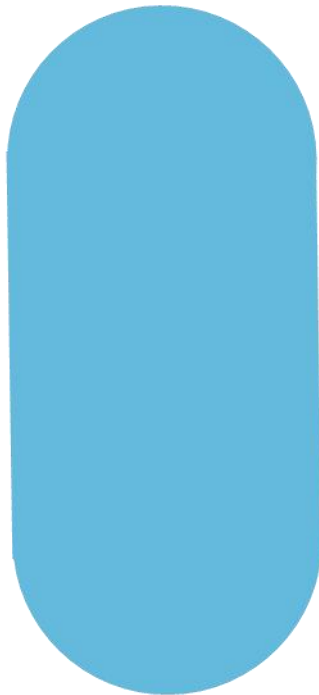


Representations

South Warwickshire Local Plan Part 1 –
Issues and Options Consultation

JAGUAR LAND ROVER

March 2023





1. The following representations are made in response to the South Warwickshire Local Plan (SWLP) Part 1 Issues and Options Consultation (January 2023) on behalf of Jaguar Land Rover in respect of their operations at Gaydon and Fen End. These include sites put forward for development at Gaydon South (site 375 on the Interactive Map), Gaydon West (site 376 on the Interactive Map), and Fen End (site 138 on the Interactive Map).
2. A summary of these representations has also been submitted to the SWLP Online Consultation Portal, and should be read alongside the supporting documents namely:
 - a. Land at Gaydon Promotion Document
 - b. Gaydon South Heritage Report
 - c. Gaydon South Ecological Report
 - d. Gaydon South Preliminary Landscape and Visual Appraisal
 - e. Gaydon South Flood Risk and Drainage Assessment
 - f. Gaydon South Flood Map
 - g. Gaydon West Heritage Report
 - h. Gaydon West Ecological Report
 - i. Gaydon West Preliminary Landscape and Visual Appraisal
 - j. Gaydon West Flood Risk and Drainage Assessment
 - k. Gaydon West Noise Assessment

Chapter 4 - Meeting South Warwickshire's Sustainable Development Needs

Q-11: Sustainability Appraisal

3. The Sustainability Appraisal (SA) has understandably focussed on exploring reasonable alternatives in relation to the location of new homes and infrastructure (Broad Locations, New Settlements, and Small Settlements). However, the SA should not exclude or ignore testing options in relation to employment and this will need to be addressed in the next iteration of the SA.



Option S2-B: Intensification

4. The focus of the discussion in the Consultation Paper relates to how intensification can be undertaken to increase housing delivery. However, it needs to be recognised that the same policy can support increase in employment floorspace and jobs. An ‘in-principle’ policy support for intensification on key employment sites would be supported by Jaguar Land Rover.

Q-S4.2: Settlement Analysis

5. The Settlement Analysis has understandably focussed on assisting with identifying locations for new housing. However, a similar exercise should be carried out for employment. It is noted that Gaydon/Lighthorne Heath falls within the spatial growth option, Economy Option (3). However, no analysis has been undertaken as to its ability to accommodate employment growth. This work should be undertaken to inform the next iteration of the Plan, and in particular take into consideration the opportunities to expand Jaguar Land Rover (sites 375 and 376).

Q-S7.2: Refined Spatial Growth Options

6. Jaguar Land Rover have the following comments on the Options.
7. Jaguar Land Rover query why employment growth at Gaydon does not appear in the Sustainable Travel (2) Option. The planned investment in bus corridors connecting Gaydon with nearby towns will result in this location being on a main bus corridor.
8. It is worth remembering that paragraph 73. a) requires Councils to consider the opportunities presented by existing or planned investment in infrastructure when deciding the location of new development. The Spatial Growth Option chosen within the Plan should therefore take into account the planned bus services at Gaydon.
9. Jaguar Land Rover support employment growth at Gaydon appearing in the Economy (3) Option and Hybrid (4) Option. However, employment growth at Gaydon does not appear within the Dispersed (5) Option diagram, and this anomaly should be addressed in the next iteration of the Plan.



10. Whichever option or combination of options is chosen, Jaguar Land Rover support a strategy that includes employment growth at Gaydon.

Chapter 5 - Delivering South Warwickshire's Economic Needs

Q-E1.1: Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire?

11. Whilst the overall figures as to future levels of employment need are not disputed, no recognition has been given to the specific employment land needs of Jaguar Land Rover to grow and expand its operations at Gaydon and Fen End as submitted through the call for sites. These needs should be reflected in the next iteration of the HEDNA as a separate, specific component of employment land need.

Option E6a: Include a policy which protects South Warwickshire's economic assets.

12. Jaguar Land Rover would support a policy which protects its current use, and provides support for further investment within land under its control. Jaguar Land Rover would welcome the opportunity to work with the Councils to agree the wording of any policy for both Gaydon and Fen End. Such policy would need to be included within Part 1 of the Plan.

Q-E7.1a: Core Opportunity Areas

13. Jaguar Land Rover support the inclusion of Gaydon within the Core Opportunity Area as a Major Investment Site. However, Jaguar Land Rover objects to the exclusion of Fen End which is equally important to the business, and this should be recognised and included within the Core Opportunity Area as a major investment site.

Option E7.2a: Include a policy relating to additional economic growth at the major investment sites.

14. Jaguar Land Rover support a policy allocating additional land for specific employment uses at Gaydon and Fen End on sites identified as 375, 376 and 138 on the Interactive Map. Further evidence as to the suitability of the sites 375 and 376 for development



for Jaguar Land Rover's purposes has been submitted with these representations. Jaguar Land Rover would welcome the opportunity to work with the Councils to agree the wording of any policy for both Gaydon and Fen End. Such policy would need to be included within Part 1 of the Plan.

Q-E8.2: Do you agree that the existing employment allocations, including the revisions to Atherstone Airfield, should be carried over into the SWLP? If, no please list the sites that should be excluded and give reasons.

15. The adopted Core Strategy for Stratford-on-Avon allocates approximately 100ha of land for the expansion of Jaguar Land Rover (Proposal GLH). The Core Strategy is now nearly 7 years old, and Jaguar Land Rover as a business has evolved in that time in response to issues such as Covid-19, changes in the global economy, and the climate change agenda. In light of those issues, its employment land needs have changed in respect of Gaydon. First and foremost, it needs to retain the ability to expand its operations at Gaydon to respond to changing demands on the business. However, that expansion must be on land it controls and on land which is contiguous with its existing operations in order to maintain security and efficiency in how it operates. For that reason, sites 375 and 376 have been put forward through the call for sites process to the Councils as land on which it controls and wishes to utilise for the secure and efficient expansion of its operations at Gaydon over the lifetime of the Plan.
16. Should those sites be deemed by the Councils as suitable for the expansion of operations at Gaydon and allocated as such within the South Warwickshire Local Plan Part 1, then it no longer has a requirement for the 100ha of land at Proposal GLH within the Core Strategy. In that context, Jaguar Land Rover therefore would not object to the removal of the allocation as part of the South Warwickshire Plan process.
17. If the land at Proposal GLH was to be considered by the Councils for a new allocation, Jaguar Land Rover would support its allocation for employment development, particularly uses associated with the automotive industry and its supply chain.



Q-P1.2: Do you agree with the proposed broad content of the Part 1 plan? If no, please indicate why

18. No, Jaguar Land Rover request that policies related to the Core Opportunity Area and Major Investment Sites (their retention and expansion) be included within the list of policies to be included in the Part 1 plan. This is important to provide certainty for Jaguar Land Rover in moving forward, and reflects their strategic importance to the area.