



GERALDEVE

EXAMINATION IN PUBLIC OF

Warwick District Local Plan

**Hearing Statement in respect of Matter 6 – Sub-Regional
Employment Site**

On behalf of Jaguar Land Rover

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1 Introduction

- 1.1 This Statement has been prepared by Gerald Eve LLP (Gerald Eve) on behalf of Jaguar Land Rover. It provides representations in relation to Matter 6 – Sub-Regional Employment Site.
- 1.2 This Statement should be read in conjunction with earlier Representations submitted in respect of the draft Plan, as well as the Hearing Statements that are being submitted on behalf of Jaguar Land Rover in respect of other matters subject to Examination.
- 1.3 As set out within the Inspector’s Hearings Guidance Note, this Statement is limited only to matters considered necessary to assist consideration of the Matter and specific questions raised.

2 Question 1

2.1 Question 1 asks:

“What is intended in terms of the scale, type and mix of development? What would be the extent of built development in the Green Belt?”

2.2 Draft Policy DS16, ‘Sub-Regional Employment Site’ states that:

“Land in the vicinity of Coventry Airport (totalling 235 hectares) as shown on the Policies Map, will be allocated as a major employment site (for B1, B2 and B8 uses) of sub regional significance.

2.3 Land to the north of the Policy DS16 Sub Regional Employment Allocation forms part of Jaguar Land Rover’s existing Whitley South Site located with Coventry City.

Resolution to Grant Planning Permission for Jaguar Land Rover at the Whitley South Site

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

2.5 An outline planning application was submitted to Warwick District (Ref: W/16/0239) and Coventry City (Ref: OUT/2016/0405) 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.

2.6 The Application site consists of land to the north and south of the A45 (between the Festival and Tollbar Island junctions on the A45 and A46), to the south of Jaguar Land Rover’s Global Headquarters and Whitley Business Park and north west of Coventry Airport. The development also includes works to land at junctions on the surrounding highway network, namely junctions of the A45 and A46 at Festival and Tollbar Islands; the junction of the A444 (Stivichall and Cheylesmore By-Pass) with the A4114 (London Road) and the junction of the A46 with Stoneleigh Road. Road).

2.7 On 26th April 2016, it was resolved that the Planning Committee is minded to approve those elements of the application within the administration area of Warwick District Council, subject to the conditions and subject to the Section 106 Agreement being signed.

2.8 In accordance with the resolution to grant, the Jaguar Land Rover development will expand the existing Whitley site to the south (Whitley South), to an area of land which principally sits within Warwick District Council, and which is located within the Policy DS16, Sub-Regional Employment Site Allocation.

2.9 The Jaguar Land Rover development, which is located within the Sub-Regional Employment Site Allocation, comprises three main elements (as per the resolution to grant of the planning application):

- the creation of a technology campus, involving the development of up to 70,683 sq m of mixed B1 buildings intended primarily for Automotive technologies together with hotel(s) (Use Class C1); Retail unit(s) (Use Class A1, A3, A4 and A5); and car showroom(s), comprising:
 - Up to 56,766 sq m of B1 (primarily B1b/B1c space) and car showroom(s) (of which a maximum of 4,645 sq m will be used for car showroom space)
 - Up to 2,300 sq m of ancillary A1, A3, A4, A5 floorspace
 - Up to 11,617 sq m of C1 floorspace.
- significant on and off site highway works; and
- the establishment of an extensive area of open space and strategic landscaping, incorporating public access and biodiversity enhancement.

2.10 It is considered essential that the emerging Local Plan provides continued support for this and other potential related development at Whitley South which will facilitate the potential for future investment in Jaguar Land Rover's research and development and engineering operations.

2.11 The expansion of the Whitley site will to continue the technological advancement of engine and overall powertrain product design, including low emission vehicles, which is set to maintain Jaguar Land Rover at the forefront of automotive design and technology.

2.12 The development 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, helping meet the aspirations of stakeholders including the District, County and City Councils and Local Enterprise Partnership.

2.13 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, and policy support and acknowledgement of Jaguar Land Rover's activities at Whitley South and their expansion within the Draft Policy DS16 Allocation site would be welcomed.

3 Question 2

3.1 Question 2 asks:

“What is the current situation regarding the planning history and status of the site?”

The Whitley Site: History

- 3.2 Jaguar Land Rover’s World Headquarters are located at their existing site at Whitley. The site was originally an airfield, built during the First World War. In the early 1920s the site and its associated buildings were bought by Sir W. G. Armstrong Whitworth Aircraft Co. Ltd. From 1923 until the end of the Second World War several aircraft types, including the Armstrong Whitworth Siskin and the Hawker Hart biplanes and the Armstrong Whitworth Whitley bomber were built at the site.
- 3.3 After the Second World War, Armstrong Whitworth concentrated its guided missile work at the plant, including the development of the Sea Slug surface-to-air missile. In 1968 Hawker Siddeley Dynamics, who had by then absorbed the Armstrong Whitworth company, closed the site with the loss of 2,260 jobs. Work being carried out at the site on the Nike-Ajax and Sea Dart missiles was transferred to Hawker Siddeley Dynamics plants in Hatfield, Cheadle Hulme and Lostock.
- 3.4 The Rootes Group, by then owned by Chrysler Europe, purchased the 187 acre site from Hawker Siddeley Dynamics in 1969 for the purpose of centralising all its design and engineering teams onto one site. From 1970 Rootes used the site for the design of all their new trucks and cars. In 1978 Chrysler sold its European operations to Peugeot, and the Whitley plant was taken over by Peugeot- Talbot. By 1985 Peugeot had moved all its design and development activities to Paris and the newly privatised Jaguar Cars bought the plant and following a refurbishment, established its engineering centre there in 1987.
- 3.5 In 2008, Tata Motors acquired the British car maker Jaguar Land Rover, manufacturer of the Jaguar, Land Rover and Daimler luxury car brands, from Ford Motor Company.

The Current Whitley Site

- 3.6 Whitley is home to Jaguar Land Rover’s world headquarters and a global engineering centre for Jaguar and Land Rover brands. Facilities include an advanced powertrain engineering facility, as well as the Jaguar Design department. More than 5,200 people are employed at the 120 acre site. As Jaguar Land Rover has expanded over the last 5 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 absolute capacity and major problems are currently being experienced with lack of suitable accommodation and car parking space.
- 3.7 In accordance with the need for expansion at the site, an outline planning application was submitted to Warwick District (Ref: W/16/0239) and Coventry City (Ref: OUT/2016/0405) 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.

- 3.8 The Application site consists of land to the north and south of the A45 (between the Festival and Tollbar Island junctions on the A45 and A46), to the south of Jaguar Land Rover's World Headquarters and Whitley Business Park and north west of Coventry Airport. The development also includes works to land at junctions on the surrounding highway network, namely junctions of the A45 and A46 at Festival and Tollbar Islands; the junction of the A444 (Stivichall and Cheylesmore By-Pass) with the A4114 (London Road) and the junction of the A46 with Stoneleigh Road. Road).

4 Question 7

4.1 Question 7 asks:

“What is the evidence in terms of the need for such a site? And specifically in this location? How would it relate to wider employment land needs, other sites in the sub-region and economic strategies?”

Whitley Expansion: The Need for Whitley South

- 4.2 Following Jaguar Land Rover’s strategic decision to bring engine production in-house, the Company has invested £1 billion in the development of its Engine Manufacturing Centre at i54 in South Staffordshire, near Wolverhampton. This facility currently produces a range of efficient engines for both Jaguar and Land Rover vehicles, which are sold around the globe. This facility has proved extremely successful and Jaguar Land Rover have recently announced it plans to significantly expand its Wolverhampton facility, to increase the number and range of engines it can produce. This will create over 1000 new jobs.
- 4.3 To support its continued growth, the company intends to invest in its engine and gearbox development and testing facilities at Whitley. This will allow it to develop and build cleaner, greener technology to power its vehicles of the future.
- 4.4 The recent resolution to grant planning permission (Reference: W/16/0239) will therefore allow for the redevelopment of the existing Whitley site, to modernise and to expand its research and development and engineering operations. A major component of this is its plans to significantly expand the number of engineering test cells. Such a significant expansion is required, partly as a result of the in-house engine production (and further expansion) and the need to continue the technological advancement of engine and product design (the company has to also meet the different legislative requirements of each country that it sells its products within) but also because of the Company’s aspirations for advancement in low emission vehicles.
- 4.5 The new engineering test cells need to be located alongside the existing cells due to the infrastructure which is already in place, including a fuel farm and climate controlled testing laboratories, as well as the engineers and research and development staff who run the facility.
- 4.6 The Whitley South site is therefore needed to provide new engineering and research and development accommodation for relocated staff. It will also provide space for growth of the business. Due to the direct interrelationship of these employees with operations at Whitley and the expanded engineering test cells, proximity and co-location is essential.
- 4.7 The Whitley South site will allow Jaguar Land Rover to:
- Reconfigure its existing site at Whitley and allow the construction of a significant number of new engineering test cells.

- Allow more engineering research and development to be carried out on the existing Whitley site.
- Construct a new engineering technology campus on Whitley South to accommodate new employees and employees relocated from the existing Whitley site.

- 4.8 The growth of the Company has placed significant pressures on its existing accommodation at Whitley. The Company continues to invest in research and development, with new recruits and more investment. Expansion of its Whitley site has therefore been critical. The expansion of engine production at Wolverhampton is underway and to meet its growth plans and the ambitious targets for emissions and technological advancement, additional engineering test cells must be operational quickly. The growth of the Jaguar Land Rover business in the UK will be restricted if plans for the Whitley site are not given the required policy support.
- 4.9 The Whitley South site also provides the opportunity for some of Jaguar Land Rover's tier-one suppliers to co-locate. Such co-location will be advantageous for both Jaguar Land Rover and the suppliers; improving efficiency and helping to secure Jaguar Land Rover's relationship with its UK based suppliers should they also choose to locate at Whitley South.
- 4.10 The aim is to deliver a high quality, high-tech automotive campus, with high quality built and landscape design. The site's frontage onto the A45 provides the opportunity for Jaguar Land Rover to showcase its vehicles, an important component of business marketing particularly to overseas clients. The provision of hotel accommodation on the site will also provide an asset for the business at Whitley, creating accessible accommodation for employees and businesses visiting and working with Jaguar Land Rover and their suppliers.
- 4.11 It is in accordance with the above that this redevelopment has been required to provide space for the company's future needs by increasing its footprint at their existing Whitley site.
- 4.12 Plans for reconfiguration and development at the existing Whitley site are being advanced. It is intended that these will be submitted in 2016 through applications for the provision of new accommodation to house the engineering, research and development functions.
- 4.13 As currently drafted, Policy DS16 does not identify or support Jaguar Land Rover's existing activities and expansion at Whitley South, within the Sub-Regional Employment Allocation Site. Policy support is needed for the future expansion at Jaguar Land Rover's existing Whitley South site in order for the business to remain competitive and innovative as a leading automotive manufacturing business.
- 4.14 Given the importance of the Whitley South site for the Jaguar Land Rover business, we consider that it is appropriate for a new standalone policy to be included alongside Draft Policy DS16.

New Standalone Jaguar Land Rover, Whitley South Policy

- 4.15 Jaguar Land Rover welcomes and supports Draft Policy DS16: 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.
- 4.16 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.
- 4.17 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.
- 4.18 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.
- 4.19 We further highlight the positive approach that is being taken in neighbouring Stratford-on-Avon's Core Strategy which was adopted by the Cabinet and Council on 11 July 2016.
- 4.20 The adopted Core Strategy identifies Jaguar Land Rover throughout and states, at Policy CS.22, that *"a flexible approach will be taken to accommodating a wide range of employment generating uses, including public and community uses, on existing industrial areas."*
- 4.21 Additionally, Stratford-on-Avon's adopted Core Strategy includes an area strategy, 'Proposal GLH' at paragraph 6.10.14 which is dedicated to the development of part of Gaydon/Lighthorne Heath for Jaguar Land Rover activities. This reads as follows:

<p><i>“What is to be delivered</i></p>	<p><i>Land comprising approximately 100 hectares at the southern end of the allocation to enable the expansion of Jaguar Land Rover (JLR) to meet the business needs for uses that can include:</i></p> <ul style="list-style-type: none"> • <i>Research, design, testing and development of motor vehicles and ancillary related activities.</i> • <i>Other advanced engineering technologies and products.</i> • <i>Offices.</i> • <i>Low volume manufacturing and assembly operations.</i> • <i>Development of associated publicly accessible event, hospitality, display, leisure and conference facilities and marketing infrastructure.</i> • <i>Automotive education and training including ancillary accommodation.”</i>
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4.22 It is also noteworthy that during the EiP, the Inspector, in his Interim Conclusions letter to Stratford-on-Avon District Council (dated 18 March 2015) confirmed the following conclusions (extracts shown) in relation to Jaguar Land Rover:

“(i) JLR

123. The 100 hectare allocation between the existing JLR site at Gaydon Proving Ground and Junction 12 of the M40 has now been identified on a plan as the southern end of the GLH allocation¹⁴³. As the Council observed in its statement specific objections to the JLR component of the allocation are not obvious. Although I accept that the allocation is locally controversial, considerations such as the loss of countryside and agricultural land yield to the national significance of what is being proposed. To underline the point, JLR told the Hearing that the allocation being sought in the CS is ‘...about keeping JLR in the UK’.

124. I have no reason to doubt that the firm’s existing facility at Gaydon is the largest facility of its type in the UK, where the firm’s cars are designed and tested at a unique research and development facility. Strategic Policy AS11, for the existing site, is essentially agreed and I shall comment on the detail in my final report, but the proposed allocation is envisaged to replicate that facility. Gaydon is said to have a pivotal role in JLR’s business and it is claimed to be the only facility where product development and innovation can take place. In that context there are limited options for where such a large scale facility could be accommodated. Although Gaydon Proving Ground comprises an extensive area of land its form and function would rule it out as a practical option for a plant of the scale being

proposed. In view of the new link road to Junction 12 of the M40, which is already under construction, the proposed site is the only realistic option.

125. Although, given that the CS looks ahead to 2031, precise details of what is proposed are inevitably not available, I consider that the allocation is fully in line with the Government's emphasis on building a strong, competitive economy. Paragraph 18 of the Framework says the Government is committed to securing economic growth in order to create jobs and prosperity. Paragraph 19 continues by stressing that the planning system should do everything it can to support and encourage sustainable economic growth, rather than to act as an impediment. It requires significant weight to be placed on the need to support economic growth through the planning system. Paragraph 20 says LPAs should plan proactively to meet the development needs of business. That is precisely what the Council has done here.

....

128. For these reasons I am happy to give the clear indication requested by JLR, to enable future investment decisions to be made, that the 100 hectare allocation is appropriate. I do not, at this stage, propose to express a view on whether it might be necessary for the allocation to be identified separately from any housing allocation. I merely record that it is conceivable that it could come forward on that basis."

- 4.23 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".

- 4.24 Additionally, Policy P1 "Support Economic Success" within the adopted Solihull Local Plan states that:

"Jaguar land Rover (JLR)

JLR is important to the national, regional and local economy and is a major employer. JLR remains committed to the Lode Lane plant in Solihull and has the opportunity to develop advanced manufacturing, the low carbon economy and technology that will stimulate new skills and new opportunities.

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."

- 4.25 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.
- 4.26 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.
- 4.27 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.
- 4.28 Suggested wording for an additional policy for Whitley South in the emerging Warwick Local Plan is 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;*
- *Powertrain prototype facilities;*
- *Offices;*
- *Low volume manufacturing and assembly operations.*
- *Development of associated publicly accessible event, hospitality, display, leisure and conference facilities and marketing infrastructure.*
- *Event, hospitality, display, leisure and conference facilities and marketing infrastructure;*
and
- *Automotive education and training facilities including ancillary accommodation.*

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.”

5 Question 8

5.1 Question 8 asks:

“What would be the benefits in terms of job creation? What evidence is there to support this and is it sufficiently robust?”

5.2 The expansion of Whitley South will provide space for the growth of Jaguar Land Rover, one of the largest and most important companies in Coventry and Warwickshire together with other businesses which could include Jaguar Land Rover’s suppliers. The scheme will secure Jaguar Land Rover’s commitment to and investment in its sites at Whitley, retaining jobs and creating many new jobs. Jaguar Land Rover’s plans for Whitley, which focus on engineering and research and development, fully accord with the LEP’s Strategy for growth and indeed form a vital component of it.

5.3 It is estimated that the Jaguar Land Rover element of the Whitley South development could accommodate some 3,000 to 4,000 employees based upon the current design, but the positive effects of the scheme on job creation would extend beyond this with the direct interrelationship between the development for the expansion south of Coventry as per the recent resolution to grant planning permission (Reference: W/16/0239) and Jaguar Land Rover’s expansion at their existing Whitley site and Whitley Business Park.

5.4 The social and economic effects of Jaguar Land Rover’s development at Whitley South are considered likely to be significantly beneficial, both for the immediate area and the sub-region. These effects include:

- facilitating and enabling investment and growth in the region;
- retaining important high growth businesses in the area;
- attracting further high growth advanced manufacturing businesses to the area and enabling clusters to develop;
- potential for direct and indirect job creation;
- helping to facilitate the expansion of Jaguar Land Rover on their existing site and the Whitley Business Park and thereby support job retention and growth;
- significant direct investment in infrastructure and construction;
- investment in highway infrastructure which will address existing capacity issues on the A45/46 with direct benefits to the economic performance of the area and its ability to attract future investment;
- the creation of around 400 construction jobs over a period of at least 5 years;

- the potential to introduce greater input into the local economy through additional employment and spending;
- health and well-being of the local communities;
- green space and access, currently denied to anyone.

5.5 These factors in combination will have a major beneficial effect on the local economy and indirectly on the health and well-being of the population. The development will make a significant contribution to meeting the growth aspirations of Coventry and Warwick, responding positively to the emerging strategies for these areas. In particular the development will meet needs of the area's largest private employer with a focus on the key sectors for growth – automotive and research and development.