

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

via email:

localplan@rugby.gov.uk

19th May 2025

Dear Development Strategy Team,

MAN027/RM/TC/AW

REPRESENTATION: RUGBY BOROUGH COUNCIL REGULATION 18 - PREFERRED OPTION CONSULTATION

These representations have been prepared by David Lock Associates ('DLA') on behalf of our clients, Manse Opus and Rolls-Royce plc, in response to Rugby Borough Council's ('RBC') Preferred Option consultation under Regulation 18, which is open from 24th March to 19th May 2025.

Manse Opus and Rolls-Royce plc fully support RBC's proposed provision for new employment floorspace within the proposed plan period (2024-2045), including 1,026,546 sqm of floorspace for Use Classes B2, E(g)(ii), E(g)(iii) and B8 under draft Policy S3 (Strategy for employment land), as set out in the *Rugby Borough Local Plan Preferred Option Consultation Document (March 2025*).

To further support RBC's proposed employment provision in the next plan period, especially at a strategic and sustainable location within the Borough, these representations address Manse Opus and Rolls-Royce plc's aspirations to:

- 1. Release land to the northwest of Ansty Park from Green Belt and designation as a B2 / E(g)(ii) or E(g)(iii) employment allocation with ancillary E(g)(i) uses in the new Local Plan (referred to as 'the Site'); and
- Amend the Green Belt and Strategic Employment Site Boundary for Ansty Park on the Policies Map for the draft Local Plan

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On the 10th April 2025, a constructive meeting was held with Nicola Smith (Chief Officer for Growth and Investment), Chris Kingham (Principal Planning Officer) and Matthew Fletcher (Economic Development Manager) from RBC to present and discuss the above aspirations. Given the positive feedback from RBC regarding the potential for employment development within the Site, as an expansion of Ansty Park, we strongly believe that releasing the Site



from Green Belt and designating it for employment in the new Local Plan will support RBC's ambitions in the next plan period.

Background

Development of Ansty Park

The land at Ansty Park has historically been used for the manufacturing of aircraft engines and rocket motors by Rolls-Royce plc. Redevelopment as a business park began after obtaining outline planning permission for a 'High Technology Park' in 1992 (planning reference: R/91/0144/14999/OP). The time limit set out as part of the original outline planning permission in 1992 for the submission of reserved matters applications and the commencement of development was extended by subsequent planning permissions granted in 1995, 1998 and 2003. Reserved matters applications were later approved for Phase 1 and subsequently Phases 2a and 2a(i) of the High Technology Park (planning references R04/1312/14999/D, R05/0025/14999/D and R07/1295/MAJP).

As the period for the submission of reserved matters for the 2003 outline permission expired in 2008, an application was submitted and approved to renew the outline planning permission in 2009. The applicant, Advantage West Midlands (Regional Development Agency), also proposed an increase in floorspace from 100,000sq.m to 140,000sqm, (planning reference: R09/0035/MEIA). The approved parameter plan is shown in **Appendix 1**.

In 2017, Manse Opus, in partnership with Rolls-Royce plc, further developed the south of the Ansty Park, now known as '*Prospero Ansty'*. The approved development parameter plan is shown in *Appendix 2*. After receiving outline planning permission in 2021 (planning reference: R19/1540), several developments for B1, B2 and B8 uses have been approved and are built out or being developed.

It has been estimated that by the time *Prospero Ansty* has become fully developed, it could directly generate approximately 5,400 jobs with total earnings of around £173 million¹. The Park has become a market-leading manufacturing and office site of regional and international significance. It is now home for global innovators, blue-chip companies and industry leaders across manufacturing, research and development and includes Meggitt Plc, MTC, Cadent Gas, LEVC and FANUC. Rolls-Royce plc's on-going manufacturing activities in the area continue to play an active and significant role in influencing the importance of Ansty Park as a key regional business park, in addition to their pre-existing aerospace development.

Ansty Park in RBC's New Local Plan process

While some plots in Ansty Park are still to be developed, RBC's Preferred Option Consultation Document (March 2025) proposes to further expand the Park by releasing land to the north east from the Green Belt and allocating it as an employment site under draft Policy S7 (employment allocations). The entire Ansty Park is also proposed to be released from the Green Belt and to continue to be designated as a strategic employment site under draft Policy E1 (employment land protection). This recognises the significant role of Ansty Park as one of the most important business parks in the region and RBC's ambition to build on this success by facilitating further employment development in a strategic location between Rugby and Coventry, supported by the adjacent strategic transport infrastructure.

As continuous occupiers of Ansty Park, Manse Opus and Rolls-Royce plc have been leading and facilitating the development of Ansty Park, and they would like to further support RBC's proposed employment growth at Ansty Park in the next plan period, by proposing an additional

¹ Environmental Statement for the approved outline planning application for *Prospero Ansty* (planning reference: R19/1540)



employment allocation on land to the northwest of Ansty Park, as well as assisting in defining Green Belt boundaries around Ansty Park.

1. Release land to the northwest of Ansty Park from Green Belt and designation as a B2 / E(g)(ii) or E(g)(iii) employment allocation with ancillary E(g)(i) uses in the new Local Plan (referred to as 'the Site');

Manse Opus and Rolls-Royce plc have identified a potential employment allocation at land to the northwest of Ansty Park, which should form part of the proposed expansion of Ansty Park to accommodate employment development within Use Classes B2, E(g)(ii) or E(g)(iii) with ancillary E(g)(i) uses, as shown in *Figure 1* below.

The site area is 6.76ha, which can accommodate around 15,210 sqm of B2, E(g)(ii) or E(g)(iii) floorspace. Any employment development within the Site would be directly accessed from Central Boulevard to the south.



Figure 1. Development Site Plan, Appendix 3 (Source: DLA)

Site Context

As illustrated in *Figure 2* below, the Site is undeveloped land, surrounded by highways and existing employment to the south west and Ansty Park to the east and southeast. Further employment uses are allocated in the new Local Plan to the east of the Site and the recently approved campus to the north at Crowner Fields Farm and Home Farm, Ansty. The Site is currently within the Green Belt and contains some trees, scrub and hedgerow boundaries.

The Site is bordered by the M6 to the north and Central Boulevard to the south. A road gyratory from the M69 is to the west and is elevated above the Site. Central Boulevard is the main access to Ansty Park off the A46 (Coventry Eastern Bypass). Strategically located, the Site is in immediate proximity to Ansty Interchange to the west, as well as Junction 2 on the M6, linking to the M69, A46, A4600, and B4056.



In terms of pedestrian access, the Site is connected to the land to the north of the M6 via a north-south Public Right of Way R31(a).

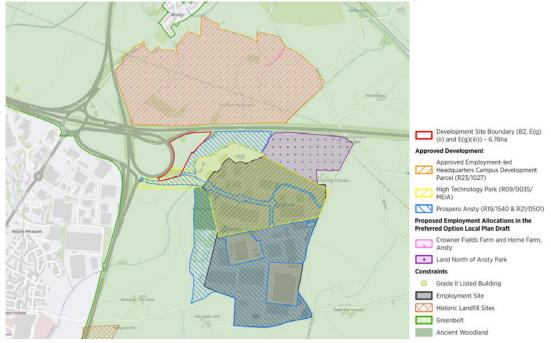


Figure 2. Site Context Plan, Appendix 4 (Source: DLA)

Strategic and Sustainable Location

The Site is in a sustainable location with strong strategic links, and this is demonstrated by the following:

- The sustainable location is acknowledged by the WMSESS², which identifies the Site as Opportunity Area 7 (M6 / A45 / M45 / A46 Coventry / Rugby) for strategic employment development;
- The Site can be connected to the existing pedestrian/cycle network to the south of Central Boulevard which connects to the wider Coventry network;
- There will be future upgraded pedestrian / cycle access via Public Right of Way R31(a), linking to the north as part of the planning permission for the recently approved campus to north at Crowner Fields Farm and Home Farm;
- The Site is surrounded by existing and future employment developments, including Ansty Park to the south and the recently approved campus to the north at Crowner Fields Farm and Home Farm;
- The recent planning permission for the campus headquarters to the north of the Site further reinforces the importance of the locality of the Site as a key regional employment hub, alongside the expansion of Ansty Park, making it an ideal location for future employment developments;
- There are bus stops along Central Boulevard to the south. This service connects Coventry
 City Centre to Ansty Park every half hour from Monday to Friday. Additionally, there are
 up to eight alternative bus services available currently serving the Walsgrave Retail Park
 within 1km (a 10-minute walk); and
- Coventry rail station is the closest station to the Site, approximately 8km to the south west of the Site. The journey time from the Site to the station is approximately 14 minutes

² West Midlands Strategic Employment Sites Study (Aug 2024)



by car. The station has cycle stands that can accommodate 120 cycles. Alternatively, Rugby rail station is located 11km to the south east of the Site with a journey time of 19 minutes by car.

Meeting the Regional Employment Need

The allocation of the Site would help meet regional employment need for the following reasons:

- The HEDNA³ for Coventry and Warwickshire outlines the constraints on industrial land supply in Coventry. Therefore, the unmet employment need in Coventry will need to be met in surrounding districts, including within Rugby Borough. Major schemes close to Coventry, such as Ansty Park, can help to meet this demand;
- The WMSESS anticipates a residual need of 615-977ha of employment land requirements across the West Midlands. The HEDNA sets out a need for 621.9ha of General Industrial and within the Coventry and Warwickshire area between 2021-2050. This Site can make a valuable contribution in addressing this shortfall;
- The Site is directly linked to the 'Employment Site' of Ansty Park within opportunity area
 7 of the WMSESS;
- The HEDNA predicts a need for increased floorspace for the manufacturing sector which could be met by the allocation of the Site for B2, E(g)(ii) and E(g)(iii) uses;
- Expansion of Ansty Park, which will bring further commercial benefits of co-location of facilities and information exchange;
- The combined gross industrial need on larger and smaller sites (deducting existing committed supply is 739,559 sq.m (202.25ha) (TPDN⁴);
- The Site will bring significant economic benefits. Based on the average of 1 job per 36sqm of B2 use floorspace⁵ and mean annual earning of £40,220 per employee in manufacturing industry in West Midlands⁶, with a floorspace of 15,210 sq.m, the site could generate around 423 jobs and total annual earnings of around £17 million.
- The TPDN outlines a need for B1c (E(g)(iii)) / B2 sites;
- The Site can be served from the existing electricity supply grid with sufficient capacity; and
- The Site is accessible to a large workforce in Coventry and beyond.

Green Belt Considerations

Whilst it is understood that RBC's Green Belt Contribution Study is outstanding due to the recent NPPF updates, the Site remains in the Green Belt, following the most recent Local Plan Review.

However, Manse Opus and Rolls-Royce plc strongly believe that the Site no longer contributes to any of the purposes of the Green Belt and should be released for development, as it makes a weak contribution to all the Green Belt purposes set out in paragraph 143 of the NPPF:

(a) To check the unrestricted sprawl of large built-up areas: Although the Site is close to the city of Coventry, it is separated by parcels of open land formed by the road network which are permanent and prominent boundary features. The Site also does not contribute to green belt openness as it is physically enclosed by natural topographical features and

³ The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA)

⁴ Topic Paper Development Needs, RBC, March 2025 (TPDN)

⁵ Employment Density Guide 3rd Edition, Homes & Communities Agency, November 2015

⁶ Earnings and Hours Worked in West Midlands, Office for National Statistics, 2023



visually disconnected from the wider Green Belt both by those features and by the existing road network (in particular, the M69, M6 and Central Boulevard);

- (b) To prevent neighbouring towns merging into one another: The Site does not form part of the gap between towns or large built-up areas, given that it is located between the city of Coventry and Ansty Park, which is not considered a large built-up area. In any case, the southern part of Ansty Park has a well-defined western boundary, including Hill Park Wood and a parcel of ecology land to the south west, which features landscape bunds and structural woodland planting;
- (c) To assist in safeguarding the countryside from encroachment: The Site is bordered by existing development, including the Ansty Park to the east and southeast, and is enclosed by a defined road network. It lacks openness, rural character and landscape that are associated with countryside. Therefore, any development on site would not constitute encroachment into the countryside.
- (d) To preserve the setting and special character of historic towns: The Site does not form part of the setting of a historic town and has no visual, physical, or experiential connection to the historic aspects of Coventry, as it is bounded by existing road network; and
- (e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: While the Site is not previously developed land, its location, bounded by road infrastructure and adjacent to existing development at Ansty Park, limits its effectiveness in fulfilling the broader Green Belt purposes. As such, the Site does not direct pressure away from developing open countryside or toward urban regeneration opportunities. Therefore, retaining it within the Green Belt does not meaningfully contribute to this purpose.

Therefore, Manse Opus and Rolls-Royce plc consider that the Site no longer contributes to any of the purposes of the Green Belt and should be released for development.

Grey Belt Considerations

Notwithstanding our view that the Site should be allocated as employment land and released from the Green Belt, in the event that neither of those proposals are accepted by RBC, the Site could also be considered as meeting the definition of grey belt. In the NPPF⁷, 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.'

As the Site does not strongly contribute to all Green Belt purposes, including the three purposes that are relevant to defining grey belt as set out below according to the PPG⁸, the Site should be considered as grey belt land:

(a) **To check the unrestricted sprawl of large built-up areas:** Although the Site is close to the city of Coventry, it is separated by parcels of open land formed by the road network which are permanent and prominent boundary features. The Site also does not contribute to green belt openness as it is physically enclosed by natural topographical features and visually disconnected from the wider Green Belt both by

⁷ National Planning Policy Framework, 12 December 2024 (NPPF)

⁸ Planning Practice Guidance - Paragraph: 005 Reference ID: 64-005-20250225



those features and by the existing road network (in particular, the M69, M6 and Central Boulevard);

- (b) To prevent neighbouring towns merging into one another: The Site does not form part of the gap between towns or large built-up areas, given that it is located between the city of Coventry and Ansty Park, which is not considered a large built-up area. In any case, the southern part of Ansty Park has a well-defined western boundary, including Hill Park Wood and a parcel of ecology land to the south west, which features landscape bunds and structural woodland planting.
- (d) **To preserve the setting and special character of historic towns:** The Site does not form part of the setting of a historic town and has no visual, physical, or experiential connection to the historic aspects of Coventry, as it is bounded by existing road network.

Additionally, the Site does not consist of any land where the areas in footnote 7 of the NPPF present themselves, such as habitats sites, local green spaces, irreplaceable habitats and designated heritage assets.

Therefore, Manse Opus and Rolls-Royce plc strongly consider that identification of the Site as grey belt is fully evidenced and justified.

Agricultural Land Classification

It is noted that most of the Site falls within Grade 2 agricultural land that historically formed part of a larger field pattern. However, the land has now been severed by the extensive road network (M6, M69 and Coventry Bypass / Central Boulevard), which has resulted in a small parcel of land in agricultural use, isolated from wider agricultural land holdings. This makes the contribution of the Site to agriculture very limited, and this limited contribution would be outweighed by the economic and sustainability benefits of allocating the Site for employment use.

2. Amend the Green Belt and Strategic Employment Site Boundary for Ansty Park on the Policies Map for the draft Local Plan

On the draft Policies Map accompanying the *Rugby Borough Local Plan Preferred Option Consultation Document*, Ansty Park is proposed to be removed from the Green Belt and designated as a strategic employment site, as shown in *Figure 3*. Although this is supported, the proposed Green Belt boundary and Strategic Employment boundaries around Ansty Park do not reflect the parameter plans for building plots as approved by earlier planning applications. Furthermore, the Open Space (draft Policy W2) also infringes into the built-up area both to the north and west of Ansty Park.

To ensure the continued growth and success of Ansty Park, it is crucial to amend the Green Belt (draft Policy S5), Strategic Employment Site (draft Policy E1) and Open Space (draft Policy W2) boundaries on the Policies Map to fully reflect the approved development areas of Ansty Park, composed of *High Technology Park* (under outline permission R09/0035/MEIA and shown in *Appendix 1*) and *Prospero Ansty* (under outline permission R19/1540 and shown in *Appendix 2*). *Figure 3* shows the revised line for the Green Belt and Strategic Employment Site boundary in red. The amended Green Belt boundaries around Ansty Park will reflect nearby physical features that contain development (Hill Park Wood, the bunded south western ecology parcel and Combe Fields Road), as well as the proposed strategic employment allocation at Ansty Park in the Preferred Option Local Plan Consultation.

By reflecting what is on the ground and the approved development parameters, Manse Opus and Rolls-Royce plc can complete the delivery of Ansty Park without undue inhibition, whilst supporting economic growth and job creation in the region. These changes will align with the



employment development objectives of the new Local Plan and Ansty Park's allocation as an existing Strategic Employment Site, promoting sustainable development while preserving the integrity of the Green Belt in other areas.

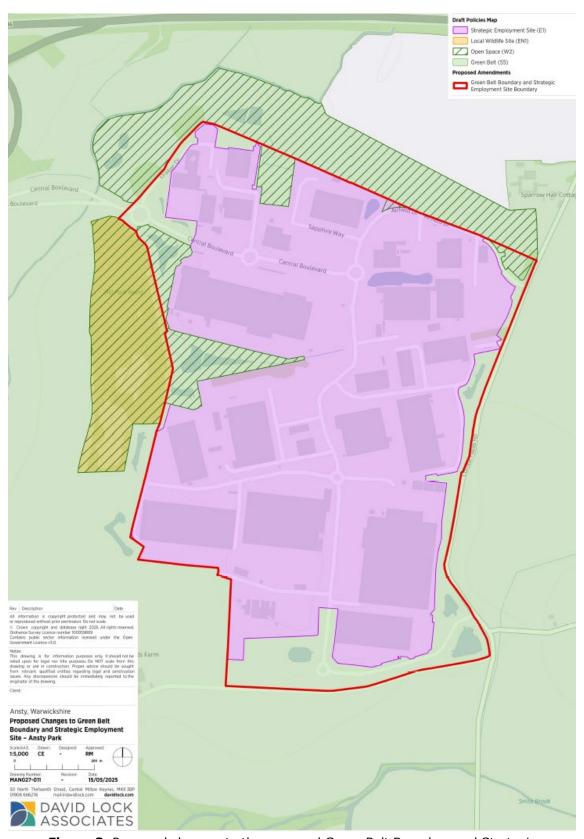


Figure 3. Proposed changes to the proposed Green Belt Boundary and Strategic Employment Site - Ansty Park, Appendix 5 (Source: DLA)



Conclusion

We trust that our representations have sufficiently set out our support for RBC's ambition of delivering more employment development in the next plan period through exploring the potential for further employment development at land to the northwest of Ansty Park and changes to Green Belt boundaries around Ansty Park.

Should you wish to discuss the above representation, or require any additional information, please do not hesitate to contact my colleagues Andrew Wintersgill, Rainie Mok or me.

We look forward to hearing from you in due course.

Yours faithfully,



Encl: Appendix 1 – Approved Parameter Plan of *High Technology Park* (planning ref 09/0035/MEIA)

Appendix 2 – Approved Parameter Plan of Prospero Ansty (planning ref R19/1540)

Appendix 3 - Development Site Plan

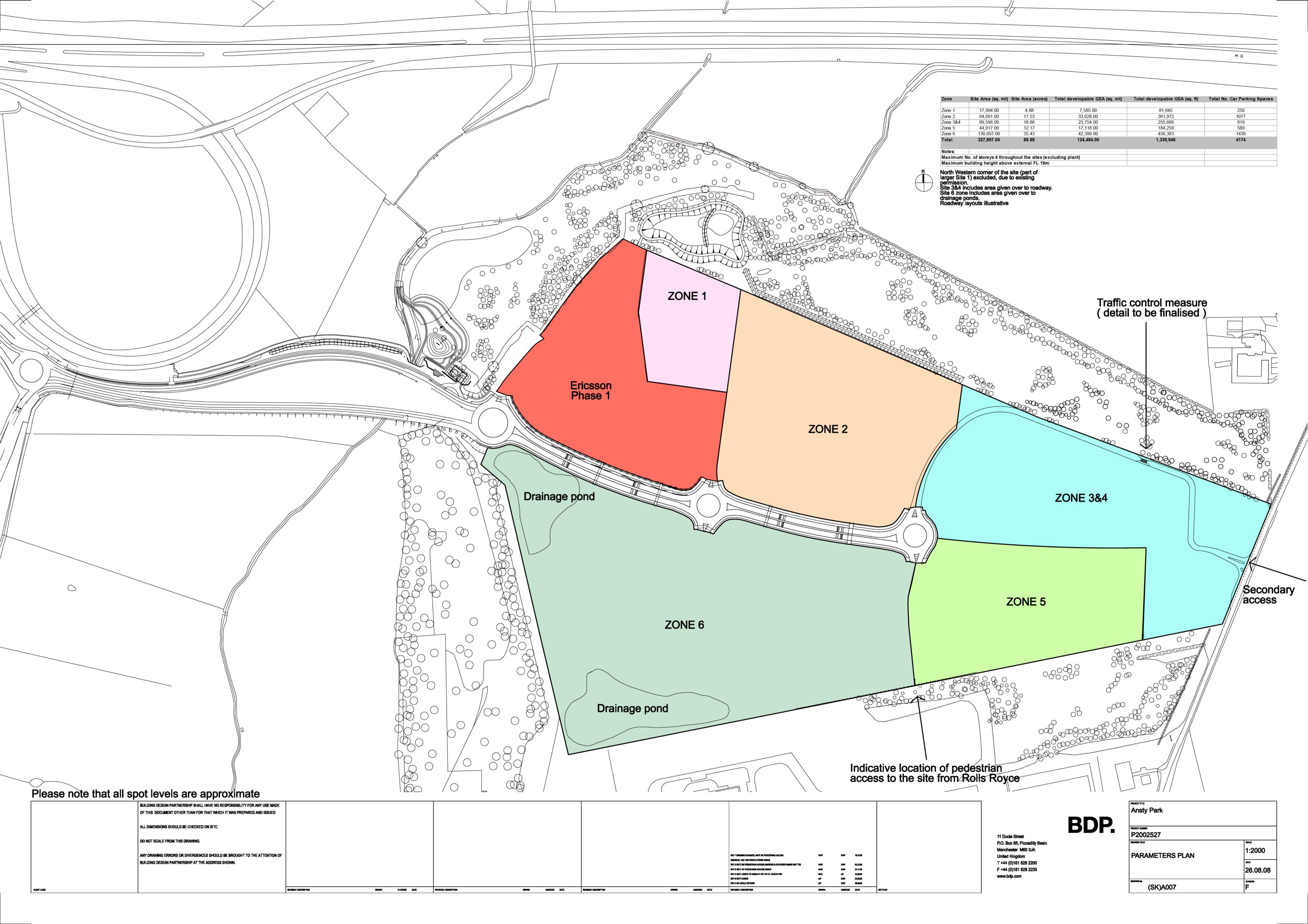
Appendix 4 - Site Context Plan

Appendix 5 - Proposed Changes to the Green Belt Boundary and Strategic Employment Site - Ansty Park



Appendix 1:

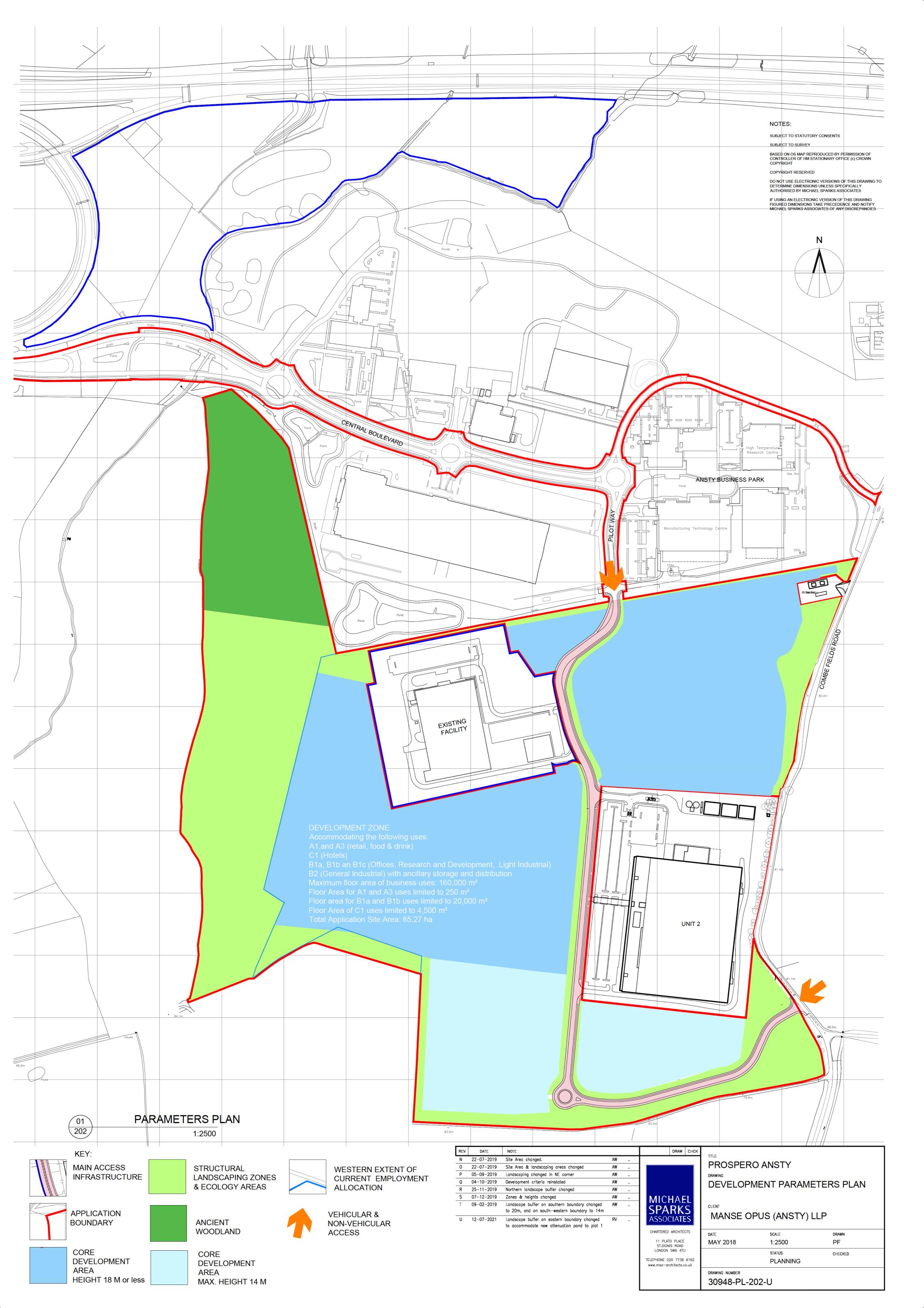
Approved Parameter Plan of High Technology Park (planning ref 09/0035/MEIA)





Appendix 2:

Approved Parameter Plan of *Prospero Ansty* (planning ref R19/1540)





Appendix 3:

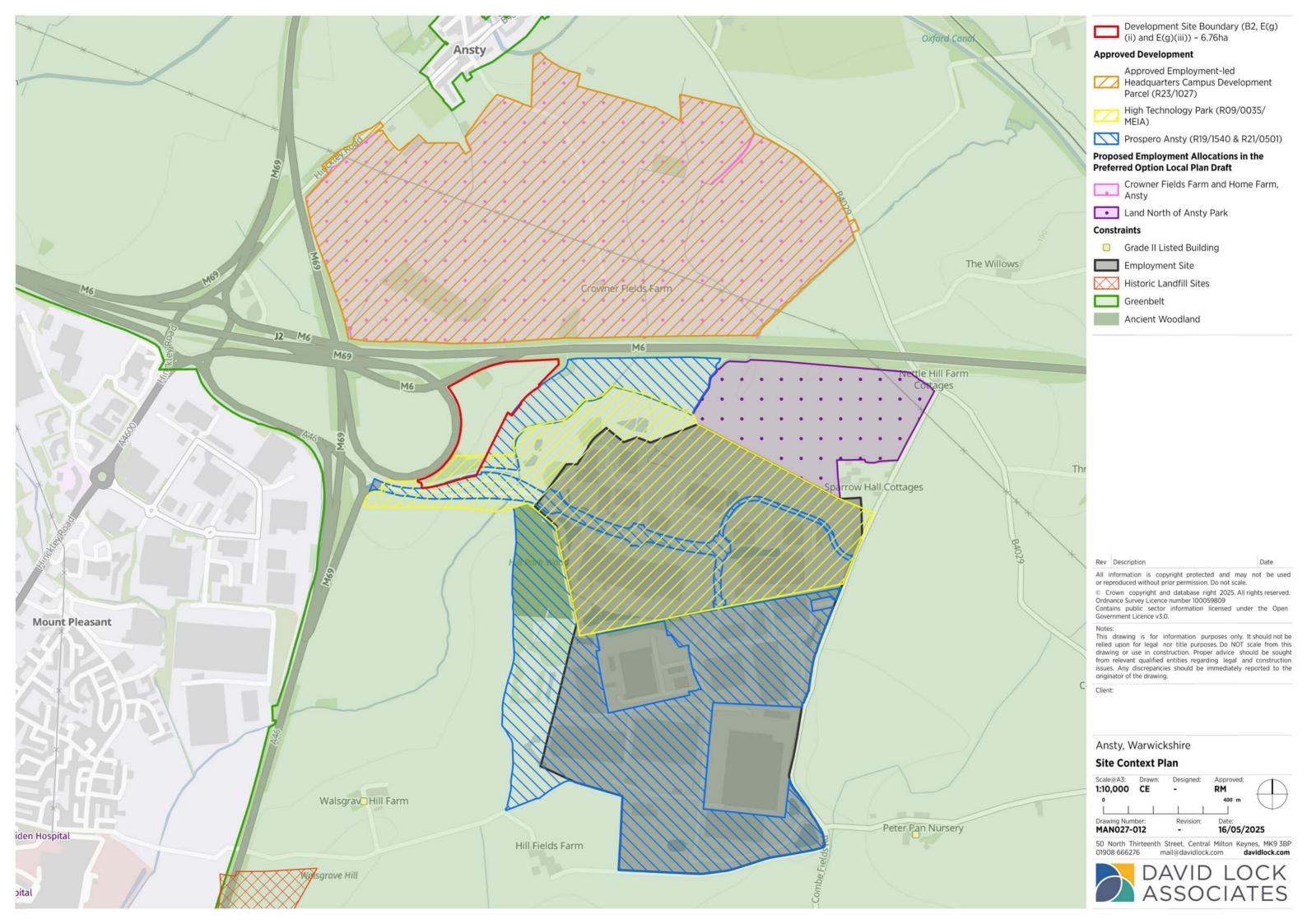
Development Site Plan





Appendix 4:

Site Context Plan





Appendix 5:

Proposed Changes to the Green Belt Boundary and Strategic Employment Site – Ansty Park

