

Separate Sheet

Gerald Eve Representations on behalf of Jaguar Land Rover

REPRESENTATION RELATING TO A NEW POLICY REQUIREMENT FOR WHITLEY SOUTH

7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

Jaguar Land Rover - Company Profile

Jaguar Land Rover is a global business and the UK's largest automotive employer, creating both direct and indirect jobs within the UK.

Jaguar Land Rover is the UK's largest automotive manufacturing business, and in 2015, sold 487,065 vehicles in 160 markets. More than 80% of vehicles produced are exported, generating revenue of £18.1 billion. In recognition of outstanding performance Jaguar and Land Rover won 180 awards in 2014/15.

Jaguar Land Rover's UK operations take place at various locations, with three vehicle manufacturing plants - two in the West Midlands at Castle Bromwich and Solihull, one is located near to Liverpool in Halewood - and two advanced design and engineering centres at Gaydon (Stratford District) and Whitley (Coventry). There are new facilities located at Fen End, near Kenilworth and Prologis Park in Ryton. Furthermore, Jaguar Land Rover has invested £1 billion in its Engine Manufacturing Centre near Wolverhampton, which opened in 2015. The facility is expected to provide circa 1,400 jobs and construction is underway to add 85,000 sqm of additional floorspace to the manufacturing facility.

In the last five years, Jaguar Land Rover's turnover has tripled and its workforce has more than doubled. The company now employs over 38,000 people with over 35,000 of those people based in the UK.

As well as direct employment, Jaguar Land Rover's activities sustain some 240,000 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. This is a responsible approach to ensuring the business grows in the future.

Jaguar Land Rover's innovation is continuous. It invested £3 billion last year in product creation and capital expenditure to bring more new vehicles to market. Over the past three years the business has announced 11,000 new 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 National Planning Policy Framework.

Jaguar Land Rover is the UK's largest automotive apprenticeship provider and some 900 apprentices have joined the company in the past five years. Its school Science, Technology, Engineering and Maths programmes engaged around 643,000 young people in the UK last year, including many schools close to its sites. In addition, almost 9,000 of its employees are enrolled in further and higher education.

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 £150 million National Automotive Innovation Centre at the University of Warwick, which Jaguar Land Rover is creating with partners including, Tata Motors European Technical Centre and WMG (Warwick Manufacturing Group). When this facility opens it will become the innovation and research hub for approximately 1,000 researchers and engineers from Jaguar Land Rover and their 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.

Jaguar Land Rover – Existing Whitley Headquarters

Jaguar Land Rover's existing site at Whitley is home to the world headquarters and an advanced engineering centre for the Jaguar and Land Rover brands. Facilities include a powertrain engineering and design facility

As Jaguar Land Rover has expanded over the last five years so has the number of staff and operations at the Whitley site. The growth has now reached a point where the site is at capacity. Growth is needed to further support the company's decision to manufacture its own engines, placing pressure on accommodation at Whitley where its engineers, researchers and support staff are based and its engine and gearbox development and testing facilities are located.

Jaguar Land Rover – Whitley Expansion

Jaguar Land Rover is seeking to redevelop, consolidate and substantially expand its existing operations at Whitley in order to support its continued growth. It is considered essential that the emerging Local Plan provides support this growth which will safeguard and facilitate substantial investment at Whitley in modernising and expanding its research and development and engineering operations.

The expansion of the Whitley site is required to facilitate the need to continue the technological advancement of engine and product design and in low emission vehicles which is set to maintain Jaguar Land Rover at the forefront of automotive design and technology.

Jaguar Land Rover's proposal is to expand the existing Whitley site to the south (Whitley South), to an area of land which principally sits within Warwick District Council.

The proposals to significantly expand the existing operations at Whitley will deliver significant enhancements to help ensure the long-term sustainability of Jaguar Land Rover's business at the site in Coventry and Warwick, and within the wider Warwickshire district as a whole.

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 Whitley require adequate flexibility to allow for differing uses and activities to come forward.

The proposals at Whitley South are currently subject to an outline planning application (Ref: OT/2016/0405), submitted to Coventry City and Warwick District Councils on 8th February 2016, on behalf of Jaguar Land Rover and Coventry City Council to provide a mixture of uses which include: research and development facilities and light industrial uses, a hotel, car showroom accommodation, small scale retail and catering establishments, a park and remodelling of junctions on the existing highway network.

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

New Standalone Jaguar Land Rover, Whitley South Policy

Jaguar Land Rover welcomes draft Policy DS19: Sub Regional Employment Allocation, which allocated 235 hectares in the vicinity of Coventry Airport, including Whitley South, as a major employment site of regional significance. While this policy is welcomed, it does not recognise the strategic importance of Jaguar Land Rover as a major employer in the region. It is therefore considered that this policy alone does not provide a suitable policy basis for the consideration of development on the Site. The policy is therefore not 'positively prepared' nor 'consistent with national policy'. The importance of Jaguar Land Rover and the contribution to advanced research, manufacturing and engineering needs to be further reinforced, as supported within the Coventry & Warwickshire Strategic Economic Plan.

It is considered imperative that a standalone policy is also included in the emerging Local Plan to identify, maintain and support Jaguar Land Rovers existing and future operations at the Whitley site within Warwick District in order to ensure the company's continued success in the wider region and the competitive global automotive sector.

Jaguar Land Rover has very limited options to expand its other West Midlands sites, many of which are largely constrained by surrounding development. Expansion at the Whitley site, which is the global headquarters and a key location specialising in the design and development of future vehicles and other automotive technologies, is critical to the future growth and progression of the business, and an integral part of the economic future of Warwick District and West Midlands more generally.

Given the employment and economic benefits of the Jaguar Land Rover business as one of the largest employers in the region, it is important that Jaguar Land Rover's existing operations within Warwick District and the wider region are formally recognised and supported. It is therefore considered that a standalone policy would provide the requisite support and confidence to ensure that Jaguar Land Rover's aspirations for further expansion over the plan period are facilitated within the District and the wider region. This would provide Jaguar Land Rover the certainty required in order to have confidence in its ability to invest.

We further highlight the positive approach that is being taken in the emerging Stratford-on-Avon Core Strategy, within which the Council, in the Interim Adopted Core Strategy Proposed Modifications (June 2015), specifically identifies land at Gaydon/Lighthorne Heath (Policy CS.21) for Jaguar Land Rover. The policy states that:

"to enable the expansion of Jaguar Land Rover's activities...A flexible approach will be taken to accommodating a wide range of employment-generating uses, including public and community uses, on existing industrial areas."

Additionally, Stratford-on-Avon's emerging Core Strategy includes an area strategy, 'Proposal GLH' at chapter 6.10 which is dedicated to the development of part of Gaydon/Lighthorne Heath for Jaguar Land Rover activities. This reads as follows:

"What is to be delivered"	<p>Land comprising approximately 100 hectares to enable the expansion of Jaguar Land Rover (JLR) to meet the business needs for uses that can include:</p> <p>Research, design, testing and development of motor vehicles and ancillary related activities.</p> <p>Other advanced engineering technologies and products.</p> <p>Offices.</p> <p>Low volume manufacturing and assembly operations.</p> <p>Development of associated publicly accessible event, hospitality, display, leisure and conference facilities and marketing infrastructure.</p> <p>Automotive education and training including ancillary</p>
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Similarly a positive approach was taken in the adopted Solihull Local Plan (December 2013) where the Council specifically identified (5.5.4) that the Council would contribute to economic growth by:

“supporting and encouraging a broad range of development at Jaguar Land Rover to facilitate its function as a major vehicle manufacturer and providing opportunities for the location of supply chain businesses within the Borough”.

Additionally, Policy P1 “Support Economic Success” within the adopted Solihull Local Plan states that:

“the Council will support and encourage the development of Jaguar Land Rover within its boundary defined in this Local Plan. This will include a broad range of development needed to maintain or enhance the function of Jaguar Land Rover as a major manufacturer of vehicles. The reasonable expansion of the site into the Green Belt will be given positive consideration where economic need can be demonstrated and appropriate mitigation can be secured.”

Full policy statements available at:

- <https://www.stratford.gov.uk/planning/key-dates.cfm>
- <https://www.stratford.gov.uk/planning/gaydonlighthorne-heath-spd.cfm>
- <http://www.solihull.gov.uk/Resident/Planning/appealsenforcement/planmaking/ldf/localplan>

In light of the above, it is considered appropriate that a formal, standalone policy be included in the emerging Local Plan. It is considered that the inclusion of a policy is justified and its absence does not present the most appropriate strategy when considered against the reasonable alternatives.

Jaguar Land Rover is committed to a significant investment at Whitley and within the District and wider region, for delivery of new investment within the plan period. It is critical for Jaguar Land Rover to continue to secure and develop its activities in order to facilitate the potential for continued success in the competitive global motor manufacturing industry. Any adverse impact from significant infrastructure projects such as HS2 must also be mitigated in order to ensure that both existing and future operations of the business are not compromised, in terms of design, construction period, implementation, and day to day operation including supplier and logistic routes.

Expansion within Warwick District is therefore key to Jaguar Land Rover’s future and an integral part of the economic future of Warwick and the West Midlands more widely. Similarly it is considered appropriate for a Local Development Order to be considered for some development which would provide further certainty for future development and investment.

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal 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 considered that a new Policy should be included in the emerging Local Plan to support Jaguar Land Rovers existing operations and expansion at the Whitley Business Park.

Suggested wording for an additional policy in the emerging Warwick Local Plan as follows:

“Whitley South – Jaguar Land Rover:

Jaguar Land Rover is a global business with a significant presence in Warwick and the West Midlands. It is the UK’s largest automotive employer and one of the region’s largest employers. Jaguar Land Rover creates a substantial contribution to the local and regional economy, providing direct and indirect employment, and is an integral part of the manufacturing future of the area and the UK as a whole.

The very special economic circumstances of the Jaguar Land Rover site are recognised by the Warwick District Council and Coventry and Warwickshire Local Enterprise Partnership. Planning policies in respect of the site are intended to positively plan for the consolidated and appropriate growth of existing activities.

The Council supports further appropriate growth and development of Jaguar Land Rover at Whitley South which could including cross-boundary working regarding the parts of Whitley that are located within neighbouring Coventry City. Supporting infrastructure over the life of the plan may include new access junctions, cycle lanes, bus links, heavy rail and rapid transit links as set out within the Infrastructure Delivery Plan.

The Council will support and encourage the expansion of Jaguar Land Rover at Whitley South form appropriate uses, in order to stimulate new economic growth, skills and opportunities and to enhance and maintain the function of a world-class automotive site. Development and expansion of operations to meet Jaguar Land Rover’s business needs will be given positive consideration.

Uses can include:

- ***Research, design, testing and development of vehicles and ancillary related activities;***
- ***Other advanced engineering technologies and product development;***
- ***Offices;***
- ***Powertrain prototype facilities;***
- ***Event, hospitality, display, leisure and conference facilities and marketing infrastructure; and***
- ***Automotive education and training facilities.***

The Council will also consider the implementation of a Local Development Order in order to streamline the delivery and implementation of development proposals at Jaguar Land Rover.”