirements for staff parking, IM also have the following additional requirements which are specific to their business:
- Approximately 45 visitors per day;
  - A weekly car dealer training event attended by approximately 10 people;
  - At any time approximately 18 cars will be 'stored' on the site associated with the International Motors business;
  - An IM Group 'Dealer Day' where new vehicular models are launched takes place 4-5 per year with 40 attendees; and
  - The Midlands Industrial Council is hosted twice a year with approximately 30 visitors (plus security).
- 9.45 It is noted that some of the parking requirements could be considered 'overflow' requirements in that they are not a day to day requirement for spaces. To reflect this, and to ensure that the proposed parking is assimilated as far as possible into the surrounding landscape when not in use, a number of the proposed spaces on the eastern edge of the site are proposed to be constructed from reinforced grass. All areas of parking will be set within a landscape setting to ensure that there is a visual 'break' between the various areas of parking on the site. In that respect, the applicant has sought to design their proposed development and its associated car parking in a sensitive manner that respects the existing character of the site and its context.
- 9.46 On the basis of all of the above, it is considered that the benefits associated with enabling the delivery of much needed employment development justify the small encroachment of parking into the Green Belt over and above that already approved. Furthermore the majority of spaces which encroach farther into the Green Belt than those previously approved will be reinforced grass which will enable them to blend into the landscape when not in use.

### **Gate House**

- 9.47 The proposed gate house for IM's new headquarters building is located in the Green Belt. The building footprint will be approximately 15 sqm. The existing access road into the business park is located in the Green Belt and therefore the extension to the access road is also proposed within the Green Belt.
- 9.48 The proposed gatehouse needs to be on the extended access road and the proposed location in the Green Belt is therefore logical and entirely justified considering the layout of development at the site.
- 9.49 The gatehouse is a specific requirement of IM and is considered necessary for the effective operation of their proposed headquarters at the site. The design of the gatehouse (in terms of its size, scale and materials) has been given particularly sensitive consideration to ensure it is appropriate for this location and continues the theme of high quality development. The building therefore reflects its Green Belt location and seeks to minimise impacts on openness as far as possible. The overall effect on the openness of the site will therefore be negligible.

### **Corner of Main Building**

- 9.50 The corner of the main building extrudes very slightly into the Green Belt. From a design point of view, it is IM's preference that their new Headquarters building 'faces' approaching visitors to provide a well-considered 'frontage' to their building. The design and layout of the proposed development has also taken account of the potential to maximise natural lighting and therefore the sustainability credentials of the buildings.
- 9.51 Only 78 sq m of the proposed headquarters (which has a proposed total floor area of 5,004 sq m) will fall within the current Green Belt boundary: this represents just 1.5% of the building. It is not considered that this small corner of the building would result in any discernible difference in terms of openness.
- 9.52 It is considered that the benefits of a well-designed building that can make the most efficient use of natural resources, and add to the sense of place being created by the high quality approach taken by the applicant towards design and layout of the proposed development, is a significant benefit which would outweigh any potential perceived harm to the Green Belt associated with this aspect of the scheme.

### **Training and Automotive Testing Facility**

- 9.53 A specific requirement of the IM Group headquarters building is an automotive training and testing facility. This facility is fundamental to the core operation of International Motors. It provides a facility for hands on training, testing and a high-tech examination environment for car dealerships. The facility also provides a location for the Business Development aspects of future car models where new car designs can be examined and tested in a secure environment.
- 9.54 The facility requires a close connection to the main headquarters allowing the facility to be easily accessible by the IM teams. An element of security and screening of the facility is also required. For this reason it is considered that the best location for the facility is to the rear of the main office building. Three of the four elevations which are 'outward' facing are then proposed to be 'banked up' with earth and vegetation to provide screening and security from all sides and assimilate the building into the

landscape. The innovative design also reduces the visual impact of the building when viewed from the Country Park.

- 9.55 If the entire development was 'shifted' south to ensure that the facility was wholly within the allocation line, this would sterilise valuable allocated employment land for a relatively small ancillary facility. It is not considered that this would be the most efficient use of a site allocated for employment development in the context of a significant shortfall of employment land in the Borough and the wider economic area.
- 9.56 The West Midlands Land Commission Report (February 2017), states *"there is already a considerable shortage of readily developable employment sites of all types"* (para 3.10) in the West Midlands, and suggests that *"the evidence the commission has seen suggests that the shortfall of land for employment space is at least as pressing as the shortage of land for new homes, and possibly more so"* (para 5.20). Turley submitted detailed representations in response to the Solihull Local Plan Review on behalf of IM which suggested that SMBC needed to revisit their employment evidence base to reflect a more accurate picture of the need for employment land in the Borough. An extract from these representations is provided in **Appendix 8**.
- 9.57 The automotive facility is one storey in height and only 200 sq m in size. Given that the building would largely be seen within the context of, and largely screened by, the main office building, it would not result in any significant impact on the openness of the Green Belt. In addition, as this facility is specific to IM's requirements, should IM ever vacate the premises, this element of the scheme could be removed and the land reverted back to open land. Overall therefore it is considered that the benefits associated with locating this element of the proposal within the Green Belt, substantially outweigh any potential harm to the Green Belt.

### **Summary of Green Belt Considerations**

- 9.58 Four small elements of the proposed development are proposed within the Green Belt and are considered 'inappropriate development'. These elements are the new access and car parking, the security gatehouse, a small corner of the main headquarters building and the automotive training and testing facility. All of these elements are a specific requirement of the end user and are fundamental to the scheme.
- 9.59 Overall, the significantly constrained extent of the allocation means that in order to successfully deliver the entire scheme in a well-designed way, it is necessary and justified for these particular elements to be located within the Green Belt.
- 9.60 The extant permission on site covers the vast majority of the area of Green Belt which would be affected by the proposals; only a small area to the north of the site is additional development in the Green Belt, over and above that which is already approved on the site.
- 9.61 There are significant benefits associated with the delivery of an allocated employment site for a specified end user. When weighing these benefits against any potential minimal harm to the Green Belt and any other harm associated with the proposed development (which through the analysis set out in Section 8 of this statement is also

minimal), it is considered that Very Special Circumstances exist which clearly justify those elements of the scheme which are proposed in the Green Belt.

## 10. Planning Obligations

- 10.1 It is not considered that the proposed development will give rise to any planning obligations and it is therefore not considered that a Section 106 Agreement will be required. It is considered appropriate that the sustainable travel objectives associated with the Travel Plan be secured via condition.
- 10.2 The applicant is aware that there is an existing Section 106 agreement associated with the previously approved scheme. A deed of variation to this Section 106 agreement will be undertaken in order to ensure that the existing agreement reflects the current context and changed circumstances; however this will be undertaken separately from this application.

## 11. Summary and Conclusions

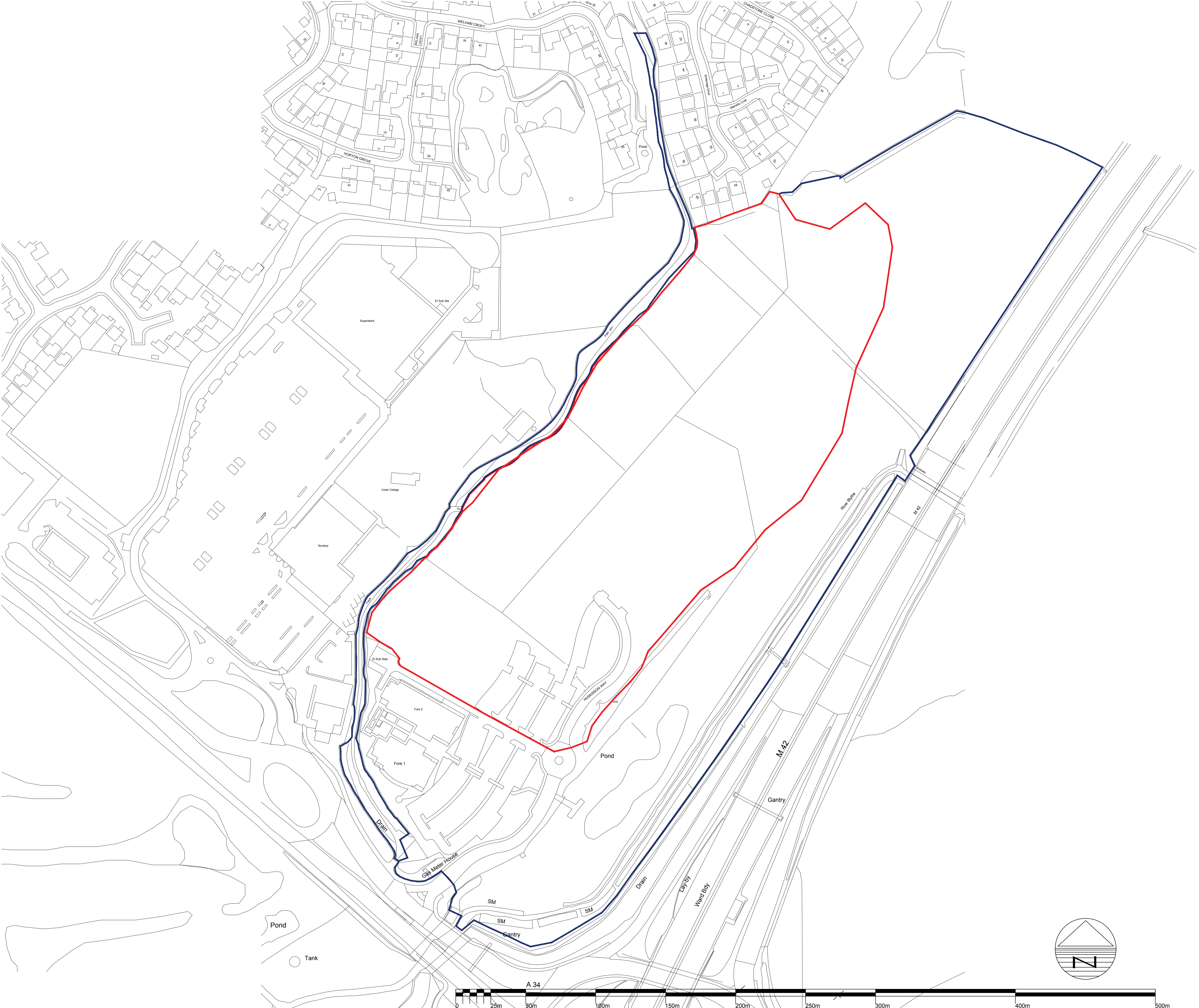
- 11.1 Fore Business Park is allocated for employment development under Policy P3 of the adopted Solihull Local Plan (2013) and the application site is the subject of an extant planning permission for major office development.
- 11.2 The proposed development should therefore be considered from the starting point that the principle is acceptable unless any potential impacts or harm would significantly outweigh the support provided by the Local Plan and the benefits that the development will bring.
- 11.3 The Applicant is dedicated to delivering a high quality development, building on the success of the existing Business Park, and incorporating its own headquarters campus into the park and surrounding landscape. This represents a significant opportunity for the Borough to accommodate a major regional employer with a strong track record for investment.
- 11.4 The proposed development comprises a Hybrid application .The description of development is as follows:

*“Hybrid planning application for employment development at Fore Business Park to comprise: in full; erection of two office buildings (Use Class B1) with ancillary automotive training and testing facility, security gatehouse, access road, car parking, landscaping and associated work; and in outline, with all matters reserved, up to 10,930 sq m of office floorspace with car parking, landscaping, and associated works.”*

- 11.5 Extensive pre-application discussions have taken place with SMBC, as well as formal public consultation with local stakeholders. This pre-application consultation has fed in to the final proposed scheme.
- 11.6 The proposals fully accord with the principles of Policy P3 of the Local Plan and the analysis set out in this Statement demonstrate that the proposed development, including those elements located within the Green Belt, are justified and appropriate and there would be very limited adverse harm scheme caused by the proposed development, especially when weighed against the scale of benefits that will be delivered.
- 11.7 Very Special Circumstances exist which outweigh the potential minimal harm to the Green Belt. The support provided by the Local Plan and other material considerations set out in this Planning Statement weigh heavily in favour of the proposals in the overall planning balance.
- 11.8 The proposed development will result in substantial economic benefits for the Borough as well as social benefits through the provision of an extension to the existing Country Park.
- 11.9 The proposed development at Fore Business Park accords with national planning guidance and represents sustainable development that has been carefully designed to respect its context and to assimilate as far as possible into the local landscape character of the site.

- 11.10 The applicant has worked collaboratively with SMBC to ensure that the proposed development meets the Council's policy requirements. On the basis of the analysis set out within this statement, it is considered that this planning application should be fully supported and approved by SMBC.

## **Appendix 1: Site Location Plan**



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THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT DRAWINGS AND SPECIFICATIONS.

ALL PROPOSALS ARE SUBJECT TO CONFIRMATION FOLLOWING DETAILED TOPOGRAPHICAL SURVEY AND GROUND INVESTIGATION WORK.

IT HAS BEEN ASSUMED THAT OTHER THAN WHERE SHOWN THE SITE IS ESSENTIALLY FLAT WITH NO EASEMENTS TO ABOVE OR BELOW GROUND SERVICES.

WHERE BOUNDARIES ARE SHOWN THESE ARE AS ADVISED BY THE CLIENT AND ARE FOR GENERAL GUIDANCE ONLY. WHILST PLOTTED WITH REFERENCE TO LAND REGISTRY DATA WHERE AVAILABLE AND INTERPOLATED AS PHYSICAL FEATURES ON SITE WHERE POSSIBLE, THEY ARE NOT INTENDED TO REPRESENT DEFINITIVE SITE EXTENTS OR LEGAL OWNERSHIP.

B 16.06.17 DDH General planning updates  
A 08.06.17 DDH Redline amended for planning submission

Rev: Date: By:  
Client:

**IM Properties**

Project:  
Office Development  
Fore Business Park

**Solihull**

Drawing Title:  
Site Location Plan

PLANNING

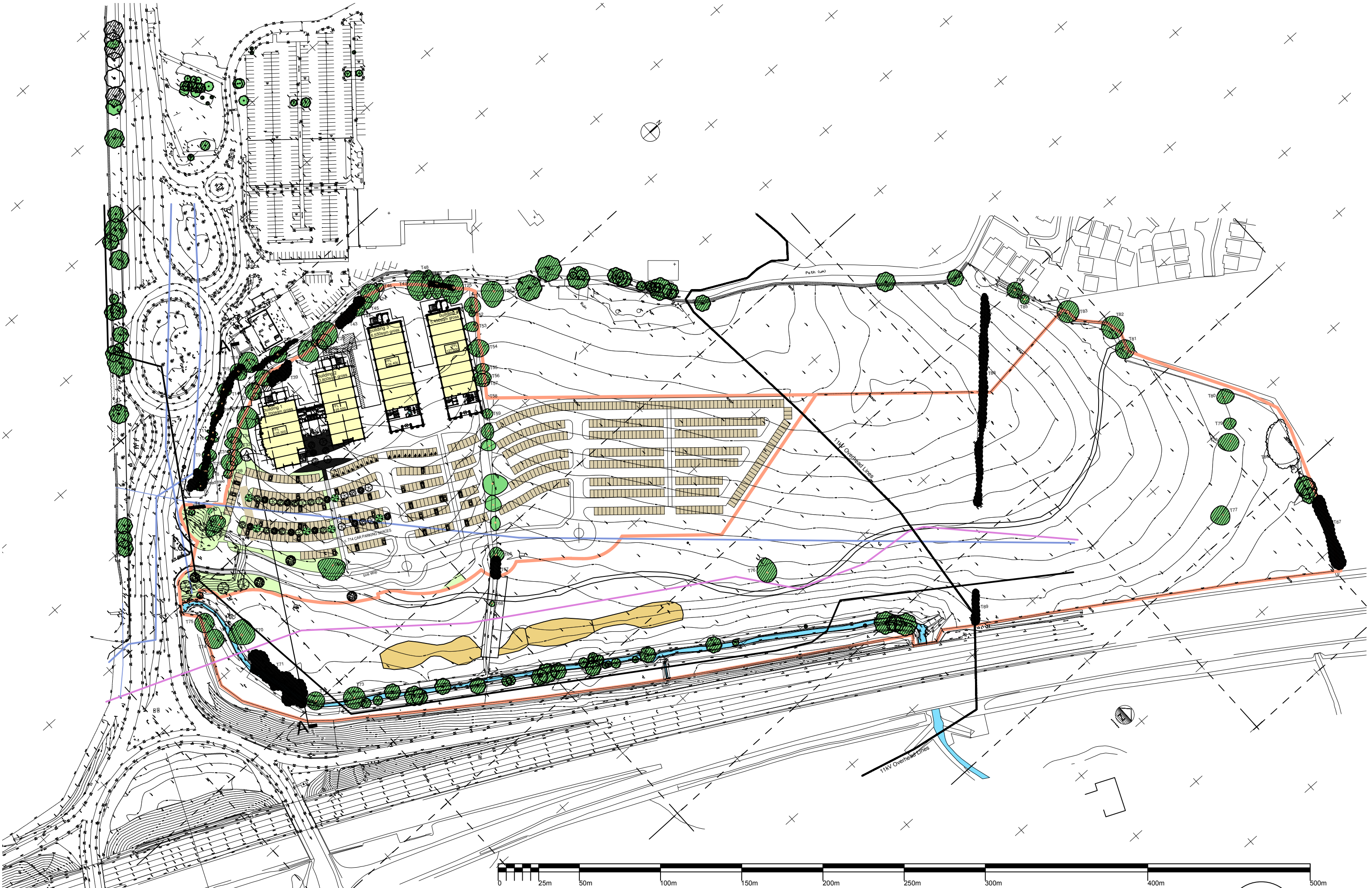
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Job No: <b>8461</b>	Drawing No: <b>P-001</b>	Revision:	<b>B</b>

## **Appendix 2: Extant Planning Permission Layout**



Original Planning Approval

## **Appendix 3: Public Consultation Event Invite**

24 May 2017  
Delivered by post

Dear

**PROPOSED COMMERCIAL DEVELOPMENT AT FORE BUSINESS PARK, SHIRLEY, SOLIHULL –  
INVITATION TO PUBLIC EXHIBITION ON 6 JUNE 2017**

I am writing on behalf of IM Properties ('IM') to invite you to a public exhibition relating to proposals for a new commercial development at Fore Business Park in Shirley, Solihull. See **Figure 1** below for the location of the site.



9 Colmore Row  
Birmingham  
B3 2BJ

T 0121 233 0902 [turley.co.uk](http://turley.co.uk)

Fore Business Park is allocated for commercial development in the adopted Solihull Local Plan (2013) and it is IM's intention to submit a planning application for commercial buildings on the site. The application will include exciting new proposals for IM's own new headquarter office building.

IM is one of the UK's largest privately owned property groups, with an investment and development portfolio of circa £900 million across the UK, Europe and the USA. You can find more information about IM Properties at [www.improperties.co.uk](http://www.improperties.co.uk).

IM are looking at the best way to develop the site and want to engage with the community and surrounding occupiers on the proposed plans. As part of this process a public exhibition will be taking place in early June. At the event the latest draft plans will be on display and members of the project team will be available to answer any questions on the proposals. Feedback forms will also be available to capture comments on the proposals.

As a local resident / key stakeholder, we would like to invite you to the exhibition on **Tuesday 6th June 2017, anytime between 4.30pm and 6.30pm at Monkspath Junior and Infant School - The Blue Room / Family Centre**, 6 Farmhouse Way, Shelly Crescent, Shirley, Solihull B90 4YW. All of the comments from the exhibition will be considered before the plans are finalised and a planning application is submitted to Solihull Metropolitan Borough Council in June 2017.

We hope to see you at the exhibition. If however you are unable to attend, please do not hesitate to contact us via email on [foreconsultation@turley.co.uk](mailto:foreconsultation@turley.co.uk). We will be able to provide you with a copy of the consultation material (once available) and answer any queries you may have.

Yours sincerely

Rosie Cotterill  
**Senior Planner**

## **Appendix 4: Public Consultation Banners**

# The Proposals for Fore Business Park

## Welcome

IM Properties (‘IM’) welcome you to this exhibition which presents the exciting new proposals for Fore Business Park.

The proposals include for a number of high quality office buildings including IM’s own new headquarters building, as well as an extension to the existing Country Park.

The purpose of this exhibition is to enable us to hear the views of the local community on the proposals and the design of the scheme. The feedback we receive will help to refine the proposals moving forward.

Members of our design and technical team are on hand to discuss the plans with you so please feel free to ask any questions you may have. We have also provided feedback forms and would welcome your comments.



▲ Site location plan

## About IM Properties

IM Properties (part of IM Group) was established in 1987 and is one of the UK’s largest privately owned property companies. IM Properties has established a strong reputation for delivering high quality developments, and the proposed development at Fore Business Park continues their commitment to delivering exceptional design quality.

The project team present today includes:

**IM Properties** – The Developer

**Turley** – The Planning Team

**Webb Gray** – The Architect

**PBA** – Highways

**CWA** – Drainage

**FPCR** – Ecology

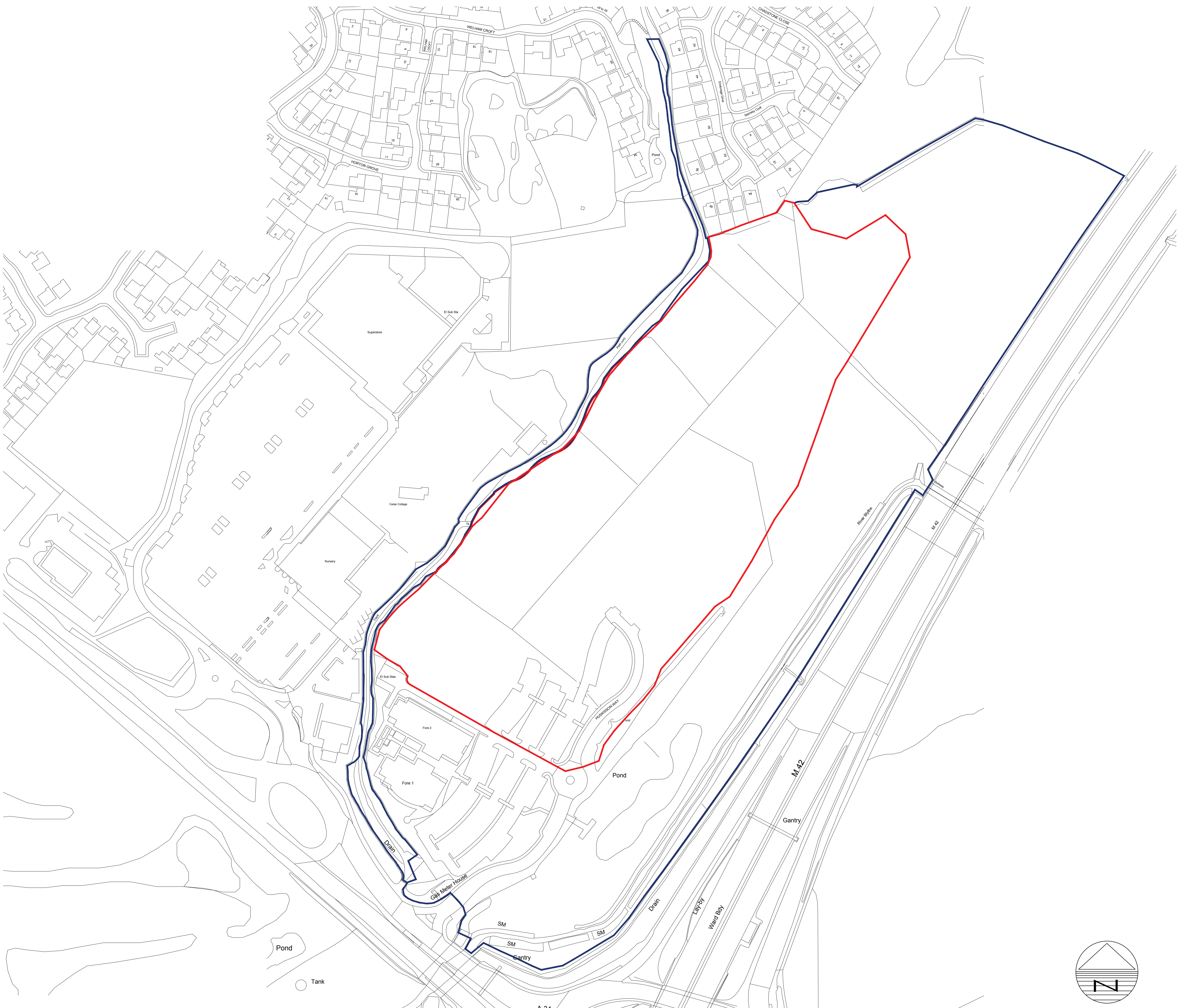


# The Proposals for Fore Business Park

## The site

The application site is located within the red line boundary shown. It forms an extension to the existing Fore Business Park shown edged in blue on the plan.

The existing business park is set within a Country Park which will be extended as part of the proposed development.



▲ Current site plan

### A Well Located Site

The site is located just off Junction 4 of the M42 which provides excellent links via motorway to all parts of the Country.

Birmingham International Airport, Birmingham International Station and the NEC are located approximately 8km to the north, about 15 minutes’ drive along the M42. The airport and railway station provide national and international connectivity, and will be bolstered by the arrival of the HS2 interchange.

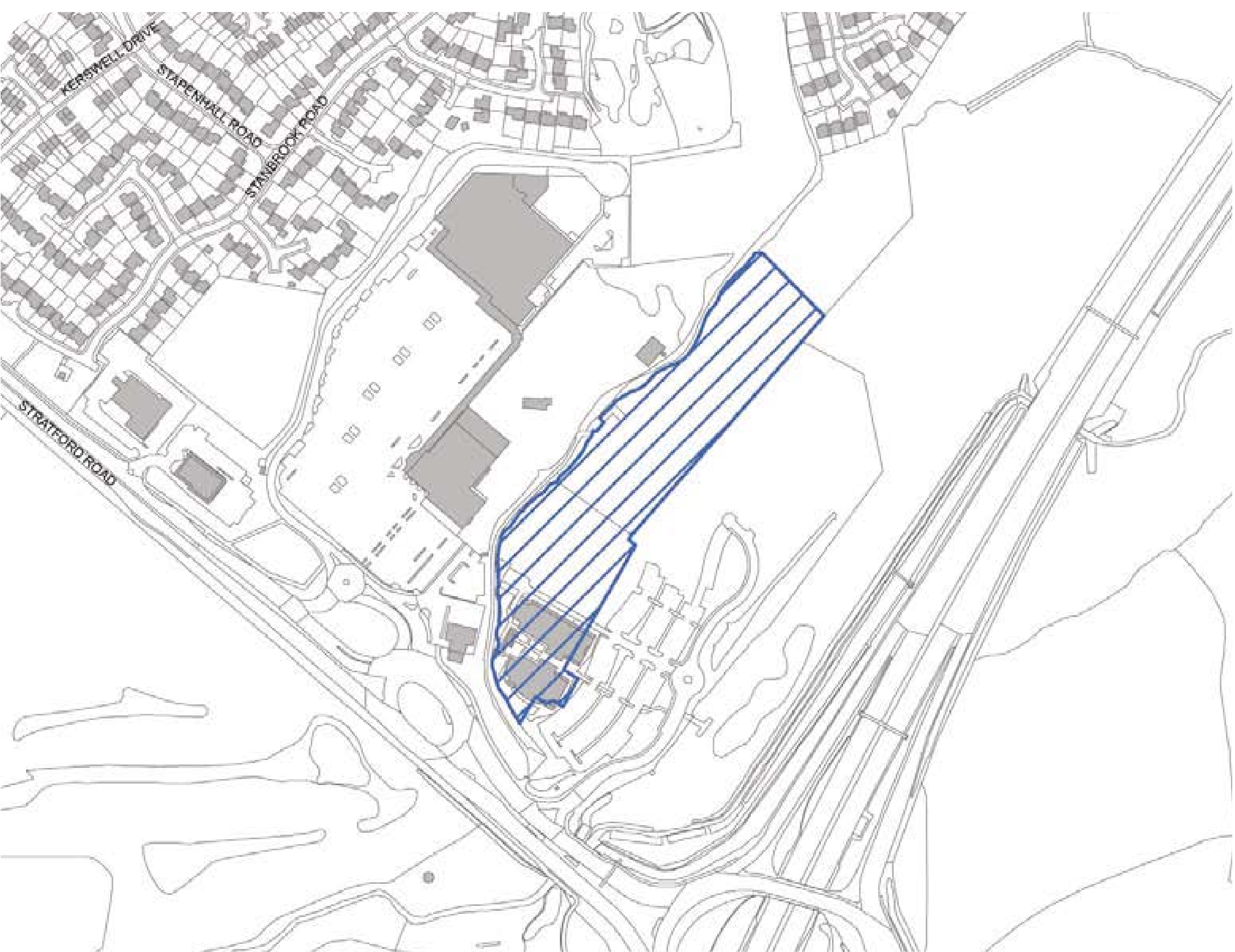
Solihull railway station is located about 3.5m away. The site is served by a bus service shared with Blythe Valley Park providing access to Solihull town centre, Solihull rail station and Birmingham International rail station as well as the X20 that operates along the A34 Stratford Road linking Stratford on Avon and Birmingham City Centre. Public transport services to the site will be further improved (with enhanced bus services secured through the recently approved application on Blythe Valley and expected to commence in 2018), with services operating nearby also calling at Cheswick Green, Knowle and Dorridge at a 15 minute frequency.

For this reason it is an excellent location for viable commercial development.

### Planning Context

Fore Business Park is allocated for employment development in the adopted Solihull Local Plan (2013). This means that the principle of employment related development on the site is acceptable.

IM Properties has engaged in a series of pre-application meetings with Solihull Metropolitan Borough Council in the run up to this consultation event.



▲ Solihull Local Plan Allocation



# The Proposals for Fore Business Park

## Our proposals



▲ Proposed Site Masterplan

Fore is already a well-established and successful business park, home to a number of commercial occupiers.

IM want to build on this success and deliver an office-led development to meet an identified need for employment in Solihull.

The development will include IM's new office headquarters, which will comprise a building of the highest quality design, to reflect its important location on the A34 gateway to Solihull.

The proposed development also includes improvements to and an extension of the existing Country Park. The Country Park forms part of an important wildlife and landscape corridor and will be enhanced to improve biodiversity on the site.

The existing footpath will also be extended to improve pedestrian connectivity with Monkspath.

A Transport Assessment will be completed to support the planning application to demonstrate the operation of the local highway network, including M42 Junction 4 and the A34 to Monkspath Hall Road.



# The Proposals for Fore Business Park

## IM Group Headquarters



IM Group is currently located at an existing office in Coleshill, however due to the proposed route of the HS2 railway line they need to relocate to a new building. As the owners of Fore Business Park, IM have chosen Fore as the location of their new office headquarters and are committed to investing a significant amount into the development of the Park.

The proposal is for a landmark building of the highest quality design and materials. The appearance of the proposal has been influenced by contemporary styling, with an emphasis on creating a clean and modern aesthetic that is both long lasting and utilises a neutral colour palette.

A key architectural element is the 'Corten Steel' wrap around enclosing the second floor accommodation. Other parts of the facade incorporate pre cast stone panels and large elements of powder coated aluminium.

The proposed building design will promote reduced carbon emissions by minimising operational energy use through passive design measures.

The building will be supported by a number of ancillary buildings which will support IM's operations. This includes an automotive training and testing facility which will be used to support the 'International Motors' section of the IM Group.

## Christian Vision Headquarters



In addition to IM Group's headquarters, a new office headquarters for the charity Christian Vision will also be developed. The Christian Vision building will sit alongside IM's new headquarters and has been designed in a style which complements the neighbouring buildings.



# The Proposals for Fore Business Park

## The environment

IM is committed to creating a development which respects and enhances the special environment around it.

The proposals include a substantial extension of and improvements to the existing Country Park. The landscaping proposals include significant habitat creation to support a variety of species and encourage biodiversity.

The extension to the Country Park will complement the wider network of landscaping and biodiversity improvements being made by IM through their development proposals at Blythe Valley Park nearby.



The Country Park will also include an extension to the existing sustainable drainage system (SUDs) and a variety of SUDs features have been incorporated into the design. This includes the creation of swales and ponds, which will also assist in encouraging biodiversity.

IM are committed to sustainable development and will look to incorporate green measures into new buildings where feasible. New buildings will be designed to surpass the current regulations on sustainability and energy usage exploring new technologies such as photovoltaic cells and other renewable energy sources. Buildings will be designed to achieve Energy Performance Ratings of B or above by combining renewable energy measures with construction materials / techniques to enhance the thermal properties of the buildings.



# The Proposals for Fore Business Park

## Feedback

Thank you for taking the time to look at  
our proposals

If you have any questions, please ask a member of our team here today. Your views on the project are important to us and we will consider them as we finalise the proposals for the submission of the planning application. We would therefore be grateful if you could take the time to complete one of the feedback forms and place it in the comments box.

Alternatively you could complete the feedback form at home and send it to:



**Turley, 9 Colmore Row  
Birmingham, B3 2BJ**



**[foreconsultation@turley.co.uk](mailto:foreconsultation@turley.co.uk)**

We would be grateful for all comments by  
**Friday 16 June.**



### Next Steps

Once we have finalised our plans for the site we will submit a planning application to Solihull Metropolitan Borough Council in June 2017.

Once the application has been submitted to the Council, you will have a further opportunity to comment on the proposals.

**Thank you.**



## **Appendix 5: Consultation Feedback Form**

We would welcome your views on our proposals for

# Fore Business Park

Thank you for attending our public exhibition. We are keen to hear your views on our proposals as part of the planning process for the scheme.

Please use this form to give us your feedback on our plans.

**General**

Do you support the proposals for office development at Fore Business Park? (please circle)

Yes / No / Undecided

Do you have any comments regarding the proposed layout? i.e. the location of the buildings.

.....

.....

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.....

.....

.....

**Country Park**

Do you support the proposals for the proposed extension to the Country Park? (please circle)

Yes / No / Undecided

Is there anything you would like to see incorporated into the Country Park?

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.....



We would welcome your views on our proposals for

# Fore Business Park

**IM Headquarters Building**

Do you have any comments on the design of the IM Headquarters Building?

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**Overview**

Do you have any further comments on the proposed development?

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**Your Details:**

Name:.....

Address:.....

Telephone Number:.....

Email:.....

Gender: M / F

Age: under 18   18-35   36-55   57-70   over 70

**Your Comments**

Please send your comments to us via the following contact details by **Friday 16 June 2017**



**Turley, 9 Colmore Row**  
**Birmingham, B3 2BJ**



**foreconsultation@turley.co.uk**

# Appendix 6: Planning Policy Summary

## Solihull Local Plan – Policy Wording

### **Policy P3 ‘Provision of Land for General Business and Premises’**

Sustainable economic growth is important to Solihull’s success as an attractive place to live, work and invest. It will enable increased prosperity, opportunity, well-being and quality of life and will potentially provide a better quality of life for individuals and communities experiencing high unemployment.

To encourage sustainable economic growth and provide a broad range of employment opportunities the Council will plan for a continuing supply of employment land. Fig 13 identifies the strategic sites that comprise the Council’s supply of main employment land for this purpose, adopting a plan monitor and manage approach to avoid over allocating land that may need to unnecessary loss of Green Belt.

The Council will support the allocated sites for the purposes set out in Fig 13. Small-scale supporting facilities may be allowed where needed to specifically enhance or complement business use in the particular business locality and are compatible with sustainable development principles.

(a) to ensure that an adequate supply of land remains available for employment purposes, sites will be protected for their allocated purposes. Non-allocated employment sites will also be protected for employment uses (Classes B1, B2, B8 and, where appropriate, waste management.) Alternative uses may be allowed where the following criteria are met:

- i) The site is relatively isolated from other business premises or is out of place in the context of other neighbouring uses, such as residential; or
  - ii) it is clearly demonstrated that there is no longer a need to retain the site /premises for their intended business class purpose; or
  - iii) In the case of vacant premises, there is no longer a reasonable prospect of attracting business development in market terms;
  - iv) The alternative uses will support sustainable development principles and will directly support employment locally;
  - v) There is no conflict with other policies of the Local Plan or National Planning Policy.
- b) The Council will encourage the retention of small and medium sized enterprises, and the creation of new ones, both in urban and rural areas as a key economic driver and to help facilitate growth in a broad variety of locations, including North Solihull as a priority, subject to the following criteria:
- i) Form, use and scale are appropriate to the character of the particular location.
  - ii) There is no significant harm to the local environment, including landscape quality and character.

iii) Proposals for home working are compatible with the character of the local environment and are consistent with the amenity policies of the Local Plan.

iv) The land or premises are not in the Green Belt or are compliant with Green Belt policy.

v) In the case of development in rural areas, it is consistent with the Council's countryside policies and does not undermine the quality and character of the natural environment.

The Council will expect development proposals on business sites to include the necessary infrastructure to accommodate high capacity digital communication.

In order to encourage sustainable access to business development and reduce the need to travel, applicants for planning permission for business use will be expected to demonstrate the anticipated level of employment that will be generated and how this will be of benefit to meet local employment needs.

Employment development will not be allowed where it sterilises natural resources or key sites needed to secure sustainable development, particularly in regard to provision for distributed heat and energy networks.

Fig 13 Table of Allocated General Business Sites

Site	Site no	Available Allocated Land Area (ha)	Readily Available Allocated Land Area (ha)	Preferred Use Class Purpose
TRW Stratford Road, Shirley	25	18.5	18.5	B1, B2, B8
Solihull Business Park, Highlands Road, Monkspath	26	6.0	6.0	B1, B2, B8
Fore, Stratford Road, Adj. M42	27	2.0	2.0	B1
Chep/Higginson, Bickenhill Lane, Bickenhill	28	4.0	0.0	B1, B2, B8
Land north of Clock Interchange, Coventry Road	29	2.0	1.0	B1
Land adjacent Birmingham Business Park	31	9.0	0.0	B1, B2, B8
Total		41.5	27.5	

### **Policy P7 'Accessibility and Ease of Access'**

a) All new development should be focused in the most accessible locations and seek to enhance existing accessibility levels and promote ease of access.

Development will be expected to meet the following accessibility criteria, unless justified by local circumstances.

i. Proposed housing development should be:

- Within an 800m walk distance of a primary school, doctor's surgery and food shop offering a range of fresh food; and
- Within a 400m walk distance of a bus stop served by a commercial high frequency bus service (daytime frequency of 15 minutes or better) providing access to local and regional employment and retail centres; and/or
- Within an 800m walk distance of a rail station providing high frequency services (3 or more per hour during peak periods) to local and regional employment and retail centres.

ii. Proposed offices, retail and leisure development should be located in town centres, or other established locations including Birmingham Business Park, Blythe Valley Business Park, Birmingham Airport and NEC, as defined in Policies P1, P2 and P19. Here and elsewhere they should be within a 400m walk distance of a bus stop served by a commercially run high frequency bus service;

iii. Proposed education, health and other public service facilities should be located where they are easily accessible on foot, by bicycle and bus by the local community they serve;

iv. Proposals for change of use are likely to be resisted if they reduce accessibility to levels below those listed in this policy.

Investment in improvements to local public transport provision, cycling and/or walking measures will be sought in association with development proposals which do not meet the accessibility criteria set out by this policy.

Residential development proposals for fewer than 3 dwellings in urban areas west of M42 and within rural settlements will be exempt from the criteria set out above. Investment in improvements to local public transport provision, cycling and/or walking measures will continue to be sought in association with such proposals where considered necessary.

b) Access to development from the core walking, cycling, public transport and road networks will be expected to be:

- i. Safe, attractive, overlooked and direct on foot, by bicycle and from public transport;
- ii. Safe for those vehicles which need to access the development;
- iii. And assessed in accordance with Policy P15 'Securing Design Quality' in the Local Plan.

### **Policy P8 'Managing Demand for Travel and Reducing Congestion'**

a) All development proposals should have regard to transport efficiency and highway safety:

- i. Development will not be permitted which results in a significant increase in delay to vehicles, pedestrians or cyclists or a reduction in safety for any users of the highway or other transport network;
  - ii. Travel demands associated with development should be managed to minimise detrimental impact to the efficiency of the highway network;
  - iii. Ensure new development reduces the need to travel e.g. by promoting linked trips and encouraging mixed use development where appropriate;
  - iv. Provision for parking and servicing will be required in accordance with a Supplementary Planning Document on managing travel demands associated with development;
  - v. The Council will support proposals for strategic public transport schemes such as rapid transit, local rail schemes as identified in LTP3 and local Park and Ride at appropriate railway stations subject to other policies in the Local Plan;
  - vi. Off-site parking provision proposed in association with economically important sites will be supported, subject to other policies in the Local Plan, where sustainable transport links between those sites and the parking provision are of a good quality, direct and attractive to use.
- b) The use of sustainable modes of transport, i.e. walking, cycling and public transport, shall be promoted and encouraged in all developments by:
- i. Ensuring the design and management of the development enables and encourages the use of sustainable modes of transport;
  - ii. Ensuring transport planning measures are implemented to help and encourage people accessing the development to use sustainable transport modes;
  - iii. Ensuring the routes to the site from nearby services and local public transport stops are good quality, direct and attractive to use for all users.

#### **Policy P9 'Climate Change'**

The Council will take full account of national and local targets for reducing greenhouse gas emissions and increasing the generation of energy from renewable and low carbon sources, when considering the location and design of new development. It will support the establishment of Renewable Energy Service Companies and community-led initiatives to reduce energy use and exploit renewable energy sources within the Borough. Where appropriate, improvements to the energy standards of existing buildings through national and local initiatives such as the Affordable Warmth Strategy for Solihull and the Government's Green Deal will be promoted.

Developers will be expected to follow a sequential approach to carbon reduction for all new development. Where feasible and viable, new development should incorporate decentralised energy and heating networks. Where it is demonstrated that decentralised networks are not feasible or viable, development should achieve the necessary carbon reduction through on-site measures incorporating design, energy efficiency and renewable energy generation, taking account of the contribution from the Building Regulations and achievement of the Code for Sustainable Homes where relevant. Where it is demonstrated that carbon reduction through on-

site measures is not feasible or viable, a financial contribution toward off-site carbon reduction will be required, in the form of allowable solutions.

Proposals to develop decentralised energy and heating networks in the Borough will be encouraged and should be based on the latest available evidence. Any impacts from infrastructure, including on-site low carbon and renewable energy installations, on the surrounding natural, built and historic environment, including ground and surface water quantity and quality, or on residents or businesses will be considered, with significant weight to be given to the reduction of greenhouse gas emissions to be achieved. Where adverse impacts are identified, these should be minimised, or be subject to appropriate mitigation. In locations where decentralised energy and heating networks or off-gas networks exist, or have the greatest potential, such as Solihull, Shirley and Chelmsley Wood town centres, North Solihull Regeneration Area hubs, and major business parks and developments, developments of an appropriate scale, density and/or mix will be encouraged and developers will be expected to connect to or deliver decentralised networks, unless it is demonstrated that this is not feasible or viable.

Where lower cost solutions such as decentralised networks are viable, developers should aim to achieve zero carbon for all new developments in excess of 50 dwellings or 1,000 square metres, unless it is demonstrated that this is not feasible or viable. Where decentralised networks are not feasible or viable at the time of application, developers will be expected to show evidence in the design of the development to enable future adoption of decentralised networks.

In locations where decentralised networks do not exist and are shown to be unviable, or where the scale or nature of the development is unsuitable, on-site energy efficiency measures and low or zero carbon energy generation shall be provided to meet a carbon reduction equivalent to a minimum of 20% of predicted energy requirements. Developers will be expected to demonstrate the highest viable energy efficiency standards through the location and layout of developments and the use of materials and construction techniques that minimise emissions. Where viable, higher level standards of the Code for Sustainable Homes will be encouraged. Where 'allowable solutions' are used to offset carbon emissions, the Council will give priority to the funding of projects within the Borough.

This policy aims to ensure that all sections of the community are more resilient to the effects of climate change, particularly older people, children and disabled people. Developers should ensure resilience to the impacts of a changing climate for the anticipated lifespan of the development through consideration of a range of adaptation measures, including the location, design, materials, build and operation of developments, and the provision of green infrastructure. Further guidance will be provided to assist the delivery of sustainable design and construction in a Sustainable Design and Construction document, which will include appropriate 'allowable solutions'.

All new developments shall provide for systematic monitoring of the energy use and carbon emissions with the capability of linking into a Borough-wide monitoring system, unless it is demonstrated that such monitoring is unnecessary. All applications shall include evidence to show compliance with this policy in the form of an energy or sustainability statement and

## **Policy P10 ‘Natural Environment’**

The Council recognises the importance of a healthy natural environment in its own right, and for the economic and social benefits it provides to the Borough. The full value and benefits of the natural environment will be taken into account in considering all development proposals, including the contribution to the green economy and the health of residents, and the potential for reducing the impacts of climate change. Joint working with neighbouring authorities will be supported, recognising the need for a landscape scale approach to the natural environment and conservation of biodiversity.

The Council will seek to protect, enhance and restore the diverse landscape features of the Borough and to create new woodlands and other characteristic habitats, so as to halt and where possible reverse the degrading of the Arden landscape and promote local distinctiveness. Development should take full account of national and local guidance on protecting and restoring the landscape and the areas in need of enhancement, including guidance relating to the countryside. Developers will be expected to incorporate measures to protect, enhance and restore the landscape, unless it is demonstrated that it is not feasible, disproportionate or unnecessary.

The Council will seek to conserve, enhance and restore biodiversity and geodiversity, to create new native woodlands and other habitats and to protect, restore and enhance ancient woodland and green infrastructure assets across the Borough. Protection of ancient woodland, designated sites and priority habitats shall include the establishment of buffers to any new development. Development should be informed by the latest information on habitats and species, and take full account of national and local guidance on conserving biodiversity, opportunities for biodiversity enhancement and for improving and restoring the Borough’s green infrastructure. When appropriate, development should seek to enhance accessibility to the natural environment, especially for disabled people.

The Council will protect areas of national and local importance for biodiversity and geodiversity, where it is reasonable, proportionate and feasible to do so. Development likely to have an adverse effect on a Site of Special Scientific Interest, whether directly or indirectly, will be subject to special scrutiny and will be permitted only if the reasons for the development clearly outweigh the nature conservation value of the site and the national policy to safeguard such sites. Where development may have an adverse effect on a Site of Special Scientific Interest, developers will be expected to incorporate measures to enhance the condition of the site, unless it is demonstrated that it is not feasible.

Development likely to have an adverse effect on a Local Nature Reserve or a Local Wildlife or Geological Site will be permitted only if the reasons for the development clearly outweigh the nature conservation or geological value of the site and its contribution to wider biodiversity objectives. Where development would have an adverse effect on a site of local value, developers will be expected to incorporate measures to enhance the site or to restore the links between sites in accordance with the Green Infrastructure study, unless it is demonstrated that it is not feasible.

Outside designated sites, developers will be expected to take full account of the nature conservation or geological value, and the existence of any habitats or species included in the Local Biodiversity Action Plan, or sites in the Local Geological Action Plan. Developers will be required to undertake a full ecological survey and to deliver a net gain or enhancement to biodiversity, unless it is demonstrated that it is not appropriate or feasible. In considering the

need for green space improvements associated with new development, developers should have regard for the standards and priorities in the Green Spaces Strategy in relation to accessible natural green space.

Where development is likely to have significant harmful effects on the natural environment, as a result of the development itself, or the cumulative impact of developments, developers must demonstrate that all possible alternatives that would result in less harm have been considered.

Where development is permitted, appropriate mitigation of the impacts and compensation where relevant will be required to deliver a net gain in biodiversity, habitat creation, landscape character and local distinctiveness. Enhancements should be undertaken either on the site, or in its vicinity, but where it is demonstrated that this is not possible, offsetting in alternative strategic locations within the biodiversity or green infrastructure network, to deliver biodiversity or other objectives may be considered. Where appropriate, developers should demonstrate compliance with this policy through an ecological statement or by relevant information in the West Midlands Sustainability Checklist.

### **Policy P11 ‘Water Management’**

All new development should have regard to the actions and objectives of appropriate River Basin Management Plans in striving to protect and improve the quality of water bodies in and adjacent to the Borough, including the Rivers Blythe and Cole and their tributaries. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary. The Council will expect developers to demonstrate that all proposed development will be served by appropriate sewerage infrastructure and that there is sufficient sewage treatment capacity to ensure that there is no deterioration of water quality, or that the delivery of any development will not be delayed by the need for additional water treatment provision.

The Council recognises the need for water efficiency in all new development. Developers shall demonstrate the highest possible standards of water efficiency through the use of water efficient fittings and appliances, and where appropriate, recycling of potable, grey water and rainwater in order to minimise consumption.

All new development shall incorporate sustainable drainage systems, unless it is shown to be impractical to do so. Developers shall ensure that adequate space is made for water within the design layout of all new developments to support the full use of sustainable drainage systems, and shall demonstrate that improvements to the water environment will be maximised through consideration of a range of techniques. Wherever possible, sustainable drainage systems will be expected to contribute towards wider sustainability considerations, including amenity, recreation, conservation of biodiversity and landscape character, as well as flood alleviation and water quality control.

Developers shall explore opportunities to contribute towards the objectives of relevant Catchment Flood Management Plans. Wherever possible, development should promote the reduction of flood risk by seeking to reinstate the natural floodplain, the de-culverting of watercourses and the limiting of surface water runoff to green field rates via the use of sustainable drainage techniques. On all development sites larger than 1 hectare, surface water discharge rates shall be limited to the equivalent site specific Greenfield run off rate. Developers will be expected to demonstrate that the layout and design of a development takes account of the surface water flows in extreme events so as to avoid flooding of properties, both within and

outside the site. Applications for new development where there is a flood risk issue should be accompanied by a site flood risk assessment. Developers are encouraged to secure reduction of flood risk by the provision or enhancement of green infrastructure, wherever possible.

Existing flood defence infrastructure will be protected and development that would compromise the flood defence function will be permitted only if it is demonstrated through a flood risk assessment that the risk both within and outside the site, and to sites further downstream is not increased.

New development will not normally be permitted within areas at risk of flooding. Where it is clearly demonstrated that there are no other viable sites at lower risk of flooding, consideration will be given to development in such locations, providing that it is designed to be safe from the effects of flooding and will minimise flood risk on the site and reduce risks elsewhere.

#### **Policy P14 ‘Amenity’**

The Council will seek to protect and enhance the amenity of existing and potential occupiers of houses, businesses and other uses in considering proposals for new development, and will:

- i. Permit development only if it respects the amenity of existing and proposed occupiers and would be a good neighbour;
- ii. Consider the visual and other amenities of potential occupiers and users of new developments close to overhead power lines and substations. Developers will be expected to locate and design new developments so as to minimise the visual and other amenity impacts;
- iii. Support the development of electronic communications networks including telecommunications and high speed broadband. The Council will have regard to the needs of telecommunications operators, any technical constraints on location of telecommunications apparatus, the potential for sharing sites, the impact of development on its surroundings, the sensitivity of the environment and the design and external appearance of telecommunications apparatus. Development in or adjacent to sensitive locations will be permitted only if there is no other technically suitable location that both meets operational requirements and causes less environmental harm and any mast is at a distance of at least twice its height from the nearest residential properties;
- iv. Safeguard important trees, hedgerows and woodlands, encourage new and replacement tree and hedgerow planting and identify areas that may be suitable for the creation of new woodlands. Priority will be given to locations that enhance or restore the green infrastructure network and to the planting of species characteristic of the Arden Warwickshire landscape;
- v. Encourage better air quality in and around the Borough through the adoption of low emission zone initiatives such as those involving the use of electric vehicles for freight and public transport. Development that would contribute to air pollution, either directly or indirectly will be permitted only if it would not hinder or significantly harm the achievement of air quality objectives or any relevant Air Quality Management Plan, and it incorporates appropriate attenuation, mitigation or compensatory measures;
- vi. Require proposals for development on land known or suspected to be contaminated to include appropriate information to enable the potential implications to be assessed and to incorporate any necessary remediation;

vii. Seek to minimise the adverse impact of noise. Development likely to create significant noise will be permitted only if it is located away from noise sensitive uses or it incorporates measures to ensure adequate protection against noise. Noise sensitive development will be permitted only if it is located away from existing sources of significant noise, or if no suitable alternatives exist, the development incorporates measures to reduce noise intrusion to an acceptable level;

viii. Protect the amenity of residential and shopping areas, community facilities and open space from bad neighbour uses. Development that would be significantly harmful because of smell, noise or atmospheric pollution will not be permitted, whilst development that would be potentially harmful to such areas will be expected to incorporate appropriate attenuation, mitigation or compensatory measures. In locations close to existing bad neighbour uses, the Council will not permit new residential or other sensitive development, unless the effects can be satisfactorily mitigated as part of the development;

ix. Protect those parts of the countryside in the Borough that retain a dark sky from the impacts of light pollution. Development involving external lighting outside established settlements will be permitted only where significant lighting already exists, or the benefits of the development clearly outweigh the impact of the lighting on the countryside. Any lighting scheme should be the minimum required for the purposes of the development and should avoid light spillage and harmful effects on biodiversity; and

x. Protect the tranquil and locally distinctive areas in the Borough by guiding new development, particularly those that will create significant noise, either directly or through associated transport, to locations that will avoid or minimise adverse impacts.

### **Policy P15 'Securing Design Quality'**

All development proposals will be expected to achieve good quality, inclusive and sustainable design, which meets the following key principles:

i. Conserves and enhances local character, distinctiveness and streetscape quality and ensures that the scale, massing, density, layout, materials and landscape of the development respect the surrounding natural, built and historic environment;

ii. Ensures that new development achieves the highest possible standard of environmental performance through sustainable design and construction and the location and layout of the development in accordance with the guidance provided in Policy P9 – Climate Change;

iii. Secures the sustainable long-term use of new development through flexible, robust and future-proofed design e.g. high-speed digital connectivity;

iv. Makes appropriate space for water within the development, using sustainable drainage (SuDS) principles, to minimise and adapt to the risk of flooding. Further guidance is provided in Policy P11 – Water Management;

v. Conserves and enhances biodiversity, landscape quality and considers the impact on and opportunities for green infrastructure at the earliest opportunity in the design process. Further guidance is provided in Policy P10 – Natural Environment;

vi. Integrates the natural environment within the development through the provision of gardens, quality open space and/or improved access to, enhancement or extension of the green

infrastructure network. Further guidance is provided in Policy P20 – Provision for Open Space, Children’s Play, Sport, Recreation and Leisure;

vii. Creates attractive, safe, active, legible and uncluttered streets and public spaces which are accessible, easily maintained and encourage walking and cycling and reduce crime and the fear of crime.

Development proposals will also be expected to contribute to or create a sense of place. Such measures may include; reflecting heritage assets and their setting in the design process, integrating landscape into the development, promoting diversity through a mix of uses within the site, or the incorporation of public art.

All residential development proposals should be built to the Lifetime Homes standard and demonstrate how they meet Building for Life 12, or its equivalent. However, the Council will take into account the economics of provision, including particular costs that may threaten the viability of the site. All residential development will be expected to adhere to the guidance set out in the

New Housing in Context Supplementary Planning Guidance (SPG) until this has been updated and the Council will prepare Supplementary Planning Documents to provide necessary additional guidance.

Applicants should adhere to the urban design principles set out in established current design guidance, including at present; Urban Design Compendium 1 and 2 (2007), By Design (2000 and 2001), Manual for Streets 1 (2007) and 2 (2010), Car Parking: What Works Where (2006), Building for Life and Secured by Design principles, or their equivalents.

Development at key economic assets within the M42 Economic Gateway; the National Exhibition Centre, Birmingham Airport, Birmingham Business Park and Blythe Valley Park, will be expected to be of the highest quality to reflect their strategic importance.

Applicants are encouraged to engage with Officers early in the design process through pre-application discussions and will be required to demonstrate that they have followed the robust Assessment-Involvement-Evaluation-Design process outlined in the national guidance on Design and Access Statements. Major development proposals are required to demonstrate how the local community has been consulted and engaged in the design process. Significant development proposals will also be encouraged to engage with the national and regional Design Review process.

### **Policy P17 ‘Countryside and Green Belt’**

The Council will safeguard the “best and most versatile” agricultural land in the Borough and encourage the use of the remaining land for farming. Development affecting the “best and most versatile” land will be permitted only if there is an overriding need for the development or new use, and there is insufficient lower grade land available, or available lower grade land has an environmental significance that outweighs the agricultural considerations, or the use of lower grade land would be inconsistent with other sustainability considerations. Development involving farm-based diversification will normally be permitted in order to support farm enterprises and the management of land, providing it is in an appropriate location, of a scale appropriate to its location, and does not harm the Green Belt, conservation or enhancement policies.

The Council will not permit inappropriate development in the Green Belt, except in very special circumstances. In addition to the national policy, the following provisions shall apply to development in the Borough's Green Belt:

- Development involving the replacement, extension or alteration of buildings in the Green Belt will not be permitted if it will harm the need to retain smaller more affordable housing or the purposes of including land within the Green Belt.
- Limited infilling will not be considered to be inappropriate development within the Green Belt settlements, providing this would not have an adverse effect on the character of the settlements. Limited infilling shall be interpreted as the filling of a small gap within an otherwise built-up frontage with not more than two dwellings.
- The reasonable expansion of established businesses into the Green Belt will be allowed where the proposal would make a significant contribution to the local economy or employment, providing that appropriate mitigation can be secured.
- Where the re-use of buildings or land is proposed, the new use, and any associated use of land surrounding the building, should not conflict with, nor have a materially greater impact on, the openness of the Green Belt and the purposes of including land in it, and the form, bulk and general design of the buildings shall be in keeping with their surroundings.
- Where waste management operations involving inappropriate development are proposed in the Green Belt, the contribution of new capacity towards the treatment gap identified in the Borough may amount to very special circumstances, providing the development accords with the waste management policy of this Plan.

The small settlements of Hampton-in-Arden, Hockley Heath, Meriden and Catherine de Barnes are inset in the Green Belt and are not therefore subject to Green Belt policy. Nevertheless, the Council, in considering applications for development in these settlements, will take into account the importance of their rural setting and of their attributes, such as historic buildings, open space, density of development, landscape and townscape that contribute towards their special character. Immediately beyond the inset boundary, strict Green Belt policies will apply.

### **Policy P18 'Health and Well Being'**

The potential for achieving positive health outcomes will be taken into account when considering all development proposals. Where any adverse health impacts are identified, the development will be expected to demonstrate how these will be addressed or mitigated.

The Council will expect new development proposals to promote, support and enhance physical and mental health and well-being. Support will be given to proposals which:

- i. Provide opportunities for formal and informal physical activity, exercise opportunities, recreation and play;
- ii. Contribute to a high quality, attractive and safe public realm in accordance with Policy P15 Securing Design Quality, to encourage social interaction and facilitate movement on foot and by cycle;

iii. Contribute to the development of a high quality, safe and convenient walking and cycling network;

iv. Improve the quality and quantity of the green infrastructure network in the Borough, particularly in the North Solihull Regeneration Area and in areas where green infrastructure is identified as lacking. The protection and enhancement of physical access, including public rights of way to open space and green infrastructure will also be supported;

v. Deliver new and improved health services and facilities in areas where they can be accessed by sustainable transport modes. Facilities for primary medical care should be identified and planned for;

vi. Increase access to healthy food by sustainable transport modes and provide opportunities for growing local produce. The Council will resist the loss of areas which currently enable local produce to be grown;

vii. Provide additional homes which are designed to meet the needs of older people and those with disabilities, and housing which enables older people to downsize from larger homes; and

viii. Improve the energy efficiency of housing.

New residential development will be expected to be built to the Lifetime Homes standard in accordance with Policy P15 Securing Design Quality, to ensure that homes are adaptable and enable people to live independently for longer. All developments should maximise internal insulation and opportunities for solar gain and wherever possible, developments should also seek to incorporate private amenity space.

Development proposals should incorporate planting, trees, open spaces and soft surfaces wherever possible in order to secure a variety of spaces for residents, visitors or employees to use and observe.

The loss of community and social infrastructure will be resisted unless it can be demonstrated that:

- It can no longer continue for commercial or operational reasons;
- There are identified benefits of the use being discontinued;
- Adequate alternative provision can be made in a manner which meets the needs of the community affected.

The Council will resist development proposals for hot food takeaways in areas where there is already a high concentration of such uses.

## **Policy P20 'Provision for Open Space, Children's Play, Sport, Recreation and Leisure'**

a) Existing public open space, sports and recreational facilities:

The Council recognises the importance and multi-functional benefits of public open space, sports and recreational facilities within the Borough and will support the enhancement of existing facilities and open space. Loss of existing facilities through development will not be

permitted where they are of value by to the local community for recreation, visual amenity, nature conservation or make an important contribution to the quality of the environment or network of green infrastructure, unless:

- i. it can be demonstrated that the open space or buildings are clearly surplus to requirements; or
- ii. the need or benefits of the development clearly outweigh the loss.

In such circumstances, the Council will require appropriate compensatory measures for the loss. Enhancement of open space or buildings shall be in accordance with Policy P15 – Securing Design Quality and Policy P10 – Natural Environment.

The Council supports the principle of designating land as Local Green Space. Where designation would be appropriate, necessary and where the open space meets the criteria outlined in national guidance, the Council will support designation of Local Green Spaces in neighbourhood plans.

b) Provision of new public open space, sports and recreational facilities:

The Council will require provision for and maintenance of appropriate open space, sports and recreational facilities as an integral part of new development. This should address identified shortfalls in local provision, outlined in adopted Council strategies and provide for the resultant increase in population from the development. Provision should accord with the local standards and priorities for action outlined in the adopted Green Spaces Strategy (2006) and future revisions, the Indoor Sports Facilities Strategy and Green Infrastructure Strategy. Where the minimum standard for children's play and youth facilities is already met, developments will be expected to give more generous provision.

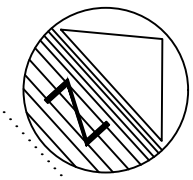
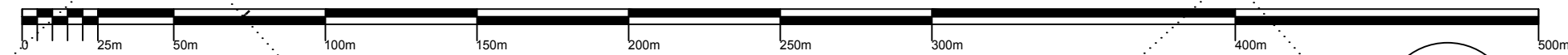
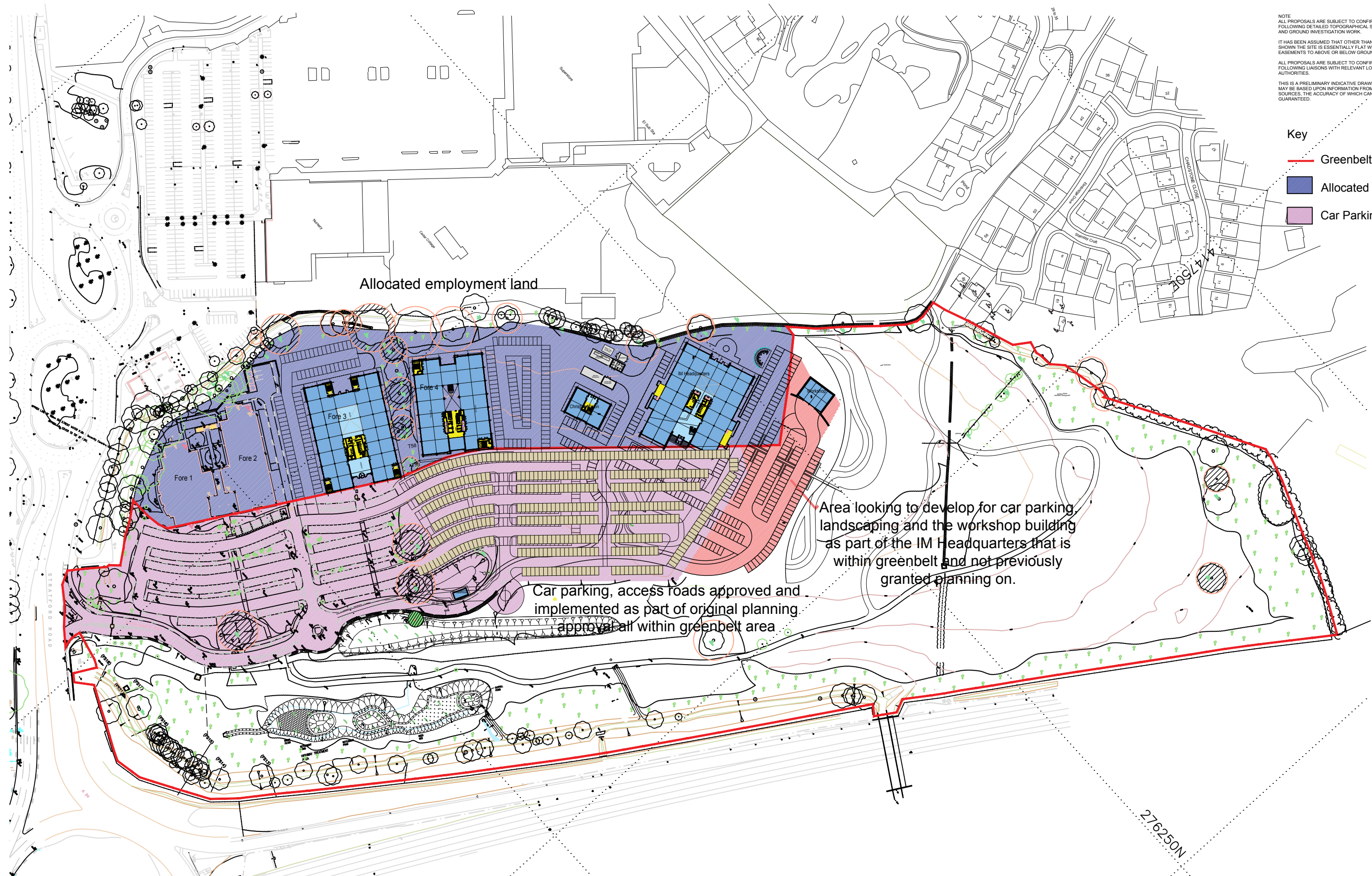
To ensure a high quality living environment for the occupiers of all new residential development, including supported housing schemes for the elderly and those with disabilities, provision should be made for informal amenity space, in accordance with Policy P15 – Securing Design Quality. Proposals for family housing will be expected to provide opportunities for safe children's play in accordance with the Design for Play and the Free Play Network's 10 Design Principles.

To promote healthy lifestyles in the workplace, major commercial development proposals, (over 1ha or 1,000 sq.m) will also be required to provide new open space and/or contribute to enhancement of the green infrastructure network, in accordance with Policy P15 – Securing Design Quality and Policy P10 – Natural Environment.

## **Appendix 7: Green Belt Overlay**

NOTE:  
ALL PROPOSALS ARE SUBJECT TO CONFIRMATION  
FOLLOWING DETAILED TOPOGRAPHICAL SURVEY  
AND GROUND INVESTIGATION WORK.  
IT HAS BEEN ASSUMED THAT OTHER THAN WHERE  
SHOWN THE SITE IS ESSENTIALLY FLAT WITH NO  
EASEMENTS TO ABOVE OR BELOW GROUND SERVICES.  
ALL PROPOSALS ARE SUBJECT TO CONFIRMATION  
FOLLOWING LIAISONS WITH RELEVANT LOCAL  
AUTHORITIES.  
THIS IS A PRELIMINARY INDICATIVE DRAWING ONLY  
MAY BE BASED UPON INFORMATION FROM VARIOUS  
SOURCES, THE ACCURACY OF WHICH CANNOT BE  
GUARANTEED.

- Key
- Greenbelt boundary line
  - Allocated employment land
  - Car Parking approved



Site Plan, 1:2000

# Appendix 8: Extract of IM Representations to Solihull Local Plan Review

## Challenge G – Securing Sustainable Economic Growth

Under 'Challenge G' a number of 'objectives' have been set, however unlike the housing need objectives set out in Section 3 of this report, the Economic objectives do not specifically seek to address the 'need' for employment land, a fundamental component of economic growth. This is considered in further detail below.

### Policy P3 – 'Provision of Land for General Business Purposes'

**Question 9 – 'Do you agree with Policy P3? If not why not, and what alternative would you suggest?'**

**Question 10 – 'Do you believe the right scale and location of development has been identified? If not why not?'**

Draft Policy P3 of the Draft Local Plan deals with the provision of land for general business and premises.

IM note that as currently drafted the Policy does not establish an employment land requirement for the Borough over the plan period to 2033. The policy instead confirms that:

*"to encourage sustainable economic growth and provide a broad range of employment opportunities the Council will plan for a continuing supply of employment land".*

This continuing supply is represented by a number of existing allocations being carried forward from the SLP and new allocations. This includes residual land at Blythe Valley Business Park in addition to a further five sites amounting to 35.5 hectares of employment land. These sites include TRW/The Green, Stratford Road, Shirley (18.5ha), Fore, Stratford Road, adjacent to M42 (2ha), Chep/Higginson, Bickenhill (4ha), Land North of Clock Interchange, Coventry (2ha); and Land Adjacent to Birmingham Business Park (9ha). A further 243 hectares is proposed through new allocations including Land at HS2 Interchange (c140ha) and Land at Damson Parkway (c94ha).

Although a further 243 hectares is proposed through new allocations including Land at HS2 Interchange (c140ha) and Land at Damson Parkway (c94ha), IM consider that in the context of an evidenced undersupply of large scale sites in the M42 Corridor<sup>4</sup>, Policy 3 makes inadequate provision for new logistics floorspace across the borough.

The Council has since updated its evidence of employment land needs through the publication of the ELR, the findings of which are considered below. Although this review was commissioned by SMBC in July 2016 to inform the review of the Local Plan, its publication in January 2017 – late in the consultation process - has resulted in the Draft Local Plan being silent on its assessment of quantitative and qualitative land needs.

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<sup>4</sup> West Midlands Strategic Employment Sites Study, PBA & JLL, September 2015

It is apparent, equally, that whilst the ELR provides an assessment of local needs the study defers responsibility for assessing how unmet strategic needs could be accommodated in Solihull, concluding instead that this *“will be a need that must be addressed across the region via the duty to co-operate”*.

By implication, Policy P3 currently provides no certainty over the level of economic growth and employment land needed within the borough to accommodate either local needs or the unmet strategic needs clearly evidenced within the sub-regional evidence based represented by the West Midlands Strategic Employment Sites Study (WMSESS).

The technical methodology applied within the ELR and its interpretation into conclusions is considered in more detail below.

### ***The Employment Land Review, 2017***

The Solihull Employment Land Review (ELR)<sup>5</sup>, published in January 2017, represents the Council's most up to date assessment of employment land needs in the borough.

The ELR's key conclusions are referenced at Paragraph 5.40 which sets out that an additional 22.6 ha of employment land is needed to meet forecast job demand over the plan period to 2033. This is based on a requirement for 12ha of land for new office development and 10.6ha of land for industrial, including B8 logistics. Despite not providing a separate breakdown of B8 logistics need, Paragraph 7.7 goes on to indicate that there is sufficient land to respond to forecast demand with a 'notional oversupply' of land over the plan period concluded at Paragraph 8.32.

Although the recommended land requirement in the ELR has not yet been advanced within the Draft Local Plan, the 22.6ha is understood to represent SMBCs OAN for employment land.

In deriving this level of need it is notable that the ELR takes a comparatively narrow approach relying heavily on a baseline economic forecast to evidence need.

The potential for investment at UKC Hub / the HS2 Interchange site to generate job growth is recognised within the ELR, which confirms:

*“We have looked specifically at the HS2 Interchange site as key site which, to date, has not been [in] employment or substantial employment use; this is expected to change of [over] the plan period and could accommodate significant additional jobs, as well as focussing further critical employment mass in the wider UKC area, including the airport, JLR and BBP<sup>6</sup>.”*

IM note, however, that the ELR does not specifically set out any 'land requirements' associated with supporting this growth, but does acknowledge that job growth will be additional to the baseline forecasts 'because it was considered as something that was not anticipated by the forecast i.e. supergrowth'.

Although the assessment of demand is contextualised in section 4 through a review of market signals and consideration of market intelligence, IM have concerns over the extent to which these factors are fully aligned in determining the OAN. For example, whilst acknowledging that growth in the online retail sector has resulted in strong demand from retailers and third party

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<sup>5</sup> Employment Land Review, Final Report, PBA, January 2017

<sup>6</sup> Ibid, Paragraph 8.38

logistic (3PLs) companies for large-scale distribution units, IM have concerns that these trends and the needs of the sector more generally have been overlooked.

The ELRs general failure to acknowledge the wider than local need for large scale strategic employment sites in Solihull is also of concern to IM, as set out above, and further challenges the robustness of the evidence being relied upon to formulate Policy P3 and the ELR's overall compliance with the NPPF and PPG.

Notwithstanding the findings of the ELR, the WMLC report also confirms that *"there is already a considerable shortage of readily developable employment sites of all types"* (para 3.10) in the West Midlands, and suggests that *"the evidence the commission has seen suggests that the shortfall of land for employment space is at least as pressing as the shortage of land for new homes, and possibly more so"* (para 5.20). On this basis, it is evident that the need for employment land in the West Midlands (and Solihull) may be greater than the evidence base is suggesting.

These issues are considered further within the technical critique below.

### ***Critique of the ELR and Employment Land Requirement***

#### **Establishing the FEMA**

In establishing the employment land requirement, it is notable that the ELR has treated Solihull as a standalone FEMA, with economic needs assessed for the authority area on its own. Solihull's complex economic geography is, however, recognised with consideration given to patterns of commuting and migration which split the Borough between two Travel to Work areas (TTWAs) – Birmingham and Coventry.

Solihull's role, alongside Birmingham, as the 'metropolitan core' of the GBSLEP area is also highlighted alongside the critical influence of the transport network, most notably the M42 corridor. In market terms the ELR notes the attractiveness of the M42 corridor as a business location means that Solihull has the potential to capture demand from far beyond the TTWA geography.

It is clear that there is a strong and reciprocal relationship with Birmingham in particular, so while for the purposes of the ELR Solihull can be 'initially' treated as a standalone FEMA it is considered that this should not be artificially divorced from the role that Solihull plays within the identified wider economic geographies (Birmingham, GBSLEP, M42 corridor and West Midlands) needs to be evident in the assessment.

Given this context, IM consider that the WMSESS provides a critical context for the assessment of employment land needs and the drafting of Policy P3 within the Local Plan. The recommendations of this study and the associated implications for Policy P3 are explored in more detail later within this representation.

#### **Analysis of Market Signals**

In line with PPG, the ELR presents an analysis of property market trends, which considers the demand for floorspace and land from business occupiers, the supply provided by landowners, and the balance between the two. In line with PPG the analysis has also been informed by consultation with local agents, developers and landowners, including IM.

The ELR concludes that Solihull is characterised by a generally healthy office market with demand driven from a broad range of requirements from professional services, aviation, utilities, software and automotive firms. PBA report a good supply of larger floorplate and good quality Grade A refurbished space in out of town business parks. There has, however, been a lack of new build activity in recent years, resulting in a tightening of supply in the town centre.

In regards to industrial and distribution space, the ELR concludes that:

- Solihull is strategically placed to capture industrial and logistics demand with access to the national motorway networks of the M5, M6 and M42 generating strong demand.
- Growth in the online retail sector has resulted in strong demand from retailers and third party logistic (3PLs) companies for large-scale distribution units.
- Despite Solihull satisfying requirements to attract retailers and 3PLs for large distribution there has not been the sites/units available to capture demand. In this context it is noted that the ELR confirms that agents still see future growth in this sector, and they do not believe it is at saturation point yet.
- There is strong internal demand from JLR and its supply chain. Indeed, the automotive supply chain is seen as a key driver of demand for smaller and mid-sized units.
- The mid-sized market is more dominant in Solihull and there are opportunities for development of mid-size units (up to 9,290 sq m) at Blythe Valley Business Park and Birmingham Business Park.
- Solihull is a prime location to capture national and regional industrial and distribution demand but suffers from a lack of sites. PBA report that the market is undersupplied and if sites were available developers would speculatively build and occupiers would take the space.

Although the ELR states that *'this market balance drives the need for additional employment land'*<sup>7</sup> it is not apparent that the qualitative needs of the industrial sector are robustly addressed through the market balance (section 7) or conclusions and recommendation of the ELR (section 8), resulting in inadequate provision being made for industrial and distribution space in the study's recommendations.

Indeed whilst acknowledging short-term market demand for larger industrial and distribution floorspace is strong, and there remains an unmet need for larger strategic sites across the region, the ELR concludes, at Paragraph 8.10, that there is a lack of compelling evidence that these needs should be met in Solihull.

IM strongly disagree with this statement and consider that there is an immediate need for additional large scale logistics sites in sustainable locations in Solihull which benefit from excellent connections to the strategic highway network and core population markets. This is substantiated by the evidence presented in the WMSESS. The study, which represents one of

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<sup>7</sup> Employment Land Review, Final Report, PBA, January 2017, Paragraph 4.1

the most up to date studies of strategic employment land needs available, concludes a demonstrable need for additional strategic sites across the region, and in particular the M42 Corridor, in response to a clear shortage of sites to meet strategic needs in this area. Indeed, when considering past annual take up against immediately available floorspace the study confirms that along the M42 Corridor there is an acute undersupply of large sites, amounting to just 3.7 years supply<sup>8</sup>.

By virtue of Solihull's location at the heart of the M42 Corridor and the conclusions reached in the WMSESS it is considered that the failure to address the implications of this strategic need within the Draft Plan represents a significant gap. It is apparent that the evidence implies that full consideration must be given as to the extent to which Solihull can contribute to meeting an element of these strategic needs.

Solihull should also not overlook the ELR's comments with regard to the durability and robustness of jobs in the sector. Indeed jobs in the industrial sector are noted as having appeared to 'weather the recession well'<sup>9</sup>. The value of jobs in this sector should therefore be acknowledged.

Given this context IM consider the conclusion reached in the ELR in this regard to be misinformed and contradictory to the findings set out both within Section 4 of the ELR and within the WMSESS.

#### **Approach to Assessing Quantitative Needs**

In line with PPG, The ELR's approach to assessing economic needs considers a range of economic and property market baseline and forecast data. It is notable, however, that whilst employment based forecasts (Experian and Oxford Economics base) are used to assess long term labour demand, the study fails to consider alternative approaches including labour supply (resident workforce forecasts) and projections based on past take up of land which would typically be expected in an ELR.

This is of concern and considered to represent a significant shortcoming of the analysis, undermining the robustness of the ELR's conclusions.

It is recognised that the forecasts in the ELR have been drawn from the SHMA as set out in our response to the housing aspects of the Draft Plan in the preceding section which confirms the agreement as to the importance of ensuring that economic and housing policies are integrated as required through paragraph 158 of the NPPF.

Our response to the housing questions has identified that within the SHMA preference is given to the Experian baseline forecasts (produced in December 2015) in the analysis of needs. These forecasts anticipate the creation of 15,250 additional jobs between 2014 and 2033, of which just over a third – 5,638 - would be B-Class jobs, of which the majority are forecast within the office sector.

In addition to the Experian baseline forecast, the ELR considers a number of other scenarios, including:

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<sup>8</sup> West Midlands Strategy Employment Sites Study, PBA & JLL, September 2015, Paragraph 4.80

<sup>9</sup> Employment Land Review, PBA, January 2017, paragraph, page 48

- The most recent Experian forecast, published in September 2016. Termed the 'Brexit scenario' this scenario forecasts 1,950 fewer jobs than the Baseline scenario. This is attributed to the forecast being produced after the EU membership referendum. The scenario is subsequently discounted due to the current uncertainty surrounding Brexit and lower job growth forecast.
- A baseline model prepared by Oxford Economics (OE) to provide an alternative view to the Experian forecast. The OE model forecasts 8,900 additional jobs in Solihull over the period from 2014 to 2030. This compares to the 13,300 additional jobs being forecast by Experian in their baseline scenario over the same period but is rejected from further consideration on the basis that the NPPF requires LPAs to plan positively for growth. It is notable that whilst OE have undertaken work on behalf of GBSLEP as part of the SEP the ELR only considers OE's Baseline forecasts.
- A UKC Hub Scenario which is again derived from the SHMA and was prepared to take account of the UKC Hub development. The ELR notes that this HS2 interchange scenario was modelled as an additional development because it was not something that would have been anticipated in the Experian baseline forecast and represented 'supergrowth'. This 'supergrowth' translates into job growth of 20,600 - equivalent to 5,400 jobs in excess of the Experian baseline – with the majority of these jobs concentrated within the office sector. PBA go on to assess the impact of creating 5,521 gross HS2 interchange jobs by 2033 (assumed to be B-Class, although this is not clear), concluding that if the interchange sites goes ahead, 138 fewer jobs will be located elsewhere in Solihull once allowances for displacement and a multiplier has been applied. By implication, the negative displacement effect results in less land being needed (outside of the HS2 interchange site) over the plan period to 2033. Whilst the input assumptions around displacement, multiplier effects and optimism bias reportedly reflect advice provided by Amion, the ELR provides no justification for the assumptions applied. IM also considers that the assumptions and methodology applied by PBA results in an overly pessimistic impact that fails to accurately reflect the stated ambition and employment growth potential of the HS2 Interchange and wider UKC Hub proposals.

In identifying a preferred scenario to establish employment land needs, the ELR adopts the baseline scenario presented within the SHMA, concluding that this ensures that housing and jobs are aligned. The resultant land requirement generated from this scenario is 22.6ha of which 10.6ha relates to office land, and the remaining 12ha industrial. Taking account of the identified demand and the existing supply of employment land, PBA conclude that there is an oversupply of employment over the plan period.

IM consider that this requirement falls considerably short of addressing the unmet needs of logistics occupiers and fails to reflect market signals and drivers, in particular the continued growth of internet retailing and associated demand for logistics floorspace generated by e-commerce companies. CBRE report that over the past 12 months 32% of take up was attributable E-commerce (32%), with a further 44% attributable to 3PL (22%), Retail (22%)<sup>10</sup>. The continuing growth of e-commerce is expected to remain a positive structural driver of

<sup>10</sup> Logistics Market Snapshot, CBRE, January 2017

demand<sup>11</sup>, with the BPF reporting that the e-commerce sector is projected to grow by 10% per year by 2021, reaching a value of £48 billion.

Whilst it is recommended that Solihull plans positively for growth and does not reduce the quantum of allocated land IM have concerns that this 'notional oversupply' is misleading and fails to fully acknowledge market signals and potential demand generated from major projects both in Solihull and across the wider geography.

### **Approach to translating floorspace to land requirements**

Consideration is given below to the ELR's methodology for assessing need and translating employment forecasts to floorspace and land. These serve to either suppress or mask the land requirements of some sectors, most notably B8 employment sectors.

IM consider that the omissions referenced above in the methodology applied in the ELR in relation to a PPG compliant process mean that the resulting approach to assessing market balance within section 7 of the ELR is not robust or appropriate. The following provides a summary of the methodological issues associated with the approach adopted in the ELR:

- The assessment of labour demand represents the only forecasting technique considered in the ELR. This narrow approach to assessing needs has the potential to mask revealed demand established through the take up of employment land (as opposed to floorspace) over a sustained period. Although past trends will not necessarily reflect future growth prospective, such an analysis often provides a useful benchmark for assessing the validity and robustness of the employment forecasts.
- The labour demand methodology adopted in the ELR, although conforming to current national guidance, has its origins in guidance produced by the Office of the Deputy Prime Minister (ODPM) in 2004. As a result the forecasts and associated analysis fails to capture the recent trends in the large scale industrial and logistics market and importantly the upside potential and demand generated from further substantial growth in e-commerce.
- It is notable that the ELR is not transparent in its approach to translating the total jobs into those likely to occupy B-Class employment floorspace. It is therefore not possible to comment on the accuracy of the assumptions applied. The conversion of the forecast decline in manufacturing employment to a positive growth of B-Class manufacturing employment, whilst welcome, is also curious and not fully justified in the evidence presented.
- The application of a blanket employment density for all industrial uses is incorrect. Employment in industrial sectors is translated into floorspace using an employment density of 44 sqm per employee. The results of this analysis are subsequently used to determine potential increases in floorspace and land demand. This approach also has the potential to under-estimate floorspace and land requirements arising from growth in B8 employment sectors (employment densities of 70-90 sqm per FTE employee are generally observed and set out

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<sup>11</sup> The UK Big Box Industrial and Logistics Market, JLL, January 2017

clearly in national guidance<sup>12</sup>). A more robust approach would be to consider an average density for each of these sub-sectors of the property market.

- A failure to provide a breakdown of industrial land requirements by floorspace typology is key concern. By implication the ELR draws no distinction between demand for different types of industrial and logistics operators and therefore contradicts the PPG which requires the needs of different market segments to be understood and planned for. This approach masks significantly the different locational, land and property requirements of B1c, B2 and B8 occupiers.
- Whilst allowances for losses, churn and a frictional margin are discussed, these assumptions are not then translated into a gross land requirement for the Borough for the purposes of assessing the supply demand balance. The ELR instead reverts to the employment forecast derived net floorspace requirement of 111,580 sq m between 2014-2033 comprising 47,910 sq m of 'industrial' and 63,670 sq m of office floorspace.
- IM also have concerns with the vacancy rate assumptions used in the market balance calculation. Typically the vacancy rate is used to assess the relative health of the property market and is a qualitative consideration in the assessment of need and demand for employment floorspace. In line with this, a 10% vacancy rate is typical in commercial market to allow for their healthy operation and churn amongst local businesses. It is therefore concerning that the inclusion vacant floorspace in excess of 5% is a somewhat arbitrary assumption, which by implication has the potential to overinflate the available supply. It is also assumed that the vacancy in excess of 5% referenced in the ELR relates to both new and existing stock - not just new employment floorspace. As a result it will include older stock that could be less attractive to the market and needs of different sectors in the future. The inclusion of vacancy, in lieu of a margin of choice, also serves to suppress the resultant requirement. Indeed, we would advocate that in order to provide a degree of flexibility in the supply of land and floorspace a 'margin of choice' needs to be taken into account in market balance calculation. Whilst maintaining a 5 year supply is advised in Section 5 this is not subsequently taken forward when balancing supply with assessed demand.

#### **Additional demand from major projects**

Although the PPG advises against the use of hypothetical scenarios, it is prudent to consider potential needs arising from major investment projects that are realistically expected to occur over the plan period.

Although a separate SHMA UKC Hub/HS2 interchange scenario is modelled to take into account potential 'supergrowth' that would not have been recognised in the baseline forecast, the assumption that only 5,336 net additional jobs in Solihull are attributable to UKC Hub appears to contrast significantly with the justifying text within the Draft Local Plan as to the scale of ambition for the area and the potential impact of a significant amount of spending on infrastructure. It is also considered that this level of jobs does not reflect the level of floorspace which could be accommodated on the allocation.

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<sup>12</sup> HCA (2015) Employment Density Guidance, 3<sup>rd</sup> Edition

The off-site HS2 interchange impacts associated with this are also assessed as having a negative displacement effect, resulting in less land being needed (outside of the HS2 interchange site) over the plan period to 2033. This appears to be an overly pessimistic stance and again fails to reflect the stated ambition and vision of the draft Local Plan.

Whilst the above 'supergrowth' is driven by potential generators of significant employment growth in Solihull it is also important to recognise that these form part of a wider strategy of 'supergrowth' at a larger geographic level. The WMCA recently published a Strategic Economic Plan (SEP) based on an 'Economy Plus' scenario that aims to create 500,000 additional jobs and secure GVA 5% higher than the national average by 2030.

The ELR's admission that the appraisal of economic growth, and by implication the impact on economic needs, '*does not consider the SEP scenarios in detail*<sup>13</sup>' is considered to represent a gap in the evidence presented. Whilst it is acknowledged that these go beyond a potential 'baseline' assessment of need it is considered important that the evidence base provides an understanding as to their implication for the future need for employment land in Solihull. Recognising the overall ambition of the Draft Local Plan this will be of importance in justifying a responsive policy approach.

The failure to take into account the implications of the stated growth objectives of the GBSLEP and WMCA in both the ELR and in the Draft Local Plan is considered to represent a significant challenge to the relevance and robustness of the Draft Local Plan and its underpinning evidence base. No justification is provided as to why this is the case given the important commitments being made by the WMCA.

### **Audit of Employment Land Supply**

Section 6 of the ELR reports on the qualitative audit of Solihull's existing and allocated employment sites. Reference is made to Paragraph 22 of the NPPF as representing the key test, with PBA's assessment focussing on the commercial attractiveness of employment sites, and within this context, the likelihood of the site being taken up for its intended employment use. Notwithstanding this, it is not apparent that commercial agent inputs to the site assessment have been sought, with PBA themselves drawing conclusions on the market potential of sites.

A number of IM's assets within Solihull are considered as part of the assessment, including Blythe Valley Business Park (BVBP) and Fore. Although the ELR acknowledges the expansion potential of BVBP, the conclusion regarding Fore is factually incorrect and does not accurately capture the current extant planning permission on the site.

The ELR concludes a total supply of 117,606 sq m of office floorspace and 165,509 sq m of industrial across 28 sites, comprising 22 existing employment sites and 6 currently undeveloped allocations from the SLP. This equates to a total supply of 283,115 sq m when losses from deliverable permissions have been taken into account.

Within the ELR it is recognised that the identified supply is not exhaustive, noting specifically proposals for the expansion of the JLR site to provide a 'logistics operations centre' which is intended to bring much of the supply chain industries from across the area into one site. It is notable that this proposal has not featured in demand or supply forecasting within the ELR.

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<sup>13</sup> Employment Land Review, Final Report, PBA, January 2017, Paragraph 5.16

Again, the absence of project such as this fails to reflect the ambition and economic potential of Solihull, and in turn the requirements of the NPPF.

It is notable that in quantifying the supply pipeline the ELR reverts to floorspace estimates and again amalgamates B2 and B8 uses into a single 'industrial' market segment.

On this point the PPG is clear that:

*“the available stock of land should be compared with the particular requirements of the area so that ‘gaps’ in local employment land provision can be identified”.*

We therefore consider this to be a fundamentally important step in identifying land to meet the identified OAN employment land figure, and in turn establishing an appropriate employment land requirement for the Borough. The ELR's approach, which relies solely on floorspace estimates, misses this important step and therefore the requirements of the PPG.

Critically, in failing to translate floorspace into a land requirement the ELR cannot be considered to be compliant with national guidance.

### **Market Balance and ELR Recommendations**

Taking account of the identified demand and the existing supply of employment land, The ELR concludes that there is an oversupply of employment over the plan period. Whilst it is recommended that Solihull plans positively for growth and does not reduce the quantum of allocated land IM have concerns that this 'notional oversupply' is misleading and fails to fully acknowledge market signals, and in particular the evidenced needs of the logistics sector, as well as unquantified demand generated from major projects both in Solihull and across the wider geography.

The failure to robustly assess and plan for the needs of the logistics sector, and in turn, the needs of Solihull's manufacturing supply chain, is therefore considered to be a key oversight within both the ELR and draft Policy 3.

IM also have a particular concern regarding Paragraph 8.10 of the ELR which states:

*“Whilst strategic warehousing might deliver job growth in the borough, this would need to be balanced against the potential loss of greenbelt and the erosion of Solihull's existing quality as an employment location”.*

This statement inadvertently suggests that logistics is less sustainable than other forms of employment development and has the potential to undermine the attractiveness of the borough to prospective occupiers and investors. To the contrary, IM would argue that strategic warehousing is intrinsic to the attractiveness of Solihull as an investment location. Indeed, logistics forms a critical part of the areas infrastructure, supporting the areas manufacturing supply chains to function effectively through movement of goods and components.

This is corroborated by evidence published by British Property Federation (BPF), and researched by Turley in 2015<sup>14</sup>, which reported that the logistics industry, by its very nature, has strong supply chain links with a wide variety of sectors. The strongest connections exist with

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<sup>14</sup> Delivering the Goods: The economic impact of the UK logistics sector, British Property Federation, 2015

manufacturing, retailers including e-commerce, and consumers, as well as other transport and storage providers.

In this regard, logistics businesses support the continued operation and growth of these sectors and are a fundamental enabler of economic growth. The provision of suitably located logistics sites and infrastructure is therefore critical to the achievement of this growth and the effective, efficient, sustainable operation of the local economy.

The sector also provides a large numbers of high quality jobs to local people. Again, the BPF research highlights that logistics supports a wide range of occupations including positions in managerial, administrative and high tech occupations, including electrical and mechanical engineering and IT roles. Furthermore, companies in the logistics sector are recognised to invest substantially in their workforce, often training individuals for engineering roles and offering apprenticeships. This is supported by research by Skills for Logistics<sup>15</sup> who found that of 300 logistics firms surveyed, 75% had funded off-the-job training or development and 78% offered information training over the previous 12 months. Training included job specific training, new technology and management, supervisory, and health and safety.

In regards to wider regional demand, Paragraph 8.37 also acknowledges that:

*“it is clear that the borough’s economy is already closely tied with that of neighbouring Birmingham and adjoining authorities along the M42 corridor. The preceding market balancing exercise is based on long-term demand within Solihull borough. At present, the borough has two sites which have been identified as having more than local significance: BVBP and BBP”.*

Given this context, both BVBP and BBP have the potential to play an important role in responding to sub-regional, or indeed, regional demand. It is therefore our view that there is scope for a considerable upward revision of the local requirement, and the allocation of additional land to respond more positively to the borough’s locally assessed employment land needs. Although this is not expressly stated, the ELR does highlight the limited pipeline of smaller local quality office and industrial sites advising that “SMBC should plan for new sites to come forward”. It is notable, however, that this recommendation is not adequately captured or recognised in Policy P3, potentially resulting in the needs of some sectors being unmet.

For the reasons outlined above (and the methodological issues highlighted at Paragraph 4.42) IM have a particular concern regarding the ELRs recommendations and Policy P3 as currently drafted.

## Summary

In drawing together the conclusion with regards to the challenge to secure sustainable economic growth this section has addressed the questions posed within the related consultation question 9 and 10 set out within the Draft Local Plan, namely:

- Q9: Do you agree with Policy P3? If not why not, and what alternative would you suggest?

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<sup>15</sup> Skills for Logistics (2014) Logistics Employer Skills Survey – Evidence Report

- Q10: Do you believe the right scale and location of development has been identified? If not why not?

It is of note that the key document in this regard, the 'Employment Land Review – Final Report' (ELR) was only published in January 2017. This post-dated the publication of the Draft Plan in November 2016 and was within the period of consultation.

This disjoint between the publication of the evidence base and the drafting of policy within the Draft Plan is apparent with a notable lack of detail with regards to the OAN for Employment Land within the justification text under Policy P3.

The Draft Plan does not specify an employment land requirement target against which its supply of identified employment land can be judged. This presents a basic challenge in assessing the extent to which it is of the right scale and/or it presents a sufficiently flexible portfolio of sites and land to accommodate the varied future demand resulting from economic growth and business investment and the continued strong projected growth in e-commerce.

It is acknowledged that the Draft Plan at a headline level plans for a positive scale of employment land based upon the sites listed within the table on page 61 of the Draft Plan. Whilst these are not totalled it is understood that these cumulatively represent almost 300 hectares of land. It is noted, however that over two thirds of this provision is accommodated within two sites LPR19 and LPR20, with the former specifically identified as fulfilling a more specific need and therefore falling outside of the general land supply.

Evidently it will be important for subsequent iterations of the Draft Plan to present a clearer justification as to the scale of employment land to be planned for and the extent to which the identified supply of sites will address this need in full, with sufficient flexibility in accordance with the requirements of the NPPF. The published ELR will evidently form an important evidence based context in this regard.

The critique of the evidence base has identified a number of specific points of concern relating to the approach adopted within the ELR, including:

- In concluding a need for 22.6ha of employment land the ELR relies solely upon a baseline Experian forecast. Whilst it is agreed that this approach of using an economic forecasting model to calculate need accords with guidance it is of concern that further consideration is also not given to historic rates of take-up or market drivers in validating the likely future need.
- Against this level of need the ELR concludes that there exists a 'notional oversupply' of employment land. In the context of the narrow scope of the evidence underpinning the concluded level of need this position is over-stated and not adequately justified. There is therefore a concern that this 'notional oversupply' is misleading and fails to fully acknowledge market signals and potential demand generated from major projects both in Solihull and across the wider geography.
- The methodology applied in the ELR for translating employment forecasts to floorspace and land is not considered to be robust or appropriate. The

methodology serves to either suppress or mask the land requirements of some sectors, most notably B8 employment sectors.

- The evidence presented fails to adequately reflect the local and sub-regional economic vision and ambition for growth. Whilst it is recognised that the baseline local level of need forms an important consideration for the Draft Local Plan it is also important that the evidence fully acknowledges Solihull's role within the wider functional economic market area and identified plans for investment and job growth. PPG states that Local authorities should develop an idea of future needs based on a range of data which is current and robust. It is therefore considered that the ELR, in its failure to acknowledge any land requirements associated with supporting growth beyond the baseline position, falls considerably short in this regard. By implication, the ELR is failing to take full cognisance of the positive employment impacts associated with other anticipated job growth arising the strategic aspiration of the GBSLEP and WMCA and potentially the needs of different industrial sectors.
- Whilst it is agreed that the HS2 interchange business land should be treated as separate from the local supply of employment land the conclusion that there will not be any positive uplift with regards to employment growth and subsequently additional demand for land is not considered to be robust. The arrival of HS2 will represent a once in a generation scale of infrastructure investment. It is to be expected that this in turn will represent a significant 'boost' to the commercial market in the area beyond the HS2 land itself.
- It has been noted that the preferred baseline scenario is unlikely to take into account the potential growth in online retailing and e-commerce as a driver of logistics demand, nor does it robustly assess the impact of demand from major projects and investment across the wider sub-region. As a result, IM consider that the forecast levels of demand informing the market balance calculations are likely to significantly underestimate actual levels of demand likely to emanate across Solihull over the plan period.

In view of the above, IM consider it to be inappropriate to conclude on the market balance for industrial and logistics land until such time that market drivers, the employment yielding potential of major projects, the needs of the supply chain and the wider than local need for sites in Solihull, are more accurately addressed in the informing evidence and land requirements calculations being relied upon to draft Policy P3.

In order for the next iteration of the Draft Plan to be sound it is considered of critical importance that the underpinning evidence base is updated and revised to take these points into consideration.

A review of the available evidence strongly indicates that there should be recognition of the potential need for additional flexibility in responding to the full need for employment land uses and in particular adequate long-term provision for B8 uses recognising the significant identified market demand in the area for logistics uses alongside other uses.

On the basis of all the available evidence, it is considered that it would be prudent to add more flexibility to Policy P3. The policy should confirm the employment land requirement but should

also include flexibility to allow for development to come forward on non-allocated sites where there is a proven need for a specific type of business development to meet a strategic need, for example Industrial (including logistics).

This type of need is not captured through the evidence base, but there is a clear indication of a likelihood that this type of need will arise, particularly as Solihull is an attractive location with well-established existing infrastructure. Indeed, the WMLC report suggests that a credible pipeline of strategic employment sites (site in excess of 25 ha) is a prerequisite for the future growth of the West Midlands, and two respondents to the 'call for evidence' provided evidence which confirmed that the lack of available sites precludes them from operating in the West Midlands. SMBC should ensure that they do not restrict opportunities for this type of investment / development.

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