

Separate Sheet

Gerald Eve Representations on behalf of Jaguar Land Rover

Representation relating to Policy DS6 – Level of Housing Growth

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Jaguar Land Rover is a major international business and one of the biggest nation employers, creating both direct and indirect jobs within the UK.

Jaguar Land Rover is the UK's largest automotive manufacturing business Last year. Jaguar Land Rover sold 425,000 vehicles in more than 170 countries. These figures make Jaguar Land Rover one of the largest exporters by value in the UK, with 80% of vehicles produced in the UK being sold abroad. In recognition of its outstanding export sales growth, Jaguar Land Rover was awarded the 2014 Queen's Award for Enterprise in International Trade, reflecting on the company's positive contribution to society and the growth of the UK economy.

Jaguar Land Rover's UK operations take place at five locations, with three vehicle manufacturing plants - two in the West Midlands at Castle Bromwich and Solihull, one near Liverpool in Halewood - and two advanced design and engineering centres at Gaydon and Whitley. These facilities provide 29,000 jobs, with over 19,000 of these provided across the network of sites in the West Midlands. Furthermore, £500 million is being invested into developing a new Engine Manufacturing Centre site near Wolverhampton, due to open in 2015, which is expected to provide circa 1,400 jobs once at full capacity.

Overall, Jaguar Land Rover will invest £3.5 billion in product creation and capacity expansion in the UK in the year to the end of March 2015. Over the past three years the company has created 12,000 manufacturing and technology jobs, which is a significant step to helping the government achieve its aim of re-balancing the UK economy.

Jaguar Land Rover is the UK's largest automotive apprenticeship provider. Indeed in 2013 alone the company hired 150 apprentices as well as 273 graduates. It currently has 474 apprentices and 585 graduates in its programmes. It also has an award-winning schools programme, Inspiring Tomorrow's Engineers, to encourage children to take up engineering careers, with over 300 thousand schoolchildren participating last year alone.

As well as direct employment, Jaguar Land Rover's activities sustain some 190,000 jobs throughout the UK at dealerships, suppliers and local businesses.

Jaguar Land Rover recognises that continual advancement is critical to maintaining competitive and advancing vehicle design and technology in a sustainable manner. Jaguar Land Rover's commitment to advanced design and technology is reflected in the fact that the company is the biggest UK investor in R&D in the manufacturing sector and is in the 'global top 100 for R&D' spend.

In addition to the advanced design and engineering centres at Gaydon and Whitley, Jaguar Land Rover has invested heavily in a number of collaborative research and development programmes, in

association with other partners and a number of higher education establishments in the West Midlands, to help create a workforce of highly skilled engineers, in an area long-associated with the automotive industry. These projects include the new £130 million National Automotive Innovation Campus at Warwick University, which Jaguar Land Rover is creating with partners including Tata Motors European Technical Centre and WMG (Warwick Manufacturing Group). When this facility opens in 2016 it will become the innovation and research hub for more than 1000 researchers and engineers from Jaguar Land Rover and our academic and supplier partners.

Jaguar Land Rover is not only one of the main employers in the West Midlands, but is an integral part of the manufacturing future of the area and the UK as a whole. It is therefore essential that the business is supported by a facilitative planning framework that allows it to continue to grow.

As Jaguar Land Rover is seeking to consolidate and substantially expand its existing operations at Gaydon, within the administrative neighbouring boundary of Stratford on Avon District Council, it is considered essential that the emerging Local Plan provides support for growth that safeguards and facilitates substantial investment, which is set to maintain Jaguar Land Rover at the forefront of automotive design and technology.

In addition to the redevelopment of the existing Gaydon site to the West of the B4100, Jaguar Land Rover has wider aspirations for substantial investment in the next 15 years to meet the growing needs of the business at the adjacent site known as Gaydon/Lighthorne Heath, which is largely bounded to by the M40 to the East, by the B4451 to the South, by the B4100 to the West, and by Chesterton Wood further to the North.

The proposals envisage significant enhancements to help ensure the long-term sustainability of Jaguar Land Rover's business at Gaydon, with development to accommodate a range of activities relating to product development and promotion that are likely to involve substantial land-take (up to 100 ha).

As a business Jaguar Land Rover needs to ensure that it can adapt quickly to external forces such as technological advances and changes in customer demand. Proposals for expansion at Gaydon are at an early stage of preparation and so adequate flexibility needs to be provided which allows for differing uses and activities to come forward.

Jaguar Land Rover requires certainty in order to have confidence in its ability to invest, expand and broaden operations in the future as part of the long term plans for Gaydon, which will be of benefit to the local, sub-regional and national economy, and to minimise planning risk.

Draft Policy DS6

Draft Policy DS6 sets out that the Council will provide for 12,860 new homes between 2011 and 2029. General support is expressed in relation to the policy explanation which sets out that this level of housing growth has been derived through the Joint Coventry and Warwickshire Strategic Housing Market Assessment (2013).

Concern is expressed that Policy DS6 is not 'effective', as it does not acknowledge an appropriate level of housing or provide for the potential future housing requirements of Jaguar Land Rover employees as a result of business expansion in the short, medium and long term. The plan is therefore not 'effective' with regard to being based on effective joint working on cross-boundary strategic priorities.

In recognising cross boundary housing requirements, Jaguar Land Rover considers that it is imperative that as one of the districts largest employers, Warwick District Council should

acknowledge that they already provide a large provision of housing for Jaguar Land Rover's existing employees. Furthermore, Jaguar Land Rover considers that given their requirement to redevelop and expand the business at Gaydon, within Stratford on Avon District, there is a need for Warwick District Council to recognise the need to provide sufficient and suitable housing to accommodate Jaguar Land Rover's employees in the short, medium and long term.

The Gaydon Site is a long-established employment site within the district and the Gaydon/Lighthorne Heath site, comprising up to 100 ha is allocated for the expansion of Jaguar Land Rover in the neighbouring Stratford-on-Avon District Council Proposed Submission Core Strategy (May 2014) (Proposal GLH).

This established Jaguar Land Rover employment site and substantial expansion is likely to increase the demand for housing within Warwick District.

The Gaydon site has a key role in the economic future of the region as will other locations within Warwick District and elsewhere, and the demand for housing and services within the region should be considered in the Warwick Local Plan as a strategic priority and in compliance with the duty to co-operate.

The NPPF identifies that it is the responsibility of the District Council to adequately plan for housing and services over the plan period and to ensure that the Local Plan is adequately flexible to adapt to changing needs. Given the cross boundary impact of the existing Jaguar Land Rover operations on Warwick Districts' current housing provision and the need for housing requirements to accommodate future Jaguar Land Rover employees, the emerging Local Plan does not adequately plan for housing and services in accordance with the NPPF.

Concern is therefore expressed that Policy DS6 of the Local Plan is not consistent with National Policy, nor is it sufficiently 'effective' as it is not based on effective joint working on cross-boundary strategic priorities, nor 'justified' when considered against the reasonable alternative of providing for the future growth requirements of Jaguar Land Rover.

It is imperative that the Warwick District Council considers its housing targets in synergy with the need to protect, encourage and facilitate the ability of existing major employers, such as Jaguar Land Rover, to expand within the District and also within adjoining Local Authorities. Accordingly, Jaguar Land Rover consider it necessary that Warwick District Council allocate an appropriate level of housing to accommodate the future housing requirements of Jaguar Land Rover employees in the short, medium and long term.

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In light of the above considerations, it is requested that the following text is inserted following paragraph 2.20 of the Local Plan Publication Draft:

“Jaguar Land Rover is a significant and growing employer within the District and region, both directly and indirectly. As a result of growth and expansion, there may be a requirement to review the level of planned housing provision in advance of the end of the plan period. Using the same approach set out within Policy DS20, the Council will keep this under review”