

North Warwickshire Local Plan Examination
Position Statement on behalf of IM Properties

Matter 10: Development Management Policies

March 2019

Turley

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1. Introduction

- 1.1 This statement is submitted on behalf of IM Properties Development Ltd (IM Properties) to the North Warwickshire Local Plan Examination.
- 1.2 It follows representations submitted to the Draft Local Plan consultation in March 2017 and the Draft Submission Local Plan consultation in March 2018 (hereafter referred to as the 'March 2017 representations' and the 'March 2018 representations' respectively), and position statements and our subsequent appearance at 'Phase 1' of the Local Plan Examination.
- 1.3 IM Properties is a privately owned Midlands-based company located near Coleshill and has a strong track record for bringing forward high-quality developments across the region. It has invested £750m in development projects across the Midlands and has an investment portfolio of £900m alongside a £1bn residential land portfolio. IM Properties' record of working closely with local authorities on major developments includes Birch Coppice Business Park within North Warwickshire, which has been transformed from a disused colliery and developed to the highest standards of building design, park infrastructure, landscaping, amenities and management.
- 1.4 IM Properties also controls 70 hectares of land to the west of Junction 9 of the M42/M6 Toll, within North Warwickshire. The site was submitted to the Borough Council's Call for Sites in 2015, and provides an exceptional opportunity for a major new employment development to meet a well evidenced, significant and pressing need for strategic employment sites in this location.
- 1.5 The site is situated within the heart of the M42 corridor and benefits from excellent access to the strategic road network, proximity to labour supply and access to intermodal facilities. It can make a substantial contribution to the jobs, investment and growth agenda of the regions' Local Enterprise Partnerships (LEPs) and the West Midlands Combined Authority, and the wider objectives of the Midlands Engine Strategy.
- 1.6 Our March 2017 and March 2018 representations set out significant concerns with the emerging plan, and these concerns remain in respect of the submitted Local Plan (March 2018). The key issues which form the focus of our representations to the Examination are as follows:
 - The failure of the Plan to recognise the strong economic need for additional strategic employment land in the Borough to address the significant and growing unmet need and demand at a sub-regional level, and within the M42 corridor more specifically;
 - The spatial strategy which has been selected without first understanding the appropriate housing and employment needs to plan for, and which has been unduly influenced by seeking to protect the Green Belt, rather than a consideration of the most sustainable strategy for directing growth; and

- Allied to our concerns above, the significant and substantive procedural shortcomings with the Sustainability Appraisal, including issues arising from the failure to prepare a revised SA Scoping Report at the outset of the process, failure to carry out and consult upon an SA of the strategic Growth Options at the appropriate time, the failure to assess the preferred growth option and reasonable alternatives and the erroneous treatment of Green Belt as an environmental constraint.

1.7 This statement responds to Matter 10 of the Examination, and specifically sets out IM Properties' comments in respect of Policy LP37: Renewable Energy and Efficiency and monitoring requirements for employment land within the Local Plan.

2. Response to Issues and Questions

Q 10.1 – Q 10.44

2.1 No comments

10.45 LP37, Renewable energy and energy efficiency?

(a) Has an assessment of locations potentially suitable for renewables facilities been undertaken?

(b) Is the 10% reference to on-site renewables justified?

(c) Should reference be made to the efficiency standards in Building Regulations?

2.2 We refer to our March 2017 representations which state the following:

2.3 Copy from March 2017 representations

Q 10.46 LP38, Information and communication technologies

2.4 No comments

Q 10.47 Are monitoring arrangements sufficiently precise and measurable to enable effective review of the plan's effects?

2.5 Following on from the discussion during the Matter 5 hearing session, there needs to be a more sophisticated approach to employment land monitoring, which takes account of both land and floorspace figures. This will ensure a better understanding of the market and implications in terms of ensuring sufficient supply to meet market demand.

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