



For and on behalf of
S & D Postlethwaite

**Rugby Local Plan Review
Response to Preferred Options Consultation**

Land at Ryton Fields Farm

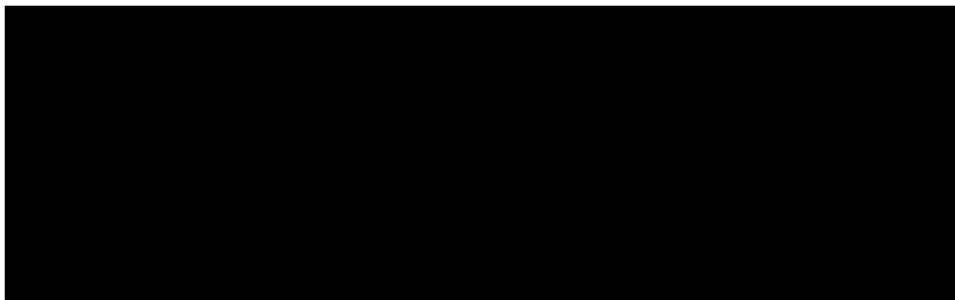
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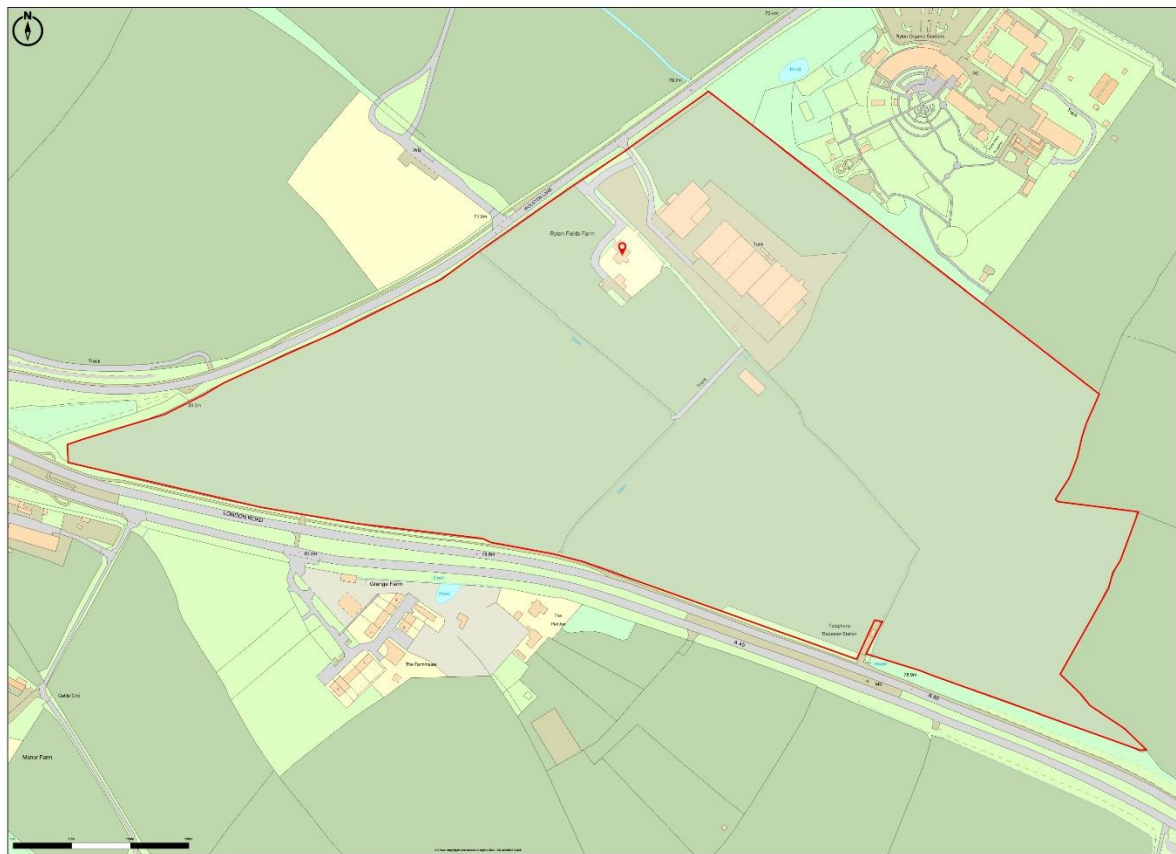
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1.0 INTRODUCTION

- 1.1 Rugby Borough Council is currently undertaking a Regulation 18 consultation on the Preferred Options for the emerging Local Plan, which commenced on 24th March and will run until 5pm 19th May 2025.
- 1.2 These representations have been prepared by DLP Planning Ltd on behalf of S & D Postlethwaite in response to Rugby Borough Council's Local Plan Review – Preferred Options Consultation. The representations relate to the promotion of Land at Ryton Fields Farm outlined in the figure below. The Ryton Fields Farm site is being promoted as being suitable, available and achievable for an employment allocation of 22.8 ha, or a potential 63,000 sqm, of E(i-iii), B2 and B8 floorspace.

Figure 1: Approximate Location of Site



Source: DLP mapping

- 1.3 DLP Planning has previously promoted the Ryton Fields Farm site through the Regulation 18 Issues and Options Consultation in January 2024 and Call for Sites (Site Reference: 2). However, the decision was made not to allocate the land for employment. The Council's principal reasons for not progressing the site beyond the Stage 2 Site Assessment, as detailed in the Rugby Borough Stage 2 Site Options Assessment report (March 2025), include its lack of proximity to existing built development and a combination of other constraints affecting the site, including ecology, Green Belt and agricultural land classification. These factors will be addressed within these representations. Further evidence



of the site's suitability, availability and achievability is presented in **Appendix 1**, **Appendix 2** and **Appendix 3** which are attached to the end of this report.

2.0 NATIONAL POLICY CONTEXT

2.1 The National Planning Policy Framework (NPPF) provides the framework within which local plans should be created. The most up-to-date version of the NPPF was released in December 2024. Local Plans should align with the NPPF's principles and priorities including those of the presumption in favour of sustainable development and plan-making requirements.

a) Presumption in Favour of Sustainable Development

2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision taking (Paragraph 11). For plan-making, this means:

- (a) *"All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- (b) *Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - (i) *The application of policies in this Framework that protects areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development*
 - (ii) *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

b) Plan-making

2.3 Paragraphs 15 to 38 of the Framework relate specifically to 'plan-making'.

2.4 Paragraph 15 states that the planning system should be genuinely plan-led. Plans should provide a positive vision for the future of each area including addressing other economic, social and environmental priorities.

2.5 Paragraph 20 requires that the strategic policies should set out an overall strategy for the pattern, scale and quality of development, making sufficient provision for employment development.

2.6 Paragraph 32 requires that the preparation of policies should be underpinned by relevant up-to-date, adequate and proportionate evidence and take into account relevant market signals.

2.7 Paragraph 36 states that plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are;

- (a) **"Positively prepared** - *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- (b) **Justified** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

- (c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- (d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”

c) Building a Strong, Competitive Economy

2.8 Paragraphs 85 to 89 relate to ‘building a strong, competitive economy’.

2.9 Paragraph 85 requires that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

2.10 Paragraph 86 states that planning policies should:

- (a) “Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration;
- (b) Set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- (c) Pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;
- (d) Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- (e) Be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.”

2.11 Paragraph 87 requires that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

3.0 LOCAL PLAN – S3 STRATEGY FOR EMPLOYMENT LAND

- 3.1 On behalf of our client S & D Postlethwaite these representations propose that Policy S3 Strategy for Employment Land and the accompanying text be clarified and amended to ensure it is fully effective and justified.
- 3.2 The strategy as currently drafted raises several concerns, particularly regarding the lack of clarity surrounding the listed sites, the unmet needs of Coventry and the needs of the wider functional economic market area (FEMA) which includes the local authorities of Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Stratford-on-Avon District Council and Warwick District Council.
- 3.3 The Coventry and Warwickshire HEDNA (November 2022) identifies an overall employment land need in Rugby for the period 2021 to 2041 of 155.7 hectares (ha), comprising 5.2 ha land for offices and 150.5 ha land for general industrial uses (B2/B8 units under 9,000 sqm) (HEDNA, Table 15.2).
- 3.4 The requirement for strategic industrial uses (B8 units over 9,000 sqm) is specified as a total requirement figure for the whole Functional Economic Market Area (FEMA) of 551 ha.
- 3.5 Both of these figures include a flexibility margin to allow for the potential delay in some sites coming forwards, current low vacancy rates, and the potential for increases in future demand in excess of the forecasts (Paragraph 11.13, HEDNA 2022).
- 3.6 Policy S3 Strategy for Employment Land allocates 284 hectares of floorspace for use classes E(g)(ii), E(g)(iii), B2 and B8 in the below locations:

Table 1: Locations of Delivery for E(g)(ii), E(g)(iii), B2 and B8

Site Name	Approximate Square Metres of Floorspace 2024-2045
Prospero Ansty and Ansty Park	26,663 sqm
Symmetry Park, Thurlaston	83,541 sqm
Coton Park East	26,421 sqm
Padge Hall Farm	136,350 sqm
Employment Planning Permissions on Small Sites as at 1 April 2024	14,012 sqm
New Allocations	
Coton Park East, Rugby	115,000 sqm
South West Rugby Employment Phase 2	130,000 sqm
North of Ansty Park	75,000 sqm
Crowner Fields Farm and Home Farm, Hinckley Road, Ansty	275,000 sqm
Prologis Park West and Mountpark, Ryton-on-Dunsmore	350,000 sqm

- 3.7 It is not made clear within the Preferred Options Consultation Document where the four sites of Prospero Ansty and Ansty Park; Symmetry Park, Thurlaston; Coton Park East; and Padge Hall Farm are sourced from. Only one of the sites (Coton Park East) is identified in the HELAA

and none are listed in the Stage 2 Site Options Assessment. The wording should be clarified to explain where the inclusion of these sites has originated.

- 3.8 Though the 155.7 ha minimum requirement is exceeded, it is not clear within the document whether the unmet need for Coventry as well as an appropriate share of the FEMA requirement of 551 ha on strategic industrial sites is met. It is unclear which (if any) of the existing and proposed allocation sites and existing commitments are contributing to the overall requirement for strategic industrial floorspace, and therefore how much of the remaining allocations/commitments are intended to meet local employment land needs. We therefore **object** to Policy S3 on the basis that the amount of employment land being allocated within Rugby is not justified. It is important that the Council continues to work with its neighbouring authorities to ensure that the wider strategic needs of the sub-region and any unmet needs of neighbouring authorities within the FEMA (such as Coventry) are met, in accordance with Paragraph 26 of the NPPF.
- 3.9 The broad location of Ryton is considered suitable to address Coventry's unmet needs given its location close to Coventry, its airport and its good access to A roads and motorways. The location has synergies with existing and recent employment developments on the city's southeastern edge.
- 3.10 4.4 ha of use class E(g)(i) office floorspace is identified in the supply in Paragraph A of Policy S3 against a requirement of 5.2 ha (which includes a margin for flexibility). The majority of this comes from the 18,000 sqm of floorspace at Crouner Fields Farm, Ansty, which is the only allocation to include office floorspace. Paragraph 1.10 within the Preferred Options Consultation Document states they have only included one new allocation for office use because the existing supply of office floorspace considerably exceeds the identified requirement.
- 3.11 Therefore, having only one office allocation across the Borough between 2024-2045 which does not meet the identified minimum need by the HEDNA of 5.2 ha without further justification and clarification within the Consultation Document is not sufficient and not compliant with national policy. We therefore **object** to Policy S3 on this basis that it is neither positively prepared nor consistent with national policy because the amount of office floorspace being allocated is less than the requirement set out in the evidence base.
- 3.12 The Ryton Fields Farm site is proposed to include over 7,200 sqm of E floorspace including office E(g)(i) floorspace. This will help meet the identified remaining office floorspace needs. It will also support the requirement of the Local Plan to plan positively, which is outlined in Paragraph 16b of the NPPF.
- 3.13 Overall, Policy S3 would meet the tests of soundness if additional office floorspace were allocated to ensure that the minimum 5.2 ha requirement is met over the plan period. It should also be clarified what proportion of the allocated sites are contributing towards meeting the unmet needs of Coventry and the 551 ha strategic industrial floorspace that is required across the FEMA.
- 3.14 The Ryton Fields Farm site is appropriate to address both the unmet needs of Coventry and the need for office floorspace. Regardless of whether the existing supply of office floorspace is sufficient, providing only one allocation does not meet the needs of businesses across the District as it fails to provide choice and flexibility in the market and serves only to meet the needs of businesses which are able to relocate or grow-on to the Ansty site.

4.0 LOCAL PLAN – S7 EMPLOYMENT ALLOCATIONS

- 4.1 On behalf of our client S & D Postlethwaite these representations propose that Policy S7 Employment Allocations should be amended to include further allocations addressing the needs set out within the evidence base documents including the 2022 HEDNA to align with existing policies and strategies within the Ryton-on-Dunsmore Neighbourhood Plan (2018-2031) and the Rugby Economic Strategy (2025-2035).
- 4.2 As stated in paragraph 2.27 of the HEDNA (2022), *“Across the sub-region, 80% of businesses have less than 10 employees and 99.6% are Small and Medium-Sized Enterprises with less than 250 employees”*. It is therefore important that the needs of these smaller businesses continue to be met, including through the provision of high quality, small-medium scale units which are capable of meeting flexible employment needs (including a mixture of E(g)(iii), B2 and B8 floorspace) and provide ‘grow-on’ space capable of allowing future business growth.
- 4.3 However, Table A7.1 of the West Midlands Strategic Employment Sites Study 2023/24 outlines a 0% delivery of small units on strategic sites post-2012 in Ryton.
- 4.4 Paragraph 1.8 of the Preferred Options Consultation Document confirms the skewing of recent delivery towards large units for national businesses which has reduced the supply available to local businesses that wish to expand. It states that some of the site allocations under Policy S7 require smaller units.
- 4.5 The need for available and affordable grow-on space is continually identified as an inhibitor to growth and as a reason for businesses relocating out of the borough in the Rugby Economic Strategy (2025-2035). It details how new employment sites in the Local Plan have focused on large units resulting in a lack of supply of small and grow-on space units. The Strategy states that the allocation of small unit space in the emerging Local Plan will be used to ensure the delivery of high quality small to medium size industrial space in accessible locations. However as outlined in Table 2, the new allocations are large.
- 4.6 The Ryton-on-Dunsmore Neighbourhood Plan (2018-2031) also emphasises the need for smaller units as parishioners have been clear in their desire for any new employment initiatives to be small-scale such as offices, which the proposed Ryton Fields Farm site includes.
- 4.7 The Neighbourhood Plan approach is consistent with National Policy in terms of providing a range of small-scale accommodation. As set out in Paragraph 88 of the NPPF, the sustainable growth and expansion of all types of business in rural areas should be enabled through planning policies and decisions. This includes providing suitable accommodation for smaller business to operate and expand into to support existing local businesses within Rugby District.
- 4.8 The Preferred Options Consultation Document allocates 5 sites for employment use which are detailed below:

Table 2: Allocated Sites in the Preferred Options Consultation Document

Site ID	Site Name	Allocation	Site Area
64	Coton Park East, Rugby	Circa 115,000 sqm of floorspace for employment use	35.97 ha
17	South West Rugby Employment Phase 2	Circa 130,000 sqm of floorspace for employment use	40.70 ha
14	North of Ansty Park	Circa 75,000 sqm of floorspace for employment use	36.94 ha
95	Crowner Fields Farm and Home Farm, Hinckley Road, Ansty	Circa 275,000 sqm of floorspace for employment use in use classes B2, B8, E(g)(ii) or E(g)(iii) and circa 18,000 sqm of use class E(g)(i) office space	112.18 ha
328	Prologis Park West and Mountpark, Ryton-on-Dunsmore	Circa 350,000 sqm of floorspace for employment use	171.68 ha

- 4.9 The allocations made in the Preferred Options Consultation Document are few but of substantial sizes, particularly Prologis Park West and Mountpark which is also in Ryton-on-Dunsmore.
- 4.10 Despite the need for allocations to provide smaller and medium-sized units as outlined in Paragraph 1.8 of the Consultation Document, the sites provide little floorspace for small and medium units according to the Employment Allocations Annex. Coton Park East will provide only 4,000 sqm of space in smaller units of up to 1,500 sqm for small and medium sized businesses. Prologis Park West and Mountpark site is proposed to provide 8,000 sqm out of a total 350,000 sqm of floorspace in small to medium sized buildings.. The Consultation Document does not provide any further detail on the provision of small and medium sized units on the remaining three sites.
- 4.11 The Ryton Fields Farm site, for comparison, is a 22.8 ha site area with the potential for delivery of over 63,000 sqm of E(i-iii), B2 and B8 floorspace. However, the site is proposed to provide 9,570 sqm of small-medium units under 2,000 sqm. A further 17,300 sqm is proposed comprising units of approximately 5,000 sqm or below. It is therefore evident that Ryton Fields Farm has the potential to address the need for smaller and medium-sized units that are lacking across the Borough, particularly to the west of the Borough and in Ryton-on-Dunsmore. Given its smaller size, it is also highly deliverable and immediately available to meet an identified need.
- 4.12 Therefore, we **object** to Policy S7 as it is not consistent with National Policy and is not positively prepared as it does not meet the needs for smaller businesses identified in the evidence base (HEDNA, 2022). The Council therefore should look to allocate sites which would provide a range of small and medium-sized units as well as grow-on space in rural areas including Ryton. This will help support existing businesses to grow locally which is as important as attracting new businesses to the borough.
- 4.13 The high-level masterplan accompanying this submission demonstrates how Ryton Fields



Farm can accommodate a mix and choice of unit sizes to enable existing local businesses to expand as well as generating its own demand for new floorspace.

5.0 LOCAL PLAN – POLICY E2 EMPLOYMENT DEVELOPMENT

5.1 Policy E2 Employment Development outlines the conditions for development within and outside of settlement boundaries. Policy E2, as currently drafted, is not positively prepared due to its lack of regard for rural employment sites outside of settlement boundaries. The policy should be amended to align with evidence documents and existing policies such as the Rugby Borough Economic Strategy (2025-2035).

5.2 Paragraph A of the policy states:

“Within settlement boundaries but outside of Strategic Employment Sites and employment allocations the development of employment uses will be permitted, subject to compliance with other policies of this plan.”

5.3 The accompanying text of Paragraph 3.4 states that *“Paragraph A of the policy supports the delivery of units for small and medium sized businesses in line with the Rugby Borough Economic Strategy.”*

5.4 However, the Rugby Economic Strategy (2025-2035) contains the following on rural business and economy:

“The Local Plan will also ensure that whether urban or rural there are policies to support the local economy so that businesses can prosper, the town centre is regenerated, rural businesses can diversify, and leisure and tourism opportunities are promoted.”

“Achieving a buy-local culture among residents and businesses with greater connectivity between our rural and urban micro-economies so that money circulates within the Borough as much as possible.”

“Outside of Rugby town, the main rural settlements of... Ryton-on-Dunsmore have also seen major housing developments”

“Rugby Gateway and Symmetry Park have involved the change of use of substantial tracts of agricultural or otherwise rural land which has been necessary to support businesses and bring the jobs necessary to support the expanding population.”

5.5 It is therefore evident that the Economy Strategy (2025-2035) outlines the need for rural employment development and for policies within the Local Plan to reflect this. It also acknowledges that the change of use of substantial tracts of agricultural land has been necessary to support needed business and jobs.

5.6 The first two quotes from the Economic Strategy (2025-2035) conflict with the draft policies as Policy E2 prevents any small-scale employment development in rural areas which would allow rural businesses to diversify and prosper. Employment development only within settlement boundaries would not support the circulation of money within the Borough, widening the divide between urban and rural areas.

5.7 The third quotation emphasises the need for employment land surrounding Ryton-on-Dunsmore. The growth in the population increases the number of jobs required to serve the local area.

5.8 Rugby Gateway and Symmetry Park have provided over 200,000 sqm of employment land on what was agricultural land for which the Economic Strategy (2025-2035) acknowledged

as being necessary to support businesses and support the expanding population. The Ryton Fields Farm proposal would transform significantly less agricultural land (22.8 ha of land, which includes existing on-site buildings, or 63,000 sqm of floorspace) for a potentially vital gain in rural employment and provision for local businesses. The development of agricultural sites outlined in the Strategy (2025-2035) as being needed to support businesses and jobs contradicts with draft Policy E2 paragraph E(i) which would only permit development for employment uses where it would not undermine the continuance of an existing viable agricultural use. The remainder of draft paragraph E is also contradicted by the Economic Strategy (2025-2035).

- 5.9 The NPPF also supports the need for diverse employment in rural areas through both Paragraph 88a and Paragraph 89. Paragraph 88a states that planning policies and decisions should enable *“the sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing and well-designed new buildings.”* Therefore, draft Policy E2 in its current form may not conform with national policy, as paragraph A largely restricts development to within settlement boundaries. This also conflicts with paragraph E of Policy E2 as national policy allows the development of new buildings, rather than just a conversion, on rural employment sites.
- 5.10 Paragraph 89 of the NPPF also conflicts against the policy as it states *“planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.”* This suggests that the Local Plan should enable employment development outside of settlement boundaries, meaning paragraph A may not be compliant with national policy.
- 5.11 Additionally, Paragraph C of Policy E2 is restrictive as it would not easily allow office uses on Strategic Employment Sites or employment locations. The Paragraph states that *“Office proposals on Strategic Employment Sites or employment locations will be permitted where there are (in accordance with Policy C2) no sequentially preferable sites available or where it can be demonstrated that the office would be genuinely ancillary in size and function to an existing employment use.”* As outlined in the earlier chapter on S3 Strategy for Employment Land, the supply of office accommodation in employment allocations does not meet the minimum requirement as set out in the HEDNA. We therefore believe greater flexibility within the policy is necessary to allow for the greater development of office floorspace.
- 5.12 To conclude, we **object** to Policy E2 in its current form as it contradicts both national policy (NPPF) and local evidence of employment needs (Rugby Economic Strategy 2025-2035). The draft policy does not support employment development in rural areas despite wider local policy striving to support rural businesses and employees.
- 5.13 Paragraph A of the policy should be amended to be more flexible with locations close or adjacent to settlement boundaries in line with the NPPF 2024. We would then agree with Paragraph 3.4 within the text which states that Paragraph A supports the delivery of units for small and medium sized businesses in line with the Rugby Borough Economy Strategy.
- 5.14 Paragraph C of the policy should be amended to be more flexible in allowing office developments to come forward on Strategic Employment Sites or employment locations, regardless of whether the office would be ancillary or whether sequentially preferable sites are available.
- 5.15 Paragraph E of the policy should also be amended as in the cases of the much larger Rugby Gateway and Symmetry Park, development of agricultural land was necessary to support

businesses and bring the jobs necessary to support the expanding population. The policy should include a caveat to support development for employment uses outside of settlement boundaries where there is an identified need for jobs to support the population. This could refer specifically to smaller or medium employment sites.

6.0 LOCAL PLAN – POLICY E3 RURAL ECONOMY

6.1 On behalf of our client S & D Postlethwaite these representations **object** to Policy E3 Rural Economy in its current form as this fails to comply with Paragraph 88a of the NPPF 2024. The draft Local Plan is therefore not currently consistent with national policy.

6.2 Paragraph 88a and 88b of the NPPF state:

“Planning policies and decisions should enable:

- a) The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;*
- b) The development and diversification of agricultural and other land-based rural businesses...”*

6.3 Paragraph A of the Policy E3 presents the forms of development which are acceptable in principle both in and outside of rural settlement boundaries, subject to their compliance with other policies of the plan:

- “i. small-scale tourism, visitor accommodation and leisure-based uses including sport and recreation;*
- ii. small-scale expansion of existing holiday caravan/chalet sites;*
- iii. garden centres and nurseries;*
- iv. equine and equestrian development;*
- v. agricultural and forestry buildings;*
- vi. new canal-based facilities, but, where such facilities are outside of settlement boundaries, not including permanent residential moorings.”*

6.4 The NPPF emphasises the need for diverse uses in rural areas which includes the sustainable growth of all types of business through both conversion of existing buildings and well-designed new buildings. It also supported the need for diversification of agricultural and rural businesses. Policy E3 does not currently permit all types of business in rural areas, and focuses largely on tourism, leisure and agricultural employment uses. Therefore, Policy E3 is currently not consistent with national policy.

6.5 As outlined in Paragraph E of Policy E3, the diversification of farms will only be permitted where:

- “i. best and most versatile agricultural land is avoided;*
- ii. new uses are subservient in scale to the main agricultural use; and*
- iii. existing buildings are used if possible”*

6.6 The policy is too restrictive, particularly in points ii. and iii. which significantly limit diversification in terms of requiring the use to be primarily agricultural. However, Paragraph 88b of the NPPF, as outlined above, states that planning policies should enable the diversification of agricultural and other land-based rural businesses. It also outlines the need for existing buildings to be used if possible, despite Paragraph 88a supporting the development of well-designed new buildings in rural areas.

6.7 The Rugby Borough Economic Strategy (2025-2035), as discussed above, outlines how farms and agricultural land have previously been transformed on a large scale necessary to support businesses and bring the jobs necessary to support the expanding population. Rural

areas of the Borough including Ryton-on-Dunsmore have seen major housing developments as discussed above, and so to support the growing population, a clause within Paragraph E should be included to allow for the development of small and medium scale employment sites on agricultural land close to settlements where major housing developments have been completed.

- 6.8 To conclude, we **object** to Paragraphs A and E of Policy E3 Rural Economy as it is not consistent with Paragraph 88a and 88b of the NPPF. Paragraph A should be amended to include the allowance of small and medium scale Class E, B2 and B8 uses as the NPPF states planning policies should allow for the development of all types of business in rural areas. Paragraph E should therefore be amended to provide greater support for the diversification of farms for employment use, as has occurred previously at Rugby Gateway and Symmetry Park. The policy should also include a clause for diversification to be permitted for small and medium scale employment developments where necessary to provide for population growth resulting from major housing developments.
- 6.9 Given the suggested amendments, it is necessary to reword Paragraph 3.8 to allow for uses within Class E as this currently states that the reference to leisure-based uses in Paragraph A and farm diversification in Paragraph E do not include uses within Class E. Class E employment land includes office, R&D and light industrial floorspace. As the office floorspace proposed for the allocated sites falls below the requirement identified in the HEDNA (2022), it is particularly important that employment in rural areas allows for the delivery of a sufficient amount of office space to meet local business needs.

7.0 STAGE 2 SITE ASSESSMENT REPORT

- 7.1 The Ryton Fields Farm site (Site 2) was not progressed beyond the Stage 2 Site Assessment as detailed in the Rugby Borough Stage 2 Site Options Assessment – March 2025. The site was evaluated against a range of topic areas including transport, ecology, landscape, heritage, other constraints and the opportunities/benefits the site would provide.
- 7.2 The Council's reasoning as to why the site was not progressed is as follows:
- "The site comprises arable and pastoral fields with industrial buildings and a residential property east of Ryton-on-Dunsmore. Landscape sensitivity is low and heritage constraints have not been identified. The site is within the Green Belt. The principal reasons for not progressing the site are its lack of proximity to existing built development and the combination of other constraints affecting the site, including ecology, Green Belt and agricultural land classification. Although not the worst site for accessibility, it is unclear how safe, convenient bus or pedestrian access could be achieved. Additionally, the site comprises very good quality agricultural land."*
- 7.3 We **object** to the Council's assessment of the Ryton Fields Farm site.
- 7.4 It is agreed that the landscape sensitivity of the site is low as the surrounding road network detracts from the overall landscape value of the site. Views of the proposed new buildings are predominantly obscured from the Public Right of Way Network and there are no designated heritage assets identified within 50m of the site. Ryton Fields Farm has also not been recognised as a site of environmental significance within the Ryton-on-Dunsmore Neighbourhood Plan (2018-2031), and so the impacts of the development on landscape would be minimal.
- 7.5 One of the Council's principal reasons for not progressing the site was its lack of proximity to the existing built development. We believe that this is an unfair evaluation as the site lies directly west of existing development including Coventry University Ryton Gardens. The site also lies directly east of the A45 so existing development in the form of key infrastructure is in close proximity to the site. In terms of nearby settlements, the south of Ryton-on-Dunsmore (Leamington Road) is located just 0.5 miles from the site whilst the south-east of Wolston is just under 1 mile away. These settlements are close enough in proximity to provide a sufficient labour force and minimise commuting distances.
- 7.6 Paragraph 89 of the NPPF 2024 also states that *"planning policies and decisions should recognise that sites to meet local businesses and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport."* Therefore, the 'lack of proximity to existing built development' is not a satisfactory principal reason for not progressing the site according to national policy.
- 7.7 Other constraints affecting the site including ecology are also listed as a principal reason for not progressing the site. However, the evaluation summary within the ecology topic area states that the site has the potential to be taken forward for development subject to demonstrating that there would be no adverse effects upon Brandon Marsh SSSI or the LWS through sensitive site design and the adoption of appropriate mitigation measures. Therefore, ecology is not a key constraint on the site subject to appropriate assessment and action.
- 7.8 Though the agricultural classification is Grade 2 or 'Very Good', it is not the highest classification. This means that it has minor limitations according to the Agricultural Land Classification (ALC) system. There is more highly productive agricultural land in the form of

Grade 1 throughout Rugby Borough.

- 7.9 Access, particularly in terms of public transport and for pedestrians, is also one of the reasons as to why the site was not progressed. We believe the evaluation is unfair and that there is exiting public access to the site. Though we acknowledge that there are some slight constraints at present, there is potential to improve the sustainability of access.
- 7.10 It is important to emphasise the excellent accessibility the site has to its close proximity to the local, principal and wider strategic road network. Access to the A45 London Road dual carriageway is via the roundabout junction immediately to the west of the site. From this roundabout, the A45 continues east for approximately 7.5km to join the strategic road network at the M45 Thurlaston Interchange roundabout.
- 7.11 To the west of the site, the A45 continues for approximately 3km northwest to meet the A46 Stonebridge Hayway, which provides an outer bypass around the boundary of Coventry. From here the eastern element of the bypass continues north for approximately 7.5km and provides access to J2 of the M6. Alternatively, the bypass continues west around the southern boundary of Coventry to provide an alternative link to the M6 at J4.
- 7.12 The dualling of the A45 in the vicinity of the site and the direct links to the wider strategic road network ensures appropriate capacity is provided to accommodate potential development traffic.
- 7.13 In terms of walking and cycling, there is an existing shared footway/cycleway provided on the northern side of Wolston Lane immediately to the north of the site. This shared facility continues west to the Ryton Roundabout where uncontrolled crossings are provided across all arms of the junction. These crossings facilitate access to the wider pedestrian/cycle/shared route network which continues south into the residential area of Ryton-on-Dunsmore (650m away) and west adjacent to the A45 towards Coventry.
- 7.14 To the east of the site the shared footway/cycle continues to provide a sustainable travel link into the residential area of Wolston which lies 1 mile away.
- 7.15 In terms of public transport, the closest stops to the site are provided on Leamington Road in Ryton on Dunsmore approximately 750m to the south of the site. These stops are served by route numbers 25/25A/25X which combine to provide up to 6 two-way services between Coventry and Rugby during the day Monday – Saturday.
- 7.16 Discussions with the key bus service operators will take place regarding potential extensions and enhancement to existing routes to bring services in to or closer to the site via the potential provisions of new stops on Wolston Lane.
- 7.17 In terms of access to local facilities, a Primary School, convenience store and a number of public houses are provided in Ryton on Dunsmore to the west of the site. Sustainable access to these facilities is via the shared footway/cycleway and existing crossing points over the A45 London Road. Further local facilities are provided in the residential area of Wolston to the northeast of the site including a Primary School, doctors surgery, convenience stores, public houses, Wolston Village Hall and Library.
- 7.18 To ensure that a sustainable development can be provided, appropriate crossing facilities would be provided as part of the wider site access design to facilitate safe pedestrian and cycle movements between the existing shared walking/cycle facility on Wolston Lane and the site.

- 7.19 The Rugby Economic Strategy (2025-2035) confirms that improvements and investment in cycle and walking routes would have wider benefits in terms of the visitor economy of Rugby: *“investment in cycling and walking routes is also a key driver for growing the Rugby visitor economy and will develop safe off-road links between our established rural villages.”*
- 7.20 There are a variety of wider constraints and opportunities that should be considered when reviewing the overall suitability of the site to accommodate employment land uses. These are set out in the table below with the potential solution or mitigation for each of the constraints set out in the opportunities box.

Table 3: Access Constraints and Opportunities

Challenge	Opportunity
The site is located outside of the wider residential areas	The existing shared footway/cycleway adjacent to the site could be widened and improved as part of the proposals to improve connections between surrounding residential areas. This would benefit existing residents as well as potential new employees working at the site.
The shared pedestrian/cycle link on the northern side of the Wolston Lane carriageway does not meet current design standards	As above. A ‘to standard’ access could also be provided into the site without the requirement of third party land.
Existing pedestrian/crossing points over the A45 London Road roundabout junction are uncontrolled and may not be attractive to all	The existing crossing points across the A45 London Road could be improved as part of any development to benefit existing residents and new employees.
Bus services in the surrounding area are limited	The existing bus services could, if appropriate be improved including with the provision of new bus stops on Wolston Lane

- 7.21 Therefore, whilst the access constraints are acknowledged, the site is in a highly sustainable location which has the potential to become more accessible for pedestrians, cyclists and those using public transport. Existing access for private vehicles is excellent as the site borders the A45.
- 7.22 Overall, we believe the reasons for which the site was not progressed beyond the Stage 2 Site Assessment are not justified. It is appropriate for the site to be re-evaluated in light of the presented evidence as the Ryton Fields Farm site could be key for addressing the Borough’s evidenced needs which are not being met through existing proposed allocations, including providing sufficient office floorspace, and employment floorspace for small-medium units and grow-on space for local businesses.
- 7.23 Further evidence of the site’s suitability, availability and achievability is presented in **Appendices 1, 2 and 3** attached to the end of this report. This evidence demonstrates that the site is deliverable and a developer (Complex Development Projects Ltd) has been working with the landowner to explore options for bringing this site forward, including undertaking early masterplanning, feasibility testing, and stakeholder engagement. Two local commercial property agents, Holt Commercial and Bromwich Hardy, also set out evidence on the need for sub-5,000 sqm employment units and reasons why the Ryton Fields Farm site is suited for addressing these needs.

8.0 GREY BELT ASSESSMENT OF RYTON FIELDS FARM SITE

8.1 It is noted that the Council's Green Belt Contribution Study has not yet been published and therefore the evidence and justification for the removal of proposed allocation sites from the Green Belt is not yet known. Notwithstanding that this evidence has not yet been published, on behalf of our client S & D Postlethwaite, we have assessed the Ryton Fields Farm site in the context of the grey belt definition and guidance and conclude that it does not strongly perform against Green Belt purposes (a), (b) or (d) and can therefore be considered as grey belt land.

8.2 The concept of grey belt was formally adopted into national planning policy in December 2024 when the latest version of the NPPF was published.

8.3 The definition of grey belt, as stated in the NPPF Annex 2 Glossary, is:

"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. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

8.4 NPPF Paragraph 143 stipulates that the five purposes of the Green Belt are:

- a) *"to check the unrestricted sprawl of large built-up areas;*
- b) *to prevent neighbouring towns merging into one another;*
- c) *to assist in safeguarding the countryside from encroachment;*
- d) *to preserve the setting and special character of historic towns; and*
- e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

8.5 In relation to decision-making, NPPF Paragraph 155 states:

"The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all of the following apply:

- a. *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;..."*

8.6 The Ryton Fields Farm site has been assessed against Green Belt purposes (a), (b) and (d) as set out in Paragraph 143 of the NPPF 2024. The outcome of this grey belt assessment is detailed below:

Table 4: Grey Belt Assessment

Purpose a: To check the unrestricted sprawl of large built-up areas
The site has been assessed as 'weakly performing' against Purpose (a) as per the PPG criteria (Reference ID: 64-005-2025-0225). This is because the assessment area is not adjacent or near to a large built-up area. It should be noted that villages are not considered as large built-up areas under the PPG.
Purpose b: To prevent neighbouring towns merging into one another
The site has been assessed as 'weakly performing' against Purpose (b) as per the PPG criteria (Reference ID: 64-005-2025-0225). This is because the assessment area does not form part of a gap between towns.
Purpose d: To preserve the setting and special character of historic towns
The site has been assessed as 'weakly performing' against Purpose (d) as per the PPG criteria (Reference ID: 64-005-2025-0225). This is because the assessment area does not form part of the setting of a historic town.

- 8.7 Therefore, the site does not strongly contribute to purposes (a), (b) and (d) of Paragraph 143 of the NPPF. The site can thus be considered as grey belt land in line with the definition stated in Annex 2 Glossary.
- 8.8 As the site has been assessed as grey belt land, we further believe the assessment of Ryton Fields Farm in Stage 2 Site Assessment Report to be inaccurate, including the statement that the site is *"likely making a strong contribution to one or more Green Belt purposes"*. This statement has not been justified by any published evidence.
- 8.9 The site should be re-evaluated in light of the evidence presented in these representations, including that the Ryton Fields Farm site is functioning as grey belt land and could therefore be key for addressing the Borough's evidenced needs which are not being met through existing proposed allocations.
- 8.10 Paragraph 148 of the NPPF states *"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations"*. The Ryton Fields Farm site should therefore be prioritised ahead of other non-grey belt sites within the Green Belt when determining which sites should be allocated for employment use.

9.0 ADDITIONAL CONCERNS

- 9.1 On behalf of our client S & D Postlethwaite these representations propose that the definition of 'Employment use' as set out within the glossary of the Preferred Option Consultation Document should be amended to additionally include E(g)(i) office space as an employment use.
- 9.2 The definition states that an employment use is *"a use within Use Classes B2, B8, E(g)(ii) and E(g)(iii) of the Town and Country Planning (Use Classes) order 1987 (as amended). Subject to compliance of the proposed use with Policy C2 (Main town centre uses) use class E(g)(i) will also be an employment use."* Policy C2 Main Town Centre Uses is not applicable to sites outside of a defined settlement boundary.
- 9.3 Therefore, E(g)(i) office space is not defined as an employment use outside of the settlement boundaries. This is not consistent with national policy as the NPPF sets out a requirement for all types of employment development to be enabled in rural areas, which includes businesses requiring office accommodation.
- 9.4 The HEDNA (2022) also sets out a requirement for 5.2 ha of E(g)(i) office employment land whilst only 4.4 ha is included within the proposed employment allocations. Due to not meeting minimum requirements and the lack of positive planning, office floorspace should be supported rather than limited by not including this space within the definition of an employment use.
- 9.5 Therefore, we propose expanding the definition of employment use within the glossary to additionally include E(g)(i) office floorspace.

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Appendix 1 – Employment Allocation Representation – Complex Development Projects Letter

To: Rugby Borough Council

Local Plan Review – Regulation 18 Consultation Response

Date: 19th May 2025

Re: Ryton Fields Farm – Employment Allocation Representation

Dear Sir/Madam,

I write on behalf of Complex Development Projects Ltd (CDP) to express our full support for the inclusion of Ryton Fields Farm as a proposed employment allocation within the emerging Rugby Borough Local Plan.

CDP has been actively working with the landowner at Ryton Fields Farm for the past three to four years, exploring the most appropriate and sustainable route to deliver this site for employment-led development. We have undertaken early masterplanning, feasibility testing, and stakeholder engagement. Although a formal legal agreement is not yet in place, terms are under negotiation and both parties are committed to seeing the site come forward.

CDP is one of the most experienced and active developers in Coventry and Warwickshire, with over thirty years' track record of delivering high-quality, commercially viable regeneration and employment schemes across the region. Our portfolio includes transformational projects such as Leamington's evolving Creative Quarter, the Telegraph Hotel in Coventry, FarGo Village, the Electric Wharf regeneration, and the major new sustainable residential district at Abbotts Park next to Coventry City Centre. We have extensive experience working in partnership with local authorities, landowners and investors to unlock complex sites and deliver long-term economic value. Further information on our work can be found at www.complexdevelopmentprojects.co.uk.

In our professional view, Ryton Fields Farm is a highly deliverable, strategically located, and market-ready site. Its advantages include:

- Direct access to the A45 and strategic road links to the M6 and M69
- Proximity to Coventry, Ryton-on-Dunsmore and Wolston, with excellent labour catchment and infrastructure
- Flexibility to deliver a range of unit sizes, including much-needed SME and grow-on space
- Low landscape and heritage constraints, with scope for sustainable, employment-led development

We are confident that Ryton Fields Farm can play a critical role in addressing the clear and evidenced shortage of flexible employment land, particularly for small and medium enterprises in Class E(g), B2 and B8 uses. It also represents an opportunity to rebalance the supply portfolio currently weighted toward large-format logistics.

If allocated, CDP would move quickly to progress technical work, refined design, and stakeholder consultation. We would aim to bring forward a planning application in short order, subject to agreement with the landowner and relevant partners.

The site's designation as 'grey belt' under the December 2024 NPPF further strengthens the case for allocation. It does not strongly perform against core Green Belt purposes and is well placed to support sustainable economic growth in the borough.

In conclusion, we strongly support the allocation of Ryton Fields Farm in the emerging Local Plan and welcome ongoing dialogue with the Council to help meet shared regeneration and economic objectives.

[REDACTED]

[REDACTED]

8

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Appendix 2 – Supporting Letter from Holt Commercial

Our Ref: NPH/DS/19052025.01

19 May 2025

PRIVATE & CONFIDENTIAL

Rugby Borough Council
Town Hall
Evreux Way
RUGBY CV21 2RR

Dear Sir/Madam

I write in support of the proposed allocation of Ryton Fields Farm for employment use within the emerging Rugby Borough Local Plan.

As a long-standing commercial agent active across the Coventry and Warwickshire market, we at Holt Commercial are acutely aware of the challenges facing local businesses seeking high quality industrial and logistics accommodation - particularly at the smaller and medium end of the market, where supply has become increasingly constrained.

While Rugby and the surrounding area has seen significant strategic-scale development in recent years, these larger schemes often cater to national operators and major logistics occupiers. In contrast, the availability of sub-5,000 sq m employment units suitable for SMEs and growing regional firms has become critically limited.

The Ryton Fields Farm site is ideally situated to address this shortfall:

- It is strategically positioned on the A45 corridor between Coventry and Rugby with strong transport links
- It has the capacity to deliver a range of unit sizes, which the market is actively demanding
- The location benefits from proximity to both a skilled local labour force and established business ecosystems in Ryton and Coventry

We regularly receive enquiries from businesses looking for grow-on space or freehold opportunities that simply cannot be met within current allocations. This lack of choice is driving occupiers away from the borough or stifling their growth ambitions. Sites like Ryton Fields Farm could play a pivotal role in rebalancing supply and supporting indigenous business growth.

It is also important to maintain a geographic spread of employment land to serve different localities and business sectors. Ryton's location complements existing allocations and helps meet the wider economic objectives of the borough and sub-region.

In our view, the site is well placed to attract a wide range of occupiers, would be readily deliverable, and aligns with both local economic need and market demand.

We would therefore encourage Rugby Borough Council to give serious consideration to its inclusion as an employment allocation in the new Local Plan.



Appendix 3 – Supporting Letter from Bromwich Hardy

Dear Sir/Madam,

I am writing as a commercial property agent with extensive experience in the Coventry and Warwickshire sub-region, and as the founding Partner at Bromwich Hardy, one of the leading independent commercial agencies in the Midlands.

I wish to express my **support for the inclusion of the Ryton Fields Farm site** within the emerging Rugby Borough Local Plan as a proposed employment allocation. Based on our active engagement with occupiers, developers, and investors in this market, I can confirm that there is a **continuing and critical shortage of available small and medium-sized employment units** in accessible locations, particularly in the **Coventry-Rugby corridor**.

The site at Ryton Fields Farm is **exceptionally well located** for logistics, light industrial and mixed employment use:

- Immediate access to the **A45 and A46**, and close proximity to **M6 and M69** motorway networks
- Located between **Coventry and Rugby**, both of which are experiencing significant growth pressures
- **Adjacent to existing infrastructure** and within easy reach of a strong local workforce

From a market perspective, we are regularly approached by local and regional businesses seeking high quality, flexible employment space—particularly within the **sub-2,000 sqm and 2,000–5,000 sqm size bands**. These requirements are not being met by the current allocation strategy, which remains heavily focused on large-format units aimed at national occupiers. This skew in supply is well documented in the **West Midlands Strategic Employment Sites Study (2023/24)** and our experience strongly corroborates this.

In addition:

- **Leasehold and freehold demand** from owner-occupiers remains very high
- Vacancy rates remain **extremely low** across modern, well-located stock
- The market requires more **choice of site sizes and geographies**, not just quantity of floorspace

The **Ryton Fields Farm** site can deliver this missing flexibility, supporting:

- Small and medium-sized enterprises (SMEs) looking to grow-on
- Local business retention
- A more balanced spatial and size distribution of employment land supply

Given the site's characteristics, strategic location, and its potential to directly address identified gaps in the local supply pipeline, I consider it to be a **logical, deliverable, and highly marketable** site for employment allocation.

I therefore support its inclusion in the emerging Local Plan and would be happy to engage further should the Council wish to explore commercial delivery potential in more detail.

