

#1

COMPLETE

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Page 1: Introduction

Q1 **Strongly Agree**

To what extent do you agree with the selection of these objectives?

Q2

What are the reasons for your answer to question 1?

AC Lloyd strongly supports these objectives, and in particular the aim of growing Rugby Borough's economy in sustainable locations.

The accompanying Key Diagram identifies a number of employment allocations and this includes land north of Ansty Park. This allocation is strongly supported by AC Lloyd as further outlined in our response to Question 8.

Page 2: Strategy for homes and residential allocations (policies S2 and S6)

Q3 **No Answer**

To what extent do you agree with the more dispersed overall spatial strategy for new homes?

Q4

What are the reasons for your answer to question 3 and if you disagree with the proposed spatial strategy what alternative should we pursue?

We do not wish to comment on this question.

Q5

Is there a site that is proposed to be allocated for housing in policy S6 that you do not support? If so, which site and why?

We do not wish to comment on this question.

Q6

The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.

We do not wish to comment on this question.

Page 3: Strategy for employment land and employment allocations (policies S3 and S7)

Q7

Strongly Agree

To what extent do you agree with the strategy for employment land?

Q8

What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?

AC Lloyd is supportive of the Council's economic strategy which aims to meet Rugby's identified development needs in full. The National Planning Policy Framework requires planning policies to be flexible enough to accommodate needs not anticipated in the plan, and we would therefore suggest that the employment land requirements set out at Policy S3 should be expressed as a minimum, not a ceiling.

AC Lloyd fully supports the chosen strategy which focuses growth in existing employment locations that are well related to centres of population, and in particular AC Lloyd supports the northwards expansion of Ansty Park as proposed.

Whilst this approach will require the release of Green Belt land at Ansty Park North (as well as other employment locations), we fully agree with the Council's reasoning for the chosen strategy for employment land. As set out in the Cabinet Report, as well as the Sustainability Appraisal (SA), the Council considers that 'exceptional circumstances' exist justifying Green Belt release at Ansty Park North for the following reasons:

- The need for strategic employment land is regional in nature. The functional economic market area (FEMA) in which Rugby Borough lies is centred on Coventry. Coventry is the main population and economic centre in the FEMA, but given its tightly drawn administrative boundary and limited employment land supply, it cannot meet its needs within its administrative boundaries. Allocating employment land within Rugby Borough near to Coventry provides the most sustainable approach to meeting the identified needs.
- Allocating land for expansion of Ansty Park has clustering and agglomeration benefits which would support more high-skilled jobs and expansion in high value-added industries.

Ansty Park is a highly successful business park and a regionally important location to R&D and advanced manufacturing. Together with the adjoining aerospace manufacturing facilities for Rolls Royce and Meggit, and the offices and logistics facilities at Prospero Park Ansty, this area forms a significant employment cluster within easy reach of Coventry and the strategic highway network.

Ansty Park is a success story and building on this success should rightly form a key element of the Borough's employment strategy going forward to further drive economic growth and provide inward investment opportunities. It is fully in line with the Framework's approach to economic development which places significant weight on the need to support economic growth and productivity and encourages each area "to build on its strength, counter any weaknesses and address the challenges of the future" (Paragraph 85). Growth of Ansty Park is also fully in line with the Framework's requirement to "facilitate development to meet the needs of a modern economy" (Paragraph 86c) and the clear encouragement for planning policies to recognise and address the specific locational requirements of different sectors. As set out at Paragraph 87a, this includes making provision for "clusters or networks of knowledge and data-driven, creative or high technology industries".

Ansty Park has historically helped to address employment land needs arising in Coventry and, through further expansion, can continue to fulfil this role providing economic benefits and employment opportunities to both Coventry's population and those of Rugby Borough and the wider sub-region. With regard to Coventry's employment needs, we are concerned that there currently is no explicit acknowledgement in the draft policies set out in the Preferred Options document that the Rugby Local Plan makes provision to address Coventry's unmet employment needs. The employment requirements stated at Policy S3 do not take account of Coventry's needs and there is no reference at Policy S3 or S7 that some of the allocations (such as Ansty Park North) will contribute towards meeting Coventry's needs as well as that of Rugby Borough and the wider sub-region. We consider that this should be made clear.

We strongly agree that the AC Lloyd's land (Site 14) is the most logical next phase of expansion of Ansty Park and strongly support the allocation of this site for 75,000 sq.m. of employment floorspace at Policy S3 and S7. This site is uniquely placed to build on the huge success of Ansty Park for the following reasons:

- It is of a sufficient size to accommodate circa 75,000 sq.m. of employment floorspace including a range of buildings plots to accommodate market demands from R&D, advanced manufacturing and technology businesses. Further growth in these sectors

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accommodate market demands from R&D, advanced manufacturing and technology businesses. Further growth in these sectors will contribute towards Rugby's Economic Strategy of creating a high skill high pay economy;

- It adjoins Ansty Park immediately to the north with the principal access proposed to be taken through Ansty Park off Central Boulevard making use of the existing road infrastructure. The site benefits from excellent connectivity to the strategic road network and can be fully integrated with the existing business park in terms of pedestrian and cycle links supporting sustainable travel and potentially strengthening the use of existing bus services;
- In keeping with the existing Ansty Park, the site offers an opportunity to provide high-quality buildings set within a managed high-quality landscape environment. This is to include the provision of landscape buffers and new green and blue infrastructure linking into, and strengthening, the existing network including the corridor along Withy Brook;
- There are no technical constraints to the site's development with matters such as flood risk able to be fully addressed through the site's layout and detailed design.

These key elements of the proposed employment development at Ansty Park North are reflected by the updated Site Supporting Statement submitted with these representations.

The Site Supporting Statement lends further support to the Council's own conclusions, based on a Stage 2 Site Assessment Report, that the site represents a relatively unconstrained option. The site is not affected by any ecology or heritage constraints and is considered to be of low landscape and visual value. The site is well connected to the local and strategic road network with proposed improvement to the transport network likely to address any existing congestion. Any development on the site can build on the sustainable transport infrastructure and travel initiative that are already in operation at the existing Ansty Park, and include segregated pedestrian/cycle paths and bus stops served by a half hourly bus service (route X30) which connects Ansty Park with Coventry City Centre.

Other constraints that are noted in the Stage 2 Site Assessment include foul water drainage (assessed as high), surface water drainage (assessed as low) and fluvial flooding affecting the western edge of the site. These constraints are not unusual and can be fully addressed when developing detailed drainage proposals for the site. The Development Concept Plan (see Site Supporting Statement) has evolved from earlier proposals to take account of the latest flood risk information to ensure that built development is located outside areas at risk of flooding.

The Stage 2 Site Assessment also highlights that the site is entirely located within the Green Belt. We note that the Council is in the process of preparing a Green Belt Contribution Study in line with the latest Government guidance on the preparation of such studies published in February 2025. This will assess the contribution green belt land within the borough makes to the five green belt purposes defined in the Framework and identify grey belt land. We fully support the Council in its efforts to ensure that its evidence base fully aligns with national policy requirements.

Although we await the outcome of the Council's Green Belt Study Update, we would like to note that in our view land at Ansty Park North is a grey belt site as it does not contribute strongly to Green Belt purpose a), b) and d) as briefly explored below.

- The site lies approximately 1km away from the urban edge of Coventry and is largely contained by significant existing development including the M6 motorway to the north, the B4029, Combe Fields Road and a Premier Inn/Brewers Fayre to the east and the existing Ansty Park business park to the south. It therefore makes a moderate contribution to Green Belt Purpose a) at best.
- The site is not directly related to either Coventry or Rugby and there would be no reduction in the gap between these two towns, visually or physically, given the area of extensive business/industrial development already present in this location. It is therefore considered that, at most, the site makes a moderate contribution to Green Belt Purpose b).
- The site also plays no role in preserving the setting and special character of historic towns (Green Belt Purpose d).

To conclude, AC Lloyd strongly support the Council's spatial strategy for employment land (Policy S3) and the employment allocations policy (Policy S7). When finalising its employment policies, we would request, however, that the employment land needs target at Policy S3 is explicitly expressed as a minimum figure for the plan period and that the policy is updated to

expressly state that provision is being made to meet Coventry's unmet needs.

As outlined above, we strongly agree that Ansty Park North (Site 14) should be included as an employment allocation. We note that in addition to Ansty Park North, Policy S7 of the Preferred Options proposes to allocate another four sites to meet employment land needs. We do not wish to comment further on these allocations apart from noting that should it be determined that the identified needs are greater or one of the proposed allocations is considered no longer suitable for inclusion in the Local Plan, consideration should be given to allocating land east of Ansty Park (Site Ref. 8) for employment uses to meet any shortfalls.

Page 4: Gypsy and Traveller sites (policy S4)

Q9

No Answer

To what extent do you agree with policy S4?

Q10

What are the reasons for your answer to question 9?

We do not wish to comment on this question.

Page 5: Climate

Q11

Agree

To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?

Q12

What are the reasons for your answer to question 11?

AC Lloyd supports the proposed climate change policies in principle, but considers that as currently worded the policies could have some unintended consequences which need to be addressed. In particular, draft Policy CL1 A(iii) requires development proposals to generate at least the same amount of renewable electricity on-site as the electricity they demand over the course of the year and we are concerned that this includes both regulated and unregulated energy use.

To give an example, an occupier seeking to switch to electric vehicle charging on site (an unregulated energy use) would be required to then generate renewable electricity to provide for this energy use. Another occupier relying on internal combustion engines, on the other hand, would not face the same requirement. The first occupier is making a sustainable choice by encourage the use of electric vehicles, but as a result needs to provide more renewable electricity than the second occupier who is pursuing a less sustainable approach. This could potentially result in the first occupier re-thinking the approach to electric vehicle charging. This clearly cannot be the intended result of this policy.

Page 6: Economy

Q13

No Answer

To what extent do you agree with the document's economic policies?

Q14

What are the reasons for your answer to question 13?

We do not wish to comment on this question.

Page 7: Centres

Q15

No Answer

To what extent do you agree with the policies for retail centres?

Q16

What are the reasons for your answer to question 15?

We do not wish to comment on this question.

Page 8: Environment

Q17

Neither Agree nor Disagree

To what extent do you agree with the document's environmental policies?

Q18

What are the reasons for your answer to question 17?

AC Lloyd supports Rugby's ambitions to protect or enhance the environment across Rugby Borough and welcomes draft Policies EN1-EN4 and EN6-EN8. However, we have some concerns regarding the implementation of draft Policy EN5.

In principle, AC Lloyd is supportive of a policy which seeks to increase tree canopy cover. However, Policy EN5 as currently drafted does not provide sufficient flexibility in how the policy is applied to different development proposals and sites.

Firstly, it needs to be recognised that there is a difference between brownfield and greenfield sites in terms of development costs. Greenfield sites tend to offer greater potential for increasing tree canopy cover as brownfield sites are often impacted by abnormal costs. Currently, only Rugby town centre is excluded.

Secondly, in seeking to retain existing tree cover before the planting of new trees, the policy has the potential to significantly constrain the development of strategic employment sites which require large development plateaus which can make the retention of existing trees (other than around the boundaries) difficult. It could also hamper the ability of future occupiers to expand/adapt their premises to changing requirements. Therefore, this element of the policy should be advisory only.

Thirdly, a requirement for 20% tree cover has the potential to conflict with the mandatory Biodiversity Net Gain (BNG) requirements and draft Policy EN4. The way BNG is achieved on each site will vary and tree cover may not necessarily generate the most optimum level of BNG compared with other habitats (grassland for example).

The Local Plan should therefore not introduce policy requirements that could make achieving statutory BNG requirements more difficult. We would therefore propose to merge draft Policy EN5 with Policy EN4 with a two-step process, as follows:

- Deliver at least 10% BNG on site in accordance with statutory requirements; and
- Where there is no conflict with achieving mandatory BNG requirements on site, deliver at least 20% tree cover, or the highest level reasonably achievable within the site, and where relevant, taking into account the financial viability of the site and the resultant development density.

Page 9: Housing

Q19

No Answer

To what extent do you agree with the document's housing policies?

Q20

What are the reasons for your answer to question 19?

We do not wish to comment on this question.

Page 10: Wellbeing

Q21

No Answer

To what extent do you agree with the document's wellbeing policies?

Q22

What are the reasons for your answer to question 21?

We do not wish to comment on this question.

Page 11: Design

Q23

Strongly Agree

To what extent do you agree with the document's design policies?

Q24

What are the reasons for your answer to question 23?

AC Lloyds supports draft Policies D1-D5 which seek to create well designed new developments.

Page 12: Infrastructure

Q25

Strongly Agree

To what extent do you agree with the document's infrastructure policies?

Q26

What are the reasons for your answer to question 25?

AC Lloyd fully supports Rugby Borough's approach to ensuring that the right infrastructure is in place to support development.

Page 13: Any Other Feedback

Q27

If there are any other comments you wish to make regarding the consultation document which you have not already given in your preceding answers, please enter them here:

Alongside the answers provided to the consultation questions, please refer to the Site Supporting Statement submitted by AC Lloyd in respect of the proposed allocation at Ansty Park North.

Page 14: About you

Q28

What is your name?

████████████████████)

Q29

What organisation are you representing, if applicable?

[REDACTED]

Q30

No

Are you a resident of Rugby Borough?

Q31

Your contact email

[REDACTED]

Q32

Your contact address

[REDACTED]

Q33

Your Postcode

[REDACTED]

Q34

Respondent skipped this question

What is your Gender Identity?

Q35

Respondent skipped this question

Age

Q36

Respondent skipped this question

Ethnicity

Q37

Respondent skipped this question

Do you consider yourself to be disabled?

Q38

Respondent skipped this question

What is your sexual orientation?

Q39

Respondent skipped this question

What is your religion or belief?