



South Staffs Council
Planning Policy Team
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Our Ref: 70091340

9 December 2021

Dear Sir/Madam,

**South Staffordshire Local Plan Review Preferred Options
Regulation 19 Consultation
Jaguar Land Rover, Engine Manufacturing Centre, i54 Business Park, Innovation Drive,
Coven, Wolverhampton, WV9 6GA**

We write on behalf of our client, Jaguar Land Rover UK, to submit a representation in response to the South Staffordshire Local Plan Review Preferred Options ('draft Local Plan') Regulation 19 consultation running from 1 November to 13 December 2021.

Jaguar Land Rover is one of the UK's largest automotive manufacturers, centred around two distinct British brands: Jaguar, one of the world's premier luxury sports saloon and sports car marques; and Land Rover, the world's leading manufacturer of premium all-wheel-drive vehicles.

37,500 people are employed by Jaguar Land Rover globally, with around 260,000 more supported through their retailer network, suppliers and local businesses. Manufacturing for the company is focused in the UK, with additional plants in Austria, Brazil, China and Slovakia. Jaguar Land Rover is a key economic asset within the West Midlands, as well as a significant employer. It also generates significant indirect employment within other businesses benefitting the wider economy.

Jaguar Land Rover UK operates at a range of locations, including the Engine Manufacturing Centre ('EMC') located on land within the i54 strategic business park.

Jaguar Land Rover actively engages with local planning authorities to highlight business needs and requirements while also ensuring that relevant local plan policies and allocations, do not negatively impact on the operations of the business.

BACKGROUND

The EMC opened in October 2014 and has invested over £450 million to double the size of the EMC over the seven years it has operated, which takes the overall investment at the EMC to around £1 billion¹. The EMC provides many highly skilled engineering and manufacturing jobs, not only employing local people but providing supply chain opportunities.

¹ <https://www.thebusinessdesk.com/westmidlands/news/728555-jlr-to-double-the-size-of-its-engine-plant>



The EMC forms a significant part of the larger i54 business park - total area 90.5 hectares (ha) of which the EMC is circa 44ha. The wider business park also has consent for a 'Western Extension' which will provide an additional 100,000sqm of employment floorspace (LPA ref: 18/00637/OUT). A corresponding reserved matters planning application for the construction of a manufacturing building including ancillary offices (LPA ref: 21/01248/REM) has recently been submitted and was validated on 23 November 2021.

Jaguar Land Rover have previously and continue to support the identification of the i54 business park as a freestanding Strategic Employment Site, as allocated in Policy SAD5 of the Site Allocations Document 2018.

SCOPE OF REPRESENTATIONS

Jaguar Land Rover supports the general direction of growth set out in draft Local Plan South Staffordshire's but has some general observations which are set out below.

These representations focus on policies relating to employment land, and specifically the proposed i54 Western Extension land allocated within the existing Local Plan, and the adjacent housing allocations.

The representations respond to:

- Question 1: evidence base
- Policy DS3 – The Spatial Strategy to 2038 [Question 5];
- Policy DS4 – Longer Term Growth Aspirations for a New Settlement [Question 6];
- Policy SA1 – Strategic Development Location: Land East of Bilbrook [Question 7];
- Policy SA2 – Strategic Development Location: Land at Cross Green [Question 7];
- Policy SA5 – Housing Allocations [Question 8]; and
- Policy SA7 – Employment Allocation – West Midlands Interchange [Question 10]; and
- Proposed policy approaches in Chapter 6 [Question 11].

In preparing our response, we have been mindful of the test for soundness set out in Paragraphs 35 and 36 of the NPPF; namely we have sought to respond commenting whether the draft Local Plan is:

- Positively prepared;
- Justified;
- Effective; or/and
- Consistent with national planning policy.

RESPONSE TO PREFERRED OPTIONS CONSULTATION

We have structured our response according to the questions posed by the draft Local Plan:

Question 1: Proportionate evidence base

DO YOU AGREE THAT THE EVIDENCE BASE SET OUT IN APPENDIX A IS APPROPRIATE TO INFORM THE NEW LOCAL PLAN?

Yes, Jaguar Land Rover supports the evidence base for the new draft Local Plan.



PLEASE PROVIDE COMMENTS ON THE CONTENT OR USE OF THE EVIDENCE BASE SET OUT IN APPENDIX A, REFERENCING THE DOCUMENT YOU ARE REFERRING TO.

The Economic Development Needs Assessment (Stage 1) outlines that the i54 business park and Western Extension were found to be the best quality employment land in South Staffordshire. i54 is an important contributor to the economy and as such is identified as a freestanding Strategic Employment Site. Jaguar Land Rover continue to support the allocation of i54.

Within the Housing Site Selection Paper 2021, it is reported that the Strategic Housing and Economic Land Availability 2021 (SHELAA) discounted several potential housing sites that were put forward for allocations within the draft Local Plan. Noted in the Paper is that i54 business park and the i54 Western Extension are shown to have been considered for housing allocations. Even though they have been dismissed based on the employment allocations and there is no suggestion that the site owner is currently willing to promote the land for housing development, Jaguar Land Rover would like to confirm they support the conclusions reached. The continued safeguarding of the site will complement Jaguar Land Rover's EMC and the existing uses within i54 business park.

Question 3: Vision and strategic objectives

(A) HAVE THE CORRECT VISION AND STRATEGIC OBJECTIVES BEEN IDENTIFIED?
YES/NO

Yes.

(B) DO YOU AGREE THAT THE DRAFT POLICIES (CHAPTERS 4 AND 5) AND THE POLICY DIRECTIONS (CHAPTER 6) WILL DELIVER THESE OBJECTIVES? YES/NO

Jaguar Land Rover supports the vision and strategic objectives. The strategic objectives for economic vibrancy are supported as they seek to retain existing employment and foster sustainable economic growth, encouraging inward investment and job creation in sectors such as advanced manufacturing. These aspects of the objectives are relevant to Jaguar Land Rover's operation of the EMC and will help to support their continued presence in the area.

Question 5: Policy DS3 – The Spatial Strategy to 2038

DO YOU SUPPORT THE POLICY APPROACH IN POLICY DS3 – THE SPATIAL STRATEGY TO 2038? YES/NO

Yes, subject to the comments made below.

IF NO, PLEASE EXPLAIN HOW THIS POLICY SHOULD BE AMENDED?

Jaguar Land Rover supports draft Policy DS3 and considers that the land surrounding the i54 site (including the Western Extension) should be continued to be supported for employment development.

This draft Policy outlines that housing growth will be primarily located at the allocations made adjacent to the Black Country, which includes Land at Cross Green (approximately 1km north-west of i54). Jaguar Land Rover support the growth of the area and appreciates the need for new

housing developments to ensure there is sustainable development in line with Paragraph 11 of the NPPF.

However, housing development in close proximity to employment land should be carefully controlled to guard against any potential conflicts between uses. Draft Policy DS3 outlines continued support for employment and economic development at the five existing freestanding strategic employment sites, including i54 business park, stating that existing and proposed employment sites will be safeguarded for their respective uses. Jaguar Land Rover supports this safeguarding of employment land.

It is proposed that draft Policy DS3 is amended to bring it in line with national policy, and therefore to make the draft Local Plan sound. The proposed change is set out below - the proposal is to ensure that the Policy makes reference to the agent of change principle outlined in Paragraph 187 of the NPPF is taken into consideration.

The existing draft Policy DS3 states:

“The district’s freestanding strategic employment sites

Outside of the district’s rural settlements, support will continue to be given for employment and economic development at the district’s five existing freestanding strategic employment sites (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes). Existing and proposed employment sites throughout the district will be safeguarded for their respective uses, in accordance with other Local Plan policies.”

Amended text below (in red):

“The district’s freestanding strategic employment sites

*Outside of the district’s rural settlements, support will continue to be given for employment and economic development at the district’s five existing freestanding strategic employment sites (West Midlands Interchange, i54 South Staffordshire, Hilton Cross, ROF Featherstone/Brinsford and Four Ashes). Existing and proposed employment sites throughout the district will be safeguarded for their respective uses, in accordance with other Local Plan policies **and the NPPF. New development in proximity to existing employment land will be integrated effectively to ensure existing businesses and facilities do not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where an operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity, suitable mitigation should be provided by the proposed before the development has been completed.**”*

Making the proposed amendment would ensure that the draft Local Plan is in line with national policy and found sound - ensuring an appropriate and sustainable balance between employment and housing growth.

Question 6: Policy DS4 – Longer Term Growth Aspirations for a New Settlement



DO YOU SUPPORT THE POLICY APPROACH IN POLICY DS4 – LONGER TERM GROWTH ASPIRATIONS FOR A NEW SETTLEMENT? YES/NO

Yes.

IF NO PLEASE EXPLAIN HOW THIS POLICY SHOULD BE AMENDED?

Draft Policy DS4 outlines the preferred growth strategy to locate new settlements along the A449. The focus area of the A449 includes Featherstone, which is in relatively close proximity (circa 2km) to the i54 site.

Jaguar Land Rover support the continued growth of the district but reiterates the need for balance between employment and housing growth - with reference to the agent of change principle within the draft Local Plan. Introducing reference to the agent of change principle will help to ensure amenity issues, which may be raised by future residents, living in close proximity to an established manufacturing centre will be effectively managed - ensuring that the interaction between the two uses does not hamper the continued operation of strategic employment sites.

Question 7: Policy SA1 – SA4 - Strategic Development Location: Land East of Bilbrook

(A) DO YOU SUPPORT THE PROPOSED STRATEGIC HOUSING ALLOCATIONS IN POLICIES SA1-SA4? YES/NO

Yes, subject to the comments made below.

IF NO, PLEASE EXPLAIN YOUR REASONS FOR THIS

Draft Policy SA1 (Strategic Development Location – Land East of Bilbrook) states that the housing allocation will provide a minimum of 848 homes, by the end of the plan period. Land East of Bilbrook is within circa 1.3km of the i54 site. The draft Policy mentions that the allocation was chosen partly due to the sustainable access to i54 business park, which in part highlights the importance of the i54 site. The proposed production of a Supplementary Planning Document to support the housing allocation is supported - this should provide a framework which helps to guide future planning applications ensuring that the agent of change principle is considered in the development of any housing proposals - thereby protecting employment land.

Further sites include:

- Draft Policy SA2 (Strategic Development Location – Land at Cross Green) states that by the end of the plan period, the housing allocation will deliver a minimum of 1,200 homes - again with excellent ties to the i54 business park. This housing allocation is within circa 1km of the i54 site.
- Draft Policy SA3 (Strategic Development Location – Land North of Linthouse Lane) outlines that this allocation will deliver a minimum of 1,200 homes by the end of the plan period. Whilst this is not in close proximity to Jaguar Land Rover, they support the allocation and the continued growth of the area.
- Draft Policy SA4 (Strategic Development Location – Land North of Penkrudge) highlights that this allocation will provide a new neighbourhood where residents can easily meet their daily needs using facilities within the development of Penkrudge village. Again, while this is not in close proximity to Jaguar Land Rover, Jaguar Land Rover support this allocation and the value it will have to the overall area.



We reiterate the point made above in relation to draft Policy SA1, while Jaguar Land Rover supports growth in the District and high-quality housing that will help support a growing workforce, any future housing development needs to be carefully managed to ensure that there is no detrimental impact on Jaguar Land Rover's operation that could undermine employment land.

As referred to previously, the introduction of an agent of change principle would be beneficial to ensure there is no conflict between new housing developments and the existing employment land uses. This will ensure that the test of soundness is met, as more change is needed to be positively prepared.

(B) DO YOU AGREE THAT GIVEN THE SCALE OF THE 4 SITES DETAILED IN POLICIES SA1-SA4, THESE WARRANT THEIR OWN POLICY TO SET THE VISION FOR THE SITE, ALONGSIDE A REQUIREMENT FOR A DETAILED MASTERPLAN AND DESIGN CODE? YES/NO

Jaguar Land Rover support the provision of separate policies for the four sites and the requirement of a detailed masterplan and design code, alongside the production of a Supplementary Planning Document, for each will help ensure that the housing developments take place in an acceptable manner that has been reviewed by relevant stakeholders prior to their adoption.

Question 8: Policy SA5 – Housing Allocation

**DO YOU SUPPORT THE PROPOSED HOUSING ALLOCATIONS IN POLICY SA5?
YES/NO**

Yes.

PLEASE REFERENCE THE SITE REFERENCE NUMBER FOR THE SITE YOU ARE COMMENTING ON IN YOUR RESPONSE

Jaguar Land Rover supports the proposed housing allocations, including Site 168 and Site 397 in Featherstone. This is relevant because the closest part of these developments will be circa 2.5km from Jaguar Land Rover's EMC on the i54 business park.

Question 10: Policy SA7 – Employment Allocation – West Midlands Interchange

DO YOU SUPPORT THE PROPOSED ALLOCATION IN POLICY SA7? YES/NO

Yes, Jaguar Land Rover supports the proposed employment allocation in draft Policy SA7.

As the question relates solely to the one employment allocation within Policy SA7 and not the employment areas with available land for employment development mentioned within the Policy description, Jaguar Land Rover considers that the draft Local Plan should include these employment areas within the Policy. This is because the i54 site was included as an employment land allocation within Policy SAD5 of the Site Allocation Document September 2018. The inclusion of the i54 site within the draft Local Plan policy will ensure that previous employment land allocations are supported and reinforced.



Question 11: Proposed policy approaches in Chapter 6

DO YOU AGREE WITH THE PROPOSED POLICY APPROACHES SET OUT IN CHAPTER 6? YES/NO

Jaguar Land Rover support the proposed policy approaches in Chapter 6.

The draft Local Plan's proposed direction of travel for sustainable economic growth includes continued support for the delivery of strategic employment sites, including the i54 site. Further, the supporting text in Chapter 6 states that alternative uses must not prejudice continued operation and viability of existing/allocated employment areas, with a strong presumption in favour of retaining strategic employment sites for employment use

Jaguar Land Rover supports this and considers it important to ensure additional development of the i54 site does not undermine existing businesses and their prospects. Therefore, Jaguar Land Rover also supports the proposed direction of focusing growth at the currently identified employment areas but considers it significant to ensure that it is economic growth and employment land.

SUMMARY

Jaguar Land Rover welcomes the opportunity to respond to the Preferred Options consultation for South Staffordshire's new plan. Jaguar Land Rover supports the growth ambitions of the Plan and supports the continued promotion of employment land surrounding the i54 park as employment land.

As set out within this representation, in order for the draft plan to be found sound in Examination, the following changes should be made:

- Policy SA1 and Policy SA2 is supported but needs to ensure there will be no harm to local employment areas;
- Policy SA5 needs to ensure that housing allocations do not harm local employment areas;
- Policy SA7 should be modified to include previous employment land allocations to further ensure their security; and
- An agent of change principle should be incorporated to protect existing employment land.

We trust that our representations will be taken into account in preparing the next version of the Local Plan. Our client is keen to engage with South Staffordshire Council and wish to continue to be involved in further consultations on the Local Plan process moving forward.

Yours faithfully

Olivia Bostock
Senior Planner