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Dear Sir / Madam,

RUGBY BOROUGH LOCAL PLAN REVIEW: PREFERRED OPTION CONSULTATION

Introduction and Context

On behalf of landowner Clients with interests to the south of Junction 1 of the M69, Lambert Smith Hampton (LSH) is instructed to submit representations to the Preferred Option Consultation being undertaken by Rugby Borough Council as part of the Local Plan Review. The representations follow a previous response to the Issues and Options Consultation between October 2023 and February 2024, which was supported by a submission to the concurrently run Call for Sites exercise.

These representations concern approximately 16.76 hectares (41.42 acres) of Green Belt land to the immediate south of Junction 1 of the M69 and the A5 Watling Street, herein referred to as “the site”. The site comprises Leicester Grange Farm, which accommodates the Barnacles Restaurant, together with ancillary commercial, residential and equestrian premises, and an adjacent parcel of land to the east which also fronts the A5.

The site has previously been assessed through the 2025 Housing and Economic Land Availability Assessment (HELAA) under reference “Site 68”, with the conclusion reached that the site is “*not currently developable – changes to policy would be required*”. The Stage 2 Site Options Assessment which follows the HELAA outlines that the site is not progressed due to poor accessibility and other constraints. The purpose of these representations is to reiterate the case that has already been made that both the site and its wider area – south of Junction 1 of the M69 – is a suitable location for the allocation of land for the full range of employment uses.

Case for Land south of Junction of the M69

As we have previously emphasised, it is imperative that a sufficient supply of employment land is allocated for smaller-scale light industrial (Class E(g)(iii)) and industrial (Class B2) uses, as well as “mid-box” units of below 9,000 sqm, both of which distinctly complement the delivery of strategic “big-box” warehouses (Class B8). Our commercial understanding and involvement in agency activity along the M69 and A5 corridors confirm that there is considerable market interest for new premises in these locations, which is evidenced by the success of IM Properties’ Hinckley Park scheme and the recently announced pre-let of Tesco at Mountpark’s development to the south of Hinckley.

It is therefore considered remiss of the Preferred Option to have not distinguished between, and provided for, both strategic and non-strategic employment land allocations, so as to ensure that a sufficient supply of small sites can forward to accommodate local needs.

In the case of the site to which these representations relate, there is a unique and dynamic opportunity for the land to not only accommodate small and medium size unit premises, on previously developed land within the Green Belt (which constitutes the Grey Belt as per the December 2024 NPPF), but also unlock a wider strategic opportunity that exists to the south of the M69 junction, particularly when having regard to the proximity of site ownerships to the strategic road network, and the commercially successful precedent that has been achieved at the Hinckley Park development.

With reference to the Interim Sustainability Appraisal Report (March 2025), it is noted that a sequential assessment of the options available for the growth at the south of Hinckley has been undertaken, which arrives at the conclusion that land at the far north-west of the Borough, to the south / south-west of Hinckley, performs poorly in terms of sustainability and as such is disregarded as an area of focus. The focus then shifts to land in the direct vicinity of Junction 1 of the M69, where it is perceived that the *“strategic case for growth here is not as strong as it is at the edge of Coventry (as a key centre of economic activity and population/labour), and perhaps also not as strong as it is on the edge of Rugby.”*

However, we are firmly of the view that the strategic case for growth in this location has not been assessed to the full extent that is required to inform the Preferred Option for the Local Plan. It is particularly disappointing to note that the Local Planning Authority has failed to undertake and publish a renewed Green Belt Study in advance of, or as part of, the Preferred Option consultation. For the avoidance of doubt, on the date of submitting these representations, the Authority’s evidence base website states that the Green Belt Contribution Study is “forthcoming”.

However, it is considered that the strategic case for Junction 1 – when having regard to the extent of land ownership that has been promoted in the area – has not been fully explored to the extent that is required to inform the Preferred Option for the Local Plan. In particular, it is disappointing to note that the Local Planning Authority has failed to undertake and publish a Green Belt Study in advance of, or as part of, the Preferred Options consultation. For the avoidance of doubt, on the date of submitting these representations, the Authority’s evidence base website states that the Green Belt Contribution Study is *“forthcoming”*. The same applies to the Strategic Transport Assessment, which remains another important consideration in the plan-making process and particularly in this instance given the proximity of the site to the strategic road network.

National planning policy is clear that an assessment of the contribution of green belt land in relation to the five green belt purposes is required to inform the plan-making process, where boundary changes are being considered. For example, at paragraph 145, the NPPF states that:

“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.”

Moreover, the Planning Practice Guidance on the Green Belt (namely, paragraphs 001 and 002) states that:

“the review and alteration of Green Belt boundaries should take place, where necessary, as part of the plan making process.”

“... authorities should produce a Green Belt assessment, either as part of the review of Green Belt boundaries during the preparation or updating of a local plan, or at another relevant point.”

The absence of an up to date review of the Borough’s Green Belt is considered to strongly undermine the spatial strategy that is set out within the Preferred Option document, as the relative performance

of Green Belt sites that have been put forward for allocation – as well as those that have not – has not been independently assessed and evidenced, in line with national planning policy and guidance. This is compounded by the fact that the Coventry and Warwickshire Joint Green Study (2015) does not specifically assess the contribution of the site and its surrounding area to the Green Belt purposes, despite being in close proximity to the strategic road network and key centres of economic activity and population, including the settlement of Wolvey where land is proposed to be allocated for over 700 new dwellings as part of the Preferred Option. In summary, this brings into question the methodology through which employment land is proposed to be allocated, and thus raises doubt over the soundness of the spatial strategy.

In the absence of an up to date review of the Borough’s Green Belt, it is appropriate at this stage for us share our previously submitted appraisal of the site and its surrounding area in terms of its contribution to the Green Belt purposes.

Green Belt Purpose	Contribution	Rating
To check the unrestricted sprawl of large built-up areas	The site contains several buildings which compromise the openness of the Green Belt within their immediate vicinity. As a result of its form and location, the site also does not play a role in preventing ribbon development.	Low
To prevent neighbouring towns merging into one another	The site is not located within an existing settlement and its spatial relationship with the nearest settlements of Burbage and Hinkley is already bisected by the M69, A5 and intervening development.	Low
To assist in safeguarding the countryside from encroachment	The developed nature of the site and its surrounding area, particularly where it adjoins the M69 and A5, means that it shares limited characteristics of the countryside. There are also clear man-made features that contain development and prevent encroachment in the long-term namely; namely, the M69 and A5 which represent permanent defensible boundaries inhibiting the encroachment of the countryside to the north and east.	Low
To preserve the setting and special character of historic towns	The site is not partially or wholly within or adjacent to a Conservation Area. In addition, there is no intervisibility between the historic core of a historic town and the site.	Low
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	All Green Belt land makes a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict and/or urban sites.	High

The above appraisal follows a similar methodology to that undertaken as part of the Coventry and Warwickshire Joint Green Belt Study and considers the same questions posed in regard to each of the five purposes. The appraisal confirms that that the site and its surrounding area has a low contribution to four of the five Green Belt purposes, with the exception being ‘to assist in urban regeneration’ which is equally applied a high grading across all of the Green Belt by virtue of the strategic role such land has in incentivising development on brownfield land. It is clear that the developed nature of the site and its situation relative to the M69 and A5 means that it does not have

a distinct functional role in protecting the Green Belt. This view was also shared by Officers as part of early engagement as to the long-term development potential of the site.

Conclusion

The Preferred Option document neglects the site and its wider location as a potential area for both strategic and non-strategic employment growth, despite its unrivalled proximity to the M69 and A5, the presence of existing industrial and logistics premises, and its relatively limited contribution to the Green Belt purposes. As such, it should be re-considered as a credible location in the plan-making and allocation process.

It is reminded that the 2024 NPPF now places greater emphasis on meeting the needs of a “modern economy”, which distinctly includes data centres and facilities for freight and logistics. Paragraph 86(c) requires LPAs to identify suitable locations for these uses, with paragraph 87 stating that planning policies should recognise and address the specific locational requirements of different sectors. For storage and distribution operations, this includes making provision at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation.

It is therefore recommended that the LPA give renewed consideration to the potential of land to the south of Junction 1 of the M69 as a suitable location for the allocation of sites for employment use. In particular, regard should be given to the suitability of the site to accommodate small to medium size unit premises, for light industrial (Class E(g)(iii)) and industrial (Class B2) uses, as well as unlock a wider strategic opportunity that exists to the south of the M69 junction, particularly when having regard to the proximity of site ownerships to the strategic road network, and the commercially successful precedent that has been achieved at IM Properties’ Hinckley Park development.

Should you find that it would be useful to discuss any of the matters set out above in relation to the site and its wider location, we would be happy to do so at your convenience.

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