

RUGBY BOROUGH LOCAL PLAN: PREFERRED OPTIONS CONSULTATION (REGULATION 18)

Representations on behalf of Sir Thomas White Charity, Linda Meakin,
Alastair & Robert Reid

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REPORT

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1 INTRODUCTION

- 1.1 These representations have been prepared on behalf of Sir Thomas White Charity, Linda Meakin, and Alastair & Robert Reid ('the landowners') in response to the Rugby Local Plan Preferred Options Document ('the Plan') published by Rugby Borough Council ('the Council').
- 1.2 The representations relate to their 112-hectare land interests at Ansty Park East. The site as addressed within these representations is being proposed as a potential additional employment land site allocation, given the site's suitability and its relationship with the existing Coventry Technology Park (Ansty Park) site.
- 1.3 The Council took the decision in October 2023 to progress the Local Plan update under current plan-making system and, as a result, expect to adopt the new Local Plan during 2027 . Any references of relevance to national planning policy in these representations refers to the latest version published in December 2024, in accordance with the transitional arrangements.
- 1.4 We have reviewed the consultation material and set out our representations on the Plan, the Interim Sustainability Appraisal, and the various supporting documents to support this response, as necessary. We note that the Council has not issued any specific questions to support the consultation, nonetheless our responses are broadly aligned with the draft policies.
- 1.5 RPS and the landowners would welcome further opportunity to engage with Rugby Borough Council (the Council') on the emerging Local Plan review as it moves forward.

2 PLAN PERIOD

- 2.1 As part of the issues and options consultation, the Council presented two options for the plan period for the new Local Plan; based on a 2045 or 2050 end date. Following that consultation, the Council has chosen 2045 as the proposed end date, as expressed in draft Policy S2 (Strategy for Homes). This results in an emerging plan period of 21 years (2024-2045) assuming a base date of 2024.
- 2.2 The plan period would be a minimum of 15 years from adoption which would extend beyond the minimum end date of 2042, in accordance with national policy (NPPF, paragraph 22). Nonetheless, the Council has not sought to align the plan period to the emerging employment evidence base (West Midlands Strategic Employment Sites Strategy and Alignment Papers) which together cover the period to 2050. The Council has selected the earlier end date (2045). It is not made clear why the earlier end date has been selected.
- 2.3 We suggest it is entirely logical and proportionate for the new plan to align with the evidence base even where this extends beyond the minimum (15 year) timeframe. In the context of delivering a positive vision for the area, appropriate strategic planning and providing greater certainty for one of the Plans principal stakeholders (consistent with NPPF para 17 and 22), i.e. the development industry we fail to see any logical reason for failing to align to the same end date. Should the Council agree to this there would obviously be the requirement for the Plan to provide land for an additional five years' worth of employment land of @ 70 hectares.
- 2.4 In addition, the South Warwickshire Local Plan is proposing a plan period up to 2050. We see no reason why Rugby should not follow the same timeframe. This would help ensure that development needs across the sub-region (Coventry and Warwickshire) are addressed on a consistent basis and would ensure effective cross-boundary engagement across the different plans.
- 2.5 On this basis, **we recommend that the plan period should be extended from 2045, to cover the period to 2050.**

3 STRATEGIC POLICIES ON EMPLOYMENT

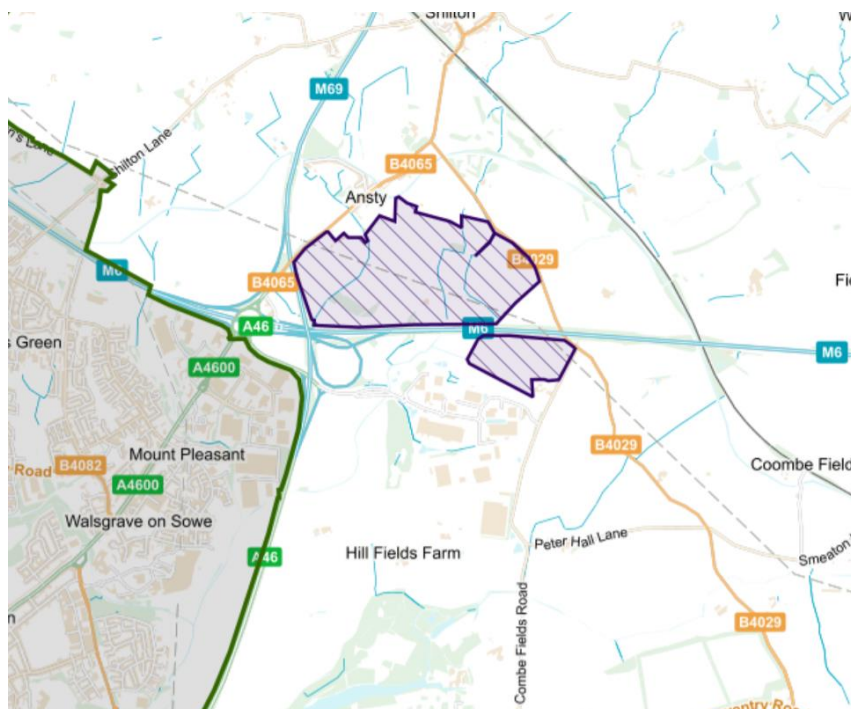
Employment Land Need and Requirement in Rugby

Draft Policy S3

- 3.1 Draft Policy S3 sets out the proposed strategy for employment land up to 2045. The policy makes provision for approximately 284 hectares of land for B2, E(g)(ii) and (iii), and B8 use, which would be sufficient to provide for 1,026,546m² of floorspace; and 22,013m² of use class E(g)(i) office floorspace (approx. 4.4 hectares).
- 3.2 Part of this provision includes 75,000m² to be delivered at Ansty Park North, which is specifically identified as one of the proposed allocations in the policy. Paragraph 1.9 of the Plan explains that the Ansty Park North site will be ring-fenced for 'its continued expansion of regionally significant manufacturing and R&D clusters' to help support the diversification of Rugby's economy.

Draft Policy S7

- 3.3 Draft Policy S7 also specifically refers to the proposed employment site allocations, including 'North of Ansty Park' (site 14). The policy says that development of the [allocated] sites shall accord with the development principles set out in the development site allocations annex and with other policies of this plan (we comment of these in the next section of this response).
- 3.4 We note that S7 appropriately identifies both Ansty Park North and Crouner Fields Farm and Home Farm, Hinckley Road, Ansty (see policies Map extract below). Given the concentration of strategic employment provision in the location and its obvious market attractiveness, it is RPS opinion for the reasons set out within these representations that additional land should be provided at Ansty Park East.



- 3.5 Overall, we **support** the employment land strategy in draft Policy S3, which provides for the future employment land needs of Rugby to 2045 (though we do recommend the plan period is extended to 2050, which might indicate a need for further employment land to be identified). We also **fully support** the allocation of the Ansty Park north site in the Plan for employment use and the site development principles under Policies S3 and S7.

Wider Strategic Employment Land Need

- 3.6 The Development Needs Topic Paper provides a summary of the various components that comprise the total employment land need as it relates to Rugby, but also relating to the wider West Midlands. The topic paper summarises analysis on future needs at the sub-regional level drawn from various evidence documents supporting the Plan; Housing and Economic Needs Assessment for Coventry and Warwickshire (HEDNA), West Midlands Strategic Employment Sites Study (WMSESS), and HEDNA-WMSESS Alignment Paper.
- 3.7 According to the evidence, the Plan is seeking to meet the industrial needs of Rugby as well as the unmet need (45 hectares) for industrial sites coming from Coventry, sufficient to provide for 1,231,987m² of floorspace under draft Policy S3.
- 3.8 Nonetheless, the evidence also indicates there is a road-based strategic sites need of 1,555-1,848ha and a rail need of 365-433ha indicating the need for a SFRI within the plan period across the West Midlands to 2045. Taking account of existing commitments (as of April 2022) there is a residual need of 615-977ha across the West Midlands (WMSESS, paragraph 1.15 / Table 1.1; Alignment Paper, para 2.7 / Table 2.3). As this need only relates to 'strategic need (over 9,000m² or more)' this does not account for all the need for industrial land across the West Midlands. Furthermore, at the sub-regional level (Coventry & Warwickshire), the total industrial need (for non-strategic and strategic sites) has been estimated and which amounts to between 1,407-1,589 ha 2021-2045, and 1,505-1,687 ha to 2050 (Alignment Paper, Table 3.9).
- 3.9 **This represents a significant level of need for employment land and which should be addressed as a matter of priority for the West Midlands and Coventry & Warwickshire authorities and it remains unclear how the Rugby Local Plan is proposing to address this.**
- 3.10 It is not clear at present to what extent the full scale of employment land need identified in the various studies is currently being addressed through emerging plans across the sub-region, or across the West Midlands as a whole. There are currently no agreements or statement of common ground in place, or in progress, which deals specifically with this issue. This would point to the possibility, in all likelihood, that **additional land is going to be required to meet the wider employment land need identified for the sub-region (Coventry & Warwickshire), and possibly across the wider West Midlands conurbation.** Such additional employment need would represent an additional level of employment land beyond that through simply expanding the plan period to 2050.

- 3.11 Consequently, **it is clear that more land will be required over and above existing draft employment allocations (including Ansty Park north), and we contend that the Ansty East site should be identified as a suitable option.**

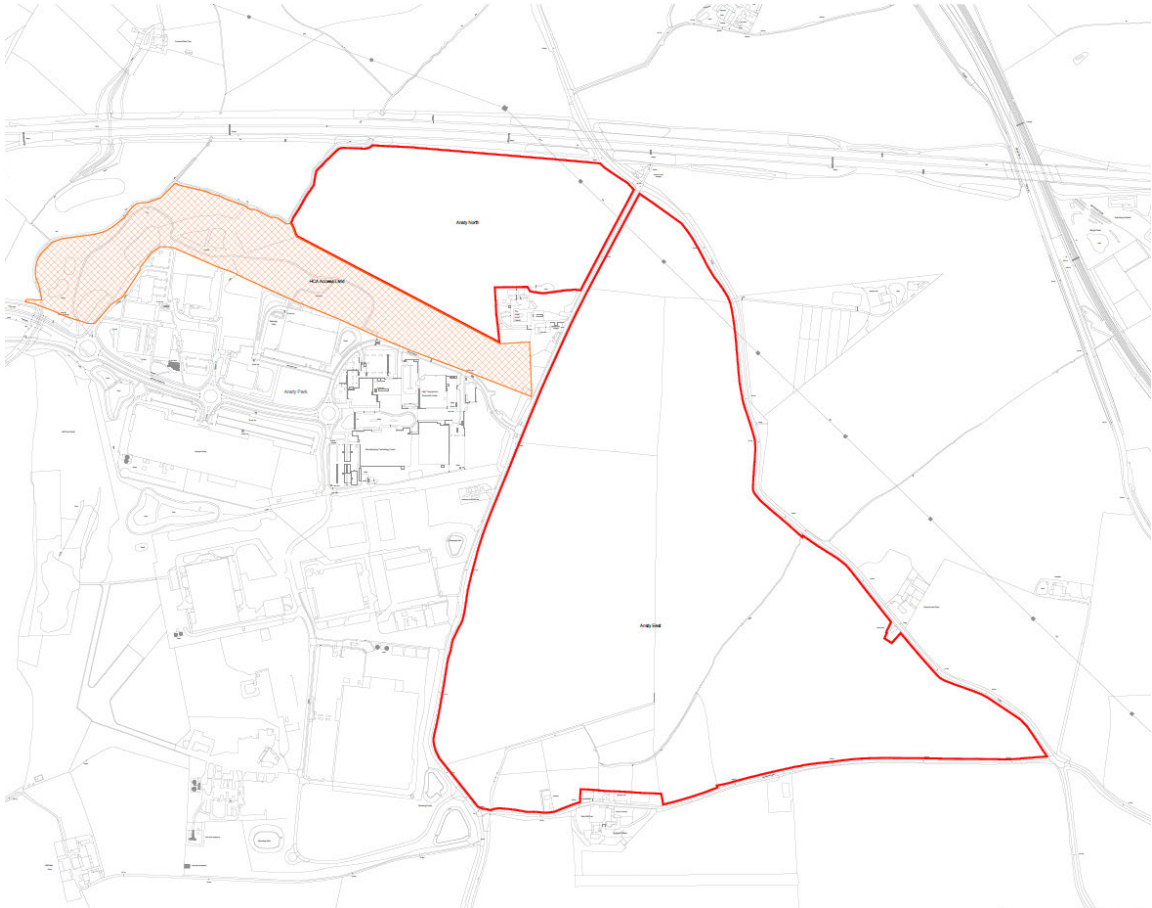
We address site-specific matters in respect of the Ansty East site (and Ansty Park north) in subsequent sections of this response.

4 OPPORTUNITY AT ANSTY PARK EAST (OMISSION SITE)

Site description

- 4.1 A location plan for the Ansty Park East site (larger red edged parcel) is presented below. The smaller red edged parcel is the Ansty Park North draft allocation.

Figure 4-1 Ansty East – location plan (larger parcel)



- 4.2 The site covers approximately 112 hectares of land mainly in agricultural use, but is located directly to the east of Coventry Technology Park (Ansty Park). Ansty Park is located in the heart of the UK's key transport hub with six motorway junctions within a 20 mile radius and direct access to junction 2 of the M6, which lies about 1 mile to the northwest of the site. Significant development has already been undertaken with occupiers including MTC, HTRC, Sainsbury's, FANUC, AVL and The London Taxi Company. Ansty Park will provide (when fully built) 1.5 million sq. ft of space set in 100 acres of landscaped parkland and has been designed to ensure that the creation and sharing of knowledge is at the heart of the park's future development¹.

¹ [Coventry Technology Park - Ansty Park](#)

- 4.3 The site itself is formed of three roads; Peter Hill Lane, Coombe Fields Road, and the B4029, and is situated to the south of the M6 east of junction 2. There are a range of access options to the site to both the M6 and M69 strategic network that are currently being progressed.
- 4.4 The site is also located in the Green Belt.

Ansty Park East Assessment against Strategic Employment Requirements

- 4.5 According to the WMSESS (paragraph 11.30) accessibility to skilled labour is a top locational factor for manufacturing and logistics occupiers. This can help avoid a mismatch between jobs and population and reduce the need for long distance commuting (which is less sustainable).
- 4.6 The WMSESS also explains that “strategic sites” should meet the following criteria:
- *Good connections with the strategic highway network (for road) – **Ansty Park East is very well connected to the SRN***
 - *Sufficiently large and flexible - ideally sites would be a minimum of 25ha and readily over 50ha – **Ansty Park East is 112 hectares in size***
 - *Is or can be served from an electricity supply grid with sufficient capacity – **no known issues regarding connectivity to utility networks***
 - *Is accessible to labour and includes a clear sustainable transport solution for the local road network - **the wider area, including the West Midlands conurbation, has a number of world renowned universities and a strong local and regional workforce***
 - *Is located away from incompatible land-uses – **whilst the site is greenfield, it is located adjacent to an existing employment area, so highly compatible in terms of employment land uses***
 - *The ability to deliver high-bay warehousing – **no known issues preventing this***
- 4.7 Consequently, the Ansty Park East site performs very well against criteria for judging the location of sites for large-scale strategic employment need and is well-located for manufacturing and logistics operations (given its proximity to Ansty Park). The strategic merits of the site for employment use are clear.

Site-Specific Merits of the Site

- 4.8 In addition, strategic factors, there are site-specific considerations which favour the Ansty Park East site.

Grey Belt considerations

- 4.9 In particular, consideration should be given to whether or not the site comprises Grey Belt, given its Green Belt status. For the purposes of plan-making (and decision-making) ‘Grey Belt’ is defined as

land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.

4.10 The relevant Green Belt purposes are as follows:

- a) to check the unrestricted sprawl of large built-up areas
- b) to prevent neighbouring towns merging into one another
- d) to preserve the setting and special character of historic towns

4.11 The Council has not undertaken an up-to-date Green Belt (Or Grey Belt) Assessment at this stage (which we advocate), which would ideally be the starting for identifying Grey Belt land, though we understand one is under preparation. The most recent Green Belt covering Rugby borough was the Coventry & Warwickshire Joint Green Belt Study, published in 2015.

4.12 Planning Practice Guidance provides advice on how to identify Grey Belt land as part of the assessment². The PPG establishes the five key 'steps', as follows:

- **Step 1-** identify the location and appropriate scale of area/s to be assessed
- **Step 2** - evaluate the contribution each assessment area makes to Green Belt purposes (a), (b), and (d), using the criteria identified below
- **Step 3** - consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area
- **Step 4** - identify Grey Belt land
- **Step 5** - identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan

4.13 We have applied these steps to establish whether the site meets the Grey Belt test.

Step 1: identify the location and appropriate scale of area/s to be assessed (PPG ID: 64-004)

- The Ansty East site as shown in Figure 2.1 of this response is the appropriate scale and location to be assessed here.

Step 2: evaluate the contribution each assessment area makes to Green Belt purposes (a), (b), and (d) (PPG ID: 64-005)

4.14 Our assessment against the PPG criteria is set out in the following table.

Table 4-1 Contribution assessment – Ansty Park East

Purpose	RPS assessment	Contribution
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² PPG Paragraph: 001-008 Reference ID: 64

<p><u>Purpose A – to check the unrestricted sprawl of large built up areas</u></p> <p>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.</p>	<ul style="list-style-type: none"> • Site is largely free from development, but existing features (roads, built development along the western boundary) would restrict and contain development on the site • Site is adjacent to or near existing development (site is located adjacent to an employment area) but is one mile east of Coventry, so would not lead to sprawl of a large built-up area • Site is partially enclosed by existing employment uses to the west • if developed, would represent a logical extension to an adjacent employment use 	Moderate
<p><u>Purpose B – to prevent neighbouring towns merging into one another</u></p> <p>This purpose relates to the merging of towns, not villages</p>	<ul style="list-style-type: none"> • Site is located in a large gap between towns (Coventry and Rugby) but, due to its size and extent, forms only a very small part of this gap • Development would not be likely to result in a loss of visual separation between towns, given the site lies over five miles west of Rugby and is separated from Coventry by existing structures (Coventry Technology Park) 	Weak / moderate
<p><u>Purpose D – to preserve the setting and special character of historic towns</u></p> <p>This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.</p>	<ul style="list-style-type: none"> • No evidence to show the site forms part of the setting of a historic town • Site is separated from the nearest town (Coventry) to some extent by existing development • have no visual, physical, or experiential connection to the historic aspects of a historic town 	Weak

4.15 Based on our assessment of the site, we contend the contribution is **moderate to weak**.

Step 3: consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF indicate a ‘strong reason’ for restricting development on the Ansty East site (PPG ID:64-006)

- The site does not comprise any land identified under footnote 7 (other than Green Belt) and so step 3 is not triggered.

Step 4: assess whether the Ansty Park East site can be identified as ‘Grey Belt’ land (PPG ID:64-007)

- Following Steps 1-3, the site can be identified as Grey Belt.

Step 5: Consider the impact on the remaining Green Belt in the plan area (PPG ID:64-008)

- The release of the Ansty East site would not, in our view, affect the ability of all the remaining Green Belt across the Plan in Rugby from serving all five of the Green Belt purposes in a meaningful way, and so would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the Plan as a whole. This is because the extent of the site as a proportion of the overall Green Belt in Rugby is very limited and localised in scale and extent.

- 4.16 On this basis, **we contend the Ansty Park East site is Grey Belt and can be removed from the Green Belt in accordance with national policy and guidance.**

5 COUNCIL'S ASSESSMENT - ANSTY PARK EAST

- 5.1 Despite the strategic and site-specific merits for employment use, highlighted above, the Council has seemingly discounted the Ansty Park East site following their Stage 2 Site Options Assessment exercise. The site is referred to by the Council as '*Land East of Ansty Park, Ansty, Coventry*' (Site 8). We have reviewed the Council's findings and provide our responses below.

Stage 2 Site Options Assessment – Ansty Park East

Potential Yield

- 5.2 The Council has indicated the site has potential to accommodate in the region of 200,000m² of employment floorspace. This is based on initial master planning work and the need to provide significant areas of landscape mitigation. Whilst this may be below the Council's 0.35 plot ratio approach for strategic scale sites, it does demonstrate the deliverability of the site.

Transport considerations

- 5.3 The Council say the site is to be accessed from a proposed new roundabout at Combe Fields Road. We agree that an appropriate access can be achieved through the Ansty Park, which is the favoured option.
- 5.4 The Council refers to 'initial' comments provided by National Highways (NH). NH says development is likely to impact both the M6 J2 and M69 / A46, with employees and HGV routing, cumulative impacts, but point to potential for suitable mitigation on the SRN. An initial assessment of junction capacity and congestion levels was measured at 3 (mid-range). This does not indicate that any potential significant adverse impacts on highway safety at this stage.

Ecology

- 5.5 The Council acknowledge the site has low ecological constraints. This does not indicate that ecology would preclude development on the site.

Landscape

- 5.6 The Council say the overall landscape sensitivity of the site is Medium/Low. This does not indicate that landscape sensitivity would preclude development on the site.

Other constraints

- 5.7 The Council highlight the existing Green Belt designation covering the site and suggest that the site could potentially make a strong contribution to 'at least one purpose'. However, the Council has not published an up-to-date Green Belt assessment of the site, and so it is wrong to make such an assertion until the evidence has been properly tested. **Based on RPS Grey Belt assessment, we contend the site only makes a moderate to weak contribution to the green belt purposes.**

Outcome of further assessment: Not progressed

- 5.8 The Council has not taken the site forward to the next stage in the process (Sustainability Appraisal of reasonable alternatives).
- 5.9 The reasons given are:
- The site predominantly comprises arable fields east of Ansty Park.
 - Accessibility by non-car modes scores poorly. The site is reasonably proximate to a future workforce in Coventry. There are low ecology constraints, no identified heritage constraints and landscape sensitivity is medium/low.
 - The site is within the Green Belt.
 - Access to the site would need to be through Ansty Park as access only from Combe Fields Road would not be acceptable for employment uses on this scale. The landowner has not advised that means of access through Ansty Park has been secured.
- 5.10 We have addressed issues relating to transport and Green Belt in our responses. Furthermore, it is not realistic or necessary at this stage to demonstrate that '*means of access through Ansty Park has been secured*'. The appropriate test in national guidance for assessing the potential deliverability of sites should be based on identifying constraints and judging whether or not these can be overcome, thus demonstrating that delivery is 'achievable'³. As we have stated, various options are available to secure the necessary access to unlock the site. A suitable access can be achieved providing the necessary connection to the existing highway from the site and onto Ansty Park, but that does not need to be 'secured' prior to allocating the site in the Plan. The process of securing the required access can be agreed as part of the planning application process.
- 5.11 The site is strategically located adjacent to one of the regions premier employment locations at Coventry Technology Park and has the potential for expanding on the existing proposals at Ansty Park North and ensure a supply of additional employment land beyond the plan period.
- 5.12 Based on our response, **we do not consider the factors used by the Council constitute adequate reasons to discount the site. There are no significant constraints that preclude development coming forward on the Ansty Park East site for employment purposes.**

³ Paragraph: 013 Reference ID: 3-013-20190722 Revision date: 22 07 2019

6 CONCLUSIONS

- 6.1 The representations set out in this submission have been prepared in support of land east of Ansty Park ('Ansty Park East').
- 6.2 In summary, we submit our responses and wish to highlight the following points:
- **we recommend that the plan period should be extended from 2045 to cover the period to 2050 with circa an additional 70 hectares of employment land**
 - **we fully support the employment land strategy in draft Policy S3, and we also fully support the allocation of the Ansty Park north site in the Plan for employment use and the site development principles under Policies S3 and S7**
 - **Evidence points to a significant employment land need in the West Midlands and Coventry & Warwickshire – that is not being addressed and would point to an additional need beyond the @ 70hectares identified above, through extending the plan period.**
 - **In order to help address the need, we contend the Ansty East site is 'Grey Belt' and can be removed from the Green Belt in accordance with national policy and guidance**
 - **We do not consider the factors used by the Council constitute suitable or justified reasons to discount the site at this stage. There are no significant constraints that preclude development coming forward on the Ansty Park East site for employment.**
 - **In light of the issue raised in this submission, should further evidence prepared for the Plan indicate that more land will be required over and above existing draft employment allocations (including Ansty Park north), we contend that the Ansty East site should be identified as a suitable option**
- 6.3 RPS and the landowners would welcome further opportunity to engage with Rugby Borough Council (the Council') on the emerging Local Plan review as it moves forward.