

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

## Land at Willey Fields Farm, Willey (and adjacent land)

### Introduction

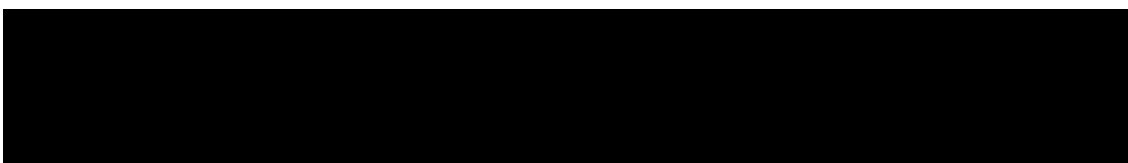
This representation is submitted by UK Land Options Ltd in response to the consultation by Rugby Borough Council on the Preferred Option stage of the new Local Plan. UK Land Options control the land to the west of Magna Park on the A5 (please see enclosed plan), currently occupied by the V12 Vehicle Preparation Centre and surrounding agricultural land. The land is shown to be retained within the Green Belt in the Preferred Option Plan. Please note that UK Land Options is working with neighbouring land owners making their land available for the development of warehousing, distribution and industrial uses through a combined allocation in the new Local Plan. Howkins and Harrison have made a submission on behalf of David Boyes and Michael Stanhope in relation to the adjoining land at Tythe Platts Farm.

### Employment Land Need

The need for more employment land as set out in the Development Needs Topic Paper is based on the Employment Needs Paper which was prepared in 2022 and itself based on data which is even older. Given the time and significant economic changes that have occurred since this time **it is recommended that a review is undertaken to respond to up to date economic conditions and forecasts.** This is essential to ensure that the Plan is based on robust and up to date evidence.

Notwithstanding this, the Topic Paper refers to the West Midlands Strategic Employment Sites Study which identifies Opportunity Areas for larger industrial sites based on the presence of major junctions. Our land is located a short distance to the north of Area 7. However, the Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change (April 2021) report identifies an 'Area of Opportunity' (number 6 - M1 Corridor south of Leicester) which includes the site and Magna Park and notes that it could accommodate further employment growth. It is immediately adjacent to Magna Park and has direct access to the A5, providing connections to the M69 to the north, the M1 to the east and the M6 to the south. The continued success and growth of Magna Park is not referred to in the Topic Paper despite it being immediately adjacent to the boundary of the borough of Rugby and providing an excellent opportunity for economic growth in the borough. Harborough has identified it as 'A Key Area of Opportunity' and supports its growth – yet land immediately adjacent with direct vehicular access is not considered in the Rugby Local Plan. It is recommended that the Topic Paper is reviewed to take into account the presence of Magna Park and to consider the opportunity it presents for the borough.

The owners of Magna Park, GLP Ltd have confirmed that long term demand exists for the continued expansion of Magna Park and the use of land to the west of the A5 within Rugby would ensure that the whole Park is provided in a more accessible and efficient layout rather



than continuing to stretch northwards up the eastern side of the A5 and eastwards away from the A5.

### **The Proposed Site Allocation**

The site proposed for allocation in this representation has been assessed in the Stage 2 Site Options Assessment (individually as Site 306: Land at Willey Fields Farm, Willey and in combination with neighbouring land as Site 331: STRATEGIC - Land at Willey Fields / Tythe Platts Farms (Employment)). Site 331 is given a score of 5 in relation to congestion (6 being least congested) which is clearly a highly positive and attractive factor for prospective employment development. The nearest bus stop is currently 750m from the site. However, the site is given a low rating for public transport accessibility based on the current situation. Magna Park is well served by a network of bus services and is recognised by Harborough Council as a sustainable location for further employment-related growth. These bus services could easily be extended across the A5 to serve the proposed allocation site. In accordance with paragraph 110 of the NPPF consideration of the sustainability of a location should take account of both its current situation and whether it could be made sustainable.

The site is not subject to or close to any ecological designations.

The overall landscape sensitivity of the site is assessed as Medium/Low. The filtering of views of the site from the A5 and Penn Lane could be increased through additional planting to supplement existing hedgerows and woodland. The recreational value of the site could be enhanced through the development by enhancing the existing Public Rights of Way.

There are no designated heritage sites within 50m of the site.

Whilst the constraint for foul water drainage is assessed as 'High', initial investigations have confirmed that improvements could be made to accommodate the foul water associated with development of the site. The constraint for surface water drainage is assessed as 'Low'.

Bizarrely, the conclusion to the assessment for this site states that it "is located at distance from other built development except for Magna Park". Clearly this should simply read that it "is located immediately adjacent to the major built development of Magna Park". The presence of Magna Park has been all but ignored in the assessment of this site and the wider position relative to the economy of Rugby. This view is supported by the fact that Figure 3 of the Housing and Economic Land Availability Assessment identifies Broad Locations for Employment Development close to every identified 'Existing Large Employment Site' within and adjacent to the borough, apart from Magna Park.

This site is largely free from significant environmental constraints and could be made sustainable (as Magna Park has been) through the extension of existing public transport services. As acknowledged by the WEMSS, the suitability of sites for employment uses is driven by their attractiveness to employers rather than existing public transport accessibility criteria. **It is therefore recommended that the site is reassessed and allocated for employment uses to facilitate the western expansion of Magna Park.**

### **Grey Belt**

It is also considered that the proposed site (and adjoining land) **should be considered to be grey belt land as defined by the NPPF.**

It partly comprises of previously developed land and does not strongly contribute to purposes a, b or d of the Green Belt as set out at paragraph 143 of the NPPF. None of the areas or assets referred to at footnote 7 of the NPPF provide a strong reason for refusing or restricting development at the site. In accordance with paragraph 155 (a) of the NPPF the development of the site and adjoining land would not fundamentally undermine the purpose (taken together) of the remaining Green Belt across the area of the Plan. In relation to part b) there is an unmet need for additional employment land in this locality as evidenced in section 3 of the representation submitted by RPS on behalf of Mr Boyes and Mr Stanhope.

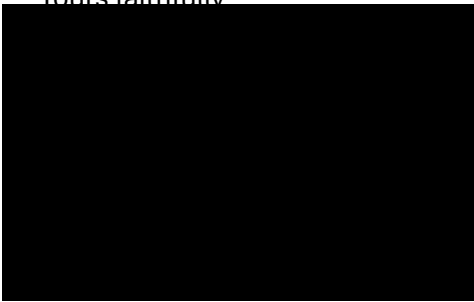
As set out above, the site is in a sustainable location in accordance with paragraphs 110 and 115 of the NPPF which aligns with part c) of paragraph 155.

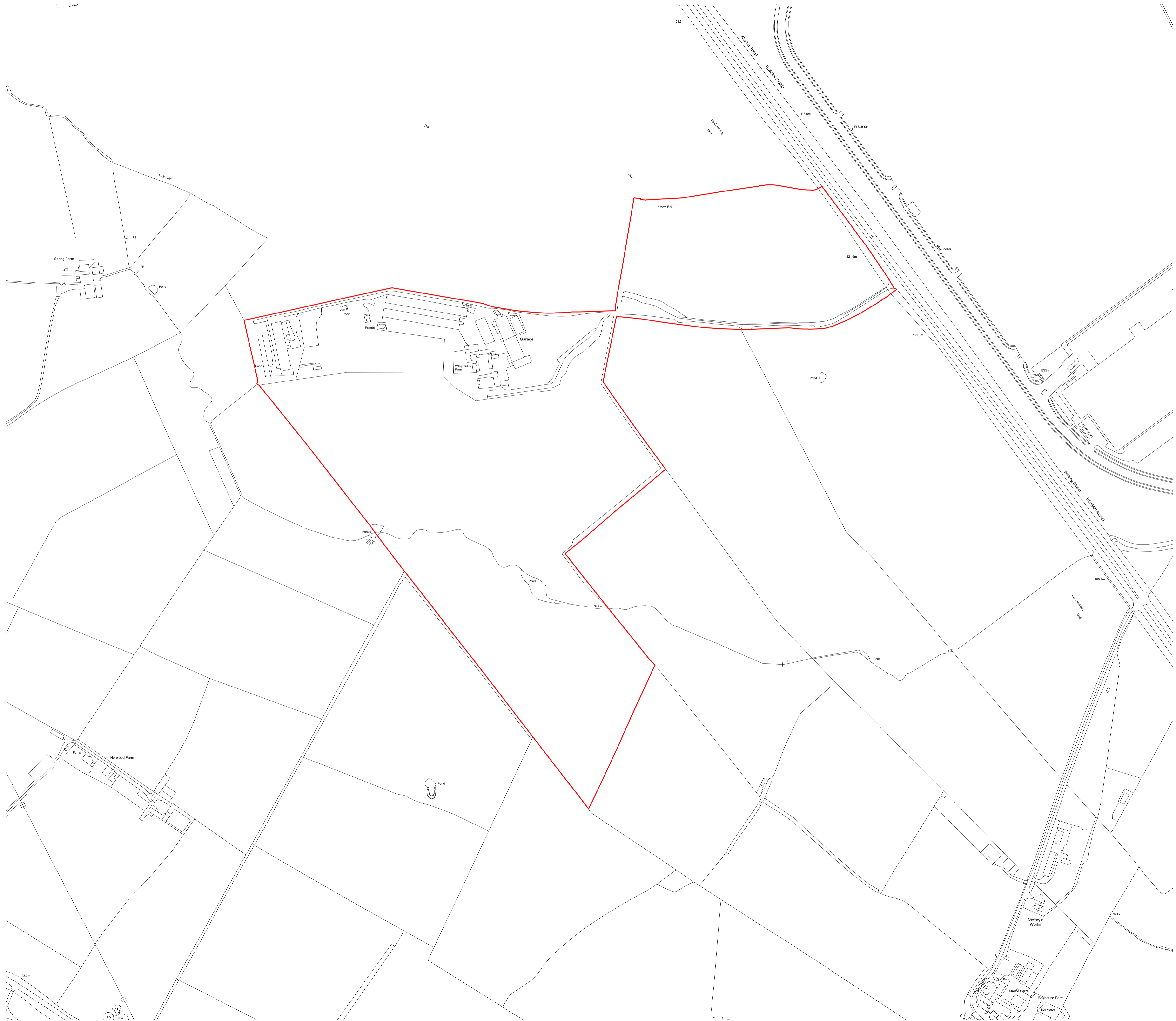
It is noted that a Green Belt Contribution Study has not yet been published by the Council.

### **Conclusion**

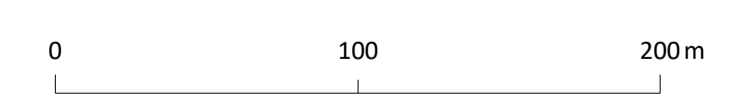
We trust that due consideration will be given to these objections to the Preferred Option Local Plan and the recommendations provided for updating the evidence base and allocating land at Willey Fields Farm for employment uses as an extension of Magna Park to ensure that the economy and residents of Rugby can benefit from the economic opportunities it provides.

Yours faithfully





**Key**  
 Site Boundary



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**Project** Willey Fields Farm  
**Title** Site Location Plan  
**Date** 13.06.2024  
**Scale** 1 : 2,500 @ A1

