

Our ref: Q220039

Your ref: [REDACTED]

Date: 19 May 2025



Preferred Option Consultation
Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR

Dear Madam/Sir

Rugby Borough Council Regulation 18 Draft Local Plan Preferred Options Consultation

We write on behalf of our client, Frasers Group, to submit representations to the Rugby Borough Council Regulation 18 Draft Local Plan (hereafter the "Draft Local Plan").

Originating as a small sport and ski shop in Maidenhead in 1982, Frasers Group is now a major UK high street retailer, with over 1,000 stores in the UK, around half of which are in town/city centres and a large number of those are in priority centres.

The Frasers Group recently received planning permission Ref No 23/1027 for an employment led campus development at Crouner Fields Farm and Home Farm, Ansty, Warwickshire.

Site 95 Proforma

It is very encouraging to see that the land at Crouner Fields Farm and Home Farm, Ansty (Site 95) has been identified as a potential employment allocation.

Site 95 is located at the junction of the M6, M69 and A46 which are part of the Strategic Road Network. Although some distance from Rugby town centre, the site is adjacent to the boundary of Coventry. Site 95 is also near Ansty Business Park which currently has sustainable transport links to Coventry and the surrounding area. The site is in a strategic and sustainable location that offers a genuine choice of transport modes.

We have reviewed the draft proforma and have one comment to make regarding the following text:

"Provision of a 20ha open space buffer to Ansty together with a further 28 ha of open space in corridors through the development"

We do not have an issue with the text relating to the provision of a 20ha open space buffer to Ansty. This is the key area that needs protecting. However, we do not consider that the requirement to deliver a specific hectareage of open space in corridors beyond this buffer is necessary or justified.

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We completely agree that green corridors should be provided through the development. However, the provision of such green corridors can be provided for through amended text – which does not require specific hectareage to be identified. We request that the draft text is amended as follows:

“Provision of a 20ha open space buffer to Ansty together with sufficient open space in corridors through the development”.

This amendment allows for a degree of flexibility in design while ensuring that the key development requirements – open space corridors – are to be provided for. The design would need to demonstrate that such corridors are sufficient to mitigate impacts arising.

Draft Policy CL1

Frasers Group are committed to delivering developments that achieve best practice limits for both operational and embodied carbon in buildings and are delivering an exemplar scheme.

With this in mind, we have reviewed Draft Policy CL1 which sets out the Council's proposed policy to deliver net zero carbon buildings.

Our review takes account of the most recent best practices in the industry aligned with the UK Net Zero Building Standard (“UKNZBS”) which is currently in trial as a pilot version. The standards, which set limits relevant to the objectives of Draft Policy CL1 were subject to extensive industry wide consultation and therefore represent sound evidence based for comparison against the specific metrics given in Draft Policy CL1.

Draft Policy CL1 Net zero buildings. FG comment: No reference is made to embodied carbon in this policy. This is an omission and therefore this policy cannot reasonably be noted as ‘Net-Zero Buildings’ without embodied carbon being addressed.

- A. New buildings comprising one or more dwellings and new non-residential buildings of 100m² gross internal area or more must be designed and built to be net zero carbon in operation. To achieve this, new buildings must:*
- i. be ultra-low energy,* FG comment: Noted no comment
 - ii. be fossil fuel free, and* FG Comment: This is noted but exceptions need to be made for emergency and life safety systems, essential back-up systems serving buildings with functions of critical importance, such as in hospitals, police stations and water treatment plants as examples, as well as essential back-up systems serving data centres or critical server infrastructure.
 - iii. generate at least the same amount of renewable electricity on-site as the electricity they demand over the course of a year, such demand including all regulated and unregulated energy use, or* FG Comment: This is very onerous and no such limits are set by the UKNZBS for example, which sets renewable energy generation targets (see iv comment below) and requires procurement of electricity from certified renewable sources to make up the balance.



- iv. *if iii is not technically feasible, on-site renewable energy generation should equal 120kWh per square metre of building footprint per year.* FG Comment: This is an unreasonable policy requirement. To contextualize this, a 5,000sqm footprint logistics building would require 800kWp PV array (c.3,600sqm) and costing £800,000. A 3-bed 2-storey house with a 60sqm footprint would require 9.6 kWp (c.45sqm) and costing £10,000. This poses a significant viability and feasibility challenge for all development types. The UKNZBS sets targets for central England as 65kWh/sqm of building footprint for single storey family homes and industrial uses, and 40kWh/sqm for other building types. The draft policy significantly exceeds this generation requirement and will not be possible to meet for most building types.

In our view, Part iii and iv would put severe feasibility and viability constraints on development coming forward in the Borough. Our suggestion would be to consolidate iii and iv and just have a kWh/m² target as per UKNZCBS, which would be viability tested. The policy could then note; *“where possible energy for the development should be procured in line with the latest UKGBC: Renewable Energy Procurement guidance. Where not viable or feasible, justification in writing should be provided to the Council”*

B. To help achieve criterion A.i. above, new dwellings shall achieve:

- i. *a maximum space heating demand of 15kWh/m² /yr or for bungalows 20kWh/m² /yr; and*
- ii. *total Energy Use Intensity (EUI) of no more than 35kWh/m² /yr.*
- iii. *On major housing developments, the EUI requirement in (ii) above may be achieved as a site wide average provided that no single dwelling exceeds an EUI of 60kWh/m² /yr.*

C. To help achieve criterion A.i. above, new build non-residential buildings shall achieve:

- i. *a maximum space heating demand of 20kWh/m² /yr; and*
- ii. *a maximum total EUI of 70kWh/m² /yr for schools and offices; or 35kWh/m² /yr for warehouses and light industrial uses (without refrigeration/conditioning); or a maximum regulated-energy-only EUI of 40kWh/m² /yr for all other uses.*

FG Comment: The evidence base for establishing these targets is unclear and we note that the evidence based for Draft Policy CL1 has not been released as part the Draft Local Plan Consultation. Our recommendation is to align with the UKNZBS and/or set progressively ambitious targets on a year-by-year basis as per standard (or very five years) up to end of the Local Plan.

D. Proposals that are built and certified to Passivhaus Classic or a higher Passivhaus standard will be deemed to meet space heating demand and EUI requirements under paragraph B and/or paragraph C. Demonstration of compliance with the requirements in paragraph A for development to be fossil fuel free and for onsite annual renewable energy



generation capacity to at least equal annual energy demand will still be required. FG: No comment.

Paragraph 36 of the National Planning Policy Framework (NPPF) (2025) is clear that Local Plans are only considered “sound” if they are positively prepared, justified, effective and consistent with national policy. In our view Draft Policy CL1 as currently drafted does not meet these tests and needs to be amended accordingly or the plan risks being found unsound.

We hope the above is clear and look forward to reviewing the next iteration of the Draft Local Plan.

Yours faithfully

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