

Separate Sheet

Gerald Eve Representations on behalf of Jaguar Land Rover

REPRESENTATION RELATING TO A NEW POLICY REQUIREMENT FOR GAYDON AND LEAMINGTON TRAINING ACADEMY

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 Sites, Gaydon and Leamington Training Academy

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.

General support is expressed for the Local Plan in 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 emerging Local Plan's employment policies are not 'effective' and not 'positively prepared', as they do 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/national transport 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 acknowledgement of Jaguar Land Rover's key locations within the region is vital. Support and recognition for Jaguar Land Rover and specifically their proposals at Gaydon, and the Leamington Spa Training Academy, 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 it is acknowledged that the existing operations of Jaguar Land Rover at Gaydon and its expansion plans for the Gaydon site are not located within the District boundaries, Jaguar Land Rover remain one of Warwick District Council's largest employers and the number of employees who live within Warwick District is only likely to increase through the expansion and growth of the business at Gaydon, Coventry (Whitley), Solihull, Castle Bromwich and Fen End in particular.

Jaguar Land Rover seeks to continue to growth at Gaydon as a centre of automotive excellence. Accordingly, Jaguar Land Rover requires 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. Jaguar Land Rover have aspirations for short and long-term growth at Gaydon, with phases of construction planned for late 2016 through to 2020.

In light of the above considerations, it is requested that formal recognition of Jaguar Land Rover's locations within the region should be recognised as important strategic sites for the economy, including the Jaguar Land Rover Training Academy in Leamington Spa, 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 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 within Stratford on Avon District 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.

New Standalone Policy for Jaguar Land Rover Gaydon and Leamington Training Academy

The emerging Warwick Local Plan does not currently recognise the strategic importance of Jaguar Land Rover as a major employer in Warwick and the region. The Local Plan is therefore not 'positively prepared' nor 'effective'. The importance of Jaguar Land Rover and the contribution to advanced research, manufacturing and engineering needs to be identified and supported.

It is considered imperative that a standalone policy is included in the emerging Local Plan to identify, maintain and support Jaguar Land Rover's existing and future operations at Gaydon in neighbouring Stratford on Avon, and at the Leamington Spa Training Academy 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 existing West Midlands sites, many of which are largely constrained by surrounding urban form. Expansion at Gaydon and the Training Academy 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 benefits of the Jaguar Land Rover business as one of the largest employers in the City and the region, it is imperative 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 required support to ensure that Jaguar Land Rover's aspirations for

further expansion, over the plan period, facilitate its continued growth in the District and the wider region.

Furthermore, a standalone policy would provide Jaguar Land Rover the certainty required 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 and the Training Academy and its operations in the wider region.

It is important to highlight the positive approach that is being taken in the neighbouring 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:

<p>“What is to be delivered</p>	<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: 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.”</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 significant investment at the Gaydon and the Training Academy sites and within the wider region, 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. 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.

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 and future operations within Warwick District and the region.

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

“Jaguar Land Rover:

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.”