Separate Sheet

Gerald Eve Representations on behalf of Jaguar Land Rover

Representation relating to Policy DS8 – Employment Land

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 DS8

Draft Policy DS8 seeks to provide for a minimum of 66 hectares of employment land to meet local need during the plan period.

General support is expressed for providing employment land to meet the needs of the district, in accordance with the NPPF. However, given the employment benefits of the Jaguar Land Rover business as one of the largest employers in the region, it is imperative that Jaguar Land Rover's existing operations within Warwick District and the wider region, including neighbouring Stratford on Avon District, are formally recognised. It is key that Jaguar Land Rover's aspirations for further expansion, over the plan period, to facilitate their continued growth in the region are acknowledged.

To safeguard and facilitate continued investment, it is important that Warwick District Council's Local Plan complements the allocation for Jaguar Land Rover's existing Gaydon site and strategic expansion and growth plans at Gaydon, within the neighbouring Stratford on Avon, which will contribute to the wider regional economy, particularly within Warwick District.

Concern is expressed that the policy is not 'effective' and is not 'positively prepared', as it does not acknowledge or formally support Jaguar Land Rover's existing and future activities within Warwick District or the wider region; specifically within neighbouring Stratford on Avon District. The plan is therefore not 'effective' and is not 'positively prepared' as it is not currently based upon effective joint working on cross-boundary strategic priorities.

Jaguar Land Rover acknowledges the Council's cross boundary work through the Coventry and Warwickshire Local Enterprise Partnership (CWLEP) in the preparation of a Strategic Employment Land Review and the Strategic Economic Plan (SEP) for the sub-region, including the identification of strategically important employment sites for the future. As part of this cross boundary work and in accordance with the CWLEP and SEP, the emerging Warwick Local Plan should acknowledge the economic role of the existing Jaguar Land Rover employment sites (Warwick Training Academy, Gaydon Engineering Centre, as well as other current and potential future Jaguar Land Rover locations within the District and region), and support the expansion proposals to safeguard the growth of the Jaguar Land Rover business as a major employer in Warwick District and facilitate future substantial investment.

The SEP (March 2014) sets out how CWLEP will grow the economy over the short, medium and longer term. The SEP identifies the importance of the Jaguar Land Rover business and expansion at Gaydon. It states that:

"Jaguar Land Rover has a significant presence at Gaydon, the location of its key product development facilities (M40 Junction 12). It is actively promoting plans involving a consolidation and expansion of its operations at this location. In its emerging Core Strategy, Stratford-on-Avon District Council is proposing to allocate a site of 100 hectares adjacent to the existing JLR site to facilitate the proposed business expansion and a significant amount of housing. A short distance to the north off Junctions 13/14/15 of the M40, Warwick District Council is seeking to build on the success of the location of National Grid, Rolls Royce (Energy division) HQs and is proposing in its emerging Local Plan an expansion of the Warwick Technology Park/Tachbrook Business Park as well as several thousand houses and new educational facilities. Both of these emerging proposals are likely to have significant overlapping implications for local/nationaltransport and other infrastructure. The CWLEP supports both of these proposals and will want Government's/Highway Agency's co-operation to investigate and invest to deliver the infrastructure to enable these developments to happen successfully."

(SEP, March 2014)

In accordance with the SEP's identification of Jaguar Land Rover as a major employer and the CWLEP's support for the expansion plans at Gaydon, Jaguar Land Rover consider that it is fundamental for cross boundary consistency that their role within the sub-region should also be acknowledged by Warwick District Council in the Local Plan.

Jaguar Land Rover also acknowledges the Council's participation in the City Deal for Coventry and Warwickshire. The Local Plan Publication Draft acknowledges that the City Deal "identified key important sectors on which the sub-region can focus on for inward investment, with Advanced Manufacturing and Engineering being particularly important." The City Deal places major emphasis on encouraging growth by making it easier for companies to realise expansion plans. Given the City Deal's emphasis on growth and the Local Plan's acknowledgment of the importance of the Advanced Manufacturing and Engineering sector, it is imperative that Jaguar Land Rover's existing operations and expansion plans at Gaydon, as well as locations within Warwick District, should be acknowledged in the Local Plan. Jaguar Land Rover should be acknowledged as a key economic driver within the wider region.

Objective 1 (p11) of the Local Plan, "Providing sustainable levels of growth in the District", states that the plan will, inter alia, support the growth of advanced manufacturing and engineering businesses. In light of this and the Council's recognition for the importance of strategic planning and cooperation beyond the district, Jaguar Land Rover considers that formal acknowledgment of Jaguar Land Rover existing and expanding business within the region is vital. Support for Jaguar Land Rover and specifically their proposals at Gaydon, and also existing and future locations within Warwick District, would be in accordance with the CWLEP and the SEP. The district-wide support from the CWLEP to Jaguar Land Rover's expansion plans should be mirrored by Warwick District Council in the Local Plan.

While we acknowledge that the existing operations of Jaguar Land Rover at Gaydon and their expansion plans for the Gaydon site are not located within the boundaries of Warwick District Council, Jaguar Land Rover remain one of Warwick District Councils' largest employers and the number of employees who live within Warwick District is only likely to increase through the expansion of the business at Gaydon. Similarly, Jaguar Land Rover has aspirations to grow within Warwick District.

Jaguar Land Rover seeks to continue to growth at Gaydon as a centre of automotive excellence. Accordingly, Jaguar Land Rover require comfort that continued growth and development at Gaydon is achievable in both the short and long term, and assurance that proposed investments are sustainable through the provision of appropriate levels of both employment land and housing to support growth of the business and accommodate the workforce.

In light of the above considerations, it is requested that formal acknowledgment of Jaguar Land Rover's existing and expanding business within the region is vital. Jaguar Land Rover's existing sites within the region should be recognised as important strategic sites for the economy, including the Jaguar Land Rover Training Academy in Warwick, which is the home of both technical and commercial training for the Jaguar Land Rover UK dealer networks; and Gaydon within neighbouring Stratford on Avon District. Support should be provided for the continued growth and expansion of the existing Jaguar Land Rover business and future growth of the region's most significant employer and exporter.

Jaguar Land Rover is committed to a significant investment into the area, including within the Warwick District and with the expansion at neighbouring Gaydon for delivery of new jobs 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. Expansion within Warwick District and at the neighbouring Gaydon site is therefore key to Jaguar Land Rover's future and an integral part of the economic future of Warwick District and the West Midlands more widely.

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.

It is considered necessary that the following supporting text is included immediately after paragraph 2.30 of the Local Plan:

"Jaguar Land Rover is a major international business with significance presence in the West Midlands. It is also 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, as a significant exporter.

Having regard to the strategic significance of Jaguar Land Rover within both the District and region, and the economic benefits that Jaguar Land Rover provides to Warwick District, the Council will support the existing operations and activities and expansion of Jaguar Land Rover's established employment land sites within Warwick District and the wider region, as well as appropriately located land and sites for future growth."