



**GERALDEVE**

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12 December 2014

**Our ref:** HSP/RJLD/G6120

**Your ref:**

Dear Sirs

**Local Plan Publication Draft: Focused Consultation**

We write on behalf of our client Jaguar Land Rover in order to submit representations to the Council's Local Plan Publication Draft: Focused Consultation Document.

This consultation represents an opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) in light of the information published in the "Focused Consultation" before it is submitted to the Secretary of State.

Please find enclosed three separate completed Representation Forms in respect of the following Local Plan policies:

1. Draft Policy DS9 – Employment Sites to be Allocated;
2. Draft Policy MS2 – Major Developed Sites in the Green Belt; and
3. Draft Policy DS19 – Green Belt.

Should you wish to discuss any of the matters raised, then please do not hesitate to contact either Robert Davies (020 7333 6207) or Harry Spawton (0161 830 7077).

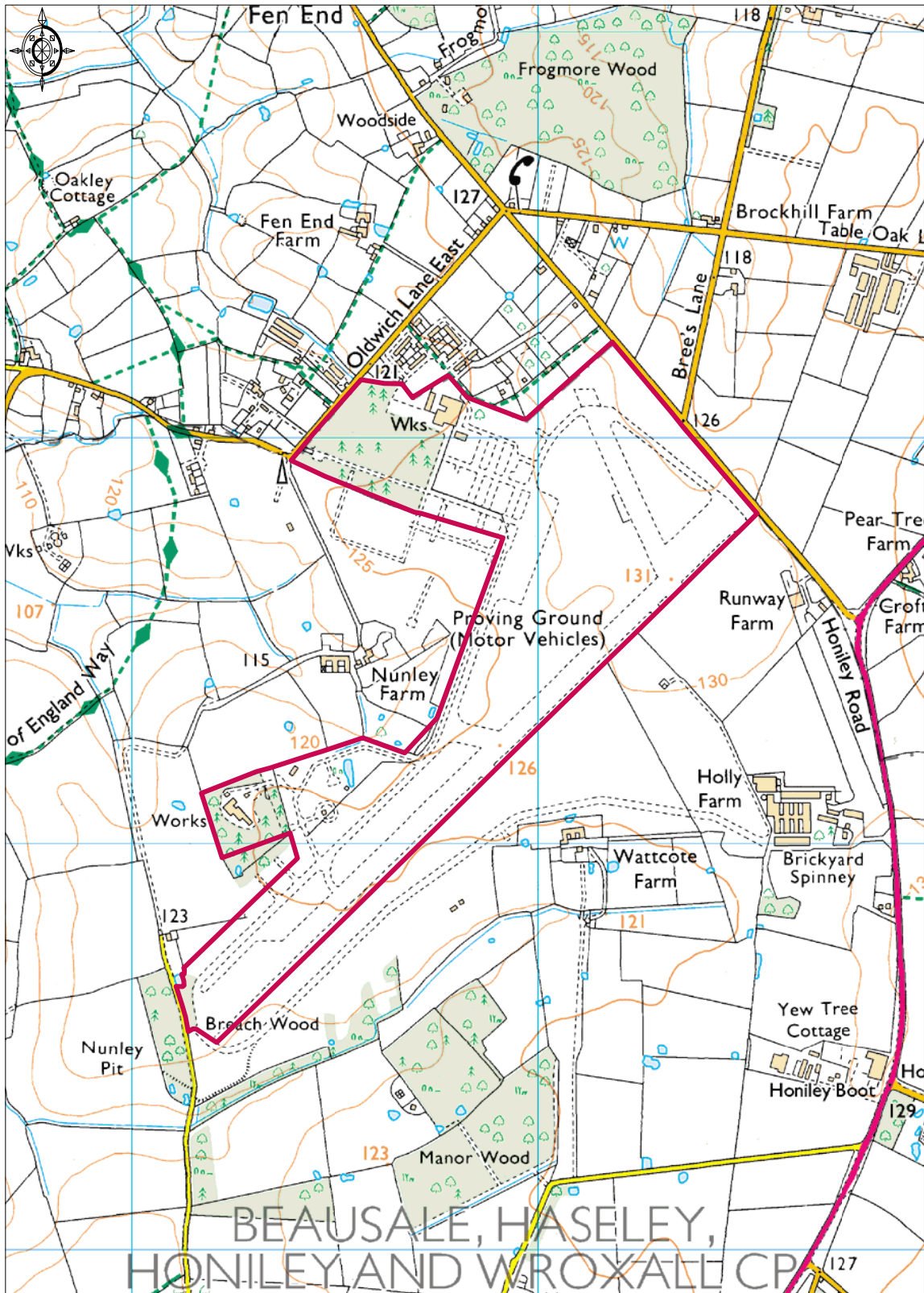
Yours faithfully

**Gerald Eve LLP**

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Encs.

The former Honiley Airfield, Oldwiche Lane East, Wroxall, Kenilworth



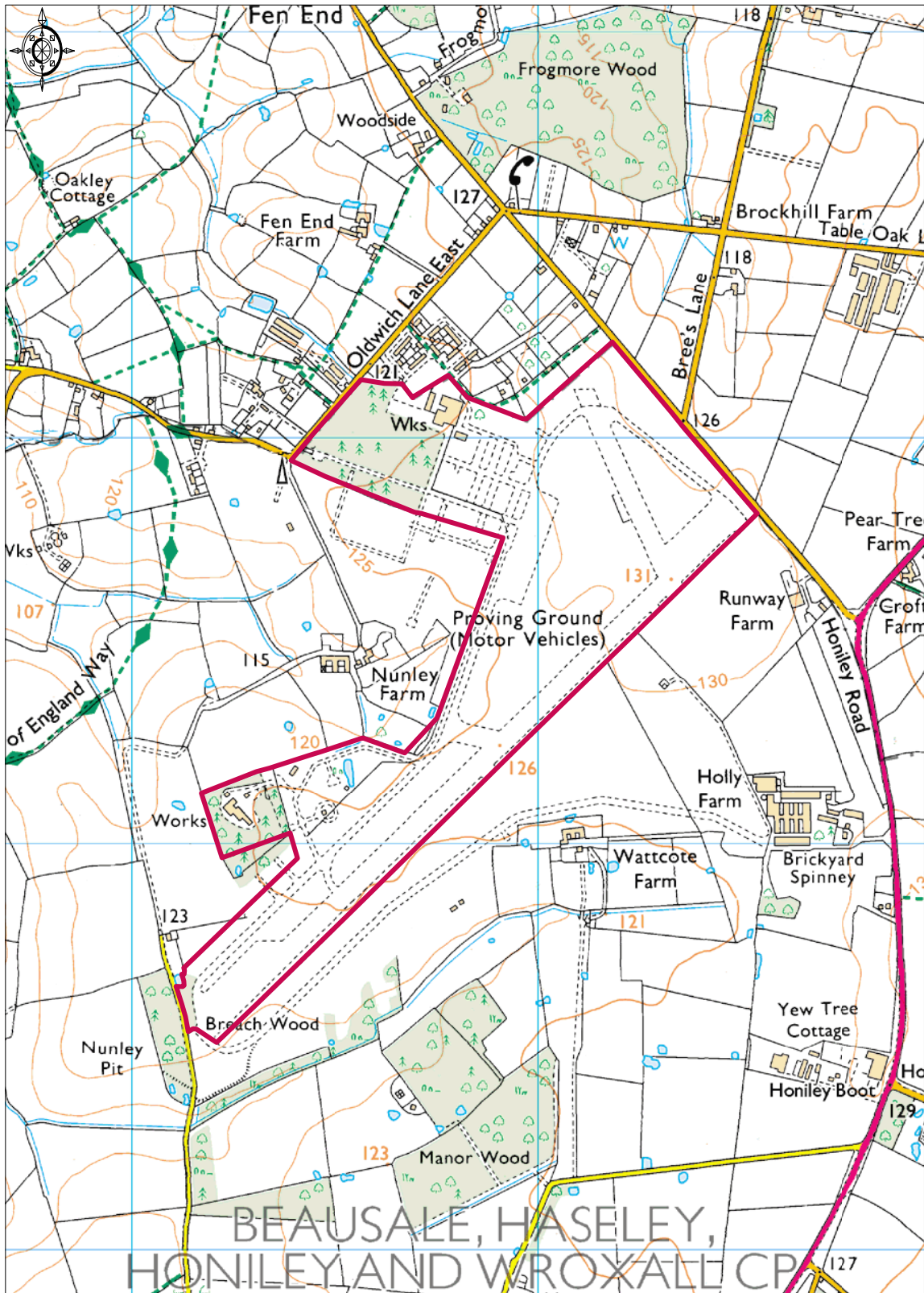
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G3995



The former Honiley Airfield, Oldwiche Lane East, Wroxall, Kenilworth  
Suggested Amendment to Green Belt Boundary



BEAUSALE, HASELEY,  
HONILEY AND WROXALL CP

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G3995



## Publication Draft Local Plan: Focused Consultation 2014

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Person ID	
Rep ID	

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This form has two parts:

- Part A – Personal Details
- Part B – Your Representations

**If you are commenting on multiple sections of the document, you will need to complete a separate Part B of this form for each representation on each policy.**

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Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be received by **4.45pm on Friday 12 December 2014**

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<b>Warwickshire Direct Whitnash</b> , Whitnash Library, Franklin Road, Whitnash
<b>Leamington Spa Library</b> , The Pump Rooms, Parade, Royal Leamington Spa
<b>Warwickshire Direct Warwick</b> , Shire Hall, Market Square, Warwick
<b>Warwickshire Direct Kenilworth</b> , Kenilworth Library, Smalley Place, Kenilworth
<b>Warwickshire Direct Lillington</b> , Lillington Library, Valley Road, Royal Leamington Spa
<b>Brunswick Healthy Living Centre</b> , 98-100 Shrubland Street, Royal Leamington Spa
<b>Finham Community Library</b> , Finham Green Rd, Finham, Coventry

at the following locations:

# Part A - Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)
Title		Mr
First Name		Robert
Last Name		Davies
Job Title (where relevant)		
Organisation (where relevant)	Jaguar Land Rover	Gerald Eve LLP
Address Line 1		72 Welbeck Street
Address Line 2		London
Address Line 3		
Address Line 4		
Postcode		W1G 0AY
Telephone number		020 7493 3338
Email address		<a href="mailto:rdavies@geraldeve.com">rdavies@geraldeve.com</a>

### 3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
The adoption of the Local Plan.	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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Person ID:

Rep ID:

## Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

### 4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Plan (tick one only):

Focused Changes [  ]    Sustainability Appraisal [  ]

Paragraph Number:

Policy Number:

Policy DS19 Green Belt

Policies Map Number:

25

### 5. Do you consider the Plan is :

5.1 Legally Compliant?

Yes

No

5.2 Complies with the Duty to Co-operate?

Yes

No

5.3 Sound?

Yes

No

### 6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

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Person ID:

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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.

### **Introduction**

Gerald Eve LLP is instructed to submit representations to the Council's Local Plan Publication Draft: Focused Consultation Document in relation to the Former Honiley Airfield, Fen End (hereinafter referred to as 'Fen End') on behalf of our client Jaguar Land Rover.

Jaguar Land Rover purchased the site in September 2014 and has significant plans for future development and expansion in accordance with the Council's Strategic Economic Plan (SEP) (March 2014).

A site location plan is attached at Appendix A.

This current consultation provides an opportunity to comment on the Council's Local Plan where it is considered the more recently published pieces of evidence have a bearing on it.

Given the above, this representation provides further comments on draft **Policy DS19 Green Belt** in light of the publication of new evidence contained in the Joint Strategic Employment Land Study (October 2014).

The following section provides an introduction to Jaguar Land Rover, a summary of their key aspirations and objectives for the future development of the Fen End site followed by representations to draft Policy DS19 in light of the publication of the Joint Strategic Employment Land Review.

### **Jaguar Land Rover**

Jaguar Land Rover is a major international business and one of the biggest local and national 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 over 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 currently 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 (Stratford) and Whitley (Coventry). At present, these facilities provide 29,000 jobs, with over 19,000 of these 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 and meeting the objectives of the Coventry and Warwickshire Local Enterprise Partnership, as well as the principles of the National Planning Policy Framework.

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 largest UK investor in research and development (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 1,000 researchers and engineers from Jaguar Land Rover alongside 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, region 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 Fen End, it is considered essential that planning policy and related justification 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.

#### **Jaguar Land Rover's Proposals for Fen End**

The existing site at Fen End currently accommodates some of Jaguar Land Rover's product creation, research, vehicle testing and development facilities and includes a test track. The site is a long established employment location dating back to the 1950's, with a history of accommodating land uses relating to the development and testing of motor vehicles since 1960.

Outline planning permission was granted for development of the site for an advanced engineering research and development campus (Class B1 (Business Uses) for the automotive and motor sport industries, Catalyst Centre, new access road and roundabout, infrastructure, parking and landscaping (including details of the Catalyst building) in 2007. This planning permission was renewed on 1 December 2011. A Reserved Matters application pursuant to the above outline planning permission was granted on 23 October 2014 (reference W/14/1152).

Jaguar Land Rover purchased the site in September 2014 and as part of its planned growth and expansion, Jaguar Land Rover propose to invest in significant new facilities at Fen End over the plan period. Future development will improve and enhance the working environment, and is also likely to involve a range of uses and activities that will result in additional employment opportunities.

#### **The Strategic Employment Land Study Update (October 2014)**

The Strategic Employment Land Study ("SELS") Update (2014) (which is the subject of this Focused Consultation) identifies Fen End as a key Strategic Employment Allocation providing 10ha of existing employment land within the District.

The SELS Update provides numerous references to the automotive industry being seen as a key growth sector that will drive the demand for strategic employment sites in the short, medium and longer term. An example of this is provided in paragraph 5.14 of the SELS Update which identifies the automotive and large big box logistics as being the two key growth sectors that will drive the demand for strategic employment sites in the short, medium and long term.



It is clear that the SELS Update identifies Fen End as a key strategic employment site which can provide a significant contribution to economic growth over the plan period. As set out above, Fen End is now owned and operated by Jaguar Land Rover and has significant potential to provide further advanced facilities to further strengthen the District's role in the automotive sector.

Paragraph 159 of the NPPF outlines the importance of using an appropriate evidence base (in this case the Joint ELR Update) to inform Local Plan policies and states:

*"Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about both the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals."*

In addition, NPPF states that local planning authorities should have a clear understanding of business needs within economic markets operation in and across their area. Local authorities are also encouraged to work together with other bodies including county and neighbouring authorities, Local Enterprise Partnerships (LEPs) and the local business community when preparing and maintaining a robust evidence base. The NPPF asks local authorities to use this evidence base to assess the requirements for employment land and floorspace and the existing and future supply of land available to meet identified needs.

Paragraph 182 of the NPPF states that Local Authorities should submit a plan for examination which it considers is "sound" – namely that it is:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

It is not considered that draft Policy DS19 as currently drafted has been positively prepared, nor is it consistent with national policy (NPPF) for the reasons set out below.

### **Draft Policy DS19 – Green Belt**

The Council has revised the Green Belt boundary as part of the emerging Local Plan. The explanation text to Draft Policy DS19 states that a number of changes have been made to the Green Belt boundaries in the Plan to enable development to come forward in a measured way in accordance with the NPPF. The policy sets out 13 sites which are to be removed from the Green Belt which includes land in the vicinity of Coventry Airport (sub regional employment site) and the University of Warwick.

We object to the draft policy on the basis that the Fen End site, which has been identified as an important investment site in the Updated SELS is not included as a site to be removed from the Green Belt.

The site was not assessed in the Green Belt review and the Council has used the 2006 Local Plan Inspector's report to inform the current designations on the site. It is not considered that draft Policy DS19 is justified and as such the Plan is not considered to be 'sound'.

It is not considered that the Fen End site as a whole, together with the extant planning permission makes a significant positive contribution to the Green Belt. Paragraph 80 of the NPPF sets out the function and purposes of designating land as Green Belt which include;

- 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

It is considered that this site does not perform any of the above functions of including land within the Green Belt for the following reasons;

- The site is contained by strong defensible boundaries. There is no potential for urban sprawl;
- The allocation of the site would not cause the merging of neighbouring towns;
- There would be no future encroachment into the existing countryside as the site is contained by the test track, part of which runs along the south east boundary of the site;
- The allocation of the site for employment uses associated with Jaguar Land Rover would not impact on the character of historic towns; and
- The allocation of the site for employment would not have a detrimental impact on urban regeneration as the Council has already clearly identified the site as an important Strategic Employment Site and the need to release suitable sites from the Green Belt.

As set out above, the site benefits from an extant planning permission for advanced engineering research and development campus for the automotive and motorsports industries and associated development (Ref. W/14/1152). As such, the key principle of development on the site has already been established. The site is an important component of the District and sub-regional growth plan as set out in the SELS Update, and the Council's opinion that the openness of the site needs to be maintained should be considered in the longer term context of the benefits of economic development and the future use and growth of the site. The designation of the site within the Green Belt could act as a significant barrier to economic growth.

An automotive and research related employment site such as Fen End needs to ensure that it can adapt quickly to external forces such as technological advances and changes in market demand. Proposals for expansion of the site are at a very early stage of preparation and so adequate flexibility needs to be provided which allows for differing uses and activities to come forward over the life of the plan. This will allow Jaguar Land Rover the necessary flexibility to respond to the continually evolving market within which it operates.

In summary, Jaguar Land Rover seeks positive planning policies that provide certainty in order to have confidence in its ability to invest, expand and broaden operations in the future as part of long term plans for Fen End, which will be of benefit to the local, county, sub-regional and national economy, and to minimise planning risk. In order to ensure that draft Policy DS19 is 'sound' the entire Fen End site should be removed from the Green Belt to ensure that the site's future use is secured and that future development of employment generating uses are not restricted. This will ensure that the site is 'future proofed' for future economic development, in line with Paragraph 20 of the NPPF which states *"to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century"*.

**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 comments, it is considered necessary, in order to plan positively for sustainable development on the site and make the plan 'sound', that draft Policy DS19 is amended to exclude the Fen End site from the Green Belt along the existing defensible site boundaries. This will ensure that the site is 'future proofed' for future economic development, in line with Paragraph 20 of the NPPF which states "*to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century*".

A plan illustrating our suggested revised boundaries is enclosed at Appendix B of this representation.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues** he/she identifies for examination.

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**9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

**10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

To enable the Planning Inspector to fully understand the key reasons why the Plan needs to acknowledge and recognise the significant employment and economic role of Jaguar Land Rover in order to make the Plan 'sound'.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**11. Declaration**

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

Gerald Eve LLP

Date :

12th December 2014

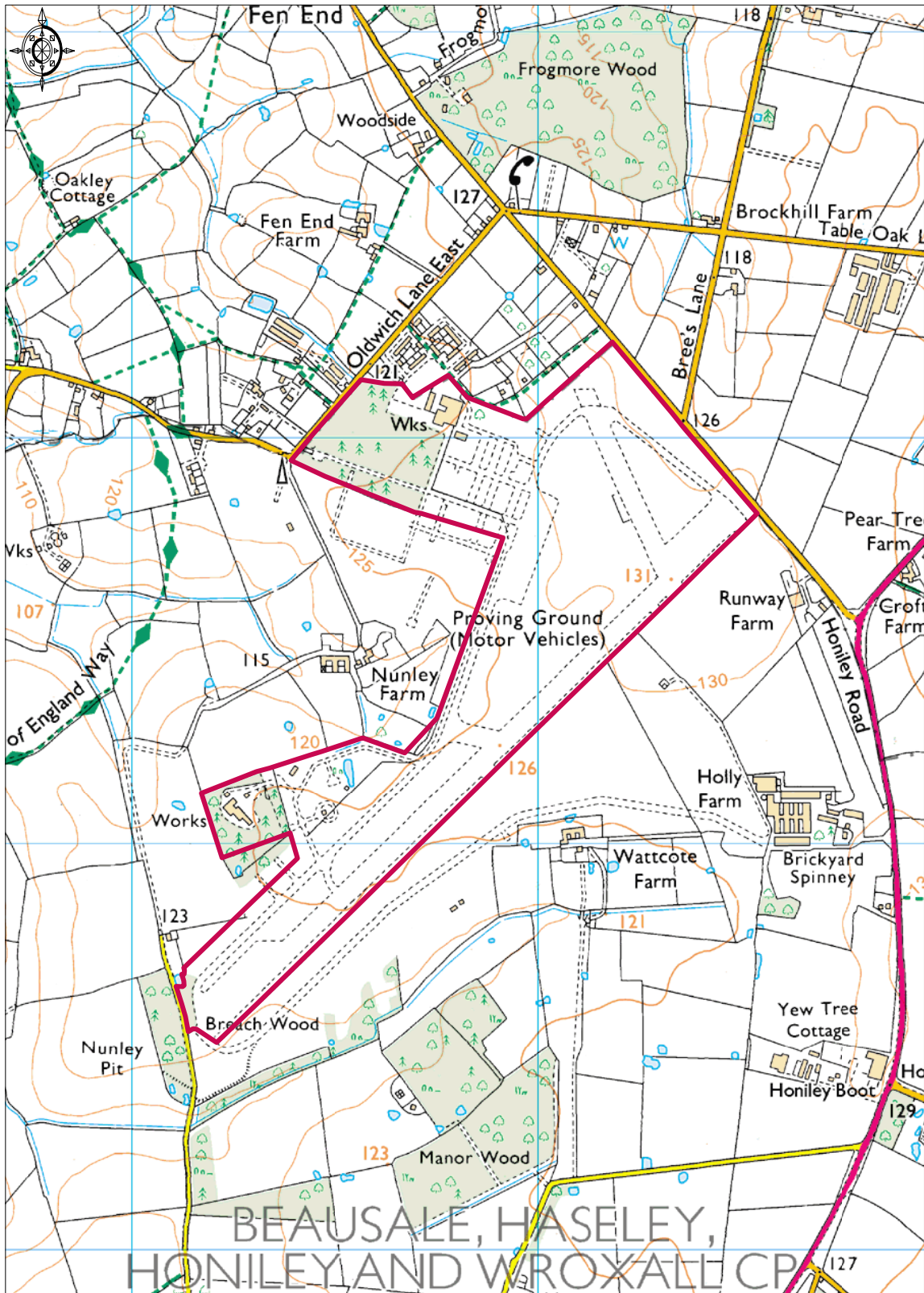
Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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The former Honiley Airfield, Oldwiche Lane East, Wroxall, Kenilworth

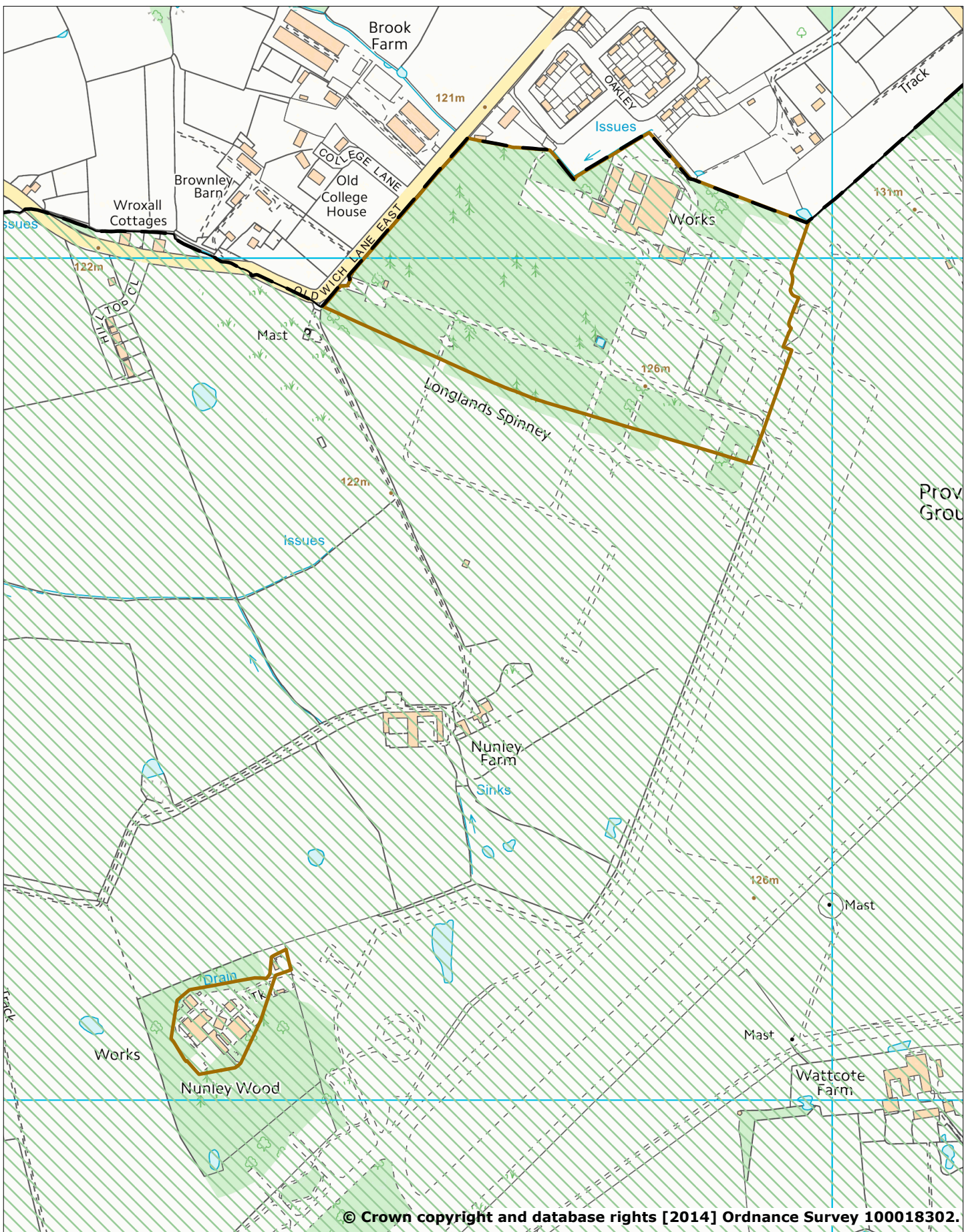


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**Key**

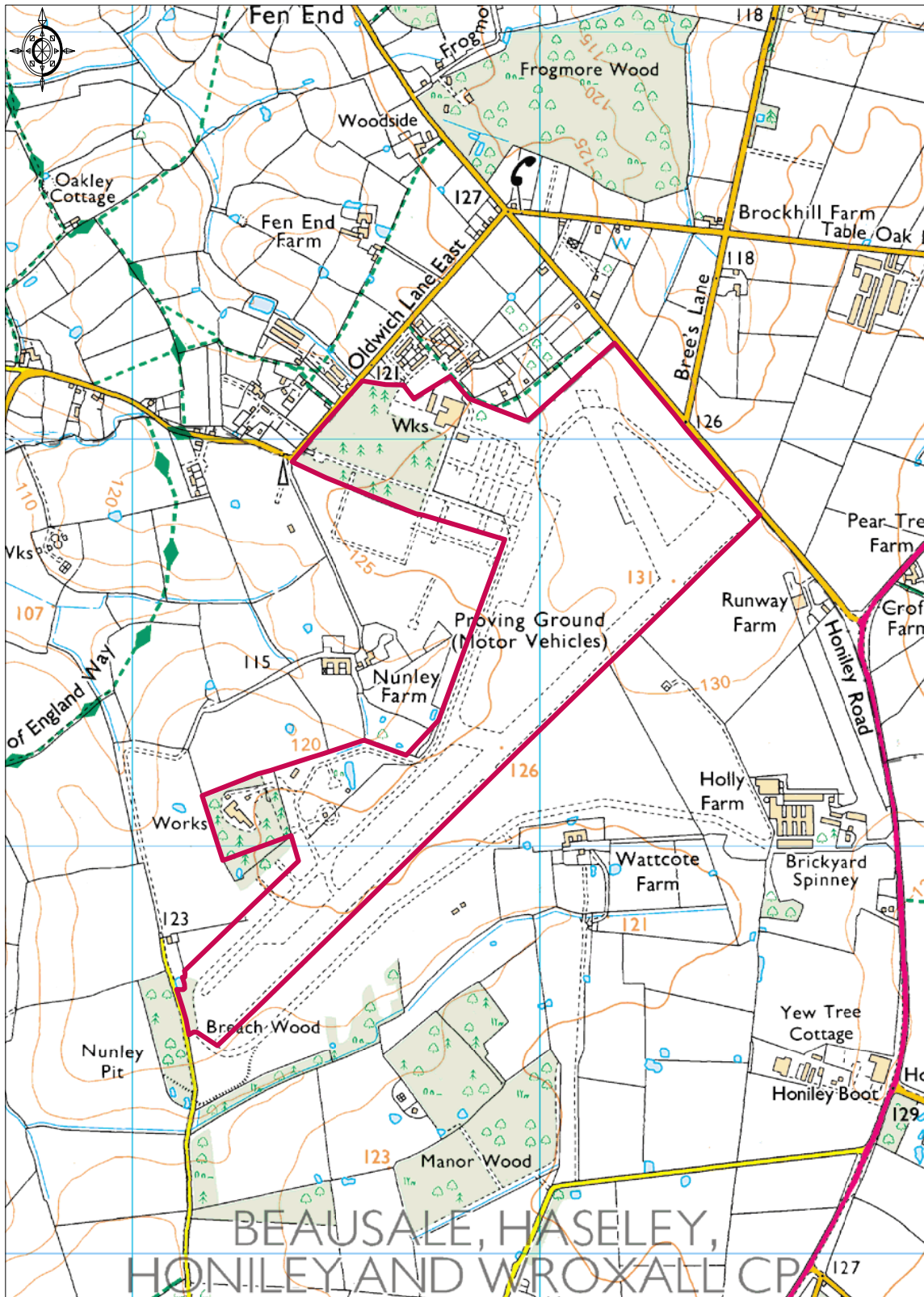
-  WDLP - Green Belt (DS19)
-  WDLP - Major Sites in Green Belt (MS2)
-  Warwick District Council Boundary

**25. Honiley Airfield**

**Local Plan  
Policies  
Map**



The former Honiley Airfield, Oldwiche Lane East, Wroxall, Kenilworth  
Suggested Amendment to MDS Boundary



BEAUSALE, HASELEY,  
HONILEY AND WROXALL CP

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at the following locations:



# Part A - Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)
Title		Mr
First Name		Robert
Last Name		Davies
Job Title (where relevant)		
Organisation (where relevant)	Jaguar Land Rover	Gerald Eve LLP
Address Line 1		72 Welbeck Street
Address Line 2		London
Address Line 3		
Address Line 4		
Postcode		W1G 0AY
Telephone number		020 7493 3338
Email address		<a href="mailto:rdavies@geraldeve.com">rdavies@geraldeve.com</a>

### 3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
The adoption of the Local Plan.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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Person ID:

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## Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

### 4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Plan (tick one only):

Focused Changes [ x ]    Sustainability Appraisal [ ]

Paragraph Number:

Policy Number:

Policy MS2 Major Sites in the Green Belt

Policies Map Number:

### 5. Do you consider the Plan is :

5.1 Legally Compliant?

Yes     No

5.2 Complies with the Duty to Co-operate?

Yes     No

5.3 Sound?

Yes     No

### 6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not:

(please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

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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.

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A site location plan is attached at Appendix A.

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Given the above, this representation provides further comments on draft **Policy MS2 Major Sites in the Green Belt** in light of the publication of new evidence contained in the Joint Strategic Employment Land Study (October 2014).

The following section provides an introduction to Jaguar Land Rover, a summary of their key aspirations and objectives for the future development of the Fen End site followed by representations to draft Policy MS2 in light of the publication of the Joint Strategic Employment Land Review.

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Jaguar Land Rover is a major international business and one of the biggest local and national 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 over 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 currently 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 (Stratford) and Whitley (Coventry). At present, these facilities provide 29,000 jobs, with over 19,000 of these 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 and meeting the objectives of the Coventry and Warwickshire Local Enterprise Partnership, as well as the principles of the National Planning Policy Framework.

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 largest UK investor in research and development (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 1,000 researchers and engineers from Jaguar Land Rover alongside 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, region 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 Fen End, it is considered essential that planning policy and related justification 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.

#### **Jaguar Land Rover Proposals for Fen End**

The existing site at Fen End is currently home to Jaguar Land Rover's product creation, research, vehicle testing and development facilities and includes a test track. The site is a long established employment location dating back to the 1950's, with a history of accommodating land uses relating to the development and testing of motor vehicles since 1960.

Outline planning permission was granted for development of the site for an advanced engineering research and development campus (Class B1 (Business Uses) for the automotive and motor sport industries, Catalyst Centre, new access road and roundabout, infrastructure, parking and landscaping (including details of the Catalyst building) in 2007. This planning permission was renewed on 1 December 2011. A Reserved Matters application pursuant to the above outline planning permission was granted on 23 October 2014 (reference W/14/1152).

Jaguar Land Rover purchased the entire Fen End site in September 2014. As part of its planned growth and expansion, Jaguar Land Rover propose to invest in new facilities at Fen End over the plan period. Future development will improve and enhance the working environment, and is also likely to involve a range of uses and activities that will result in additional employment opportunities.

#### **The Strategic Employment Land Study Update (October 2014)**

The Strategic Employment Land Study Update (2014) (which is the subject of this Focused Consultation) identifies Fen End as a key Strategic Employment Allocation providing 10ha of existing employment land within the District.

The Update provides numerous references to the automotive industry being seen as a key growth sector that will drive the demand for strategic employment sites in the short, medium and longer term. An example of this is provided in paragraph 5.14 of the ELR Update which identifies the automotive and large big box logistics as being the two key growth sectors that will drive the demand for strategic employment sites in the short, medium and long term.

It is clear that the Update identifies Fen End as a key strategic employment site which has the potential to provide a significant contribution to economic growth over the plan period. As set out above, Fen End is now owned and operated by Jaguar Land Rover and has significant potential to provide further advanced facilities to further strengthen the District's role in the automotive sector.

Paragraph 159 of the NPPF outlines the importance of using an appropriate evidence base (in this case the Joint ELR Update) to inform Local Plan policies and states:

*“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about both the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”*

NPPF states that local planning authorities should have a clear understanding of business needs within economic markets operation in and across their area. Local authorities are also encouraged to work together with other bodies including county and neighbouring authorities, Local Enterprise Partnerships (LEPs) and the local business community when preparing and maintaining a robust evidence base. The NPPF asks local authorities to use this evidence base to assess the requirements for employment land and floorspace and the existing and future supply of land available to meet identified needs.

Paragraph 182 of the NPPF states that Local Authorities should submit a plan for examination which it considers is “sound” – namely that it is:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

It is not considered that draft Policy MS2 as currently drafted has been positively prepared, nor consistent with national policy for the reasons set out as follows.

### **Draft Policy MS2 – Major Sites in the Green Belt**

Jaguar Land Rover welcome the identification of the Former Honiley Airfield as a key employment site in the District which plays an important role in the local, sub-regional and national economy.

Draft Policy MS2 sets out that in the case of the Former Honiley Airfield there may be very special circumstances to justify further development. Furthermore, the policy states that the range of uses will be restricted to the automotive and motorsport industries and employment associated with these industries.

Within the policy, the Council has acknowledged that the site has an important role in delivering the aims of the Coventry and Warwickshire Local Enterprise Partnership (CWLEP), in relation to the growth of manufacturing, particularly in the long term through the implementation of the planning permission.

Within the explanation text of the policy, paragraph 3.153 sets out that some small scale development will be necessary adjacent to the test track to assist in operations, but that the Council will ensure that the openness of the Green Belt is maintained.

An automotive and research related employment site such as Fen End needs to ensure that it can adapt quickly to external forces such as technological advances and changes in market demand. It is crucial that the site is expanded to create confidence to attract investment. This employment site has the potential to contribute to the aims and objectives of the Coventry and Warwickshire LEP.

As a business, Jaguar Land Rover, due to its dynamic nature, needs to ensure that it can adapt quickly to external forces, such as technological advances and changes in customer demand. Proposals for expansion of the site 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 over the life of the plan. This will allow Jaguar Land Rover the necessary flexibility to respond to the continually evolving market within which it operates.

Given the above, the current boundary of the MDS (see Local Plan extract at Appendix B) at Fen End is considered to be a major barrier to the potential growth of the site over the plan period. The site is a key priority for the CWLEP and Jaguar Land Rover have the potential to invest in the site's usage and growth. Given the importance and investment, the barrier of the current MDS boundaries will not provide any certainty for any future investment over and above the extant planning permission, over the plan period. This goes against the Council's own objectives and the objectives of the Strategic Economic Plan.

In order to make draft Policy MS2 'sound' it is considered that the Council as a minimum re-examines the boundary of the MDS to include the test track as part of the overall site, in particular given its extensive areas of hard standing, its status as previously developed land, and recognising the fact that it has an established pattern of continued use for vehicle testing and driver training which is consistent with the principle use of the wider site.

It would be more appropriate, however, to go further than this and seek to remove the entire site out of the Green Belt to ensure that the site's future use is secured and that future development of employment generating uses are not restricted by the Green Belt or MDS allocation. Paragraphs 83 to 85 of the NPPF set out when a Council should review the Green Belt designation and amend boundaries. It is clear that local authorities *'should not keep land which it is unnecessary to keep permanently open'* within the Green Belt and that the concept of a sustainable pattern of development has been agreed by the granting of the extant planning permission. The potential removal of the site from the Green Belt is assessed in further detail in further representations to draft Policy DS19 Green Belt.

In summary, Jaguar Land Rover requires positive planning policies that provide 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 Fen End, which will be of benefit to the local, county, sub-regional and national economy, and to minimise planning risk. In order to ensure that draft Policy MS2 is 'sound' and is consistent with the NPPF, the boundary of the proposed MDS must be increased to include the test track as part of the overall site. It would be most appropriate to remove the entire site from the Green Belt.

- 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 comments, it is considered necessary, in order to plan positively for sustainable development on the site and make the plan 'sound', that the proposed MDS boundary is increased in order to include the test track as part of the overall site. (See our suggested proposed MDS boundary amendment at Appendix C).

It is also considered that the following policy is included in relation to the Former Honiley Airfield:

*Former Honiley Airfield:*

*The Council support further appropriate development on the airfield site in principle. The very special economic circumstances of the Former Honiley Airfield are recognised and the planning policies in respect of the site are intended to positively plan for the consolidation and appropriate expansion of existing activities.*

*This should be demonstrated, by bringing forward comprehensive proposals in the production of a Masterplan Supplementary Planning Document (SPD) to determine the key principles of land uses, layout, design, phasing, infrastructure and mitigation.*

*The Council will support and encourage the development of appropriate uses at the former Honiley Airfield in order to stimulate new economic growth, skills and opportunities and to enhance and maintain the function an automotive and research based site. Any appropriate development and expansion of the former Honiley Airfield will be given positive consideration. The Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.*

*Land at the Former Honiley Airfield will be made available to enable the expansion of Jaguar Land Rover (JLR) to meet the business needs for uses that can include:*

- *Research, design, testing and development of motor vehicles and ancillary related activities;*
- *Other advanced engineering technologies and products;*
- *Offices;*
- *Low volume manufacturing and assembly operations;*
- *Development of associated publicly accessible event, hospitality, display, leisure and conference facilities and marketing infrastructure;*
- *Automotive education and training including ancillary accommodation;*
- *The upgrade, redesign and potential extension of the existing vehicle track;*
- *The provision of appropriate car parking across the site and within the centre of the track for product vehicles, employees, contractors and visitors;*
- *The provision of a new roundabout and associated access;*
- *The potential provision of a suitable access to the centre of the track via a bridge and/or tunnel to allow safe car and transporter movements to enable the centre of the track to be utilised effectively for automotive purposes;*
- *The provision of a batch and holding area to accommodate vehicles from other JLR sites;*
- *The provision of security measures around the site.*

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues** he/she identifies for examination.

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**9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

**10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

To enable the Planning Inspector to fully understand the key reasons why the Plan needs to acknowledge and recognise the significant employment and economic role of Jaguar Land Rover in order to make the Plan 'sound'.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**11. Declaration**

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

Gerald Eve LLP

Date :

12th December 2014

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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