



LPR Consultation Policy and Delivery
Solihull Metropolitan Borough Council
Solihull
B91 3QB

Our Ref: 70078572

14 December 2020

Dear Sir/Madam,

Local Plan representations: Regulation 19

We write on behalf of our client, Jaguar Land Rover, to submit a response to the publication of the Solihull Local Plan (Draft Submission) 2020 (Reg 19) consultation (the 'Draft Submission Plan').

Jaguar Land Rover's Lode Lane manufacturing site (the 'site') employs approximately 7,000 people, operating 24 hours a day to meet the global demand for Range Rovers and the Jaguar F-PACE. It forms one of the largest employment sites in the West Midlands and is Jaguar Land Rover's largest manufacturing facility in the UK.

This site bounds the draft employment land allocation UK2 at Damson Parkway, Solihull (formerly known as Proposed Employment Site 20 in earlier versions of the draft Plan), with specific reference made to the site providing expansion opportunities for Jaguar Land Rover.

Jaguar Land Rover support the principle of allocating employment land at draft allocation UK2. Jaguar Land Rover does however have serious and grave concerns with some of the detail of draft allocation UK2 as submitted for Regulation 19 consultation, and requests Solihull MBC takes into account the detail of this letter and makes the requested changes to this policy.

Concerns with draft Policy UK2

The recently published Draft Submission Plan October 2020 (Reg 19) amends the previous wording of draft Policies UK2 – Land at Damson Parkway and P12 – Resource Management to include an option for the provision of a relocated Household Waste and Recycling Centre and Council Depot within the land allocation. Jaguar Land Rover has serious and grave concerns regarding this addition within the allocation and does not support this amendment, due to following potential implications:

- The potential impact on the future site expansion of Jaguar Land Rover's Solihull manufacturing facility;
- The potential impact on the future aspirations of creating direct access to the new M42 Junction 6 road link; and
- The non-compliance with adopted Policy P3 Provision of Land for General Business and Premises.



Future expansion

The continued expansion and growth of the largest of Jaguar Land Rover's UK manufacturing sites and one of the West Midlands' largest employers, is largely constrained on the north, south and west by the neighbouring urban form and protected Elmdon Park. Land to the east of the facility is the only area that could accommodate growth. It is therefore essential that this land is protected for the future expansion needs of Jaguar Land Rover.

As a recognised Key Economic Asset contributing to Solihull and creating a substantial number of local skilled employment opportunities, the Solihull Local Plan Review reinforces the Council's objective to support Jaguar Land Rover's continued economic success, understanding their need to stay competitive and the requirement for growth through the proposed allocation of employment land site Ref: UK2 (adopted and draft Policy P1). Site UK2 identifies the only area available for the Lode Lane facility's expansion, to the north/east of the existing site.

The land to the immediate north of the existing facility, to the west of Damson Parkway, was granted consent for development in conjunction with the continued operation of Jaguar Land Rover. The location of this development infills the remaining available land to the west of Damson Parkway and south of the A45.

The proposed amendment to the justification text of Policy UK2 notes that part of the draft allocation, to the south east of Damson Parkway, has been identified as an option for the relocation of the Household Waste and Recycling Centre and Council depot. This area of land bounds Jaguar Land Rover's existing dispatch lot to the east.

The development of a Household Waste and Recycling Centre and Council depot in this location would result in the total enclosure of Jaguar Land Rover's Lode Lane facility, developing the last area of land available as a natural extension to the existing facility's footprint.

Further details would also be needed to understand the security provisions of any facility which bounds our site. There is a potential to weaken defensible boundaries and pose additional security risks.

Prior to the recent amendments to the wording of Policy UK2, the proposed allocation supported Paragraphs 80 and 82 of the NPPF, seeking to create an identified area of employment land for the continued growth and expansion of Jaguar Land Rover and/or for the addition of alternative, complementary automotive use, creating a cluster of industry.

The proposed provision of a waste treatment facility and depot would result in the inability for the continued growth of the existing large-scale local employer, one of the largest in the West Midlands, contrary to their adopted and draft Local Plan and the National Planning Policy Framework (2019) ('NPPF').

As such, Jaguar Land Rover request that the Household Waste and Recycling Centre and Council depot are not located within draft allocation UK2.

Future connectivity to the highway network

Highways England has recently obtained consent for a series of works between Junction 5 and Junction 6 of the M42, resulting in the creation of a 2.4km dual carriageway link road aligned to the A45 and access via Junction 5A. This area of the M42 currently supports road access to Birmingham Airport and significant business locations, such as the UK Central Solihull Hub Area.

The justification for these works is supported by the current, significant congestion issues that form a constraint to any future investment and economic growth in this area. The benefits of the scheme once complete will be an increase in capacity at Junction 6, reduced congestion, improved access to key business areas in the region, and improved local cycle and pedestrian routes.

There is a future aspiration to connect Damson Parkway directly with this new dual carriageway. Such a link road would create a more direct route between the UK2 allocation and the M42, directing traffic away from the existing routes and improving capacity on the local and strategic road network. This could also allow for further economic development opportunities in the local area in the future.

The route for such a link road is not yet known, nor has a case been made for it. As such, Jaguar Land Rover is not asking Solihull MBC to protect the potential route but merely ensure the Local Plan and allocation UK2 is sufficiently flexible to incorporate this road should it be needed during the plan period between (2020-2036).

There is an aspiration to have rail freight connectivity serving the allocation to ensure future logistic capability for all parties. Any plan policy should protect this aspiration.

Policy P3 assessment

Adopted Policy P3 protects allocated employment land for their allocated purposes and employment uses defined as offices, industrial and warehousing, and where appropriate, waste management. The amendment to the wording of Policy UK2 seeks to include waste management as an appropriate land use at Damson Parkway.

Considering site UK2, it is located on both sides of Damson Parkway. The surrounding land comprises the Jaguar Land Rover Lode Lane facility and its phased extension to the south of the A45, whilst within the wider site there are several residential dwellings, a gypsy traveller site and other small, home-based businesses.

Policy UK2 states that the waste treatment centre and depot would be located within the allocation, understood to comprise the two land parcels to the east and north of Jaguar Land Rover's dispatch lot.

Based on the existing site uses and in the interest of enabling the continued growth of Jaguar Land Rover, a waste management facility is not deemed appropriate in this location.

Policy P3a sets out five criteria for the assessment of alternative uses:

- Site is relatively isolated from other business premises or neighbouring uses;
- Demonstrated that there is no longer a need to retain the site for their intended business class purpose; or
- There is no reasonable prospect of attracting business development in market terms;
- The alternative use will support sustainable development principles and directly deliver employment locally; and
- There is no conflict with policies of the Local Plan or National Planning Policy.

Against the aforementioned criteria, a waste management site and Council depot in this location would not be deemed appropriate. The proposed location is in proximity to a 24-hour operating business, which is continuing to expand into the wider area. Furthermore, its neighbours include



residential dwellings to the north and south, which are not directly compatible with a waste treatment facility.

The site in its current form does not lack prospects for its future development, nor does it require extensive marketing to identify potential interest, as this exists in the form of Jaguar Land Rover, as identified in Policies P1, P3, UK2 and the Council's objectives to support its continued growth.

The continued growth of one of the West Midlands' largest employers, in proximity to the existing facility ensuring a concentrated operation, provides a clear rationale for supporting sustainable development and the delivery of local employment. A concentrated approach reduces the travel and movement of goods and people across Solihull, supporting the best use of space with their dense development footprint maximising employment opportunities for skilled workers within the local community.

Finally, the provision of a waste management facility that would severely constrain the continued growth of an existing, prosperous and beneficial employer does not constitute the best use of land, contrary to the NPPF. Jaguar Land Rover currently employ approximately 7,000 people at the Solihull facility, with any expansion allowing for increasing figures and generating employment rates in keeping with business use class densities. A waste management facility and depot, however, would not provide employment densities of the same level based on the site's function and use of space, nor does it support the continued large-scale growth of an existing large employer.

CONCLUSION

Jaguar Land Rover support the principle of employment land at draft allocation UK2 within the Draft Submission Plan, supporting the continued growth and operation of employment uses within the area.

Notwithstanding, the amended wording of draft policy UK2 identifies the allocation as a potential, appropriate option for the relocation of a Household Waste and Recycling Centre and Council Depot. Jaguar Land Rover do not consider the provision of this option within site UK2 is an appropriate location for this operation, based on its existing local context. Such a facility, located in the south east of the allocation, would prejudice the future expansion and continued growth of Jaguar Land Rover's Solihull facility. It would potentially prejudice future connectivity with Highways England's M42 Junction 6 relief road and does not constitute an appropriate location as per the adopted Policy P3a assessment.

We trust that the information set out within this letter is detailed and clear and understand that its review and consideration will run into the spring. In the meantime, should you have any questions or queries, please do not hesitate to contact me or my colleague Olivia Bostock

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Yours faithfully

Daniel Jackson
Director