

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For official
use only)

**Name of the Local Plan to which
this representation relates:**

Rugby Borough Council Proposed Submission
Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026
By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in
the subject line, OR by post to:** Development Strategy, Town Hall, Evreux Way,
Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation
you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable)
but complete the full contact details of the agent in 2.*

Title	<input type="text"/>	<input type="text" value="MR"/>
First Name	<input type="text"/>	<input type="text" value="TONY"/>
Last Name	<input type="text"/>	<input type="text" value="GALLAGHER"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="REDACTED"/>
Organisation (where relevant)	<input type="text" value="REDACTED"/>	<input type="text" value="REDACTED"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="REDACTED"/>

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph		Local Plan Policy	S3 AND S7	Policies Map	Yes
Site ID	88				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	
(2) is Sound	Yes		No	NO
(3) complies with the Duty to co-operate	Yes		No	NO

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached representations letter and supporting evidence, however in summary:

Draft Local Plan is not sound as it has not been 'positively prepared' as the evidence base fails to identify the areas objectively assessed need, it is not 'effective' as it has failed to address a neighbouring authority's unmet employment need and is not 'justified' as the proposed allocated strategy does not provide sufficient flexibility for the type of unit to meet demand. As such the Draft Local Plan is not consistent with Paragraph 36 of the National Planning Policy Framework.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Draft Policy S3 needs to be updated to reflect the actual employment floorspace need, and Draft Policy S7 should be updated to include Site 88 as an employment allocation with the potential to deliver c.45,000sqm of employment floorspace to meet that need. The Policies Map should be updated accordingly.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

YES

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The points raised are critical to the soundness of the plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

NO AI USED.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

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<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>

Our ref: Q250205
Your ref:
Email: [REDACTED]
Date: 13 March 2026



Proposed Submission Consultation
Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR

Dear Madam/Sir

Rugby Borough Council Regulation 19 Proposed Submission Local Plan Consultation

1 Introduction

- 1.1 We write on behalf of our client, BARJANE to submit representations on their behalf to the Rugby Borough Council Regulation 19 Draft Local Plan (hereafter the “Draft Local Plan”).
- 1.2 BARJANE is a privately owned family-run industrial and logistics property group. The group prioritises long-term investment with a deep-rooted sense of responsibility to enhance the environments and communities where it invests.
- 1.3 BARJANE is in the process of delivering c.106,000sqft GEA of high-quality Class E(g)(iii), B2 and B8 floorspace at Central Park, Rugby and already has substantial employment holdings at Brackmills Estate, Northampton.
- 1.4 BARJANE, is promoting a c.12.6 hectare (ha) parcel of land located along Hinckley Road (B4065) to the southwest of Ansty (hereafter referred to as the “Site” or “Site 88” and identified in a plan at Document 1) for allocation in the Draft Local Plan for employment uses to assist in meeting the substantial employment need in the area.
- 1.5 Our client submitted representations as part of Reg 18 Draft Local Plan consultation in May 2025. These representations and the supporting information demonstrated a significant unmet employment need in the area and that the Site is deliverable and is not subject to any technical or environmental constraints which cannot be suitably addressed. Separately a full legal title review was undertaken, and this identified no constraints.
- 1.6 The Draft Local Plan and the updated evidence base released as part of Reg 19 consultation has been carefully reviewed. Its BARJANE’s view that the Draft Local Plan remains unsound as it does not allocate enough land within Opportunity Area 7 of the West Midlands Strategic Employment Sites Study (WMSESS) to meet the substantial employment need in the area which is growing.
- 1.7 This letter, which is to be read with the attached documents, begins with an executive summary. then summarises the Site and surroundings, the vision for the Site, the key points raised in the

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Reg 18 representations, before turning to the Draft Local Plan and our recommended amendments for the draft plan to be found sound.

2 Executive Summary

- 2.1 The Site is strategically located in the heart of the Golden Triangle, directly adjacent to the M6, M69, and A46 and access to a broad and diverse labour market. There are established and forthcoming employment uses near the Site.
- 2.2 Opportunity Area 7 is the most appropriate location for new and much needed employment sites to be delivered as confirmed in the evidence base. The Site is well-related to existing successful employment areas and major road links and is close to a main centre of population in Coventry thereby reducing commuting distances.
- 2.3 Updated evidence reinforces the conclusions from BARJANES's Regulation 18 representations that underlying demand for Class B2/B8 employment land is materially stronger than accounted for in the WMSESS, with historic delivery, particularly of big box units on non-strategic sites, under recorded.
- 2.4 When corrected, this indicates an unmet employment need requirement of at least 63ha, which has not been quantified or addressed through the Regulation 19 proposed employment allocation strategy.
- 2.5 The Council's own evidence recognises that at least one additional strategic employment site of around 50ha should be directed to Opportunity Area 7. However, this has not been translated into additional allocations at Regulation 19.
- 2.6 The replacement of the proposed Prologis Ryton allocation with Walsgrave Hill has reduced the overall quantum of strategic floorspace delivered within Opportunity Area 7 by approximately 60,000sqm, without a corresponding replacement allocation.
- 2.7 There is also a persistent unmet employment need arising in Coventry's Local Plan review, including an identified shortfall of approximately 9ha (c.36,000 sqm) on smaller sites, alongside the wider unmet position.
- 2.8 A review of the proposed Regulation 19 allocation portfolio demonstrates that the headline floorspace within the draft policy wording overstates actual availability. This is due to a combination of use restrictions, pre-letting, site constraints and limitations on the ability of several allocations to accommodate flexible big-box units (10,000–50,000 sqm) that are most active in the market. Also, some of the proposed allocations are over-represented in capacity terms (including Coton Park East), while others provide limited flexibility for larger big-box formats, reducing overall resilience and increasing reliance on a small number of sites
- 2.9 For the Draft Local Plan to be found sound, Draft Policy S3 needs to be updated to reflect the actual employment floorspace need, and Draft Policy S7 should be updated to include the Site as an employment allocation with the potential to deliver c.45,000sqm of employment floorspace to meet that need. The Policies Map should be updated accordingly.



- 2.10 The allocation of Site 88 would provide a site which addresses employment need and would also complement the other proposed allocation by broadening choice, strengthening resilience, and providing additional flexibility within the strongest market area.
- 2.11 The Council have updated their Green Belt evidence as part of the Reg 19 consultation. However, a site-specific assessment of the Site has not been undertaken and the Site forms part of a much wider parcel. BARJANE have commissioned Grey Belt appraisals of the Site, which clearly demonstrate that the Site meets the definition of Grey Belt and shares many of the characteristics of a parcel to the east of the Site that the Council have identified and having the potential to be Grey Belt.
- 2.12 The Site should therefore be given priority over Green Belt land.

3 Background

Site and Surroundings

- 3.1 The Site, which extends to c12.6ha, is located approximately 6.5km north-east from Coventry and 180m south-west of Ansty village, Warwickshire. The Site is located within the administrative area of RBC, but in close proximity to the boundary of Coventry City Council (“CCC”) and Nuneaton and Bedworth Borough Council (“NBBC”).
- 3.2 The western boundary is defined by the M69 and native hedge and tree planting. The south and eastern boundary of the Site is defined by the B4065 which connects Junction 2 of the M6 to Ansty and on to Shilton. The Site is bound to the northeast by residential development within Ansty and open fields.
- 3.3 Frasers Groups new global headquarters, Frasers Campus, is to be delivered on land to the east. Planning permission was granted in May 2025 for HQ office, national logistics facilities (c.3,000,000sqft), retail and leisure concept R&D, Learning and Development Academy, hotel and group accommodation.
- 3.4 There are also existing employment developments at Ansty Park and Prospero Ansty Park to the southeast.

Vision

- 3.5 The Site is strategically located adjacent to Junction 2 of the M6 in the heart of the “Golden Triangle” – the optimum location for a logistics and distribution facility within an estimated four hour drive of 90% of Britain’s population.
- 3.6 Site 88 benefits from immediate proximity to the M6, M69, and A46, offering direct national connectivity— ideal for logistics and supply chain efficiency. The Frasers Campus is to be delivered on land to the east and there are existing employment developments at Ansty Park and Prospero Ansty Park to the southeast. This location allows for significant efficiencies for occupiers and end users. This is a unique strategic position of national significance for a site of this size, being at the junction of two motorways.



- 3.7 To maximise the benefits of its strategic location, the vision for the Site is for its redevelopment to deliver high quality and sensitively designed employment development to meet need within the area.
- 3.8 The Site also benefits from access to a broad and diverse labour market due to its close proximity to Coventry and excellent road connectivity. This facilitates reliable commuting opportunities for a wide regional workforce and further strengthens the Site's viability for employment uses. The development will also help to reduce deprivation in key wards.
- 3.9 Given high demand for land in this area and low availability, the Site will be taken up quickly with occupiers offering competitive offers thereby maximising local benefits for Rugby. There is significant current interest in the Site with live enquiries from multiple potential occupiers, demonstrating its strategic importance
- 3.10 The logistics sector is critical to the UK and the local economy and has become more so in recent years as a result of changing retail patterns. Rugby is one of the local authorities where transport and storage is a dominant industry.
- 3.11 The design of the units will deliver a modern, high-quality, and visually distinctive scheme that adheres to the highest environmental and sustainability standards, while remaining in keeping with surrounding developments. The development will visually and acoustically shield Ansty and the wider area from both site operations and nearby existing infrastructure, thereby enhancing and improving the setting and improving access and usability of the surrounding walking and cycling infrastructure.

Reg 18 Draft Local Plan Representations

- 3.12 Representations were submitted on behalf of BARJANE which can be summarised as follows:
 - The is Site promoted for allocation to address the significant employment land shortfall identified in the area and aligns with local and regional economic growth ambitions – it is located in Opportunity Area 7 of the WMSESS which is identified in the WMSESS as the most appropriate area to meet this need.
 - The level of trend-based need is significantly higher than identified in the WMSESS and higher than the upper end of its forecasts. The Savills market evidence commissioned by BARJANE demonstrated that up to date data shows that historic take-up has been 46% higher than the WMSESS found.
 - Reviewing the evidence base shows that it is likely that RBC is underproviding larger 'big box' units on non-strategic sites. A number of completed 'big-box' units on sites below the 25-hectare strategic threshold were not captured in the original modelling. When combined with the WMSESS data, this suggested higher historic delivery rates for large units on non-strategic sites.
 - The Site is strategically located within the Golden Triangle which enables substantial efficiencies for both occupiers and end-users, enhancing the overall competitiveness of the area for employment development.



- The Site also benefits from access to a broad and diverse labour market due to its close proximity to Coventry and excellent road connectivity.
- Allocating the Site would not only address the identified shortfall both within Rugby Borough and the unmet needs in Coventry but would also support the long-term strategic economic resilience across Rugby, Coventry & Warwickshire, and the wider West Midlands region.
- Site 88 meets the definition of “Grey Belt” and should be prioritised for development over Green Belt sites.

4 Economic Case

Rugby Employment Need

- 4.1 The Reg 19 Draft Local Plan sets the plan period at 2025-2042 i.e.15 years from the date of adoption which is identified as 2027. This reduction in the plan period arose from several responses to the Reg 18 consultation which argued that the plan period should be reduced to reduce the number of new homes that need to be planned for now.
- 4.2 Draft Policy S3 identifies an employment need slightly adjusted from the Reg 18 Draft Local Plan as follows:
- 19,761sqm of office floorspace (c.3.95ha); and
 - 1,034,000sqm of Class B2 and Class B8 (c. 287ha).
- 4.3 There has also been an adjustment to the proposed employment allocations (Draft Policy S3 and Draft Policy S7) with removal of the proposed land allocation at Prologis Park West/Mountpark, Rytonon-Dunsmore and its replacement with Land at Walsgrave Hill on the edge of Coventry to the south of the Site. The Site is not identified as a draft allocation.
- 4.4 This change responds to the findings of the Strategic Transport Assessment (2025), which identified the potential for the Prologis Park West/Mountpark allocation to have a significant adverse impact on queuing at the Tollbar End A45/A46 interchange.
- 4.5 Following the technical representations received as part of the Reg 18 relating to employment land issues, particularly those regarding the WMSESS together with the associated Coventry & Warwickshire HEDNA-WMSESS Alignment Paper 2024 (the ‘Alignment Paper’) an Addendum to the Alignment Paper (the ‘Addendum’) was prepared in 2025.
- 4.6 The Addendum seeks to address the following matters raised via the representations:
- The need to revise the strategic sites supply and residual needs position within Coventry & Warwickshire to take account of the erroneous inclusion of the country park at Coventry Gateway South within the land area. The effect of this is to reduce the scale of committed supply by 90ha;
 - Correction to 5% suppressed demand model figures within the WMSESS, and consideration of any implications arising; and



- Consideration of the robustness of the assumed plot ratio for strategic employment sites of 0.35.

4.7 As detailed in Economic Case Note attached at **Document 2** whilst the Addendum records the additional completions identified through the Savills evidence, it concludes that these largely relate to sites that would meet the WMSESS definition of 'strategic' sites and therefore does not adjust the quantified requirement for 'big-box' units on non-strategic sites, nor translate the evidence into an uplift in employment land provision within Opportunity Area 7.

4.8 As a result, the historic delivery and underlying demand for larger units on non-strategic sites identified at Regulation 18 has not been fully reflected in the preferred modelling outcomes or in the scale and composition of the Regulation 19 employment land allocations. The Economic Case Note identifies the following matters which are summarised below.

1. Corrected Suppressed demand has increased the scale of need to be addressed which has not been addressed in the Draft Local Plan.

- The Regulation 18 representations supported by Savills' market evidence identified that historic delivery and take-up were higher than reflected in the original WMSESS datasets. While the Addendum acknowledges those representations, the preferred modelling scenarios and quantitative conclusions were not amended to reflect that higher evidenced delivery
- The Addendum confirms that the suppressed demand adjustment within the WMSESS 'Net Absorption – Suppressed Demand (Low)' scenario was incorrectly applied. The corrected suppressed demand figure of 1,562,523sqm (rather than 319,379sqm) increases the gross requirement under that scenario to approximately 9.1m sqm (2,802 ha) – significantly higher than previously identified.
- Although the Council argue that this scenario does not alter the overall conclusions, this correction clearly further increases the demand already identified at Regulation 18. Combined with the additional historic completions highlighted by the updated Savills Market Report 2026 (attached to Document 2), the underlying market demand is likely to be stronger than that assumed by the Council in their preferred scenario.
- However, this strengthened demand position has not been accompanied by a corresponding uplift in the quantitative requirement or additional flexibility within the proposed allocations.
- BARJANE's Regulation 18 representations identified a shortfall of 63ha of employment land within Rugby. The Council's updated analysis for the Draft Local Plan now aligns with this analysis, i.e. that there is a greater requirement because historic delivery was under-counted. However, that numerical assessment has not been carried out by the Council.



- It remains our view that on this basis alone there is a shortfall of at least 63ha of employment land.
- The Council's draft allocation strategy is now increasingly reliant on assumptions and delivery of a small number of sites, rather than providing a robust range of allocations capable of responding to the updated demand and supply evidence.

2. The removal of non-developable land at Coventry Gateway South reduces effective B2/B8 (Mixed/B8) supply within Opportunity Area 7.

- The removal of non-developable land at Coventry Gateway South reduces effective Class B2/B8 (Mixed/B8) supply within Opportunity Area 7.
- The Addendum confirms that correcting the error within Coventry Gateway South reduces WMSESS strategic commitments by approximately 90ha and increases the residual needs range to 705–1,067ha.
- Even providing land at the upper end of the Opportunity Area 7 recommendations (975 hectares) would fall short of the revised upper bound by approximately 90ha. Within Opportunity Area 7, this correction reduces the years-of-supply position from approximately 20 years to around 14.5 years.
- This reduction in effective supply is further reinforced by the proposed replacement of the Prologis Ryton allocation with Walsgrave Hill, which has reduced the overall quantum of strategic floorspace delivered within Opportunity Area 7 by approximately 60,000sqm, without a corresponding replacement allocation.
- It remains our view that there is a shortfall of at least 63ha of employment land. In addition, there is now a further shortfall in the Opportunity Area 7 because of the exclusion of the county park within Coventry Gateway South which increases unmet need by a further 90ha in the region.
- While the Council considers that this position does not give rise to an immediate quantitative shortfall, the updated evidence indicates that Opportunity Area 7 is now operating with a tighter and more delivery-sensitive supply position than previously assumed, reducing resilience should delivery assumptions not be met.
- For the plan to be sound, the Council should be planning to make best use of its available and deliverable sites within Opportunity Area 7, including Site 88, to meet this unmet need and also provide additional flexibility and resilience within the supply pipeline.

3. Opportunity Area 7 remains the strongest market area.

- The location strengths of Opportunity Area 7 include strategic motorway access; strong performance in terms of rents and historic take-up; proximity to the Coventry labour market; and sustained demand for B2 and B8 uses.
- The Addendum recognises that, in light of reduced effective supply and the market strength of Area 7, at least one additional strategic employment site of around 50ha should be directed to this market area as a minimum response.



- However, despite this clear recommendation the Regulation 19 strategy does not add a new additional c.50ha allocation in Opportunity Area 7 in response, and the Development Needs Topic Paper (2025) (“DNTP”) instead treats the uplift as addressed through existing commitments and the current Regulation 19 allocations.
- The Savills Market Report 2026 reinforces this position and indicates continued strength of Class B2/B8 uses in the Coventry–Rugby market, including:
 - Over 1.56million sqft of take-up across seven transactions since mid-2025;
 - Active Coventry/Rugby-specific requirements of up to 5.1 million sqft;
 - A further 8.4millionsqft of requirements across the wider Golden Triangle; and
 - Demand concentrated in units typically between 100,000 and 400,000sqft (c. 9,300 –37,200sqm).
- A significant proportion of this demand is location-specific, reinforcing the importance of maintaining an adequate and flexible supply within the Coventry–Rugby market itself.
- Existing supply could meet only around half of currently identified Coventry/Rugby-focused requirements, without accounting for future demand across the remainder of the plan period.

Leasing Velocity

- 4.9 The Savills Market Report 2026 identifies strong leasing velocity within the Coventry–Rugby market, reflecting sustained occupier demand alongside a constrained supply position.
- 4.10 A relatively small number of transactions has the capacity to absorb a substantial proportion of available supply within Opportunity Area 7. This highlights the sensitivity of the market and the limited headroom currently available.

Draft Allocations

- 4.11 The strategic location and benefits of locating employment use within Opportunity Area 7 is well recognised.
- 4.12 The Council have selected the draft allocations based on the following:
 - They are expansions to, or are well-related to, existing successful employment areas and major road links.
 - They are close to the main centres of population in Coventry and Rugby, reducing commuting distances.
 - They offer opportunities for diversification of the economy, a range of different scales of building and the delivery of other benefits including country parks/public open space and training facilities.
- 4.13 The Regulation 19 evidence base indicates reduced effective supply and a tighter years-of-supply position in Opportunity Area 7, alongside continued demand for B2/B8 floorspace in the Coventry–Rugby market.



- 4.14 Against this position, the proposed allocations within Draft Policy S7 provides limited choice of sites capable of accommodating flexible Class B2/B8 big box requirements.
- 4.15 The WMSESS recognised that a substantial proportion of large-unit demand has historically been met on sites below the 25ha strategic threshold.
- 4.16 The Savills Market Report 2026 analysis confirms that delivery of big-box units on non-strategic sites has been higher than previously assumed, demonstrating flexible Class B2/B8 accommodation forms a persistent and important part of the Coventry–Rugby market.
- 4.17 The proposed Regulation 19 allocations present a substantial quantum of industrial floorspace in headline terms. However, a review of the committed supply demonstrates that a significant proportion of this space is either already pre-let, subject to use or size restrictions, or otherwise constrained in its ability to respond to market demand. As a result, the effective supply available to meet future, flexible Class B2/B8 requirements is materially lower than the headline figures suggest.
- 4.18 The following Regulation 19 site allocations are considered to be constrained in their ability to respond to this segment:
- **Coton Park East** is physically and operationally constrained and predominantly SME-led/sub-10,000sqm units in nature, limiting its ability to accommodate flexible Class B2/B8 units. The Council’s assumed capacity of the site is 115,000sqm. The masterplan provides 19.15 ha of employment land across six separate development plots. This would provide c.90,000sqm based on typical market development densities. On this basis, the employment capacity of Coton Park East appears to be overstated by approximately 25,000 sqm.
 - **North of Ansty Park** is subject to explicit use restrictions focused on R&D and B2 uses, preventing it from accommodating larger or more flexible B8 requirements.
 - **Walsgrave Hill**, while strategic in overall scale, provides limited provision within the c.30,000–50,000sqm floorspace bracket (which Site 88 can accommodate) and delivers materially less employment floorspace overall than the Ryton site it replaced. Its contribution to meeting flexible demand for larger strategic ‘big box’ units is therefore constrained.
 - **Padge Hall Farm** borders Hinckley and Nuneaton settlements, and part of the site sits within Hinckley & Bosworth and Nuneaton & Bedworth boroughs. We understand that 45,704 sqm (approximately 27%) of the new space committed at Padge Hall Farm has been pre let to Tesco at the outset of the plan period. This equates to approximately one third of the site being committed, materially reducing flexibility and resilience within the proposed allocation portfolio.
 - Approximately 57% (15,210sqm across Plots 11 and 12) of the committed floorspace in **Prospero Ansty and Ansty Park** is subject to Class B1 and B2 use restrictions. This materially limits the site’s ability to respond to Class B8 demand and reduces its contribution to meeting flexible, market-led requirements within Opportunity Area 7.



- With regards the **Houlton remaining employment land**, the shape of the site restricts the largest unit deliverable to 11,892 sqm, with the remainder small SME units, therefore the site is constrained in meeting demand for larger strategic 'big box' units in the 10,000 – 50,000 sqm+ range which Site 88 could accommodate.
- Whilst the site allocation at **Crowner Fields Farm** offers the potential for flexibility in terms of unit size, the planning permission establishes a defined range of large-scale unit formats (predominantly XL boxes in excess of 50,000sqm), which in practice limits the degree of flexibility available within the supply pipeline.

4.19 Overall, this means the effective choice available to occupiers seeking larger strategic give box and adaptable Class B2/B8 accommodation is severely limited.

4.20 The Site is capable of accommodating a single unit of up to approximately 45,000 sqm, which is rare for a site of this scale, at the junction of two motorways, and directly responds to the identified gap between SME focused allocations and very large strategic sites.

4.21 In this context, Site 88 provides an opportunity for an allocation to meet the identified unmet need, broaden the effective range of sites available within Opportunity Area 7, strengthen resilience within the supply pipeline, and provide proportionate additional flexibility to respond to evidenced market demand.

4.22 It should also be noted that the Site performs better in the congestion analysis within the Stage 2 Site Options Assessment (December 2025) ("Updated Stage 2 Report") than Walsgrave Hill.

4.23 The allocation of Site meets the Council's criteria in that it:

- is well-related to, existing successful employment areas and major road links.
- is close to the main centres of population in Coventry and Rugby, reducing commuting distances.
- offers opportunities for diversification of the economy, a range of different scales of building can be provided and the delivery of other benefits including public open space.

4.24 The Site provides flexibility to accommodate big-box Class B2/B8 units in a prime motorway location adjacent to the M6/M69 junction, within the Golden Triangle logistics market and in close proximity to the Coventry labour market and established employment clusters including the Frasers Campus, Ansty Park and Prospero Ansty.

Coventry's Need

4.25 The Development Needs Topic Paper states that:

- CCC is unable to meet 9 hectares (36,000 sqm) of its industrial land need on smaller (non-strategic) sites within its own area.
- This unmet need could, in principle, be met by any authority within the Coventry & Warwickshire Functional Economic Market Area (FEMA), which includes Rugby, North Warwickshire, Nuneaton & Bedworth, Stratford on Avon and Warwick.



- 4.26 Overall, the evidence base recognises that Coventry cannot meet its full employment land requirement within its administrative boundary and that this unmet need must be addressed through cross boundary provision.
- 4.27 Within the WMSESS, Opportunity Area 7 is identified as the principal location through which demand arising from the Coventry market can be accommodated. While OA7 is defined functionally around Coventry and Rugby, the available and deliverable employment land within this opportunity area is in Rugby.
- 4.28 Rugby also already plays a significant role in accommodating strategic employment development serving the Coventry market, reflecting its accessibility, market attractiveness and established delivery record.
- 4.29 In this context, there is a clear and reasonable basis to conclude that Rugby should accommodate a greater proportion of Coventry's unmet requirement, and that meeting a higher share, such as the full 9ha, within Rugby would be consistent with the spatial logic and evidence underpinning Opportunity Area 7.
- 4.30 BARJANE has communicated directly with Coventry City Council officers in respect of Site 88, and whilst they confirmed they are not in a position to engage on another local authority plan making process, they commented in writing *"It's exactly the type of site we were hoping to see come forward when we put out the Coventry call for sites"*.

Conclusion

- 4.31 The Draft Local Plan does not allocate enough land within Opportunity Area 7 of the WMSESS to provide for Rugby's need as well as for CCC's unmet need.
- 4.32 Paragraph 36 of the National Planning Policy Framework (NPPF) (2025) is clear that Local Plans are only considered "sound" if they are:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area' 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;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - 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
 - 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.
- 4.33 Allocating the Site for employment would not only respond to the growing need but would be a strategic move to ensure long-term economic resilience and growth of Rugby, Coventry & Warwickshire and West Midlands.



- 4.34 The Draft Local Plan is not positively prepared as it does not identify the full extent of employment need and hence does not allocate sufficient land to meet evidenced need.
- 4.35 The Draft Local Plan is not effective as it fails to deal with requirements of the NPPF in helping CCC to address their unmet needs. Whilst Duty to Cooperate is to be abolished from 26 March 2026, the Minister’s statement (27 November 2025) is clear that local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and Inspectors should continue to examine plans in line with the policies in the NPPF on ‘maintaining effective co-operation’.
- 4.36 Furthermore, the Draft Local Plan is not justified as the proposed allocation strategy does not provide sufficient flexibility for the type of unit to meet demand.
- 4.37 Therefore, for the Draft Local Plan to be found sound, Draft Policy S3 needs to be updated to reflect the actual employment floorspace need, and Draft Policy S7 should be updated to include the Site as an employment allocation with the potential to deliver c.45,000sqm of employment floorspace to meet that need. The Policies Map should be updated accordingly. The Site’s allocation would also:
- Broaden the effective supply of employment land within the strongest market area;
 - Improve resilience within the delivery pipeline;
 - Provide flexibility to accommodate Class B2/B8 big box requirements; and
 - Complement rather than compete with the existing strategic allocations.
- 4.38 The allocation of Site 88 is not simply providing additional capacity to meet a defined need. It also improves flexibility and resilience within the strongest market area where the updated evidence base indicates headroom has tightened and reliance on a limited number of constrained or committed sites has increased.

5 Site Considerations

- 5.1 The Updated Stage 2 Report sets out RBC’s analysis of potential site options which were considered for allocation in the Reg 19 Draft Local Plan against topic areas including transport, ecology, landscape, heritage, other constraints and identifies the opportunities/benefits.
- 5.2 The updates to the assessment for the Site have been made including to the Reasoning which has been updated as follows (blue underlined and ~~strikethrough~~):

“This is a large site composed of fields located between the M69, Hinkley Road and Ansty.

The surrounding road network is relatively uncongested, the site ranks relatively weakly for accessibility, which is based on MSOA level-measures. It has a moderate score for non-car connectivity, but it does not appear that there are realistic options for access by non-car modes at present, except from Ansty village. The site promoter has identified opportunities for improving non-car-based access through provision of new bus stops on Hinckley Road and contributions to new bus services and/or shuttle buses from surrounding urban areas. The site would also



benefit from improved connectivity if/when the planning permission at Crowner Fields Farm (Frasers Campus) is implemented.

Neither heritage nor ecological sensitivity was identified, and overall landscape sensitivity is low. The site is within the Green Belt, potentially making a strong contribution to at least one purpose. The site is adjacent to the village of Ansty with potential for adverse visual and noise impacts. The developer has included mitigations such as green buffers in the site plans but relationship with the village is still poor. The site is within the Green Belt, making a strong contribution to purposes A and C and a moderate contribution to purpose B.

In view of its relatively weak existing accessibility, lack of relationship to existing built development and employment land and likely contribution to the Green Belt, and relationship with Ansty village the site is not being progressed beyond the Stage 2 Assessment.”

Green Belt

- 5.3 The Site continues to be classified as Green Belt.
- 5.4 The Council have undertaken an updated Green Belt Contribution Study (October 2025) as part of their Reg 19 evidence base.
- 5.5 The Green Belt Study has not considered the Site on its own as part of a finer grain assessment, but as part of a much wider parcel- This broad brush approach concluded that parcel the Site is within has a strong contribution for Green Belt Purposes (a) and (c) and a moderate contribution for Green Belt Purpose (b) and (d) and this has then been reflected in the Updated Stage 2 Report.
- 5.6 BARJANE have commissioned a Green Belt Appraisal Addendum (to that submitted as part of Reg 18 representations) to consider the Site against this new evidence base.
- 5.7 As detailed in Document 3, the Green Belt Appraisal Addendum continues to conclude that the Site does not strongly contribute to Purposes (a), (b) or (d) and instead it has been assessed to make “No Contribution” to these purposes through the application of the recent PPG assessment methodology. Following the development of the Frasers Group scheme which planning permission Ref No 23/1027 in May 2025, the Site’s contribution to Purpose (a) continues to be considered to be “Moderate” and therefore does not make a ‘strong’ contribution to this purpose. There are also no Footnote 7 constraints that would provide a ‘strong’ reason for refusing or restricting the proposed development.
- 5.8 The Green Belt Appraisal Addendum concluded that development of the Site would not undermine Purposes (a), (b), (d) and (e) of the Green Belt, and would only cause only Moderate harm to Purpose (c), in relation to safeguarding the countryside from encroachment. Therefore, the release of the Site from the Green Belt for an employment allocation would not fundamentally undermine the five purposes (taken together) of the remaining Green Belt within the wider plan area of RBC.



- 5.9 NPPF Paragraph 155 (a) has been satisfied, the economic case confirms that there is an unmet need for employment use as per Paragraph 155 (b) and the development would be delivered in a sustainable location as Paragraph 155 (c).
- 5.10 The Grey Belt Assessment prepared by Marrons (attached at **Document 4**) also confirms that the Site meets the definition of Grey Belt.
- 5.11 The assessment notes that within the Council's Green Belt Contribution Study- Stage 2 Assessment (2025) the site identified as "CF_02", which is to east to the Site and also adjacent to Ansty is considered to be Grey Belt. Marrons strongly suggest that the Site performs in a comparable manner and which further supports their finding that the Site is Grey Belt.
- 5.12 The Site clearly meets the Grey Belt definition and should be treated as such and given priority over Green Belt land.

Impact on Ansty

- 5.13 The Site 88 proforma confirms that the overall landscape sensitivity is "Low" and the Site's rural character is diminished by noise and movement from traffic along nearby road.
- 5.14 The Reg representations were supported by technical documents which assessed the proposed development's potential impacts on Ansty.
- 5.15 The Acoustic Report prepared in support of the allocation which confirmed that the proposed use of the Site should not cause significant impacts at the dwellings within Ansty, either due to maximum levels at nighttime or ambient levels in the daytime period. In fact, given the considerable road traffic noise within the vicinity, the proposals would provide a degree of screening and improvement to the residential properties to the north.
- 5.16 A Landscape and Visual Appraisal Addendum (**Document 5**) has been prepared. The Site is well-contained by boundary vegetation along its northern boundary with the village and along the boundary with Hinckley Road that together serve to limit intervisibility with the local area. Residential views towards the Site are limited as these houses benefit from well-vegetated rear gardens and are generally separated from the Site by large paddocks with mature field boundaries and dense tree belts that interrupt views. The development would also incorporate a substantial landscape buffer along the northern boundary of the Site, featuring a berm that would be planted with appropriate tree species to supplement and enhance the existing vegetation along the northern edge of the Site. The Addendum concludes that the intervisibility between the development and the village is therefore the predicted to be very limited and should not prevent further consideration of the Site for allocation.

6 Summary

- 6.1 BARJANE is promoting a c.12.6ha land parcel for allocation in the next iteration of the Draft Local Plan for employment uses to assist in meeting the substantial employment need in the area.



- 6.2 Located in the heart of the “Golden Triangle”, Site 88 benefits from proximity to the M6, M69, and A46, offering direct national connectivity - ideal for logistics and supply chain efficiency. This location allows for significant efficiencies for occupiers and end-users.
- 6.3 In addition to excellent accessibility to the strategic road network, the Site also has good labour availability due to proximity of Coventry and good accessibility by road, which allows the Site to draw on a wide labour pool from the region.
- 6.4 The Regulation 19 evidence identifies a clear and cumulative set of factors demonstrating that additional employment land is required within Opportunity Area 7 to meet need as follows:
- The Addendum’s conclusion that at least one additional strategic employment site of approximately 50ha (c.200,000sqm) is required as a minimum response to reduced effective supply and strong market demand, which has not been translated into new allocations;
 - A reduction in strategic floorspace capacity resulting from the replacement of the Ryton allocation with Walsgrave Hill, equating to an estimated loss of c.60,000sqm;
 - Persisting unmet employment need arising in Coventry, including an identified shortfall of approximately 9ha (around 36,000sqm) on smaller sites, alongside the wider unmet position;
 - The removal of non-developable land at Coventry Gateway South, which has materially reduced effective B2/B8 supply within Opportunity Area 7;
 - Evidence that deliverable capacity has been overstated at certain allocations, including an over-estimation of employment floorspace at Coton Park East of c.25,000sqm; and
 - A significant proportion of new industrial floorspace being already pre-let (Padge Hall Farm), alongside other site-specific constraints which limit flexibility and resilience across the allocation portfolio.
- 6.5 Paragraph 36 of the NPPF is clear that Local Plans are only considered “sound” if they are positively prepared, justified, effective and consistent with national policy. As clearly demonstrated in these representations, the Draft Local Plan is not sound has not been ‘positively prepared’ as the evidence base fails to identify the areas objectively assessed need, it is not ‘effective’ as it has failed to address CCC’s unmet needs and is not ‘justified’ as the proposed allocated strategy does not provide sufficient flexibility for the type of unit to meet demand.
- 6.6 For the Draft Local Plan to be found sound, Draft Policy S3 needs to be updated to reflect the actual employment floorspace need, and Draft Policy S7 should be updated to include the Site as an employment allocation with the potential to deliver c.45,000sqm of employment floorspace to meet that need. The Policies Map should be updated accordingly.
- 6.7 As recognised by the proposed allocation at Walsgrave Hill, this is the most appropriate location for new and much needed employment sites to be delivered as confirmed in the evidence base. The Site is well-related to existing successful employment areas and major road links and is close to a main centre of population in Coventry thereby reducing commuting distances.



- 6.8 The allocation of the Site for employment use would not only respond to the growing need but would be a strategic move to ensure long-term economic resilience and growth of Rugby, Coventry & Warwickshire and West Midlands. There are no constraints to the delivery of the Site which cannot be suitably mitigated.
- 6.9 Furthermore, the Site meets the definition of Grey Belt and should therefore be given priority over Green Belt land.
- 6.10 We hope the above is clear and look forward to reviewing the next iteration of the Draft Local Plan.

Yours faithfully

A handwritten signature in black ink, appearing to read 'TG', enclosed in a light grey rectangular box.

Tony Gallagher
Consultant to Quod



Document 1



Document 2



Note

Land to the South-west of Ansty (Site 88) – Regulation 19 Economic Case Note

Executive Summary

- Updated evidence reinforces conclusions from Regulation 18 representations that **underlying demand for B2/B8 employment land is materially stronger than accounted for in the WMSESS**, with historic delivery, particularly of big box units on non-strategic sites, under-recorded. When corrected, this indicates an **unmet requirement of at least 63 hectares**, which has not been quantified or addressed through the Regulation 19 allocation strategy.
- The Alignment Addendum itself recognises that **at least one additional strategic employment site of around 50 hectares should be directed to Opportunity Area 7**; however, this has not been translated into additional allocations at Regulation 19.
- The replacement of the Ryton allocation with Walsgrave Hill **has reduced the overall quantum of strategic floorspace delivered within Opportunity Area 7 by approximately 60,000 sqm, without a corresponding replacement allocation.**
- There is persistent unmet employment need arising in Coventry's Local Plan review, including an identified shortfall of approximately 9 ha (around 36,000 sqm) on smaller sites, alongside the wider unmet position.
- A review of the Regulation 19 allocation portfolio demonstrates that **headline floorspace overstates effective availability**, due to a combination of use restrictions, pre-letting, site constraints and limitations on the ability of several allocations to accommodate flexible big-box units (10,000–50,000 sqm) that are most active in the market.
- Analysis of individual allocations shows that some sites are over-represented in capacity terms (including Coton Park East), while others provide limited flexibility for larger big-box formats, reducing overall resilience and increasing reliance on a small number of sites.
- In this context, **Site 88 represents a necessary and proportionate allocation**, capable of delivering flexible B2/B8 big-box accommodation, including a single unit of up to approximately 45,000 sqm, which is relatively rare for a site of this scale and directly addresses an identified gap between SME-focused sites and very large strategic parks.
- The allocation of Site 88 would also complement the other proposed allocation as it would - **broaden choice, strengthen resilience, and provide additional flexibility within the strongest market area**, helping ensure the employment land strategy is responsive to evidenced demand over the plan period.



Note continued

1 Introduction

- 1.1 This Economic Case Note has been prepared to support representations to the Regulation 19 Draft Rugby Borough Local Plan in respect of **Site 88 – Land to the South West of Ansty**.
- 1.2 It updates the earlier Regulation 18 Economic Case, reflecting evidence included in:
 - The Regulation 19 Draft Local Plan;
 - The Development Needs Topic Paper;
 - HEDNA-WMSESS Alignment Paper Addendum;
 - Savills Market Report, Site 88 (March 2026);
- 1.3 This Economic Case Note should be read alongside the Quod Planning Note and updated market evidence from Savills (Savills Market Report, Site 88 (March 2026)) attached at Appendix 1.

2 Regulation 18 Representations Demand Evidence

- 2.1 At Regulation 18, representations supported by Savills market evidence identified that historic employment land delivery, particularly in relation to larger ‘big box’ units on non-strategic sites¹, appeared to be under-recorded within the WMSESS².
- 2.2 The Regulation 18 Economic Case demonstrated that:
 - Historic take-up across the West Midlands and within Rugby had been materially higher than reflected in the WMSESS trend analysis;
 - A number of completed ‘big box’ units on sites below the 25-hectare strategic threshold were not captured in the original modelling;
 - When combined with the WMSESS data, this suggested higher historic delivery rates for large units on non-strategic sites;
 - Applying the WMSESS methodology to the expanded dataset indicated a greater requirement for ‘big box’ units on smaller sites, including an indicative shortfall of approximately 26 hectares within Rugby.
- 2.3 The WMSESS itself acknowledged that trend- and absorption-based models are sensitive to historic undersupply. Where past delivery has been constrained, future need derived from those trends is likely to be underestimated.
- 2.4 The Regulation 18 representations concluded that underlying market demand, particularly within Opportunity Area 7, was likely to be stronger than assumed in the preferred modelling scenarios in the WMSESS.

¹ For the purposes of market analysis, Savills typically refer to *big box* industrial and logistics units as being 100,000 sq ft (c. 9,290 sqm) or above, with *very large* or “XL” *big box* units generally in excess of 500,000 sq ft (c. 46,450 sqm).

² West Midlands Strategic Employment Sites Study 2023/24 (2024). <https://www.hwa.uk.com/site/wp-content/uploads/2025/01/28.30-West-Midlands-Strategic-Employment-Sites-Study-2023-2024.pdf>



Note continued

- 2.5 The Regulation 19 HEDNA–WMSESS Alignment Addendum acknowledges these Regulation 18 representations and responds to them. However, while the Addendum records the additional completions identified through the Savills evidence, it concludes that these largely relate to sites that would meet the WMSESS definition of ‘strategic’ sites and therefore does not adjust the quantified requirement for ‘big box’ units on non-strategic sites, nor translate the evidence into an uplift in employment land provision within Opportunity Area 7.
- 2.6 As a result, it appears the historic delivery and underlying demand for larger units on non-strategic sites identified at Regulation 18 has not been fully reflected in the preferred modelling outcomes or in the scale and composition of the Regulation 19 employment land allocations.

3 Regulation 19 Evidence and the Demand-Supply Position in Opportunity Area 7

What has changed in Council evidence at Regulation 19

- 3.1 The Regulation 19 evidence base³ demonstrates that the Council has revisited the employment land evidence submitted at Regulation 18, correcting technical errors and clarifying assumptions.
- 3.2 In particular:
- Technical corrections have been made to the WMSESS modelling, including to the suppressed demand scenario.
 - Effective B2/B8 supply in Opportunity Area 7 has been materially reduced following the removal of non-developable land at Coventry Gateway South.
 - Representations relating to historic completions and ‘big box’ delivery on sub-25 ha sites have been considered in the Alignment Addendum.
- 3.3 These updates are welcomed as enhancing the technical robustness of the evidence base. However, these updates have significant implications for the supply–demand position, particularly in Opportunity Area 7, which should be reflected in the overall employment land strategy.
- 3.4 *Corrected suppressed demand increases the scale of need*
- 3.5 As set out in Section 2, the Regulation 18 representations supported by Savills evidence identified that historic delivery and take-up were higher than reflected in the original WMSESS datasets. While the Alignment Addendum acknowledges those representations, the preferred modelling scenarios and quantitative conclusions were not amended to reflect that higher evidenced delivery.
- 3.6 The Regulation 19 Addendum confirms that the suppressed demand adjustment within the WMSESS ‘Net Absorption – Suppressed Demand (Low)’ scenario was incorrectly applied.

³ Including the Development Needs Topic Paper and HEDNA-WMSESS Alignment Paper Addendum.



Note continued

- 3.7 The corrected suppressed demand figure (1,562,523 sqm rather than 319,379 sqm) increases the gross requirement under that scenario to approximately 9.1 million sq.m (2,802 ha) – significantly higher than previously identified.
- 3.8 Although the Council concludes that this scenario does not alter the overall conclusions, the correction further increases the demand already identified at Regulation 18. Combined with the additional historic completions highlighted by Savills, it indicates that the **underlying market demand is likely to be stronger than assumed in the preferred scenario.**
- 3.9 However, **this strengthened demand position has not been accompanied by a corresponding uplift in the quantitative requirement or additional flexibility within the allocation portfolio.**
- 3.10 As a result, the strategy is increasingly reliant on assumptions and delivery of a small number of sites, rather than providing a robust range of allocations capable of responding to the updated demand and supply evidence.
- Effective B2/B8 supply has reduced*
- 3.11 The removal of non-developable land at Coventry Gateway South reduces effective B2/B8 (Mixed/B8) supply within Opportunity Area 7.
- 3.12 The Addendum confirms **that correcting Coventry Gateway South reduces WMSESS strategic commitments by approximately 90 hectares and increases the residual needs range to 705–1,067 hectares.**
- 3.13 Even providing land at the upper end of the Opportunity Area recommendations (975 hectares) would fall short of the revised upper bound by approximately 90 hectares.
- 3.14 Within Opportunity Area 7, **this correction reduces the years-of-supply position from approximately 20 years to around 14.5 years.**
- 3.15 This reduction in effective supply is further reinforced by **the replacement of the Ryton allocation with Walsgrave Hill, which has reduced the overall quantum of strategic floorspace delivered within Opportunity Area 7 by approximately 60,000 sqm, without a corresponding replacement allocation.**
- 3.16 Our previous assessment identified a shortfall of 63ha. The Council's updated analysis for the Regulation 19 Plan now aligns with our previous analysis, i.e. that there is a bigger requirement because historic delivery was under-counted. However, that numerical assessment has not been carried out by the Council.
- 3.17 **It remains our view that on this basis alone there is a shortfall of at least 63ha.** Our previous analysis identified unmet in Coventry of 45ha on smaller sites and 71.3ha in total. In addition, there is now a further shortfall in the relevant area (Opportunity Area 7) because of the exclusion of the county park in Coventry Gateway South. **That increases unmet need by a further 90ha.**
- 3.18 Overall, this indicates that the scale of unmet need affecting Opportunity Area 7 is materially greater than assumed in the Regulation 19 strategy. **In order to respond effectively to this position, Rugby should be planning to make best use of its available and deliverable**



Note continued

sites within Opportunity Area 7, including Site 88, to meet this need and also provide additional flexibility and resilience within the supply pipeline.

Opportunity Area 7 remains the strongest market area

3.19 Opportunity Area 7 is identified within WMSESS as the strongest employment market in the sub-region due to:

- Strategic motorway access, including proximity to Junction 2 of the M6;
- Strong performance in terms of rents and historic take-up;
- Proximity to the Coventry labour market; and
- Sustained demand for B2 and B8 uses.

3.20 The Alignment Addendum recognises that, in light of reduced effective supply and the market strength of Area 7, **at least one additional strategic employment site of around 50 hectares should be directed to this market area as a minimum response**; however, the Regulation 19 strategy does not add a new additional c.50ha allocation in Opportunity Area 7 in response, and the Development Needs Topic Paper instead treats the uplift as addressed through existing commitments and the current Regulation 19 allocations.

3.21 Recent market evidence reinforces this position. The Savills March 2026 Market Report indicates continued strength of B2/B8 uses in the Coventry–Rugby market, including:

- Over 1.56 million sq ft of take-up across seven transactions since mid-2025;
- Active Coventry/Rugby-specific requirements of up to 5.1 million sq ft;
- A further 8.4 million sq ft of requirements across the wider Golden Triangle; and
- Demand concentrated in units typically between 100,000 and 400,000 sq ft (c. 9,300–37,200 sq.m).

3.22 A significant proportion of this demand is location-specific, reinforcing the importance of maintaining an adequate and flexible supply within the Coventry–Rugby market itself.

3.23 Available Grade A supply within Coventry and Rugby is approximately 2.98 million sq ft, reducing to around 2.81 million sq ft once space under offer is excluded. Supply is concentrated in a limited number of very large or second-hand units, restricting occupier choice.

3.24 On this basis, **existing supply could meet only around half of currently identified Coventry/Rugby-focused requirements**, without accounting for future demand across the remainder of the plan period.

Leasing velocity

3.25 Savills' March 2026 Market Report identifies **strong leasing velocity within the Coventry–Rugby** market, reflecting sustained occupier demand alongside a constrained supply position. Since mid-2025 there has been significant take-up, with further space under offer and strong interest across both available buildings and design-and-build opportunities.



Note continued

3.26 A relatively small number of transactions has the capacity to absorb a substantial proportion of available supply within Opportunity Area 7. This highlights the sensitivity of the market and the limited headroom currently available.

3.27 In this context, continued leasing velocity reduces resilience within the supply pipeline, increasing reliance on a small number of sites should demand persist at current levels. This reinforces the conclusion that additional, flexible employment land is required to maintain choice and responsiveness within the strongest market area.

Overall summary

3.28 Overall, our review of the Regulation 19 updates shows that:

- Modelled need is higher than previously presented (following correction of suppressed demand) and this is not reflected in Draft Policy S3 or Draft Policy S7;
- Effective B2/B8 supply within Opportunity Area 7 has reduced;
- The years-of-supply position has tightened materially; and
- Market demand remains strong and location-specific.

3.29 When read alongside the higher historic delivery rates identified at Regulation 18, the overall effect is that **Opportunity Area 7 is now operating with a more delivery-sensitive and less flexible supply position than previously assumed.**

3.30 The Regulation 19 updates indicate a materially tighter and more delivery-sensitive supply position within Opportunity Area 7, at a time when demand remains strong and location-specific. This reduces the strategy's resilience and leaves limited contingency should delivery assumptions not be met or demand prove stronger than the preferred modelling outcomes imply.

4 Review of Current Site Allocations and the Role of Site 88

4.1 The Regulation 19 evidence base indicates reduced effective supply and a tighter years-of-supply position in Opportunity Area 7, alongside continued demand for B2/B8 floorspace in the Coventry–Rugby market. Against this position, the allocation portfolio provides limited choice of sites capable of accommodating flexible B2/B8 big box requirements.

4.2 The WMSESS⁴ recognised that a substantial proportion of large-unit demand has historically been met on sites below the 25-hectare strategic threshold. Updated Savills analysis confirms that delivery of 'big box units on non-strategic sites' has been higher than previously assumed, demonstrating that flexible B2/B8 big box accommodation forms a persistent and important part of the Coventry–Rugby market.

4.3 While the Regulation 19 allocations present a substantial quantum of industrial floorspace in headline terms, a review of the committed supply demonstrates that a significant proportion of

⁴ <https://www.hwa.uk.com/site/wp-content/uploads/2025/01/28.30-West-Midlands-Strategic-Employment-Sites-Study-2023-2024.pdf>



Note continued

this space is either already pre-let, subject to use or size restrictions, or otherwise constrained in its ability to respond to market demand. As a result, the effective supply available to meet future, flexible B2/B8 requirements is materially lower than the headline figures suggest.

4.4 The Regulation 19 site allocations are constrained in their ability to respond to this segment of demand:

- **Coton Park East** is subject to various physical site constraints restricting the supply predominantly to SME led / sub 10,000 sqm units in nature and limiting its ability to accommodate flexible B2/B8 big box units. Our analysis of the draft masterplan⁵ provided for local consultation by the developer, provides 19.15 ha of employment land across six separate development plots. This would provide c. 90,000 sqm based on typical market development densities.

The Council's assumed capacity of approximately 115,000 sqm appears to be derived from the application of a uniform plot ratio to the gross site area, without allowing for plot inefficiencies, site constraints such as non-developable land or the fragmented nature of the allocation. On this basis, the **employment capacity of Coton Park East appears to be overstated by approximately 25,000 sqm**. Given the comparable constraints affecting Walsgrave Hill, there is also a strong case that a lower plot ratio (c. 0.35) would be a more appropriate one to be applied to Coton Park East to more accurately reflect its deliverable capacity.

- **North of Ansty Park** is subject to explicit use restrictions focused on R&D and B2 uses, preventing it from accommodating larger or more flexible B8 requirements.
- **Walsgrave Hill** while strategic in overall scale, due to plot inefficiencies the masterplan provides limited provision within the c.30,000–50,000 sqm floorspace bracket (which Site 88 can accommodate) and delivers materially less employment floorspace overall than the Ryton site it replaced (60,000 sqm). Its contribution to meeting flexible demand for larger strategic 'big box' units is therefore constrained.
- **Padge Hall Farm** borders Hinckley and Nuneaton settlements, and part of the site sits within Hinckley & Bosworth and Nuneaton & Bedworth Boroughs. 45,704 sqm (approximately 27%) of the new space committed at Padge Hall Farm has been pre-let to Tesco at the outset of the plan period. This equates to approximately one-third of the site being committed from the outset, materially reducing flexibility and resilience within the allocation portfolio.
- **Prospero Ansty and Ansty Park:** Approximately 57% (15,210 sqm across Plots 11 and 12) of the committed floorspace is subject to B1 and B2 use restrictions. This materially limits the site's ability to respond to B8 demand and reduces its contribution to meeting flexible, market-led requirements within Opportunity Area 7.

⁵ The draft masterplan informing this analysis is included at Appendix 2.



Note continued

- **Houlton remaining employment land:** The shape of the site, restricts the largest unit deliverable to 11,892 sqm, with the remainder small SME units, therefore the site is constrained in meeting demand for larger strategic 'big box' units in the 10,000 – 50,000 sqm+ range which Site 88 could accommodate.
- **Crowner Fields Farm:** whilst the site allocation itself offers flexibility in terms of unit size, the extant planning permission establishes a defined range of large scale unit formats (predominantly XL boxes in excess of 50,000 sqm), which in practice limits the degree of flexibility available within the supply pipeline.

4.5 Overall, this means the effective choice available to occupiers seeking larger strategic big box and adaptable B2/B8 accommodation is severely limited to meet the demand set out by Savills.

4.6 In this context, Site 88 provides an opportunity for a necessary allocation to meet unmet need which would also complement the other allocations. The site provides flexibility to accommodate B2/B8 big box units in a prime motorway location adjacent to the M6/M69 junction, within the Golden Triangle logistics market and in close proximity to the Coventry labour market and established employment clusters including the Frasers Campus, Ansty Park and Prospero Ansty.

4.7 Importantly, the site is capable of accommodating a **single unit of up to approximately 45,000 sqm**, which is rare nationally for a site of this scale, at the junction of two motorways, and **directly responds to the identified gap between SME-focused allocations and very large strategic sites.**

4.8 Inclusion of Site 88 in allocation portfolio would broaden the effective range of sites available within Opportunity Area 7, strengthen resilience within the supply pipeline, and provide proportionate additional flexibility to respond to evidenced market demand.

5 Conclusion

5.1 The updated Regulation 19 evidence base, read alongside the Savills market evidence, indicates:

- Stronger underlying demand than previously assumed, including correction of the suppressed demand modelling;
- A material reduction in effective B2/B8 supply within Opportunity Area 7; and
- Continued and location-specific market demand within the Coventry–Rugby market.

5.2 Our previous assessment identified a shortfall of 63ha. The Council's updated analysis for the Regulation 19 plan now aligns with our previous analysis, i.e. that there is a larger requirement because historic delivery was under-counted; however, that numerical assessment has not been carried out by the Council. It therefore remains our view that on this basis alone there is a shortfall of at least 63ha.

5.3 Our previous analysis also identified unmet need in Coventry of 45ha on smaller sites and 71.3ha in total. In addition, the removal of non-developable land at Coventry Gateway South has further worsened the supply position within Opportunity Area 7, increasing the scale of unmet need by approximately a further 90 ha.



Note continued

- 5.4 Flexibility within Opportunity Area 7 has narrowed materially, with reduced effective supply and continued, location-specific demand. The current allocation portfolio provides limited opportunity to accommodate flexible B2/B8 big box units – the segment of the market which evidence suggests is most active.
- 5.5 When considered in combination, the Regulation 19 evidence identifies a clear and cumulative set of factors demonstrating that additional employment land is required within Opportunity Area 7, including:
- The Alignment Addendum’s conclusion that at least one additional strategic employment site of approximately 50 ha (around 200,000 sqm) is required as a minimum response to reduced effective supply and strong market demand, which has not been translated into new allocations;
 - A reduction in strategic floorspace capacity resulting from the replacement of the Ryton allocation with Walsgrave Hill, equating to an estimated loss of approximately 60,000 sqm;
 - Persisting unmet employment need arising in Coventry, including an identified shortfall of approximately 9 ha (around 36,000 sqm) on smaller sites, alongside the wider unmet position;
 - The removal of non-developable land at Coventry Gateway South, which has materially reduced effective B2/B8 supply within Opportunity Area 7;
 - Evidence that deliverable capacity has been overstated at certain allocations, including an over-estimation of employment floorspace at Coton Park East of approximately 25,000 sqm; and
 - A significant proportion of new industrial floorspace being already pre-let (Padge Hall Farm), alongside other site-specific constraints which limit flexibility and resilience across the allocation portfolio.
- 5.6 On this basis, the Regulation 19 employment land strategy does not provide a sufficient allocation response within Opportunity Area 7 when set against the updated demand and supply evidence.
- 5.7 Site 88 represents a proportionate and targeted response to this position. Its allocation would:
- Broaden the effective supply of employment land within the strongest market area;
 - Improve resilience within the delivery pipeline;
 - Provide flexibility to accommodate B2/B8 big box requirements; and
 - Complement rather than compete with the existing strategic allocations.
- 5.8 In this context, Site 88 is not simply providing additional capacity to meet a defined need, but also improves flexibility and resilience within the strongest market area where the updated evidence base indicates headroom has tightened and reliance on a limited number of constrained or committed sites has increased.



Note continued

APPENDIX 1: Savills Market Report, Site 88 (March 2026)

Updated Market Report

Site 88, Hinckley Road, Ansty, CV7 9FJ

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1. Executive Summary

Savills have been instructed by BARJANE to provide an updated market report following the Regulation 18 Consultation in relation to Site 88, Hinckley Road, Ansty, CV7 9FJ. This updated report has been prepared as part of representations to the emerging Local Plan (Regulation 19 Consultation) to support the Site's allocation for employment use.

We set out our thoughts below, providing the latest commentary on the industrial and logistics market, provision of historic take up analysis of regional and local markets that demonstrates the strong level of occupier demand for the subject site.

Since providing the initial market report in May 2025, there has been over 1.56 million sq ft in take-up across 7 transactions, with a further approx. 170,000 sq ft under offer at Symmetry Park Rugby and strong interest in a number of the available buildings and wider Design and Build opportunities in the Coventry and Rugby area. This strong interest accounts for approx 1.96 million sq ft on 5 prospective deals, all expected to move forward within the next 6 - 12 months, again highlighting the leasing velocity in the area

Current supply is also restricted and leasing velocity at other recent developments (Apollo at Ansty Park, with 860,956 sq ft leased within the last 12 months) and the new Frasers's campus (Crownier Fields Farm, Ansty) within Opportunity Area 7 demonstrate the extremely strong demand for this location, where Site 88 is located.

We have also reviewed the assumptions of the WMSESS - HEDNA Alignment Paper in respect of the industrial need for big box units (9,300 sqm+) on non-strategic sites (sub 25 ha) and identified 309,825 sq. m of space appears to be omitted from their analysis.

The market evidence detailed within the report highlights a shortage of supply relative to demand in the local area, providing a strong and compelling case to bring the site forward to meet such demand. This demand will increase given the projected growth of online sales, changes in supply chain and the drive from occupiers to take best-in-class premises. As a result, more land is required to be brought forward to meet the ongoing demands of occupiers.

Site 88 provides the flexibility required to satisfy the varying size requirements as detailed in the Section 6 of this report.

2. Location

The site is strategically located for distribution purposes being situated at the heart of the Midland's Golden Triangle, boarded by the M1, M6 and M42 motorways.

The site has excellent access to the national motorway network being located adjacent to Junction 2 of the M6, accessed via the B4065 and the M69 via the Ansty Interchange, which provides quick access to the M1 at J21 (Leicester).

Coventry lies 5 miles (3.1 km) to the south-west of the site, with Rugby situated 12 miles (7.5 km) to the east and Birmingham 26 miles (16.2 km) to the west. London is situated 98 miles (60.9 km) to the south-east.

East Midlands Airport, the second busiest cargo airport in the UK is located 36 miles (22.4 km) to the north of the site and there is also quick access to Birmingham Airport within 18 miles (11.2 km) of the subject site.

Daventry International Rail Freight Terminal (DIRFT) is a rail-road intermodal freight terminal located in close proximity to the subject site, situated 15 miles (9.3 km) to the east. The Hams Hall Rail Freight Terminal is also located only 19 miles (11.8 km) to the west.

3. National Industrial Market

The Trump administration's tariffs announcement was 2025's defining event. Injecting uncertainty into the market, the occupier market showed a clear decline in activity in terms of requirements in Q2, before demand recovered strongly in Q3 and beyond. The overall impact of the US trade tariffs has, thus far, had limited direct impact on the market with the impact being more keenly felt in business and consumer confidence.

The Autumn Budget in late November 2025, Labour pledged investment in growth sectors, while reassuring investors that debt levels will remain contained. Notable growth-oriented policies in infrastructure, housebuilding and nuclear energy should mean the UK's economy will be well positioned to ride the wave as economic growth returns. While economic growth slowed post-tariffs, the IMF reduced the UK's 2025 GDP forecast from 1.6% to 1.1% in April, before revising its year-end estimate to 1.3% in October. The Purchasing Managers' Index (PMI) in October pointed to the economy regaining momentum towards the end of the year.

Beyond strong take-up this year, which is detailed within the report, a number of key market fundamentals continue to improve. Requirements quickly recovered after a decline in the aftermath of the Trump's "Liberation Day" tariffs, with the Savills Requirements Index recording a 16% increase quarter-on-quarter and a 12.3% increase year-on-year. This should translate into continued momentum in the market in 2026, with requirements typically taking between nine and twelve months to materialise in take-up.

Several structural trends are reshaping the logistics property market and will continue to exert upward pressure on demand for space.

Online retail remains a key driver propelling the market forward. Indeed the latest data from the ONS on online retail penetration shows that for November 2025 penetration reached 32.4%, the highest level since November 2021 when some Covid-related prevention measures remained in place. Next plc highlighted the continued importance of their online channels which delivered 8.8% growth in 2025 versus physical stores at 3.5%. All in, despite reasonable concerns about the cost of living, tax rises, and pressures on the labour market, the UK consumer is not showing any obvious signs of flagging.

eCommerce growth remains resilient, underpinned by generational shifts in consumer behaviour. Younger cohorts exhibit a strong preference for online shopping, reinforcing the structural demand for last-mile and regional distribution hubs. Even as overall retail spending fluctuates, the share of online transactions continues to rise, requiring occupiers to maintain agile supply chains and invest in additional warehousing capacity.

In a similar vein to eCommerce, we are also seeing a surge in interest from Chinese occupiers, both logistics operators and retailers. In the first half of the year, 1.7 million sq ft of space was leased, with Chinese eCommerce operator JD.com accounting for over a third of this activity. This is the second-highest year for leasing activity among Chinese occupiers, behind only 2021, and a second year in a row of strong take-up levels.

Another potential advantage to the market in relation to Chinese e-commerce is the recently announced ending of the 'de-minimis' rule, which exempts parcels under the value of £135 paying customs duties. Companies such as Shein and Temu have operated in this manner in recent years. Whilst the change in the rules is phased not to come in until 2029, the reform is likely to shift more stockholding and fulfilment activity into the UK. This will increase the demand for domestic warehousing.

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The rapid expansion of the data centre sector will continue to constrain the speculative development pipeline as this sector continues to target land being promoted for Industrial and Logistics (I&L). Data centres require large, well-connected sites with robust power infrastructure, often overlapping with prime logistics locations near major transport corridors.

Another area of growth for the market in the latter half of the decade will come from the Defence sector, as referenced by the research undertaken by Savills, which highlights that we expect close to 400m sq ft of additional demand from this sector across Europe as European Nato countries increase their defence spending. The early signs are that there is some credence to the projections with 2025 being a record year for defence-related take-up at 3.8m sq ft, comfortably ahead of the long term average level of 1.7m sq ft per year.

Regardless of global noise around a loosening of ESG targets, occupiers seemingly remain committed to their own corporate goals. Indeed, over 75% of take-up this year has been for Grade A units, against a pre-Covid average of 68%, and whilst the supply of poorer-quality space has increased, we have not seen take-up rise as we would have expected based on previous cycles.

Nearshoring and supply chain diversification are accelerating as businesses seek to mitigate risk and reduce dependency on distant markets. Manufacturers and retailers are increasingly positioning production and inventory closer to end consumers, particularly within Europe, to improve resilience and shorten lead times. This trend is creating demand for larger, strategically located logistics parks capable of supporting integrated operations.

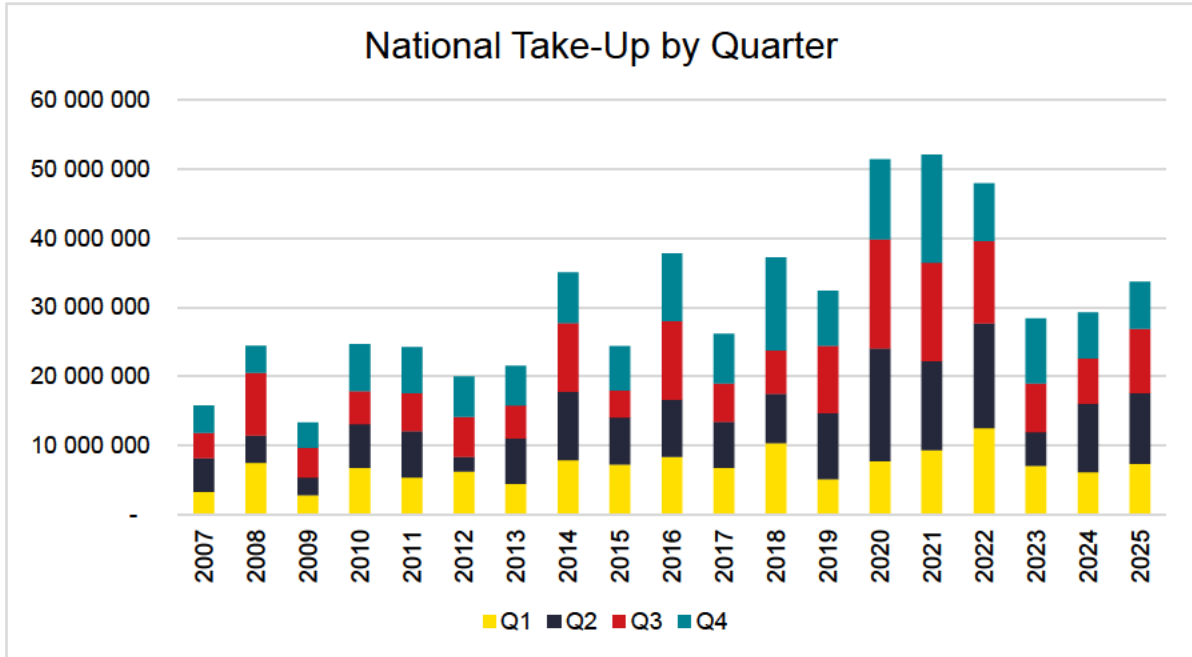
Employment remains an important issue for many businesses and the shortage of suitable supply chain staff has been a particular concern over the past few years. Consequently, many businesses are seeking buildings in locations with good access to a suitable workforce and we are seeing increasing consideration being given to acquiring buildings that provide an environment that helps to attract and retain staff.

To summarise, there are clear signs that the supply-side forces that have driven the increase in vacancy rates are abating, with speculative development and, to a lesser extent, the flow of second-hand stock slowing down. There are key structural drivers, such as the growth of the defence sector and Chinese e-commerce players driving the market forward. Moreover, the take-up of existing units is increasing and net absorption has recently turned positive.

Collectively, these dynamics are expected to sustain strong demand for logistics space across the UK.

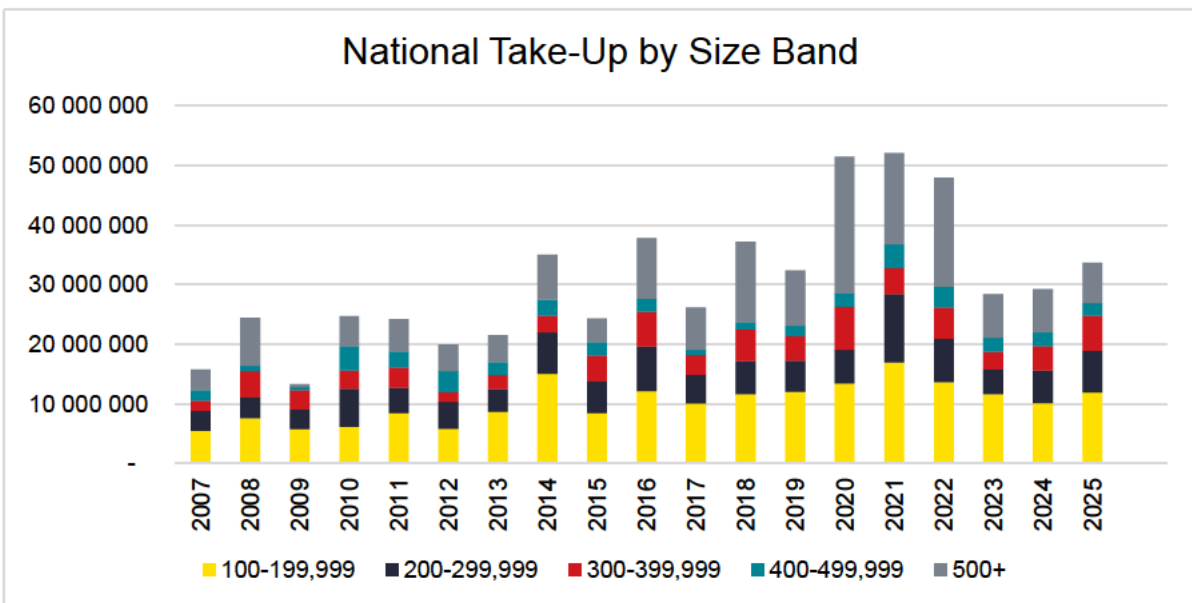
National Take-up

At a national level, take-up in 2025 reached 33.41 million sq ft, an increase of 14% on 2024 and 29% ahead of the pre-Covid average. Total deal counts also increased year-on-year and reached 140, a 13% improvement on 2024. Overall, this signals to strong market conditions, given it was the best year for take-up since 2022.



National Take-Up by Quarter, Savills Research (February 2026)

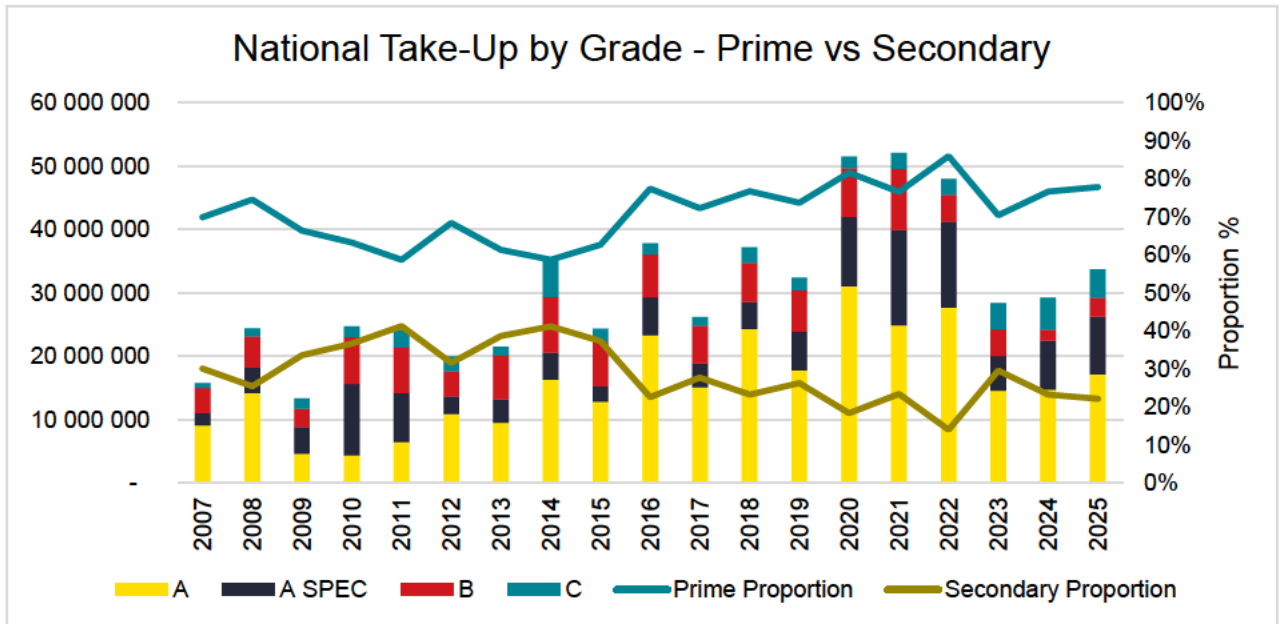
In 2025, approximately 44% of deals signed were for larger warehouses above 300,000 sq ft, showing that there is increased demand for larger warehouse premises to satisfy requirements. We have seen requirements increase in size over the last 10 years, with average deal size being approx. 220,000 sq ft in 2015, increasing to approx. 240,000 sq ft in 2025. As a result, a greater supply is required to satisfy these growing requirements.



National Take-Up by Size Band, Savills Research (February 2026)

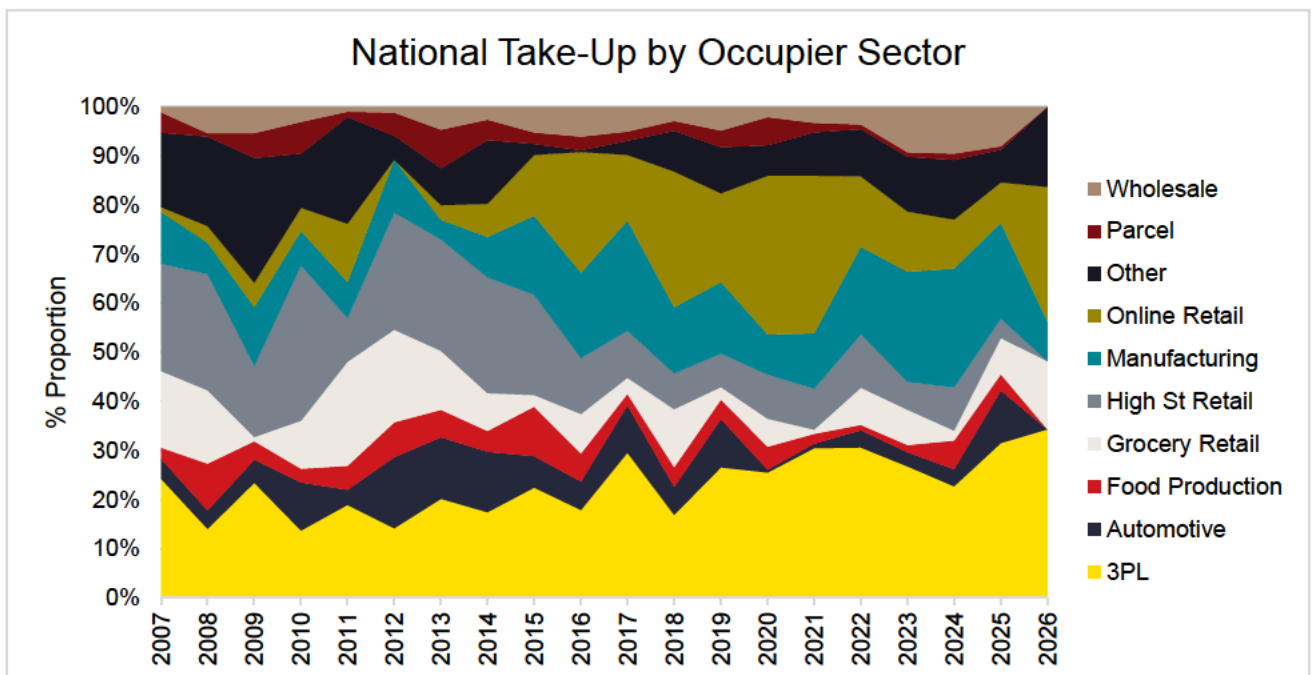
Market Report - Site 88, Hinckley Road, Ansty

In addition, the market reflects a clear occupier preference for best-in-class quality units with over 75% of space transacted being Grade A (either speculatively developed or existing units), against a pre-Covid average of 68%.



National Take-Up by Grade, Prime vs Secondary, Savills Research (February 2026)

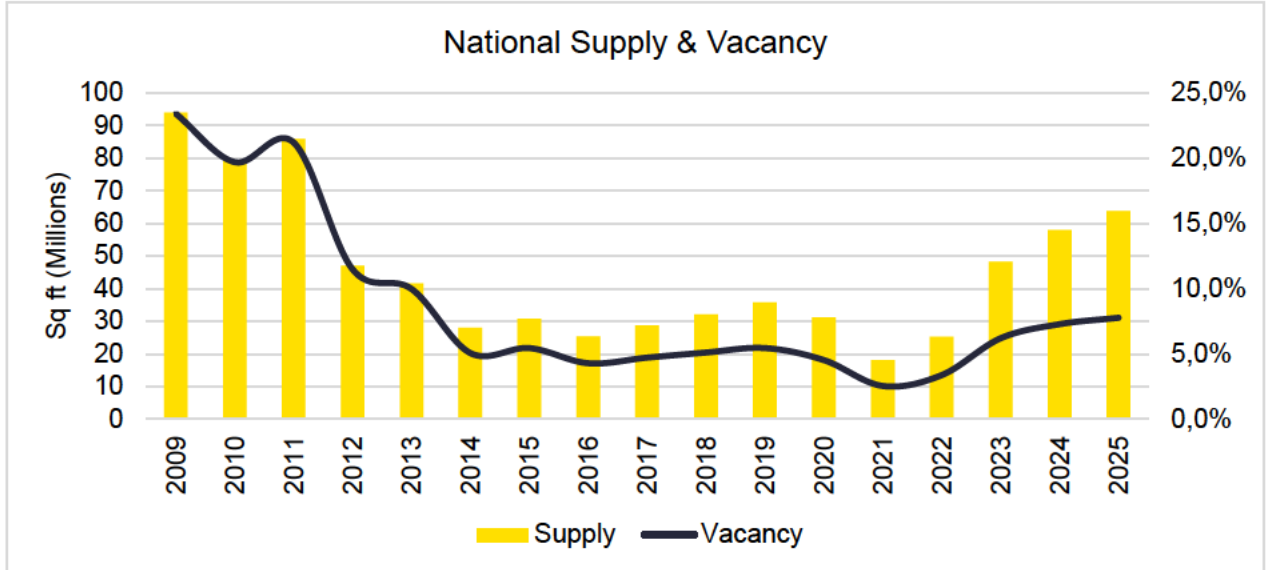
The occupier mix demand points towards a resurgence in manufacturing-related demand, with companies in that sector accounting for 33% of the market at 10.6 million sq ft, which was up 8% year-on-year, thereby giving further evidence to the near/re-shoring trend. Third-party-logistics (3PLs) still remained the most active occupier sector, taking approximately 10.7 million sq ft of space. 2025 also saw traditional high street and grocery retailers increase their take-up by 16% to reach 3.7 million sq ft.



National Take-Up by Occupier Sector, Savills Research (February 2026)

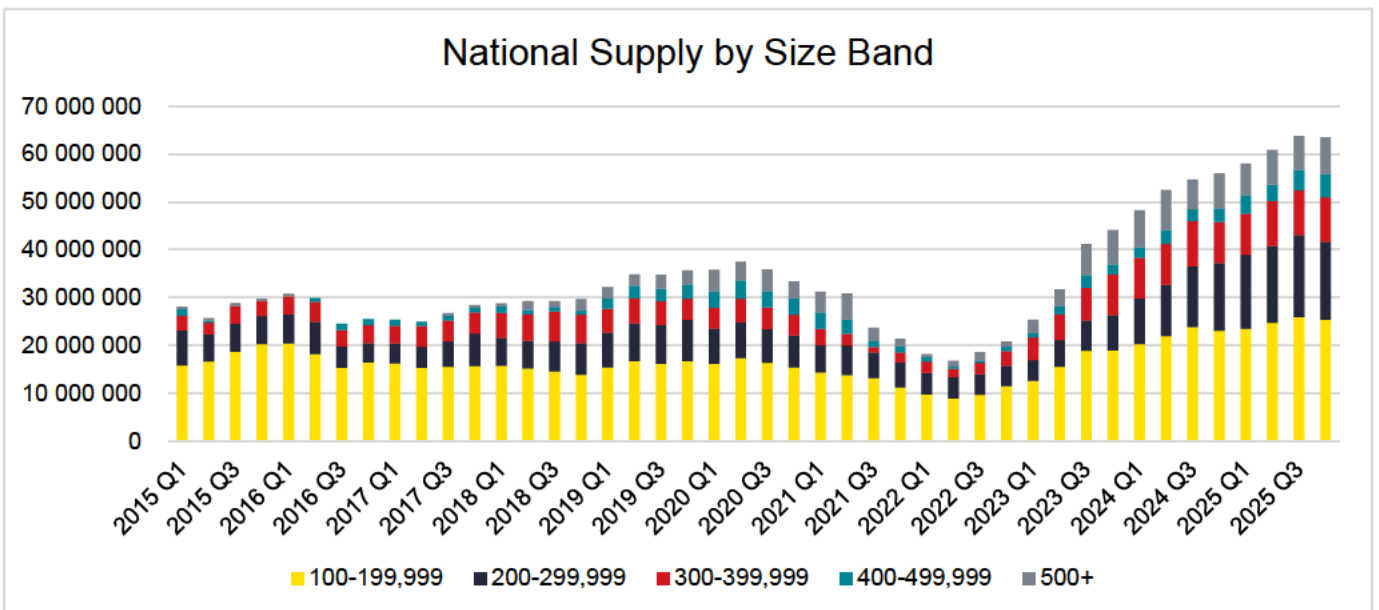
National Supply

In 2025, despite the strong levels of take-up in the year, the total supply at the end of the year stood at 63.85 million sq ft. This reflects a vacancy rate of 7.78%. This increase is a combination of speculative completions and second-hand supply coming back to the market.



National Supply and Vacancy Rate, Savills Research (February 2026)

Analysing the national supply, the 63.85 million sq ft consists of approximately 35% Grade A speculatively developed space, 22% Grade A space, 19% Grade B space and 24% low-quality Grade C space. As a result, there is approx. 15 million sq ft of poor quality space which would not be competition for new Grade A space and would likely be deemed obsolete given inferior specification and poor ESG credentials. We are also tracking 24 units that are under offer to occupiers, and should these deals complete, this will result in supply falling to 57.6 million sq ft. With that in mind, we do expect the vacancy rates to fall within 2026.



National Supply by Size Band, Savills Research (February 2026)

4. Midlands Industrial Market

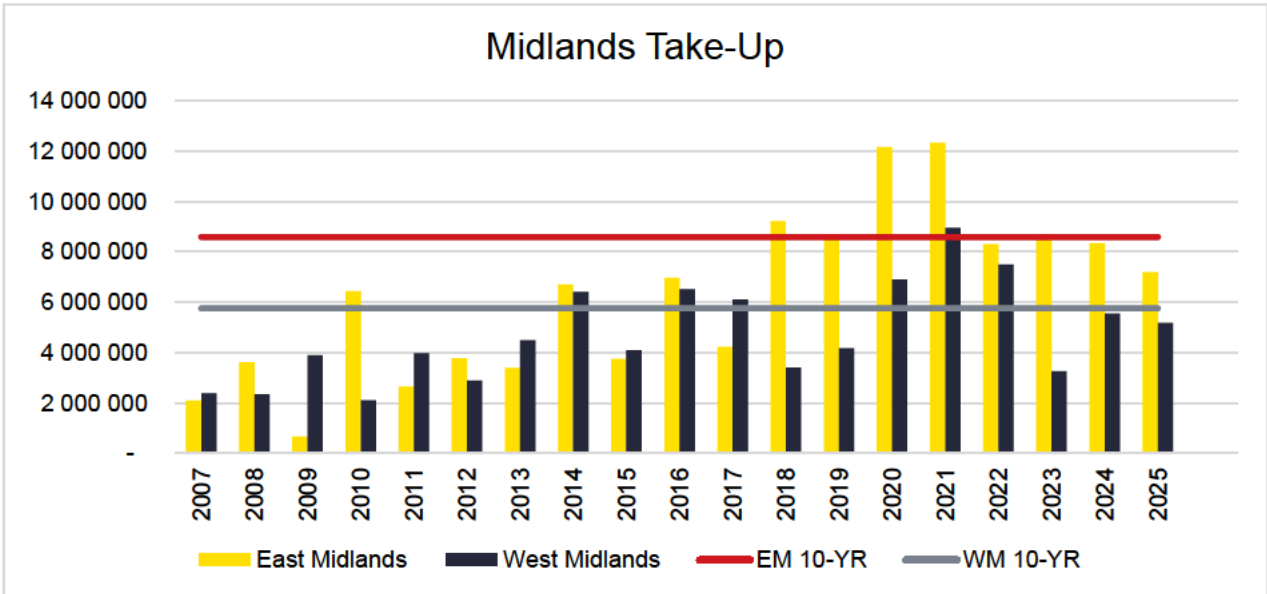
At a regional level, the East and West Midlands are part of the Golden Logistics Triangle which represents the largest area of logistics and warehousing occupiers in the country. This strategic location, along with a history of manufacturing, means that the wider Midlands region has the strongest levels of take-up across the UK.

Over 37% of 'Big Box' sheds taken up across the country in 2025 were in the East and West Midlands, with the breakdown as follows:

- 21.6% was taken up in the East Midlands equating to 7.2 million sq ft.
- 15.5% was taken up in the West Midlands equating to 5.2 million sq ft.

The lower levels of take-up in the West Midlands relative to the East Midlands is primarily driven by a scarcity of industrial land, driven by the presence of a large amount of green belt land. In this context, demand remains extremely high for readily developable industrial land. In 2025, Savills saw a large proportion of requirements come from both global and significant national companies looking to establish either their manufacturing headquarters or logistics platforms across the wider Midlands region.

As economic uncertainty returns to the wider UK market, occupiers continue to choose the Golden Triangle as their preferred location for large national manufacturing and distribution centres.



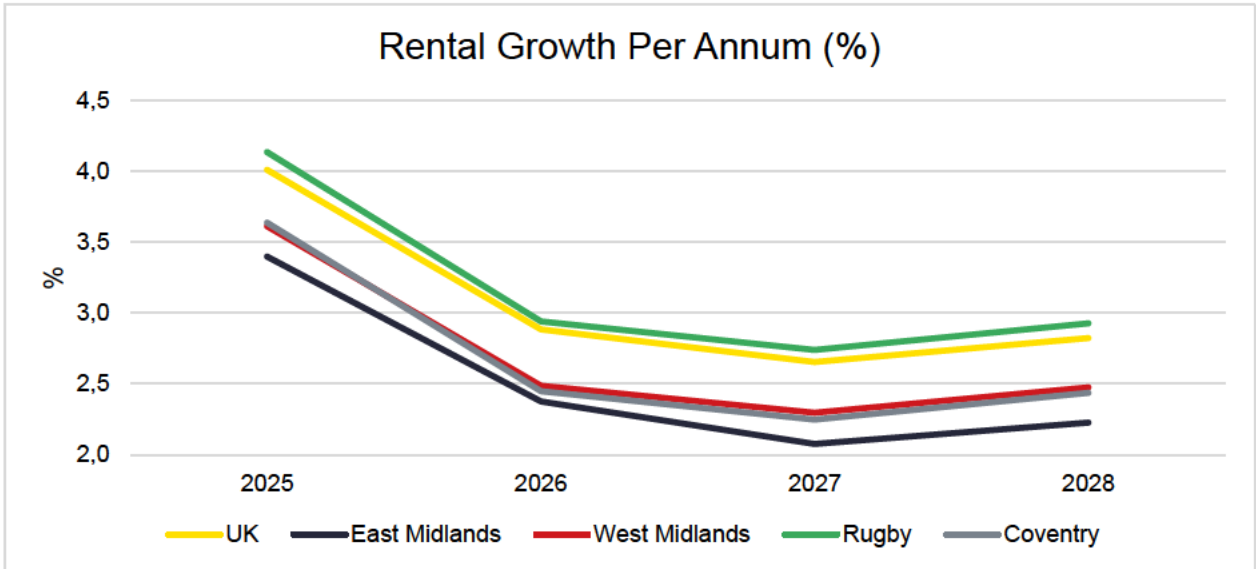
Midlands Take-Up, Savills Research (February 2026)

Market Report - Site 88, Hinckley Road, Ansty

We have set out below key transactions across the Midlands within the last 24 months:

Date	Address	Size (Sq Ft)	Tenant	Terms	Comments
Nov 25	SPC 220 Segro Park Coventry Coventry	220,512	DP World	Leasehold Confidential	Speculatively developed unit 15 m clear internal height 20 docks and 2 level access
Oct 25	DC327 Prologis Park DIRFT Daventry	327,689	GXO Logistics	Leasehold Confidential	Speculatively developed unit 18 m clear internal height 32 docks and 5 level access
Sep 25	Zone G Prologis Park DIRFT Daventry	1,299,254	M&S	Leasehold Confidential	Pre-Let Bespoke Requirement
Sep 25	DC2 Prologis Park Hams Hall	261,147	Fiege Logistics	Leasehold 10-year lease 5-year break	Speculatively developed unit 15 m clear internal height 24 docks and 4 level access
Aug 25	Optimus 277 Optimus Point Leicester	277,475	Navigator Tissue UK	Leasehold 15-year lease	Modern second-hand unit 12.5 m clear internal height 28 docks and 4 level access
Jul 25	Unit 5 Symmetry Park Rugby	391,077	Iron Mountain (Sainsbury's contract)	Leasehold 15-year lease	Speculatively developed unit 17 m clear internal height 36 docks and 4 level access
Mar 25	EMDC 343 East Midlands DC Castle Donington	342,741	SuperSmart Services	Leasehold 15-year lease	Speculatively developed unit 15 m clear internal height 29 docks and 4 level access
Nov 24	Plot 3 Symmetry Park Kettering	956,042	Amazon	Leasehold Confidential	Pre-Let Bespoke Requirement
May 24	MPC3 Magna Park Corby	587,662	Bleckmann Logistics	Leasehold	Speculatively developed unit 18 m clear internal height 64 docks and 8 level access
May 24	Mountpark Hinckley (Padge Hall Farm) Land at A5	491,000	Tesco	Leasehold Confidential	Pre-Let Bespoke Requirement
Sep 24	Plot 4 Magna Park Corby	1,300,000	Nike	Leasehold Confidential	Pre-Let Bespoke Requirement
May 24	MPS9 Magna Park Lutterworth	388,444	CEF	Leasehold 20-year lease	Speculatively developed unit 15 m clear internal height 36 docks and 4 level access
Feb 24	Plot 4 Segro Logistics Park Northampton	1,191,000	Yusen	Leasehold	Pre-Let Bespoke Requirement
Mar 24	DC1 Central Park Rugby	376,563	Hoover	Leasehold Confidential	Refurbished s/hand unit 15.8 m clear internal height 26 docks and 4 level access
Aug 23	DC625 DIRFT Daventry	625,326	Inditex	Leasehold 15-year lease 10-year break	Speculatively developed unit 18 m clear internal height 92 docks and 9 level access
May 23	Rugby 661 Central Park Rugby	661,348	Sainsbury's	Leasehold 5-year lease	Refurbished s/hand unit 12 m clear internal height 40 docks and 2 level access
Mar 23	DC9 Apex Park Daventry	357,221	Hankook Tyres	Leasehold Confidential	Pre-Let Bespoke Requirement
Feb 23	Plot 3A Segro Park Coventry	598,050	DP World (Syncreon UK)	Leasehold 15-year lease 10-year lease	Pre-Let Bespoke Requirement

Due to the current supply and demand dynamics, Savills has revised its rental growth projections. In our baseline scenario, Savills is forecasting rental growth of 2.5% per annum for the East Midlands and 2.7% for the West Midlands (2025 - 2028 projections). That being said, for the individual locations of Coventry and Rugby, the forecasts are 2.7% and 3.2% respectively.

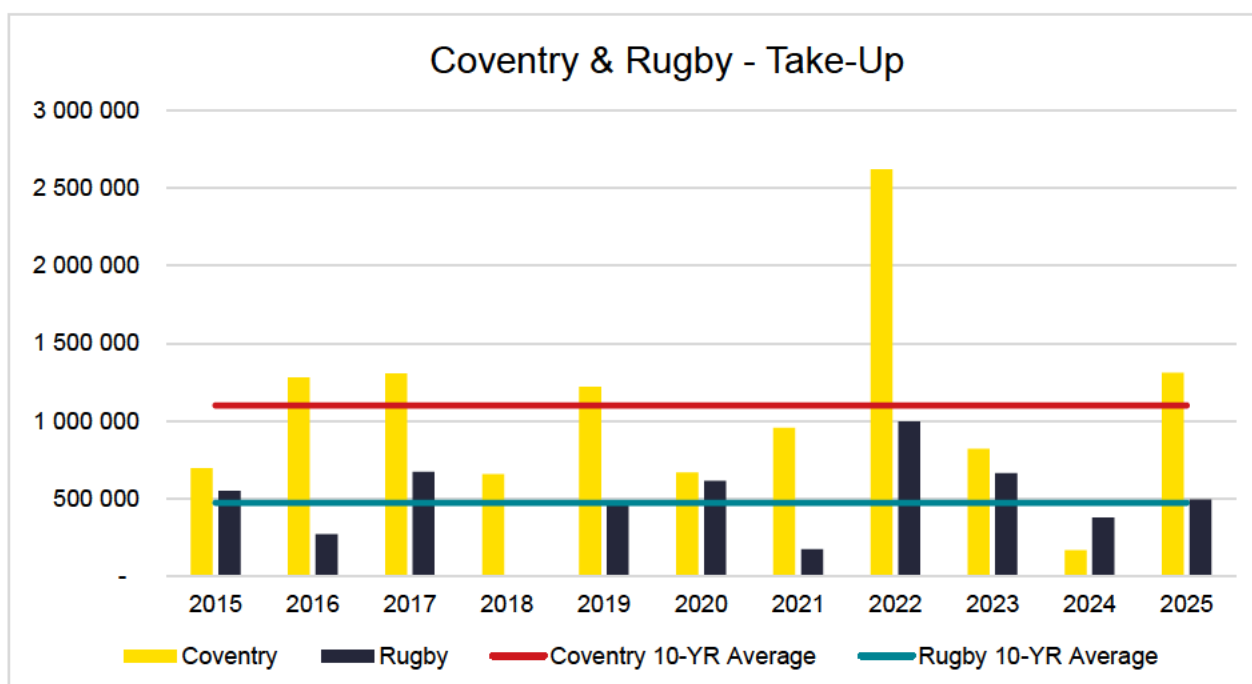


Rental Growth Forecast, Savills Research (February 2026)

The baseline rental growth projection for the UK logistics sector is 3.1% per annum, exceeding the pre-Covid ten-year average. Regional variations exist, but overall, the sector is expected to maintain solid rental growth, supported by improving fundamentals and investor confidence.

5. Local Industrial Market

Coventry and Rugby are located firmly at the centre of the Midlands within the Golden Triangle, given their access to the M1 and M6 motorways. This provides quick access throughout the region and links to the wider UK market. This is an increasingly important corridor for occupiers to be located in, due to its strategic importance for access to most of the UK within a HGV drive-time. Focussing on the local area, see below the take-up levels of these locations since 2015.



Savills Research, February 2026

The table above demonstrates the strong levels of demand across the locations over the last 10 years. The last two years saw levels of take-up fall below the 10-year average caused in part by to the restricted levels of supply within these locations. With build costs increasing and the investment market softening in the industrial and logistics over the last 12 – 18 months, this has meant that development of new space has been reduced. This is especially true for Rugby where there has been little-to-no recent speculative development except for Symmetry Park Rugby.

Some of the most notable deals over the last couple of years in the area include:

- DP World leasing approx. 220,000 sq ft at Segro Park Coventry in November 2025
- Iron Mountain leasing approx. 391,000 sq ft at Symmetry Park Rugby in July 2025
- Hoover leasing approx. 376,000 sq ft at Central Park Rugby in March 2024

The take-up figures within the graph above do not include the Tesco pre-let at Mountpark Hinckley (Padge Hall Farm) which adds a further 491,000 sq ft. Savills Research does not include this within the data for Coventry and Rugby, given it is on the A5 in Hinckley so allowed for in that dataset. That being said, a proportion of the site does fall within Rugby Borough Council (the site also sits within Nuneaton & Bedworth Borough and Hinckley & Bosworth Borough Council) and the site has been accounted for by Rugby Borough Council within the land to satisfy their strategic need. Approx. 40% of this site has already been taken through the Tesco pre-let as mentioned. Mountpark have detailed consent for two additional units of approx. 258,000 sq and 514,000 sq ft. The Hinckley market is somewhat different to Coventry and Rugby, with some occupiers not willing to move between the two locations due to staffing and historic routes.

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Moreover the take-up figures do not account for the acquisition by the Frasers Group of land adjacent to the subject site at Ansty. This is the land known as Crowner Fields Farm, Ansty. This requirement takes out approx. 278 acres, where circa 3.5 million sq ft of industrial / warehouse space will be developed (of which 2.7 million sq ft will reflect storage and distribution space).

We have set out below the key transactions within the local area since 2023 for units over 100,000 sq ft. The below table highlights the recent levels of take-up within Coventry and Rugby:

Date	Address	Size (Sq Ft)	Tenant	Terms	Comments
U/O	Unit 7 Symmetry Park Rugby	170,529	<i>Under Offer</i>	Leasehold Confidential	Speculatively developed unit 15 m clear internal height 20 docks and 2 level access
Dec 25	Apollo VI Ansty Park Coventry	269,882	JD Logistics	Leasehold 10-year lease 5-year break	Speculatively developed unit 14 m clear internal height 27 docks and 2 level access
Dec 25	Apollo IV Ansty Park Coventry	172,407	Daals	Leasehold 5-year lease	Speculatively developed unit 12 m clear internal height 17 docks and 2 level access
Dec 25	Central 100 Central Park Rugby	100,766	Continental	Leasehold 5-year lease	Refurbished s/hand unit 12.5 m clear internal height 10 docks and 2 level access
Nov 25	SPC 220 Segro Park Coventry	220,512	DP World	Leasehold Confidential	Speculatively developed unit 15 m clear internal height 20 docks and 2 level access
Oct 25	DC105 Prologis Park Coventry	104,884	Eurofit	Leasehold 10-year lease	Refurbished s/hand unit 10 m clear internal height 10 docks and 2 level access
Jul 25	Unit 5 Symmetry Park Rugby	391,077	Iron Mountain (obo Sainsbury's)	Leasehold 15-year lease	Speculatively developed unit 17 m clear internal height 36 docks and 4 level access
May 25	Apollo V Ansty Park Coventry	301,591	Daals	Leasehold 5-year lease	Speculatively developed unit 14 m clear internal height 27 docks and 2 level access
Mar 25	Apollo VII Ansty Park Coventry	117,076	JD Logistics	Leasehold 10-year lease 5-year break	Speculatively developed unit 12.5 m clear internal height 10 docks and 2 level access
July 24	DC4 Prologis Park Ryton	166,820	Furnolic	Leasehold 10-year lease 8.5-year break	Refurbished s/hand unit 12.5 m clear internal height 15 docks and 4 level access
Mar 24	DC1 Central Park Rugby	376,563	Hoover	Leasehold Confidential	Refurbished s/hand unit 15.8 m clear internal height 26 docks and 4 level access
Sep 23	DC10 Prologis Park Coventry	328,305	IFCO Systems	Leasehold 15-year lease 10-year break	Refurbished s/hand unit 12 m clear internal height 18 docks and 4 level access

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May 23	Rugby 661 Central Park Rugby	661,348	Sainsbury's	Leasehold 5-year lease	Refurbished s/hand unit 12 m clear internal height 40 docks and 2 level access
May 23	Apollo II Ansty Park Coventry	172,639	Staircraft	Leasehold 15-year lease	Speculatively developed unit 12.5 m clear internal height 15 docks and 2 level access
Feb 23	Plot 3A Segro Park Coventry	598,050	DP World (Syncreon UK)	Leasehold 15-year lease 10-year lease	Pre-Let Bespoke requirement

Since providing the initial report in May 2025, there has been over 1.56 million sq ft in take-up across 7 transactions.

It is particularly important to note Apollo at Ansty Park, located at Junction 2 in Coventry. It is owned by JingDong Property, having acquired the site off Goldman Sachs. The four unit speculative development ranges in size from 117,076 sq ft up to 301,591 sq ft and totalling 860,956 sq ft. Within the last 12 months, all of this space has been acquired by occupiers and there is currently no vacancy on the wider Park. This highlights the strategic importance of Junction 2 of the M6 to occupiers going forward, and strong leasing velocity of space within Opportunity Area 7, where Site 88 is located.

Set out below are the existing marketed Grade A competing buildings for the subject site of units over 100,000 sq ft within Coventry and Rugby:

Address	Size (Sq Ft)	Quoting Rent	Landlord / Lessor	Comments
Rugby 106 Central Park Rugby	106,196	£11.95 per sq ft	BARJANE	Speculatively Developed. PC in March 2026. 14 m clear internal height, 8 docks, 2 level access doors and 50 m yard depth.
Unit 110 Pickford Gate Coventry	119,243	£12.00 per sq ft	Royal London	Speculatively Developed. PC in October 2026. 12.5 m clear internal height, 10 docks, 2 level access doors and 50 m yard depth.
SPC 140 Segro Park Coventry	140,567	£10.50 per sq ft	Segro	Speculatively Developed. Available Now. 15 m clear internal height, 12 docks, 2 level access doors and 50 m yard depth.
Unit 7 Symmetry Park Rugby	170,529	£9.95 per sq ft	Tritax Symmetry	Speculatively Developed. Available Now. 15 m clear internal height, 20 docks, 2 level access doors and 50 m yard depth. Under Offer at date of this Report
DC5 Prologis Park Ryton	170,535	£10.00 per sq ft	LEVC	Fitted warehouse. Available now on sublease. 12.5 m clear internal height, 15 docks, 6 level access doors and 50 m yard depth.
Rugby 220 Valley Drive Rugby	220,263	£9.50 per sq ft	Delin Capital	Modern second-hand unit, under refurbishment. 12 m clear internal height, 19 docks, 7 level access and cross-dock. PC in March 2026.
Rugby 251 Central Park Rugby	250,400	£11.50 per sq ft	JingDong Property	Speculatively Developed. PC in October 2026. 15 m clear internal height, 24 docks, 3 level access doors and 50 m yard depth.

Market Report - Site 88, Hinckley Road, Ansty

Coventry 252 Coventry Log. Park Coventry	252,210	£10.00 per sq ft	Geodis	Fitted warehouse. Available Now. 15 m clear internal height, 20 docks, 2 level access doors and 50 m yard depth.
Unit 6 Symmetry Park Rugby	338,308	£9.95 per sq ft	Tritax Symmetry	Speculatively Developed. Available Now. 15 m clear internal height, 30 docks, 4 level access doors and 50 m yard depth.
C540 Panattoni Park Coventry	538,193	£12.50 per sq ft	Panattoni	Speculatively Developed. PC in January 2027. 15 m clear internal height, 48 docks, 6 level access doors and 55 m yard depth.
Rugby 673 Central Park Rugby	673,270	£9.00 per sq ft	Sainsbury's	Fitted warehouse. Available now on sublease. 12 m clear internal height, 40 docks, 2 level access doors and 40 m yard depth.

**those shaded in yellow are currently under construction and to be delivered within the next 12 months.*

The existing Grade A supply within the local area equates to approx. 2.98 m sq ft. From this, circa 170,000 sq ft is now firmly under offer on Unit 7 at Symmetry Park Rugby. This takes fully available existing supply down to approx. 2.81 m sq ft.

Reviewing the available supply in the local market of Coventry and Rugby further, of the 2.98 m sq ft, this is largely dominated by two units, being C540 at Panattoni Park Coventry and Rugby 673 at Central Park, Rugby (approx. 1.21 m sq ft combined). It is important to note that Rugby 673 is a second-hand building, constructed in the early 2000's and the specification is inferior to that of a brand new warehouse, in respect of ESG credentials and volumetric cubic capacity.

Moreover, there are very few sites that currently benefit from outline planning permission and are able to deliver unrestricted units over 100,000 sq ft within this area. These are limited to Segro at Segro Park Coventry, who have a further a further approx. 1.8 million sq ft that can be delivered. Segro have strong occupier interest in the remaining plots. Opus also have Plot 4 at Prospero (Ansty Park), which can deliver up to 161,557 sq ft. This is currently Build to Suit only.

The various pieces of strong interest are across available buildings and plots, which accounts for approx 1.96 million sq ft on 5 prospective deals, all expected to move forward within the next 6 - 12 months. This again highlights the leasing velocity in this area.

Market Report - Site 88, Hinckley Road, Ansty

In addition to the table set out within the WMSESS - HEDNA Alignment Paper to demonstrate the industrial need for big box units (9,300 sqm+) on non-strategic sites (sub 25 ha), Savills have also reviewed other examples of big box development on non-strategic sites within the last 10 years in the area that do not appear to have been included.

Site	LA	Floorspace (sq. m)	Site Area (ha)	Date Completed	Comments
HamdonGate Central Park, Rugby (2 units)	Rugby Borough Council	24,010	6.16	2015 / 16	Excluding the additional 5,574 sq m unit and the adjacent Quartzelec facility
Stoford / Blackrock Carbon at Middlemarch, Coventry (2 units)	Coventry City Council	28,833	7.44	2017 / 18	Two units, let to World of Books and Dirks Consumer Logistics (Zooplus)
M&G Imperial Park at Middlemarch Coventry (2 units)	Coventry City Council	47,847	11.98	2017	Excludes the 5,574 sq m unit (let to Innovare Systems)
Goodman Bermuda Park, Nuneaton (1 unit)	Nuneaton and Bedworth Borough Council	21,404	4.14	2020	Acquired by HelloFresh
Baytree Rhenus Logistics Campus Nuneaton (2 unit)	Nuneaton and Bedworth Borough Council	91,142	25	2023	Both units acquired by Rhenus to create a high ESG logistics campus
Goodman Lyons Park, Coventry (3 units)	Coventry City Council	65,471	23.28	2018 / 2022	Note an additional 30,000 sq m could have been accommodated but was specified to Amazon parking. This excludes the 75k unit on plot 2, and 5 mid-box units forward funded by LaSalle IM (now owned by DTZ IM)
Canmoor / IPIF Puma Park, Scimitar Way, Coventry (1 unit)	Coventry City Council	11,237	4.19	2022	Excluding the additional 2,694 sq m and 3,530 sq m units.
Travis Perkins Whitley Business Park, Scimitar Way, Coventry (1 unit)	Coventry City Council	19,881	8.9	2016	Developed by TP for occupation, subsequently let to Kuehne + Nagel
Total		309,825	91.09		

The above table highlights the strong demand for big box on non-strategic sites in the local area to those already highlighted within the WMSESS - HEDNA Alignment Paper, for example Coventry Logistics Park that was developed by Bericote / JP Morgan,. A couple of recent examples include Middlemarch Business Park in Coventry, where Stoford / Blackrock developed two units (103,000 sq ft and 207,000 sq ft) and successfully let the scheme to World of Books and Zooplus (Dirks Consumer Logistics) respectively. Moreover, Canmoor / IPIF developed three units at Puma Park in Coventry, which was subsequently let to Kite Packaging who acquired all three units on the scheme for a wider campus. We understand Kite Packaging preference was to acquire a single unit of approx. 175,000 - 200,000 sq ft but were unable to find a suitable solution so ended up taking all three units at Puma Park instead.

6. Active Requirements

Detailed below is an overview of current active requirements within the area. Notably for Site 88 (Hinckley Road, Ansty), 21 of these are specifically looking for space in and around the Rugby / Coventry market, equating to demand for up to 5.1 m sq ft of space in total, with a further 25 looking for space within the wider Golden Triangle location equating to a further 8.425 m sq ft.

Occupier Type	Requirement Size	Comment
Retailer	500,000 sq ft	Have an existing facility in Coventry, consolidation exercise
National Trade Occupier	100 - 150,000 sq ft	Facility in Coventry, looking to consolidate operations
International Retailer	500,000 sq ft	For new facility in the UK, focussed on Golden Triangle
International 3PL	250 - 400,000 sq ft	3PL seeking to secure new contract
Local 3PL	150 - 300,000 sq ft	Based in Coventry in secondary space, seeking new site
National Trade Occupier	200 - 300,000 sq ft	Seeking new space within Golden Triangle
Defence-Sector Occupier	100 - 150,000 sq ft	Based in Coventry, seeking larger premises
Food Manufacturer	300,000 sq ft	Seeking new warehouse for food processing facility
Manufacturer	150,000 sq ft	Based in Coventry, seeking new premises to support growth
Retailer	500,000 sq ft	Midlands HQ, seeking new facility
Global Manufacturer	200 - 400,000 sq ft	Based in East Anglia, seeking to relocate to Golden Triangle
Defence-Sector Occupier	100,000 sq ft	Based in Coventry, upscaling due to additional contracts
Local B2 / B8 User	100,000 - 150,000 sq ft	Based in Coventry, consolidation of premises
Local Manufacturer	150,000 sq ft	Based in Coventry, for new facility
Local Manufacturer	100,000 - 200,000 sq ft	Based in Exhall, for larger facility to support growth
Local B2 / B8 User	100,000 - 150,000 sq ft	Based in Exhall, for new bespoke facility
Manufacturer	100,000 - 200,000 sq ft	Based in Coventry, to support growth of the occupier
Automotive User	100,000 sq ft	Consolidation from various sites in to a bespoke unit
UK 3PL	250,000 - 500,000 sq ft	Golden Triangle location for new contracts
Specialist 3PL	300,000 sq ft	New facility in Coventry to support existing customer
International E-Comm	300,000 - 600,000 sq ft	For bespoke facility within Coventry
UK Parcel Co	150,000 - 250,000 sq ft	New bespoke facility for parcel delivery company
European 3PL	200,000 - 400,000 sq ft	New unit for customer contracts, centred on Coventry
Supermarket Retailer	250,000 sq ft	For new facility. Require high ESG credentials.
Local 3PL	100,000 sq ft	Based in Coventry, for new facility to support growth
Regional 3PL	100,000 - 150,000 sq ft	Based in the region, for new facility re expanding contracts
International Parcel Co	150,000 - 250,000 sq ft	Located close to Coventry, seeking new facility with top ESG
International Parcel Co	300,000 - 500,000 sq ft	Based in the region, seeking new bespoke solution
International End User	250,000 - 300,000 sq ft	Based in Coventry, seeking new bespoke facility in the area
European 3PL	200,000 - 400,000 sq ft	Seeking larger facility within the Golden Triangle
Automotive 3PL	100,000 - 150,000 sq ft	Contract with automotive client, seeking new facility
International 3PL	250,000 - 500,000 sq ft	New contracts, seeking warehouse in Golden Triangle
Regional Parcel Co	150,000 - 200,000 sq ft	Golden Triangle requirement for new Midlands DC
International 3PL	300,000 - 400,000 sq ft	Currently in Coventry, consolidation to bespoke larger unit
Supermarket Retailer	500,000 sq ft	Golden Triangle requirement
Local B8 User	100,000 - 150,000 sq ft	Based in Rugby, seeking new facility in the area
International 3PL	250,000 - 350,000 sq ft	Midlands-wide requirement for additional space
National B2 / B8 User	220,000 - 300,000 sq ft	For new facility on the M69 Corridor
European 3PL	300,000 - 400,000 sq ft	Bespoke facility for new secure contract
Local B8 User	100,000 - 125,000 sq ft	Relocation from existing facility to more efficient, new unit
International 3PL	100,000 - 150,000 sq ft	New contract, looking within Coventry and Rugby
Manufacturer	150,000 - 250,000 sq ft	Manufacturer for bespoke facility in Rugby / Coventry
Specialist 3PL	500,000 sq ft	New bespoke facility, satisfy long-standing customer
International 3PL	200,000 - 250,000 sq ft	Bespoke solution within the Golden Triangle
Specialist 3PL	250,000 - 400,000 sq ft	Additional facility within the Golden Triangle
European 3PL	200,000 sq ft	New contract, focus on Golden Triangle

Market Report - Site 88, Hinckley Road, Ansty

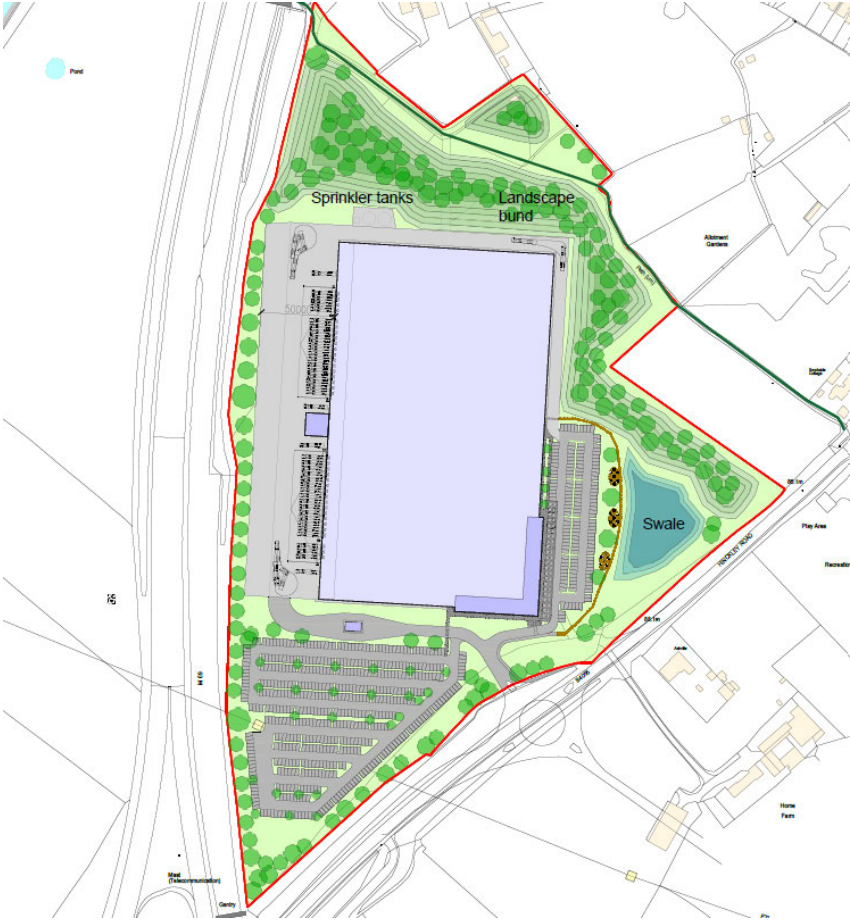
The above list illustrates a pipeline of current active enquiries, with **active demand between 10.12 m sq ft - 13.525 m sq ft**, indicating the significant scale of unmet need from a range of local / regional, national and international occupiers that could be satisfied through bring the subject site forward.

The existing Grade A supply within the local area equates to 2.98 m sq ft (as detailed in the previous section of the report). From this supply, approx. 170,000 sq ft is under offer. This takes fully available existing supply down to approx. 2.81 m sq ft. Based on the requirements detailed above, the current available supply (after allowing for those that are already under offer) would only be able to satisfy approx. 55% of the current active requirements for Coventry / Rugby alone. This is without taking into account the more footloose requirements for the region which would also like to be located in Coventry / Rugby due to its strong employment story and strategic location with quick national connectivity. Ultimately, this means that more land needs to be brought forward to satisfy this greater level of demand. These are just active requirements currently in the market but over the course of the Local Plan period this will continue to increase. Typically, Savills data has an estimated 6 - 9 month lag between requirements logged and then transacted.

7. Proposed Scheme Review

We have been provided with a copy of one of the feasibility plans for the subject site, PRC-11644-FE001-Rev C, which is detailed below.

The feasibility site plan provides a single unit extending to 413,043 sq ft (38,373 sq m) on a Gross Internal Area basis. The site totals approx. 31 acres (12.6 ha), providing a low site coverage of 33.2%.



Market Report - Site 88, Hinckley Road, Ansty

Another feasibility plan has been prepared showing a multi-unit layout, with units ranging from 63,873, - 168,584 sq ft, which is also very suitable for demand in this geography. The plan is detailed below.



The feasibility plans are well aligned to the requirements of the majority of occupiers. The specification detailed within the plans in relation to loading provisions (i.e. dock and level access loading), yard depth, car parking spaces and the proposed ESG credentials (both in respect of the building itself i.e. BREEAM Target Outstanding and EPC A+ along with wellness created by the outdoor green space on the site) are in line with the market demand.

We believe either of the schemes would be well received in the market, given the overall demand and active occupier requirements as well as the limited supply of buildings in the area. Moreover, the proposed schemes offer the flexibility required to satisfy the varying size requirements as detailed in the Section 6 of this report.

8. Summary

The subject site is located in a prime location adjacent to Ansty Interchange, where the M6 and M69 motorways meet to provide strong transport links to the region and wider UK market. This corridor is a prime market, where land and floorspace remain in high demand from occupiers.

The market evidence as detailed within the report highlights a shortage of supply relative to demand in the local area, providing a strong and compelling case to bring the site forward to meet such demand.

This trend is best highlighted by existing Grade A supply within the local area equating to 2.98 m sq ft (of which 170,000 sq ft is under offer). This takes fully available existing supply down to approx. 2.81 m sq ft. Based on the active requirements, the current available supply of big box units would only be able to satisfy approx. 55% of the current active requirements for Coventry / Rugby. These are just active requirements currently in the market for this particularly area, notwithstanding the more footloose requirements that choose Coventry and Rugby due to strong employment story and strategic location. Over the course of the Local Plan period, the level of active requirements will continue to increase.

This demand will increase given the projected growth of online sales, changes in supply chain and the drive from occupiers to take best-in-class premises. As a result, more land is required to be brought forward to meet the ongoing demands of occupiers.

We trust that the above provides you with the information you need at this stage. Savills would be pleased to discuss this further with you when convenient.



Note continued

APPENDIX 2: Masterplan drawing – Coton Park East

Coton Park East masterplan⁶



⁶ Site 64 Coton Park East Masterplan, Rugby. Source: <https://www.rugby.gov.uk/documents/20124/0/Site+64%2C+Coton+Park+East%2C+Rugby%2C+Concept+Plan.pdf/e13a970f-5fc7-81e6-ec42-0af71f0be0df?t=1742563197892>



Note continued

Walsgrave Hill masterplan⁷



⁷ Site 121, Land at Walsgrave Hill masterplan, Coventry. Source: <https://www.rugby.gov.uk/documents/20124/0/Site+121%2C+Land+at+Walsgrave+Hill%2C+Coventry%2C+Vision+Document.pdf/810f901c-4bbf-320f-cfa0-9859fc669122?t=1742565514819>



Document 3

GREEN BELT APPRAISAL - ADDENDUM

REGULATION 19 CONSULTATION



MARCH 2026



FRASERS CAMPUS

PLANNING CONSENT REFERENCE NUMBER:R23/1027



SITE 88
HINCKLEY ROAD
ANSTY
CV7 9JF



Document Management.

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1. Introduction.

- 1.1. This Addendum to the Reg 18 Site 88 Green Belt Appraisal has been prepared by Pegasus Group on behalf of BARJANE in respect of Site 88: Hinckley Road, Ansty, Coventry, CV7 9JF (the 'Site'). Rugby Borough Council (the 'Council') have recently published their Proposed Submission (Reg. 19) Local Plan (Regulation 19) for public consultation, with all comments required by 13th March 2026. This Addendum has been prepared as part of representations to the emerging Local Plan to support the Site's allocation for employment use.
- 1.2. The Site is located approximately 850m to the north-east of Coventry, slightly to the north of Junction 2 of the M6, and approximately 60m to the south-west of the settlement edge of Ansty. The Site is triangular in shape with an area of circa 12.6ha and is currently used for recreational horse grazing. It is bound by the M69 motorway to the west, Hinckley Road (B4065) to the south-east, and the village of Ansty to the north. The Site is separated from the village of Ansty by a collection of small paddocks and allotments. The Site is accessed from Hinckley Road and a track bisects the Site on a north-south alignment. There are currently no buildings within the Site; however, pylons and OPL cross the southern part of the Site.
- 1.3. The Site is located within the Green Belt and as such, this Addendum considers the Site's potential to be reclassified as 'Grey Belt' as defined by the *National Planning Policy Framework* (the 'NPPF')¹.
- 1.4. When introducing the Grey Belt in December 2024, the Government was clear that the change was to be interpreted as a new strategic approach to Green Belt land designation and release. In the first instance, it required local authorities to use the local plan process to adopt a 'sequential approach', considering brownfield land, then Grey Belt land, and only then higher performing Green Belt land.
- 1.5. The Government fully expected developers to bring forward proposals on low-performing Grey Belt land outside of the plan process.
- 1.6. As the Secretary of State for Housing and Planning made clear in a Parliamentary Statement (27th February 2025) with author's emphasis:

"We are clear that development must look to brownfield first, prioritising the development of previously used land wherever possible. However, we know brownfield development alone will not be enough to meet our housing need. That is why the revised National Planning Policy Framework (NPPF) published in December 2024 included a new approach to the Green Belt, prioritising the release of lower quality grey belt land within it..."

¹ [National Planning Policy Framework \(amended February 2025\) - GOV.UK](#)

Reg. 18 Green Belt Appraisal (May 2025, BARJANE)

- 1.7. A Reg 18 Site 88 Green Belt Appraisal was submitted as part of representations to the Regulation 18 Local Plan consultation process. This appraisal concluded that the Site currently **does not** strongly contribute to Purposes (a), (b) or (d) and instead it has been assessed to make **No Contribution** to these purposes through the application of the PPG methodology.
- 1.8. Following the development of Site 95: Crouner Fields Farm and Home Farm, the Site’s contribution to Purpose (a) is judged to increase to **Moderate** and still would not make a ‘strong’ contribution to this purpose. The Grey Belt assessment findings are summarised at **Table 1** (below):

Receptor	Purpose (a): Checking unrestricted sprawl	Purpose (b): Preventing the merging of towns	Purpose (d): Preserving the setting and special character of historic towns
Site 88	No Contribution / Moderate	No Contribution	No Contribution

Table 1: Summary of Green Belt Appraisal (May 2025, BARJANE)

- 1.9. The Reg 18 Site 88 Green Belt Appraisal also concluded that the Proposed Development would **not** result in any conflict with Purposes (e) in relation to assisting urban regeneration and would only cause only **Moderate** harm to Purpose (c), in relation to safeguarding the countryside from encroachment. On this basis, it was concluded that the release of the Site from the Green Belt to allow the Proposed Development would not **fundamentally** undermine the five purposes (taken together) of the remaining Green Belt within the wider plan areas of Rugby Borough Council.

Local Plan Evidence Base

Green Belt Contribution Study – Stage 1 (October 2025)

- 1.10. LUC was commissioned by the Council to undertake a strategic assessment² of the contribution of Borough’s Green Belt land to the NPPF Green Belt purposes.
- 1.11. This assessment, which replaces the *Joint Green Belt Study (2015)*³ carried out by LUC for the Council and neighbouring authorities in 2015, is designed to provide a high-level strategic analysis to inform the early stages of the preparation of the Council’s new Local Plan, specifically to inform work for the Council’s Reg. 19 Local Plan consultation.

² [Green Belt Contribution Study – Strategic Assessment \(2025\) – LUC](#)

³ [Joint Green Belt Study \(2015\) – LUC](#)

- 1.12. The assessment methodology takes account of changes to the NPPF in December 2024 which introduced the concept of ‘Grey Belt’ and the requirement for local authorities to review their Green Belt boundaries, unless they are able to meet their identified development need in full. The assessment draws upon *National Planning Practice Guidance* (the ‘PPG’)⁴ on the assessment of Green Belt land to identify Grey Belt sites (published in February 2025).
- 1.13. As a strategic-scale analysis, this study did not produce an assessment of defined parcels of land but instead used an analysis process to identify variations in contribution to the purposes, with areas (10ha or greater) being defined to reflect those variations.
- 1.14. The conclusions drawn for the area of Green Belt that washes over the Site are summarised at **Table 2** (below):

Receptor	Purpose (a): Checking unrestricted sprawl	Purpose (b): Preventing the merging of towns	Purpose (c): Safeguarding the countryside from encroachment	Purpose (d): Preserving the setting and special character of historic towns	Purpose (e): Assisting urban regeneration
The Parcel in which the Site is situated	Strong contribution	Weak / Moderate contribution	Strong contribution	Weak contribution	Moderate contribution

Table 2: Summary of Green Belt Contribution Study – Stage 1

- 1.15. The analysis also flagged areas that could potentially be identified as Grey Belt – which did **not** include the Site – as a consequence of meeting the NPPF’s definition of Grey Belt:

“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.”

Green Belt Contribution Study – Stage 2 (December 2025)

- 1.16. This second stage of assessment⁵ provided a more detailed analysis for land within selected sites being promoted for allocation. None of these sites lie within areas identified as Grey Belt by the Stage 1 strategic-scale assessment; however, the Stage 2 assessment provides more detailed analysis to identify smaller-scale variations in contribution and, as a result, in the location of additional Grey Belt land. As the Site was not progressed by the Stage 2 Site Options Assessment, it was not subject to this additional, finer grain analysis.

⁴ [Assessing Green Belt to identify Grey Belt land – GOV.UK](#)

⁵ [Green Belt Contribution Study – Stage 2 Site Contribution Assessments \(2025\) – LUC](#)

Topic Paper: Green Belt Exceptional Circumstances (December 2025)

- 1.17. The Topic Paper⁶ explains that the Council's case for exceptional circumstances is different for the different types of potential Green Belt release, whilst also acknowledging at Paragraph 2.19 that the gross need for employment land in the Borough is **significant**, comprising approximately 1,034,000m² (287ha) of floorspace for use classes B2, E(g)(ii) and (iii), and B8.
- 1.18. The Topic Paper quotes the West Midlands Strategic Employment Sites Study 2024 (WMSESS) that states the following of Opportunity Area 7 (OA7):

"Coventry and Rugby continue to be the key markets in the Midlands and continue to see high levels of demand and resulting take-up. The market is positioned firmly within the "Golden Triangle" with immediate access to the M6/M1 interchange ..."

- 1.19. OA7 incorporates Coventry and Rugby and small parts of Nuneaton and Bedworth Borough and Warwick District; however, all junctions within OA7 lie wholly or partly within Rugby Borough. Lack of available land at junctions means that, for the purposes of NPPF para 147(c), there are no realistic non-Green Belt options for accommodating the residual large site need for OA7 within the neighbouring authorities. At Paragraph 2.36, the Topic Paper accepts that, by reference to para 147(a) NPPF, there are no options for meeting the need for large-scale employment sites on brownfield land. **Importantly, the Site is located within OA7 in close proximity to Junction 2 of the M6.**

Stage 2 Site Options Assessment (December 2025)

- 1.20. The Stage 2 Site Options Assessment (2025)⁷ considers the Site as **Site 88: Hinckley Road, Ansty**, describing it as *"a large site composed of fields located between the M69, Hinckley Road and Ansty"*. The Stage 2 assessment concluded that the Site should not be progressed:

"... In view of its relatively weak existing accessibility, contribution to the Green Belt, and relationship with Ansty village the site is not being progressed beyond the Stage 2 Assessment."

- 1.21. The assessment notes that **no** heritage or ecological sensitivity was identified, and overall landscape sensitivity is **low**; however, it also concludes that the Site's proximity to the village of Ansty creates the potential for adverse visual and noise impacts. The assessment notes that the Site is located within the Green Belt, making a strong contribution to Purposes (a) and (c), and a moderate contribution to Purpose (b) – this is based on the wider parcel assessment, rather than a site-specific one.
- 1.22. **To date, the Council has not undertaken any site-specific assessment to determine the Site's suitability to be reclassified as Grey Belt land.**

⁶ [Topic Paper: Green Belt – Exceptional Circumstances \(2025\) – Rugby Borough Council](#)

⁷ [Stage 2 Site Options Assessment \(2025\) – Rugby Borough Council](#)

2. Purpose (a): To check the unrestricted sprawl of large built-up areas.

2.1. The PPG provides the following considerations for informing judgements as to whether land is Grey Belt in relation to Purpose (a):

Purpose (a): To check the unrestricted sprawl of large built-up areas	
<i>This purpose relates to the sprawl of large built-up areas. Villages should not be considered large built-up areas.</i>	
Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features:</p> <ul style="list-style-type: none"> - be adjacent or near to a large built-up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	<p>Assessment areas that contribute moderately are likely to be adjacent or near to a large built-up area, but include one or more features that weaken the land’s contribution to this purpose (a), such as (but not limited to):</p> <ul style="list-style-type: none"> - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or None	<p>Assessment areas that make only a weak or no contribution are likely to include those that:</p> <ul style="list-style-type: none"> - are not adjacent to or near to a large built-up area - are adjacent to or near to a large built-up area, but containing or being largely enclosed by significant existing development

Table 3: Extract from PPG (Paragraph 005)

2.2. There is no clear definition in the NPPF of what constitutes ‘urban sprawl’. The PAS guidance⁸ states in relation to Purpose (a):

⁸ [*Planning on the Doorstep: The Big Issues – Green Belt \(2015\)*](#)

“The terminology of ‘sprawl’ comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?”

- 2.3. The term is generally understood to mean the spreading of the town or city and its suburbs over previously undeveloped land.
- 2.4. There is also no definition provided by the December 2024 NPPF for a ‘large built-up area.’; however, the Office for National Statistics defines a ‘large’ built-up area as a settlement with a population range of between 75,000 – 199,999 people. As acknowledged at Paragraph 3.33 of the Green Belt Contribution Study – Strategic Assessment the city of Coventry can sensibly be considered a large built-up area.
- 2.5. At Paragraph 3.41, the Stage 1 study notes that (emphasis added): *“The point beyond which Green Belt land is not considered to be ‘near to’ a large built-up area is where development, whether it be the expansion of existing villages or the creation of new settlements would be sufficiently distinct from the large built-up area as to not be perceived as sprawl associated with it”.*
- 2.6. The Site is physically and visually distinct from Coventry, separated by open fields and both the M6 and M69 corridors. It was on this basis that the Reg 18 Site 88 Green Belt Appraisal (prepared by BARJANE) included in the Reg. 18 representations judged that the Site made **No** contribution to this purpose.
- 2.7. However, taking the alternative approach – i.e. that the Site is near to Coventry and therefore is in an edge-of-settlement location – it remains the case that the Site does not make a ‘Strong’ contribution to this purpose.
- 2.8. Following **Table 3** (above), it is important to note that the PPG indicates that an edge-of-settlement site is likely to make a ‘Moderate’ rather than ‘Strong’ contribution to the Green Belt where it includes *“one or more features that weaken the land’s contribution to this purpose”* (emphasis added). The list that follows is expressly non-exhaustive.
- 2.9. Accordingly, just one such feature can mean a site’s contribution to Green Belt Purpose (a) is ‘Moderate’ rather than ‘Strong’.
- 2.10. It is also clear from the language used in the PPG that features in question can be natural or man-made; and that they do not need to be present on all sides of the site (i.e. ‘largely enclosed’ is one of the factors that the PPG suggests points towards a ‘Weak’ contribution and therefore cannot tenably be treated as a requirement for a ‘Moderate’ as opposed to ‘Strong’ contribution).
- 2.11. At the Site, there are multiple such factors, where the existing natural and man-made features that would have the effect of partially enclosing and containing development:

- **having physical feature(s) in reasonable proximity that could restrict and contain development** – the Site is fully contained by the village of Ansty to the north, Hinckley Road to the east, and the M69 motorway to the west.
- **be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development** – the features noted above would have the effect of enclosing and containing development such that new development would not result in an incongruous pattern of development.
- **contain existing development** – there is a horse menage within the Site, but the majority of the Site is undeveloped.
- **being subject to other urbanising influences** – there are notable urbanising influences, including the surrounding strategic road network and the resultant traffic movement and noise, new residential development at the western-end of Grove Road, and the existing pylon and OPL that introduce dominant detracting features within the Site.

2.12. The existing physical and topographical features that have the effect of fully enclosing and containing development, and the presence of other urbanising features suggest that the Site makes only a **Moderate** contribution to this purpose at most..

2.13. Arguably, the Site does not even pass that test, as indicated in **Table 3** (above), land that makes only a 'Weak' contribution to Purpose (a) is likely to be *“adjacent to or near to a large built-up area, but containing or being largely enclosed by significant existing development”* (emphasis added).

2.14. It is demonstrably the case that this triangular-shaped Site is enclosed on all three sides by: (1) the village of Ansty; (2) Hinckley Road (and the Frasers Group development proposals in the future); and (3) the M69 motorway corridor.

2.15. The PPG guidance therefore strongly supports the argument that the Site makes only a **Weak** or **No** contribution to Purpose (a).

3. Purpose (b): To prevent neighbouring towns merging into one another.

3.1. The PPG provides the following considerations for informing judgements as to whether land is Grey Belt in relation to Purpose (b):

Purpose (b): To prevent neighbouring towns merging into one another	
<i>This purpose relates to the merging of towns, not villages.</i>	
Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none"> - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
Moderate	<p>Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or None	<p>Assessment areas that contribute weakly are likely to include those that:</p> <ul style="list-style-type: none"> - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Table 4: Extract from PPG (Paragraph 005)

3.2. The December 2024 NPPF is explicit with its terminology in relation to this purpose, citing ‘towns’ rather than other types of settlements such as villages and hamlets. The recent PPG update specifically states that this purpose “*relates to the merging of towns, not villages*”.

3.3. Ansty is not a town and the nearest towns to the Site are Bedworth and Nuneaton, circa 3.8km and 6.1km to the north-east of the Site respectively. In both cases, the Site would form only a very small part of the settlement gap, without making any contribution to visual separation. The large rural village of Bulkington lies approximately 2.8km to the north of Ansty; however, this settlement is not judged to be a town and should not be considered when judging the contribution this Site makes to Purpose (b).

3.4. The PPG makes clear that the Site’s location in a gap between a town (Coventry) and a village (Ansty) is not relevant when making judgements as to whether land should be considered Grey Belt, and the Site therefore makes a **Weak** or **No** contribution to Purpose (b).

4. Purpose (d): To preserve the setting and special character of historic towns.

4.1. The PPG provides the following considerations for informing judgements as to whether land is Grey Belt in relation to Purpose (d):

Purpose (d): To preserve the setting and special character of historic towns	
<i>This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.</i>	
Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features:</p> <ul style="list-style-type: none"> - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	<p>Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> - being separated to some extent from historic aspects of the town by existing development or topography - containing existing development - not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or None	<p>Assessment areas that make no or only a weak contribution are likely to include those that:</p> <ul style="list-style-type: none"> - do not form part of the setting of a historic town - have no visual, physical, or experiential connection to the historic aspects of the town

Table 5: Extract from PPG (Paragraph 005)

4.2. This purpose makes specific reference to ‘historic towns’ not individual historical assets or smaller settlements such as villages and hamlets. This is supported by the PAS guidance which states, *“this purpose is generally accepted as relating to very few settlements in practice”* and is considered particularly relevant to the Green Belts of York, Chester, Bath, Durham, Oxford and Cambridge.

4.3. The connection between a historic town’s historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection.



- 4.4. This purpose makes specific reference to 'historic towns' not individual historical assets or smaller settlements such as villages and hamlets. Although the centre of Coventry can be considered a historic town, a significant amount of modern development lies between its historic core and the Site. The Site does not have a visual relationship with the historic core of Coventry and does not demonstrate any characteristics that contribute to Coventry's character or historic setting.
- 4.5. On this basis, the Site is not considered to be located within the setting of a historic town and therefore this purpose is not relevant to the Site. The Site therefore makes **No** contribution to Purpose (d).

5. Footnote 7.

5.1. The following section considers the relevance of the criteria listed in Footnote 7 of the December 2024 NPPF. A summary of this appraisal is provided in **Table 6** (below), which confirms that none of the identified environmental or policy constraints would constitute a **strong** reason to refuse or restrict development within the Site:

Criteria	Commentary
Habitat Sites	No statutory or nationally designated ecological features within or in proximity to the Site.
Site of Special Scientific Interest (SSSI)	No SSSI within or in proximity to the Site, the nearest being the Coombe Pool SSSI circa 2.9km to the south of the Site.
Local Green Space	The Site is not located within or in proximity to a Local Green Space.
National Parks	The Site is not located within or in proximity to a National Park.
National Landscapes	The Site is not located within or in proximity to a National Landscape.
Defined Heritage Coast	The Site is not located in proximity to a defined Heritage Coast.
Irreplaceable habitats	Development of the Site would not result in the loss or deterioration of any irreplaceable habitats.
Designated heritage assets	No designated heritage assets lie within the Site. A small number of Listed buildings are located in the wider landscape, including the Grade II* Listed Church of St. James approximately 750m to the north-east of the Site, with the Grade II* Listed Ansty Hall slightly beyond. Given the overlooking position of the church, there is potential for the Site to be located within the setting of this asset. However, the Site offers very limited views towards the Church, which are typically restricted to the weathervane on top of the spire. The Grade II Listed The Whitehouse Wingletang is located circa 600m to the north-east of the Site and Grade II Listed Canal Bridge (No.11) circa 900m to the west of the Site. As such, heritage concerns are unlikely to form a strong reason to restrict or refuse planning permission.
Areas at risk of flooding or coastal change	The Site lies within EA Flood Zone 1 for fluvial flood risk (the lowest risk zone); however, the mapping indicates a slight risk of surface water flooding to the south of the Site that would be dealt with through design.

Table 6: Summary of Footnote 7 criteria in relation to the Site

6. Grey Belt Conclusions.

- 6.1. The Site **does not** strongly contribute to Purposes (a), (b) or (d) and instead it has been assessed to make a **Weak** or **No** contribution to Purposes (a) and (b), and No contribution to Purpose (d) through the application of the recent PPG assessment methodology.
- 6.2. There are **no** known Footnote 7 constraints that would provide a ‘strong’ reason for refusing or restricting the Proposed Development; however, the Site is considered to form part of the wider setting to the Grade II* Listed Church of St James.
- 6.3. The churchyard setting of the church reflects its historic use and strongly contributes to its historic interest, while also allowing an appreciation of the building’s architectural interest; however, this setting is generally enclosed by mature trees, limiting intervisibility with the surrounding area.
- 6.4. In particular, the Site offers very limited views towards the Church, which are typically restricted to the weathervane on top of the spire. Typically, views towards the church are screened by intervening vegetation. The distant and partial nature of these views mean they make very little contribution to the significance of the listed building and would not cross the Footnote 7 threshold of providing a ‘strong’ reason for refusing or restricting the proposals. The introduction of the vegetated bund along the northern boundary is considered to provide sufficient screening to be mitigate the impact on views from the churchyard to a satisfactory level.
- 6.5. Views towards the Site from the Grade II Listed Canal Bridge (No.11) are interrupted by trees and other vegetation on the canal bank and the elevated part of the M69, and there is no intervisibility with the other heritage assets in the wider area (including but not limited to The Whitehouse Wingletang (Grade II Listed) and Ansty Hall (Grade II* Listed)).
- 6.6. On this basis, the Site is considered to meet all the requirements to be reclassified as Grey Belt, and the assessment findings are summarised at **Table 7** (below):

Receptor	Purpose (a): Checking unrestricted sprawl	Purpose (b): Preventing the merging of towns	Purpose (d): Preserving the setting and special character of historic towns
The Site	Weak or No contribution	Weak or No contribution	No contribution

Table 7: Summary of Grey Belt Appraisal

7. Impact on the Wider Green Belt.

- 7.1. Paragraph 155 which has been newly inserted into the December 2024 NPPF states that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate subject to the following criteria being met:

“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 ...”

- 7.2. As summarised at **Section 6** of this report, the Site does **not** make a ‘Strong’ contribution to Purposes (a), (b), or (d) of the Green Belt, and there are **no** known Footnote 7 constraints that prevent the Site from being classified as Grey Belt.

- 7.3. The PPG offers the following guidance when considering the impact on the wider Green Belt (emphasis added):

How can the impact of releasing or development on the remaining Green Belt in the plan area be assessed?

*A Green Belt assessment should also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would **fundamentally** undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.*

In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a **meaningful** way.

Table 8: Extract from PPG (Paragraph 008)

- 7.4. The wording of this guidance makes clear that the Government has deliberately set a very high bar, presumably to encourage the identification of Grey Belt land that will meet this criterion.

Purpose (e): To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 7.5. By restricting development beyond urban boundaries, Purpose (e) seeks to encourage the recycling of derelict and other urban land. As such all Green Belt land contributes towards this purpose. The development of the Site for employment uses would not undermine Purpose (e) as there are relatively few opportunities for this type and scale of regeneration within the urban area of Coventry, and where opportunities do exist they have been identified in the Council’s planning policies and/or are currently being progressed by developers.
- 7.6. Overall, the release of the Site from the Green Belt would not have more than a marginal impact on regeneration aims. The Site therefore makes no more than a **Weak** contribution to this purpose.

Purpose (c): To assist in safeguarding the countryside from encroachment

- 7.7. The only remaining Green Belt purpose which would be breached through development of the Site is Purpose (c), as development of the Site would represent an irreversible encroachment of built form into the countryside.
- 7.8. An assessment of Purpose (c) requires consideration of the extent to which land constitutes 'countryside' on the basis of its usage. Some open land may, through its usage, have a stronger relationship with the adjacent urban area and, as a result, not be considered 'countryside' to the same degree as other open land. Equally, some land may be largely contained by urban development but may nonetheless retain, as a result of its usage and its size, a countryside character. In addition, the presence of urban development within an assessment parcel will clearly have an impact on the degree to which land is countryside.
- 7.9. The extent to which land can be considered to relate to an urban area or to the wider countryside can be referred to as the degree of 'distinction' from the urban area. Expansion into land that lacks a strong distinction from a settlement is likely to have less perceived encroaching impact into the countryside.
- 7.10. The Site comprises two pastoral fields, currently used for horse grazing, and a small, fenced paddock to the north, defined by boundary trees, mature hedgerows, and areas of woodland. The land is mostly flat and uniform with improved grassland and scattered trees. Existing features include disused mobile homes, vehicular tracks linking to Hinckley Road, pylons, and a PRow crossing from northwest to east. Surrounding infrastructure such as the M69 motorway and nearby housing reduces the scenic quality and tranquillity. There is filtered intervisibility with adjacent roads and residential areas. The Stage 2 Site Options Assessment concluded that the Site has a **low** overall landscape sensitivity. This is **agreed**.
- 7.11. The Site is isolated from the surrounding countryside by virtue of the surrounding road infrastructure to the east and west, and well-contained to the north by the village of Ansty, with the large pylon and OPL introducing a notable detracting presence. Overall, the Site is judged to relate more strongly to these urbanizing features than to the countryside.
- 7.12. On balance, the Site makes no more than a **Moderate** contribution to Purpose (c) and the development of the Site would not result in any material encroachment of the countryside.
- 7.13. Given that the Site represents only 0.06% of the Green Belt within the borough, the release of the Site from the Green Belt would not affect the ability of the remaining Green Belt in the plan area from serving all five of the Green Belt purposes in a **meaningful** way.
- 7.14. **Criteria (a) of NPPF Paragraph 155 is therefore satisfied.**

8. Summary.

8.1. This Addendum to the Reg 18 Site 88 Green Belt Appraisal has been prepared by Pegasus Group on behalf of BARJANE in respect of Site 88: Hinckley Road, Ansty, Coventry, CV7 9JF. The Council have recently published their Proposed Submission (Reg. 19) Local Plan (Regulation 19) for public consultation, with all comments required by 13th March 2026. This Addendum has been prepared as part of representations to the emerging Local Plan to support the Site’s allocation for employment use.

Local Plan Evidence Base

8.2. The Green Belt Contribution Study – Strategic Assessment takes account of changes to the NPPF in December 2024 which introduced the concept of ‘Grey Belt’ and the requirement for local authorities to review their Green Belt boundaries, unless they are able to meet their identified development need in full.

8.3. As a strategic-scale analysis, this study did not produce an assessment of defined parcels of land but instead used an analysis process to identify variations in contribution to the purposes, with areas (10ha or greater) being defined to reflect those variations.

8.4. The conclusions drawn for the area of Green Belt that washes over the Site are summarised at **Table 9** (below):

Receptor	Purpose (a): Checking unrestricted sprawl	Purpose (b): Preventing the merging of towns	Purpose (c): Safeguarding the countryside from encroachment	Purpose (d): Preserving the setting and special character of historic towns	Purpose (e): Assisting urban regeneration
The Site	Strong contribution	Weak / Moderate contribution	Strong contribution	Weak contribution	Moderate contribution

Table 9: Summary of Green Belt Contribution Study – Stage 1

8.5. As the Site was not progressed by the Stage 2 Site Options Assessment, it was not subject to any additional, finer grain analysis by the Green Belt Contribution Study – Stage 2; however, there is nothing presented in the latest evidence that alters our view that the Site meets all the requirements to be reclassified as Grey Belt land.

8.6. **To date, the Council has not undertaken any site-specific assessment to determine the Site’s suitability to be reclassified as Grey Belt land.**

Grey Belt Appraisal

8.7. The Site **does not** strongly contribute to Purposes (a), (b) or (d) and instead it has been assessed to make a **Weak** or **No** contribution to Purposes (a) and (b), and No contribution to Purpose (d) through the application of the recent PPG assessment methodology.

- 8.8. There are **no** known Footnote 7 constraints that would provide a ‘strong’ reason for refusing or restricting the Proposed Development; however, the Site is considered to form part of the wider setting to the Grade II* Listed Church of St James.
- 8.9. On this basis, the Site is considered to meet all the requirements to be reclassified as Grey Belt, and the assessment findings are summarised at **Table 10** (below):

Receptor	Purpose (a): Checking unrestricted sprawl	Purpose (b): Preventing the merging of towns	Purpose (d): Preserving the setting and special character of historic towns
The Site	Weak or No contribution	Weak or No contribution	No contribution

Table 10: Summary of Grey Belt Appraisal

Impact on the Wider Green Belt

- 8.10. The Site is isolated from the surrounding countryside by virtue of the surrounding road infrastructure to the east and west, and well-contained to the north by the village of Ansty, with the large pylon and OPL introducing a notable detracting presence. Overall, the Site is judged to relate more strongly to these urbanizing features than to the countryside.
- 8.11. On balance, the Site makes no more than a **Moderate** contribution to Purpose (c) and the development of the Site would not result in any material encroachment of the countryside.
- 8.12. Overall, the release of the Site from the Green Belt would not have more than a marginal impact on regeneration aims. The Site therefore makes no more than a **Weak** contribution to Purpose (e).
- 8.13. Given that the Site represents only 0.06% of the Green Belt within the borough, the release of the Site from the Green Belt would **not** affect the ability of the remaining Green Belt in the plan area from serving all five of the Green Belt purposes in a **meaningful** way.
- 8.14. **Criteria (a) of NPPF Paragraph 155 is therefore satisfied.**

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Cirencester

33 Sheep Street, Cirencester,
Gloucestershire, GL7 1RQ
T 01285 641717
E Cirencester@pegasusgroup.co.uk
Offices throughout the UK

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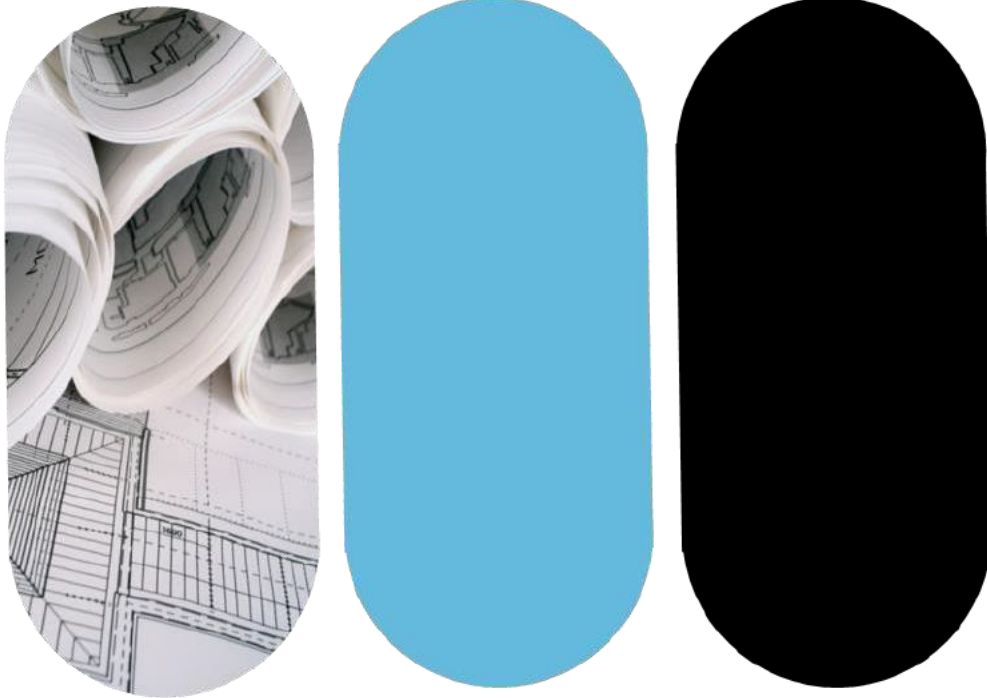


 Part of Shakespeare Martineau

Site 88 – Land to the South West of Ansty

Grey Belt Site Assessment

March 2026



Level 19, The Shard, 32 London Bridge Street, London SE1 9SG
www.marrons.co.uk

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1. INTRODUCTION

Purpose of Report

- 1.1 This site-specific Grey Belt Assessment ('Report') has been prepared by Marrons on behalf of BARJANE ('the developer') in relation to Site 88 – Land to the South West of Ansty ('the Site') located within the administrative boundary of Rugby Borough Council ('RBC').
- 1.2 This Report is prepared in support of Representations to the Regulation 19 Draft Rugby Borough Council Local Plan consultation, submitted by Quod on behalf of BARJANE. In summary, the Representations make the case for the Site to be identified as a development allocation for employment uses to assist in meeting the employment need in the area.
- 1.3 The findings in this Report can also be used to support any future planning application for the Site.
- 1.4 In summary, this Report identifies the Site would utilise grey belt and that development of the Site would not comprise inappropriate development within the Green Belt.
- 1.5 This Report has been prepared in accordance with the revised National Planning Policy Framework ('NPPF') published in December 2024 and updated National Planning Policy Guidance ('NPPG') on the Green Belt published on 27th February 2025. It does not take account of the consultation NPPF published in December 2025 and any new policy might impact how the grey belt tests are undertaken however it would not change the overall findings. The most notable change is the removal of the reference to Footnote 7 areas and assets in relation to the grey belt definition.
- 1.6 The grey belt assessment is based on the initial proposals for the Site to deliver a c.45,000sqm employment scheme in addition to a new vehicular access, landscaping and associated works and infrastructure.

Grey Belt Context

- 1.7 The revised NPPF introduced grey belt policy in December 2024 as part of a suite of measures to significantly boost growth over this parliamentary period. Our



assessment follows the approach set out in national policy (and it is noted in the conclusion that currently a new NPPF has been published for consultation) is structured as follows.

- 1.8 For context, section 2 of this Report includes a short description of the Site (covering the site and surrounding area, boundary review, any designations and relevant planning history) and a summary of the proposed development.
- 1.9 To provide background to the assessment, section 3 considers headline findings from the Council's previous Green Belt Assessment work and identifies any locally unique characteristics and purposes of the Green Belt in question.
- 1.10 A site-specific grey belt assessment is set out in section 4 which firstly assesses whether the site can be identified as grey belt (in accordance with Figure 1 of the NPPG) and secondly whether development in the Green Belt is not inappropriate (in accordance with Figure 2 of the NPPG). The sequencing of the tests is as follows:
 - Do any designations exclude the Site being grey belt (in accordance Footnote 7 of the NPPF);
 - Does the Site not strongly contribute towards purposes A, B or D (Annex 2 and paragraph 155 of the NPPF, and NPPG);
 - Would development fundamentally undermine the purposes of the remaining Green Belt across the area of the plan (paragraph 155 of the NPPF).
 - Is there a demonstrable need for the proposed development (paragraph 155 of the NPPF); and
 - Does the Site represent a sustainable location for development and promote sustainable transport (paragraphs 110, 115 and 155 of the NPPF).
- 1.11 Section 5 outlines that consideration of the golden rules does not apply to the proposed development.
- 1.12 Section 6 considers the impact on openness of the Green Belt. In summary, given the Site utilises grey belt and is not inappropriate development in the Green Belt there is no harm to openness in line with recent High Court decision.
- 1.13 Finally, section 7 provides a conclusion.



2. THE SITE AND PROPOSALS

The Site

- 2.1 The Site lies to the southwest of Ansty, in the west of Rugby. It is situated to the east of the M69 and to the north of the B4065 (Hinckley Road), within the administrative boundary of Rugby Borough Council ('RBC'). A site location plan is set out at Appendix 1.
- 2.2 It is approximately c.12.6 hectares (approximately 31 acres) in size and is almost triangular in shape. The Site gently slopes north to south.
- 2.3 The Site comprises undeveloped, agricultural land predominantly used for grazing. The Site is accessible to the public via a Public Right of Way ('PRoW') located on the eastern boundary. There is an existing singular vehicle access track that enters the Site from the B4065 traversing from the south to the north.
- 2.4 The Site is located approximately 50m southwest of Ansty village and approximately 790m to the northeast of Coventry. It is well related to the village of Ansty; however, it is noted that it does not physically adjoin the settlement boundary.
- 2.5 The Site displays strong boundary features as explained below. The Site is bordered by trees and hedgerows along all the boundaries. A hedgerow runs through the northern part of the Site from east to west.
- 2.6 In summary, the Site is enclosed from the west by the M69 and the south by the B4065. To the northeast are residential properties. The eastern boundary is defined by PRoW 30a which runs north to south connecting the Oxford Canal to the B4065.
- 2.7 There is an existing 132kV pylon located to the southeastern corner of the Site which runs northwest and southeast.

Designations

- 2.8 The following designations impact the Site:
 - The Site is washed over by Green Belt (the West Midlands Metropolitan Green Belt).
 - There are no protected landscape, ecology designations or TPOs on the Site.



- The Site is in Flood Zone 1 therefore has a low risk of flooding. Pockets of surface water flooding are located along the eastern boundary and southwest corner of the Site.
- The Site has an agricultural land classification of Grade 3 (which is described as Good).
- PRow 30a runs along the eastern boundary of the Site.

Surrounding Designations

- There are no listed buildings on the Site. The Grade II listed “*The Whitehouse*” and “*Wingletang*” (a pair of C.18th cottages) are located approximately 500m to the east of the Site, along Main Road. In addition, the Grade II* listed Ansty Hall and Grade II* Church of St James are located within 1km further to the northeast. “*Canal Bridge No.11 (Cater’s Bridge) Oxford Canal*” (Grade II) is also located approximately 1km to the west, as shown on the map extract at Appendix 2.
- The settlement boundary for Ansty is located to the east of the Site. Ansty is designated as a “*Rural Village*” within Policy GP2 of the adopted Local Plan.

Boundary Review

2.9 The Site is well defined by the following boundary features:

- The southern boundary is bordered by mature trees and hedgerows and the B4065 (Hinckley Road).
- The western Site boundary is bordered by hedgerows and planting, in addition to the M69.
- The northern boundary is bordered with hedgerows and trees with residential properties located to the northeast fronting Grove Road. The Oxford Canal is located further north.
- PRow 30a runs along the eastern boundary of the Site in addition to mature landscape features.

2.10 Overall, the Site displays strong boundaries. The Site is very well contained by the M69 to the west, the B4065 to the south, residential development to the northeast



and mature vegetation to the east. On the ground, the Site is physically and visually related to the settlement of Ansty and it represents a well-defined and logical extension to the existing settlement of Ansty which itself is inset into the Green Belt designation.

Surrounding Area

- 2.11 The Site is located approximately 790m to the northeast of Coventry and approximately 50m southwest of Ansty.
- 2.12 Ansty is designated as a “*Rural Village*” within Policy GP2 of the Local Plan. Whilst “*Rural Villages*” are identified as having a limited level of services compared to that of other rural settlements, they are considered more suitable for development than locations within the countryside.
- 2.13 The policies map identifies that the built up area of Ansty is inset from the Green Belt. The village is not completely washed over by Green Belt.
- 2.14 Ansty is a sustainable settlement and is accessible by a range of modes of travel. It is accessible by foot or cycling via the B4065. There are Public Houses in the village and a hotel, in addition to other small businesses.
- 2.15 Several bus stops are located along the B4065, within walking distance from the Site. These provide connections to St Cross Hospital Shelter, Pool Meadow Bus Station, Nuneaton Bus Station and Grove Road (74A, 74B, 74C and 84).
- 2.16 The Site is strategically located for distribution purposes within the heart of the Midlands Golden Triangle, between the M1, M6 and M42 motorways.
- 2.17 The Site is within 1km of J2 of the M6. From this junction, the M6 provides connection west and east. The M69 runs to the north and the A43 to the south.
- 2.18 Rugby is located approximately 19km to the southeast. Birmingham is located approximately 37km to the west and London is located approximately 152km to the southeast.
- 2.19 East Midlands Airport (a significant cargo airport) is located approximately 56km to the north of the Site and Birmingham Airport is located approximately 25km to the west.



2.20 Daventry International Rail Freight Terminal (DIRFT), a rail-road intermodal freight terminal is located approximately 25km to the east of the Site. The Hams Hall Rail Freight Terminal is also located approximately 30km to the northwest.

Proposed Development

- 1.1 The vision for the Site is to create a new high quality and sustainable employment-led development with strong links to the strategic road network within the Midlands Golden Triangle, on the edge of Ansty.
- 1.2 The Site seeks development of the land to provide approximately 45,000sqm (use class B2/B83) of employment floor space in conjunction with associated infrastructure and operations, including but not limited to a new vehicular access, sustainable urban drainage system, landscaping, habitat creation and internal roads/routes and other works.
- 1.3 A series of layout options have been explored for a range of differing unit sizes and configurations which formed part of the Regulation 18 representations. The lower site coverage includes the opportunity to include extensive soft landscape enhancements to screen the Site as well as delivering biodiversity enhancements, sustainable drainage features and amenity improvements.
- 1.4 The proposed layout will follow a design and landscape-led approach and comprises the following key elements:
 - Employment development – covering around 32% of the Site and comprising a highly sustainable development achieving a minimum of BREEAM ‘Outstanding’ and EPC A+ ratings with renewable energies included;
 - Drainage basins / ponds forming part of the sustainable drainage strategy;
 - Green infrastructure and landscaping, including habitat creation along the Site boundaries, to ensure the proposed development responds to the surrounding character and to assist with the delivery of biodiversity net gain;
 - A new primary access (indicative) into and out of the Site with a new arm on the roundabout proposed as part of the development of application R23/1027; and
 - New shared surface routes (indicative) for pedestrians and cyclists through the Site and potential enhancements to the PRow along the eastern Site boundary.



3. COUNCIL'S GREEN BELT ASSESSMENT

3.1 This section provides a summary of the Rugby Green Belt (forming part of the wider West Midlands Metropolitan Green Belt) and explains how the Council's Green Belt Assessment ('GBA') considers the Site.

Local Plan Context

3.2 The Development Plan for Shropshire Council comprises the following:

- Local Plan 2011-2031.

3.3 The Plan was adopted by RBC on 4th June 2019.

3.4 RBC is now in the process of reviewing and replacing the adopted Plan. A Regulation 19 version of the Plan was published in January 2026, and the consultation closes on 13th March 2026. This will replace the currently adopted Plan which is now out of date.

Rugby Green Belt Assessment

3.5 The RBC Green Belt Assessment ('GBA') published in 2025 to support the new Local Plan is separated into a Stage 1 and Stage 2 report.

Rugby Green Belt Contribution Assessment (Strategic Assessment) ('Stage 1')

3.6 Stage 1 was published in October 2025 and forms part of the evidence base for the emerging Local Plan.

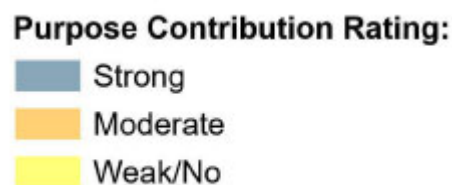
3.7 The purpose of the assessment is to provide a high-level strategic analysis of the Council's Green Belt to inform the early stages of the preparation of the new Local Plan, specifically to inform early spatial options work for the next draft Local Plan consultation.

3.8 The assessment methodology takes account of changes to the NPPF in December 2024 which introduced the concept of grey belt and the requirement for LPAs to review their Green Belt boundaries, unless they are able to meet their identified development need in full. The assessment also considers changes to the NPPG published in February 2025.



- 3.9 The Stage 1 assessment looks at the whole c.20,000 hectares of Green Belt in RBC and then looks at sub-divided parcels in the Stage 2 assessment. This means that the Site is located within a strategic parcel, which is significantly larger than the Site itself. In more detail, the assessment process identifies variation in contribution to the Green Belt purposes and areas were defined to reflect those variations. This approach is considered (by the Council) to avoid misleading results where predefined areas have variations in contribution within a parcel that are averaged out. The areas of variation differ in size depending on the range of factors affecting their contribution, but a minimum size of 10 hectares was used for the strategic scale study. This means that the ratings given represent the strongest contribution within it and do not identify areas of weaker contribution below 10 hectares in size.
- 3.10 The assessment used a rating scale of “*Strong*”, “*Moderate*” and “*Weak*” in accordance with the rating scale referenced in the PPG.

Figure 1: Rating Scale



- 3.11 “*Strong*” contribution ratings, where applicable to purposes A, B or D, identified land that do not meet the definition of grey belt.
- 3.12 The analysis also identified which areas of land could be identified as grey belt.
- 3.13 Within RBC, Rugby is considered a large built-up area. No other settlements within the Borough are considered to fall within the definition.
- 3.14 In terms of surrounding areas, Coventry, Nuneaton, Bedworth, Hinckley, Lutterworth and Magna Park are also considered to be a large built-up areas.
- 3.15 None of Rugby’s Green Belt is considered to make a contribution to preserving the setting and special character of historic towns.
- 3.16 As stated, the Site is located within a strategic parcel, which is significantly larger than the Site itself. An assessment of the individual Site was therefore not provided as part of the Stage 1 assessment.



3.17 For the purposes of this Report, the extent of the Site was identified within the strategic parcel and the conclusions of the Council’s assessment against Purpose A, B and D are outlined below.

Purpose A

3.18 The Site performed “Strongly” against Purpose A.

3.19 Paragraph 4.2 confirms “*Land adjacent to the inset urban edges of Coventry (including Bedworth), Nuneaton, Hinckley, Magna Park (and the associated town of Lutterworth) and Rugby is considered to make the strongest contribution to Purpose A.*”

3.20 Paragraph 4.3 sets out that “*In a number of locations land close to these urban edges is also playing a role in preventing sprawl and assimilation of neighbouring villages and other areas of urban development. The Green Belt PPG is clear that villages are not large built-up areas, but some are close enough to a large built-up area to be associated with it.*”

3.21 Paragraph 4.4 of the Assessment sets out that “*Key areas of separation between large built-up areas and satellite settlements, and locations where significant spread of those satellite settlements away from the large built-up areas would likely be perceived as associated sprawl, include: around the settlements of Binley Woods, Ryton-on-Dunsmore, Barnacle, Ansty and Shilton - associated with the sprawl of Coventry.*”

Purpose B

3.22 As shown in Figure 2 below, the southwestern part of the Site performed as “Moderate” and the northwestern and eastern part of the Site performed as “Weak/no” contribution against Purpose B.

Figure 2: Contribution to Purpose B



3.23 Paragraph 4.7 sets out that *“The gap between Coventry and towns to the east - Rugby and Lutterworth/Magna Park - is wide and robust, such that most land between these settlements is considered to make a moderate contribution to Purpose B... Where land adjacent to existing villages is subject to some evident urbanising influence already, or where there are sizeable areas of washed-over development, contribution reduces to weak.”*

Purpose D

3.24 The Site performed as *“Weak/no”* contribution against Purpose D.

3.25 Paragraph 4.12 states *“despite some intervisibility between Rugby’s Green Belt and historic towns, no connection of notable significance was found between the Green Belt and their historic settings and significance. This is considered to be driven largely by the fact that the historic areas of the settlements do not lie in close proximity to the Green Belt, separated physically by the modern expansion of the settlements.”*

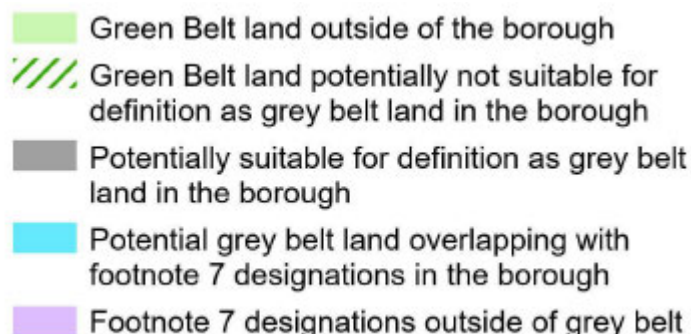
3.26 It is concluded that Rugby’s Green Belt is not considered to make a notable contribution to preserving the setting and special character of historic towns.

Land Identified as Grey Belt

3.27 The assessment also identified areas of land suitable for definition as grey belt. Areas of land were ranked as follows:



Figure 3: Areas suitable for definition as grey belt rating



3.28 The Site was identified as being “*Green Belt land potentially not suitable for definition as grey belt land in the borough*”.

3.29 Paragraph 4.15 sets out that no land was identified as making a significant contribution to Purpose D therefore only areas of the Green Belt which make a strong contribution to either Purpose A or Purpose B are considered to not meet the definition of grey belt.

Other Purposes

3.30 The Site was identified as making a “*Strong*” contribution to Purpose C and an “*Equal*” contribution to Purpose E.

3.31 In relation to Purpose E, all of the Borough’s Green Belt has been judged as making an equally strong contribution to the purpose in acknowledgement of the significant role it has and continues to play in encouraging the recycling of derelict and other urban land in the adjacent urban areas.

Green Belt Contribution Study (Stage 2: Site Contribution Assessments)

3.32 Stage 2 of the GBA provides a more detailed analysis for land within selected sites being promoted for development sites. It is noted that none of the sites lie within areas identified as grey belt in the Stage 1 assessment. The Stage 2 assessment therefore provides more detailed analysis in order to identify any smaller-scale variations in contribution and, as a result, in the location of potential grey belt.

3.33 The Stage 2 assessment provides a detailed analysis for land within selected sites being promoted for development sites. None of the sites were within areas identified as grey belt in the Stage 1 assessment, but Stage 2 provides a more detailed



analysis to identify smaller-scale variations in contribution and, as a result, in the location of potential grey belt.

3.34 The Site was not included within the Stage 2 assessment.

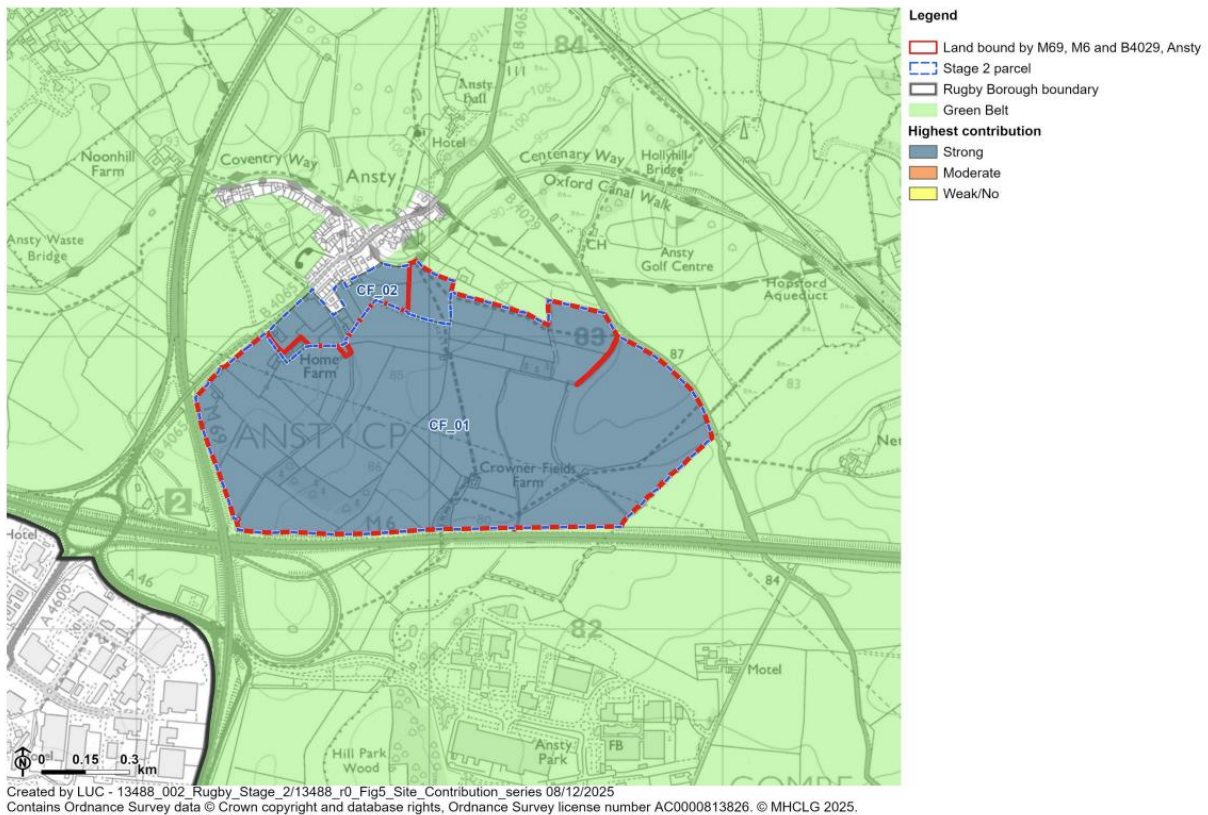
3.35 However, it is noted that Site 95 Crouner Fields Farm and Home Farm, Hinckley Road, Ansty (112.18ha, employment) ('Site 95') was included in the assessment. Site 95 is located to the southeast of the Site and has been identified as a draft employment allocation site.

3.36 The Stage 2 assessment split Site 95 to reflect different ratings for Purpose B. It was found that the majority of the land made a moderate contribution to Purpose B, being situated in a robust gap. However, the small areas of the Site in proximity to Ansty made a weak contribution to Purpose B as it is relatively contained and associated with the small satellite village.

3.37 The Stage 2 assessment divided Site 95 into different parcels ('CF_01' and 'CF_02') to reflect smaller-scale variations in the contribution ratings identified at Stage 1, as shown in Figure 4 below.

3.38 The assessment used the same rating scale of "*Strong*", "*Moderate*" and "*Weak/no*" as used in the Stage 1 assessment.

Figure 4: Site 95, Stage 2 parcels and highest rating for contribution



3.39 CF_02 is located adjacent to Ansty and CF_01 is located further to the south of the village.

3.40 Both parcels were identified as having a “Strong” contribution as the highest contribution.

3.41 CF_01 was identified as being “Green Belt land potentially not suitable for definition as grey belt land in the parcel”.

3.42 CF_02 was identified as land that was “Potentially suitable for definition as grey belt land in the parcel”.

3.43 Similar to the Site, parcel CF_02 is well related to Ansty and located adjacent to the settlement. As such, the Council’s assessment of CF_02 has been considered in detail below.

3.44 In relation to parcel CF_02, the following scores were given:

- Purpose A - Moderate



- Purpose B - Weak/no
- Purpose C - Strong
- Purpose D - Weak/no
- Purpose E - Equal
- Grey Belt – Yes.

3.45 A summary of the conclusions for Purpose A, B and D and grey belt for CF_02 is provided below:

Purpose A

3.46 In relation to being a parcel adjacent or near to a large built-up area, the GBA concluded that the parcel is close to a small urban area (Ansty) but also near enough to a large built-up area to contribute to preventing its sprawl. The parcel is near to Coventry, and the satellite village of Ansty. In addition, there are no physical features in reasonable proximity strong enough to restrict and contain development. Outer boundaries to the east are formed of mature hedgerows which would not sufficiently limit the impact of development on adjacent open land.

3.47 The GBA also sets out that development of land in CF_02 would not have an incongruous impact on the urban pattern. CF_02 is already subject to significant urbanising influence.

Purpose B

3.48 In relation to the gap between towns, the assessment noted that the parcel lies in a moderate gap between towns. The parcel lies in a gap between Coventry and the village of Bulkington, which is associated with the town of Bedworth. The gap is comprised of undulating open countryside, and areas of woodland.

3.49 It was also considered that the parcel forms a very small part of the gap. The majority of the open intervening land lies to the north-west. In addition, development of land in the parcel would likely have a negligible impact on visual separation between towns. The parcel is adjacent to a village and so subject to some urbanising influence already.



Purpose D

3.50 The parcel does not form part of the setting of a historic town.

Grey Belt

3.51 As the parcel does not make a strong contribution to the Green Belt purposes A, B or D, it was concluded that it had the potential to be grey belt land. Such locations can only be provisionally defined as grey belt land until further relevant and necessary specialist assessment work has been undertaken.

Other Characteristics in the Green Belt

3.52 The West Midlands Metropolitan Belt was first established in Warwickshire in the Warwickshire Structure Plan 1975. The reasoned justification for the creation of the Green Belt in that document refers to its purpose as including (amongst other things) preventing coalescence of the “*major urban areas*” of the “*Birmingham Conurbation*” and the “*Coventry Belt*”. The latter it defines as the corridor of towns from Nuneaton, through Coventry to Leamington and Warwick. It also states that the “*prime purpose*” of the Green Belt proposals was to “*prevent the unrestricted outward spread of the Conurbation and of Coventry and of the towns and other settlements around and between them*” and of “*checking the unrestricted sprawl of built-up areas in Warwickshire*”.

3.53 RBC is located to the east of Coventry on the edge of the West Midlands Green Belt.

3.54 A total of 20,570ha of RBC is designated as Green Belt, representing approximately 58% of the total area of the Borough. The Site itself is approximately 12.6 hectares, accounting for 0.06% of the Rugby Green Belt. Appendix 3 shows the extent of the Green Belt within Rugby.

Relevance of GBA to the Site

3.1 The relevance of the GBA is considered in respect of comments from the Inspector in a recent appeal decision in Brentwood.

3.2 Allowed appeal (dated 16 January 2025) relating to Plots 1-6, Land South of Horseman Side, Navestock RM4 1DN in Brentwood explained that conclusions from Green Belt Reviews that consider large parcels are not necessarily relevant for decision-making. Paragraph 21 states that “*Looking at parcels is helpful in a*



strategic sense to inform plan making and future development growth. However, for decision making, it seems more relevant to look at a site-specific level for determining grey belt land, otherwise the scale could be too large and skewed by land some distance from the actual site". This decision concerns six appeals including APP/H1515/W/24/3341474.

- 3.3 This appeal decision provides useful insight as it recognises that Council's assessments are often of strategic parcels much larger than the site in question and therefore a site-specific assessment should be undertaken in respect of grey belt (for planning applications). This is clearly the case with the RBC GBA. Our site-specific grey belt assessment is set out in Section 4 of this report.
- 3.4 Notwithstanding this, we consider that the GBA findings for CF_02 are useful to consider in respect of the Site's grey belt assessment, because CF_02 is located next to the Site and it is not a strategic parcel.



4. GREY BELT ASSESSMENT

4.1 This section assesses whether the Site is grey belt and whether development would not be regarded as inappropriate development in the Green Belt.

Assessment Methodology

4.2 The sequencing of the assessment reflects Figure 1 and Figure 2 of the NPPG on the Green Belt (as set out in Appendix 4).

4.3 In practice there are six tests which determine whether the Site is grey belt and whether development in the Green Belt would not be inappropriate as follows.

Table 1: Grey Belt Assessment Methodology

Test 1: Designations	NPPG Figure 1 (can site be grey belt)
Do any designations exclude the Site from being grey belt because they would form a reason to refuse a planning application (in accordance with Footnote 7 of the NPPF)? If no such designations exist, the Site can be grey belt.	
Test 2: Purposes Assessment	NPPG Figure 2 (is development in the Green Belt not inappropriate)
Does the Site not strongly contribute towards purposes A, B or D (in accordance with NPPF Annex 2 and Paragraph 155a)? If yes, the Site can be grey belt.	
Test 3: Impact on remaining Green Belt	NPPG Figure 2 (is development in the Green Belt not inappropriate)
Would development at the Site fundamentally undermine the purposes of the remaining Green Belt across the area of the plan (in accordance with Paragraph 155a of the NPPF)?	
Test 4: Need	
Is there demonstrable need for the proposed development (in accordance with Paragraph 155b of the NPPF)? Demonstrable need exists if the Council cannot demonstrate a five year housing land supply or its Housing Delivery Test result is below 75%.	
Test 5: Sustainability	
Is the Site in a sustainable location for development and do the proposals promote sustainable transport (in accordance with Paragraphs 110, 115 and 155c of the NPPF)?	
Test 6: Golden Rules Requirements	NPPG Figure 2 (is development in the Green Belt not inappropriate)
Can the proposals achieve Golden Rules requirements relating to provision of affordable housing, infrastructure and open space provision (in accordance with Paragraph 156 of the NPPF)?	

4.4 Each test is considered below.



- 4.5 The grey belt is defined in the NPPF as follows: *“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”.*

Test 1. Designations

- 4.6 The Site can be considered grey belt because there are no designations (e.g. protected areas or assets of particular importance) relating to the Site (on Site or around the Site) which would provide a strong reason for refusing or restricting the development proposed. This conclusion has taken into consideration the heritage designations surrounding the Site.
- 4.7 Whilst there are no heritage assets on the Site, there are several statutorily listed buildings surrounding the Site. The nearest listed buildings to the Site are located approximately 0.5km to the east of the Site comprising *“The Whitehouse”* and *“Wingletang”* (a pair of C.18th cottages) (Grade II). *“Ansty Hall”* and *“Church of St James”* (Grade II*) are located approximately 1km further to the northeast. In addition, *“Canal Bridge No.11 (Cater’s Bridge) Oxford Canal”* (Grade II) is approximately 1km to the west.
- 4.8 Local Plan Policy SDC3 (Protecting and Enhancing the Historic Environment) sets out that development will be supported that sustains and enhances the significance of the Borough’s heritage assets. Development affecting the significance of a designated or non-designated heritage asset and its setting will be expected to preserve or enhance its significance. Applications with the potential to affect the significance of a heritage asset will be required to provide sufficient information and assessment (such as desk-based appraisals, field evaluation, and historic building reports) of the impacts of the proposal on the significance of heritage assets and their setting. In addition, great weight will be given to the conservation of the Borough’s designated heritage assets and any harm to the significance would need to be justified. Where a development will lead to less than substantial harm to the significance of a designated heritage asset, this will be weighed against the public benefits of the proposal. Proposals causing substantial harm to designated heritage assets will need to demonstrate that the harm is necessary to achieve substantial



public benefits sufficient to outweigh the harm or loss.

- 4.9 The proposed development would not impact the surrounding heritage assets due to the distance and existing visual buffers. Landscape screening will be included as part of the proposals to ensure any potential impacts are limited to the most sensitive receptors (i.e., Ansty Hall and St James Church).
- 4.10 The proposals will be supported by a robust Heritage Statement which will provide an assessment of the significance and setting of the designated heritage assets and comments on the contribution of setting to significance. It is expected that this assessment would demonstrate that if the proposed development would lead to any harm this would be at the lower end of less than substantial harm to the designated heritage assets, and any harm would be outweighed by the public benefits of the proposals, in accordance with paragraph 215 of the NPPF.
- 4.11 This approach to considering Footnote 7 of the NPPF (which is referenced in the grey belt definition at Annex 2 of the NPPF) is in accordance with national policy and is also demonstrated in the appeal decision at *“Land adjacent to A4155 Marlow Road and Westhorpe Farm Lane, Marlow”* (PINS ref. APP/K0425/W/24/3351904).
- 4.12 A summary of the Footnote 7 considerations is set out in Table 2 below. This outlines whether a Footnote 7 designation might *“provide a strong reason for refusing or restricting development”*. To do this, one must look back to paragraph 11 of the NPPF and recognise that *“refusing”* development relates to decision-making only (in accordance with 11di) and that *“restricting”* development relates to plan-making only (in accordance with 11bi). As such, for the purposes of this assessment, only the element of *“refusing”* development should be considered.

Table 2: Footnote 7 Assessment

Designation	Site consideration	Reason to refuse	Comment
Habitat Sites	No relevant Footnote 7 designations on or around Site.	Test not applicable. No reason to refuse development.	N/A
SSSI	No relevant Footnote 7 designations on or around Site.	Test not applicable. No reason to refuse development.	N/A
Green Belt	Yes. The Site forms part of the Green Belt.	Test not applicable. Green Belt excluded from test	The Site utilises grey belt.



		in accordance with NPPF grey belt definition.	
Local Green Space	No relevant Footnote 7 designations on or around Site.	Test not applicable. No reason to refuse development.	N/A
National Landscape			
National Park			
Designated Heritage Assets (and other heritage assets of archaeological interest)	There are designated heritage assets within the surroundings.	This is not a reason to refuse development as any harm to the surrounding designated heritage assets would be at the low to medium end of the spectrum of less than substantial harm (in accordance with paragraph 215 of the NPPF).	N/A
Areas at risk of flooding or coastal change	No relevant Footnote 7 designations on or around Site.	Test not applicable. No reason to refuse development.	Site is in Flood Zone 1. This does not trigger Footnote 7.

4.13 As previously mentioned, the draft NPPF removes reference to Footnote 7 within the grey belt definition. The consultation on the NPPF closed on 10th March 2026 and it is anticipated that the NPPF will be adopted in Summer 2026 and will then carry weight in decision making. It is therefore assumed that the change to the grey belt definition will come into effect once the new NPPF is adopted.

Test 2. Purposes Assessment

4.14 The Site can be considered to be grey belt because it does not make a strong contribution towards Green Belt purposes A, B or D in accordance with the definition of grey belt set out in Annex 2 of the NPPF.

4.15 In terms of the NPPG assessment criteria, the starting point of the grey belt assessment is to consider whether the adjoining (or nearby) settlement is a village



or not. In this case, Ansty is designated as a “*Rural Village*” within Policy GP2 of the adopted Local Plan, therefore is not considered a town. In addition, the Green Belt Assessment does not identify Ansty as a town or large built-up area.

4.16 Purposes A, B and D are considered below.

Purpose A

4.17 Purpose A (“*to check the unrestricted sprawl of large built-up areas*”) relates to the sprawl of large built-up areas (“*LBUAs*”) according to the NPPG.

4.18 Ansty is a village as mentioned in the development plan; therefore, it is not a town or a LBUA. The Site is located to the west of the settlement of Ansty and is well defined and well related to the village. Development at the Site represents a well-defined and logical extension to the settlement of Ansty.

4.19 The Site boundaries are important to recognise for the assessment of Purpose A because they are well defined and permanent. For example, the M69 is located to the west of the Site and the B4065 to the south encloses the Site. The built development of Ansty is located to the east of the Site to reinforce the fact that it is well related to Ansty, and it also provides a built edge adjacent to the Site boundary. Therefore, in addition, this means that the Site is subject to urbanising influences and is largely enclosed by significant existing development.

4.20 In the case that the Site was considered to be “*near to*” a LBUA, the fact that it is largely enclosed by existing development and is subject to urbanising influences means that its contribution to purpose A cannot be strong.

4.21 We therefore consider that the Site makes a “*weak or no*” contribution to Purpose A.

Purpose B

4.22 Purpose B (“*to prevent neighbouring towns from merging into one another*”) relates to the merging of towns, not villages according to the NPPG.

4.23 It is considered that the Site makes a “*weak or no*” contribution to Purpose B.

4.24 Similarly to parcel CF_02, the Site lies in a gap between Coventry and the village of Bulkington, which is associated with the town of Bedworth. The assessment concluded that parcel CF_02 formed a very small part of the gap. In addition,



development of land in the parcel would likely have a negligible impact on visual separation between towns. The parcel is adjacent to a village and so subject to some urbanising influences.

4.25 It is considered that development at the Site would also have no or negligible impact on the visual separation between Coventry and Bulkington. This is because there is a limited physical or visual relationship between the towns. Coventry and Bulkington are over 6km apart and the gap has been eroded by several small settlements such as Ansty. The Site therefore plays no or very limited role in preventing the merging or erosion of the visual or physical gap between settlements and loss of openness would not be perceived as reducing the gap between settlements.

4.26 Development at the Site would therefore not undermine or lessen the gap between Coventry and Bedworth.

Purpose D

4.27 Purpose D (*“to preserve the setting and special character of historic towns”*) relates to towns and not villages.

4.28 The Stage 1 Assessment set out that the Rugby’s Green Belt is not considered to make a notable contribution to preserving the setting and special character of historic towns.

4.29 The Site is therefore considered to make a *“weak or no”* contribution to Purpose D.

4.30 Overall, this site specific assessment clearly demonstrates that the Site is grey belt because it does not strongly contribute to purposes A, B or D.

Test 3. Wider Green Belt

4.31 The proposals would not fundamentally undermine the purposes (taken together) of the remaining Green Belt which meets the requirements of paragraph 155a.

4.32 The Site utilises grey belt land therefore does not make a strong contribution towards the Green Belt (at a local level) as demonstrated by the assessment above.

4.33 Based on the scale and location of the Site, it represents a very small portion of the overall Rugby Green Belt and represents a sustainable Site for employment development.



4.34 Taking a more strategic view, as a result of the scale of the Site and its relationship to the settlement, development would have no impact on the overall performance of the wider West Midlands Metropolitan Green Belt land.

4.35 The Site itself is approximately 12.6 hectares (<0.1%) and represents a very small proportion of the 20,570 hectares of Rugby Green Belt, therefore development would have no impact on the purposes of the wider Green Belt.

Test 4. Need

4.36 The supporting Regulation 19 Economic Case Note prepared by Quod (dated March 2026) confirms that there is a demonstrable need for the proposals.

4.37 The Note outlines that the Council have revisited the employment land evidence as part of the Regulation 19 consultation, correcting technical errors and clarifying assumptions. In particular, the following changes have been made:

- Technical corrections have been made to the West Midlands Strategic Employment Sites Study 2023-2024 ('WMSESS') modelling, including to the suppressed demand scenario.
- Effective B2/B8 supply in Opportunity Area 7 has been materially reduced following the removal of non-developable land at Coventry Gateway South.
- Representations relating to historic completions and 'big box' delivery on sub-25 ha sites have been considered in the Alignment Addendum.

4.38 The updated evidence reinforces conclusions from Regulation 18 representations that the underlying demand for B2/B8 employment land is materially stronger than accounted for in the WMSESS, with historic delivery, particularly of big box units on non-strategic sites, under-recorded. When corrected, this indicates an unmet requirement of at least 63 hectares, which has not been quantified or addressed through the Regulation 19 allocation strategy.

4.39 The Alignment Addendum itself recognises that at least one additional strategic employment site of around 50 hectares should be directed to Opportunity Area 7; however, this has not been translated into additional allocations at Regulation 19.

3.1 The replacement of the Ryton allocation with Walsgrave Hill has reduced the overall quantum of strategic floorspace delivered within Opportunity Area 7 by



approximately 60,000 sqm, without a corresponding replacement allocation.

- 3.2 There is persistent unmet employment need arising in Coventry's Local Plan review, including an identified shortfall of approximately 9 ha (around 36,000 sqm) on smaller sites, alongside the wider unmet position.
- 3.3 A review of the Regulation 19 allocation portfolio demonstrates that headline floorspace overstates effective availability, due to a combination of use restrictions, pre-letting, site constraints and limitations on the ability of several allocations to accommodate flexible big-box units (10,000–50,000 sqm) that are most active in the market.
- 3.4 Analysis of individual allocations shows that some sites are over-represented in capacity terms (including Coton Park East), while others provide limited flexibility for larger big-box formats, reducing overall resilience and increasing reliance on a small number of sites.
- 3.5 The Note concludes that the Regulation 19 employment land strategy does not provide a sufficient allocation response within Opportunity Area 7 when set against the updated demand and supply evidence.
- 3.6 In this context, Site 88 represents a necessary and proportionate allocation, capable of delivering flexible B2/B8 big-box accommodation, including a single unit of up to approximately 45,000 sqm, which is relatively rare for a site of this scale and directly addresses an identified gap between SME-focused sites and very large strategic parks.
- 3.7 The allocation of Site 88 would also complement the other proposed allocation as it would - broaden choice, strengthen resilience, and provide additional flexibility within the strongest market area, helping ensure the employment land strategy is responsive to evidenced demand over the plan period.
- 3.8 The Note therefore demonstrates that there is a demonstrable need for B2/B8 uses within Opportunity Area 7.

Test 5. Sustainability

- 3.9 The Site is in a sustainable location for employment-led development. This is not in question.



- 3.10 In accordance with paragraph 155c, development should not be regarded as inappropriate where it would be in a sustainable location. Sites should promote sustainable transport (paragraph 110) and a) prioritise sustainable travel modes, b) provide safe and suitable site access for all users, c) achieve the requirements of the National Design Guide and National Model Design Code and d) effectively mitigate any significant impacts on the transport network (paragraph 115).
- 3.11 As mentioned above, the Site is strategically located for distribution purposes within the heart of the Midlands Golden Triangle, between the M1, M6 and M42 motorways.
- 3.12 The Site is strongly connected to the national motorway network, located within 1km of J2 of the M6, accessed via the B4065 and the M69 via the Ansty Interchange, also providing access to the M1 at J21.
- 3.13 East Midlands Airport (a significant cargo airport) is located approximately 56km to the north of the Site and Birmingham Airport is located approximately 25km to the west.
- 3.14 Daventry International Rail Freight Terminal (DIRFT), a rail-road intermodal freight terminal is located approximately 25km to the east of the Site. The Hams Hall Rail Freight Terminal is also located approximately 30km to the northwest.
- 3.1 Appendix 5 shows the extent of the Golden Triangle and the national connectivity in relation to the Site (prepared by PRC).
- 3.2 On a local level, Ansty is accessible by foot or cycling. There are Public Houses in the village and a hotel, in addition to other small businesses.
- 3.3 Several bus stops are located along the B4065, within walking distance from the Site. These provide connections to St Cross Hospital Shelter, Pool Meadow Bus Station, Nuneaton Bus Station, Grove Road (74A, 74B, 74C and 84).
- 3.4 The proposed development makes provision for shared surface routes for pedestrians and cyclists, helping to enhance and promote sustainable travel.
- 3.5 This demonstrates that the proposals seek to prioritise sustainable travel and provide safe and suitable access for all uses.



Grey belt Assessment Findings

- 3.6 Overall, our assessment demonstrates that the Site is considered to be grey belt (because it passes tests 1 and 2) and is not regarded as inappropriate development in the Green Belt (because it passes tests 3, 4 and 5).
- 3.7 Significantly, looking at the Council's GBA as part of Stage 2, it looks in detail at potential sites for Green Belt release and it is important to recognise that CF_02 which is next to the Site (also adjacent to Ansty) has the potential to be suitable for the definition of grey belt. We strongly suggest that the Site performs in a comparable manner and this supports our finding that the Site utilises grey belt.



4. GOLDEN RULES ASSESSMENT

- 4.1 The golden rules requirements set out in paragraph 156 are not relevant to the proposals for employment provision. The requirements relate to affordable housing, infrastructure and open space for housing provision only.



5. OPENNESS ASSESSMENT

- 5.1 This section considers the openness of the Green Belt.
- 5.2 The starting point for the Site is that an assessment of openness is not required for development on PDL or grey belt land in accordance with Footnote 55 of the NPPF. This approach was confirmed in the High Court in September 2025 as the aim of preserving the openness of the Green Belt “*cannot be compromised*” by development that is found to be “*not inappropriate*”. As such development on grey belt is not inappropriate development in the Green Belt.
- 5.3 This case relates to Mole Valley DC v Secretary of State for Housing, Communities and Local Government (EWHC 2127).
- 5.4 It is our view that the Site utilises grey belt and would not be inappropriate development in the Green Belt and therefore an assessment of the openness of the Green Belt is not required to support any planning application / case for development.



6. CONCLUSION

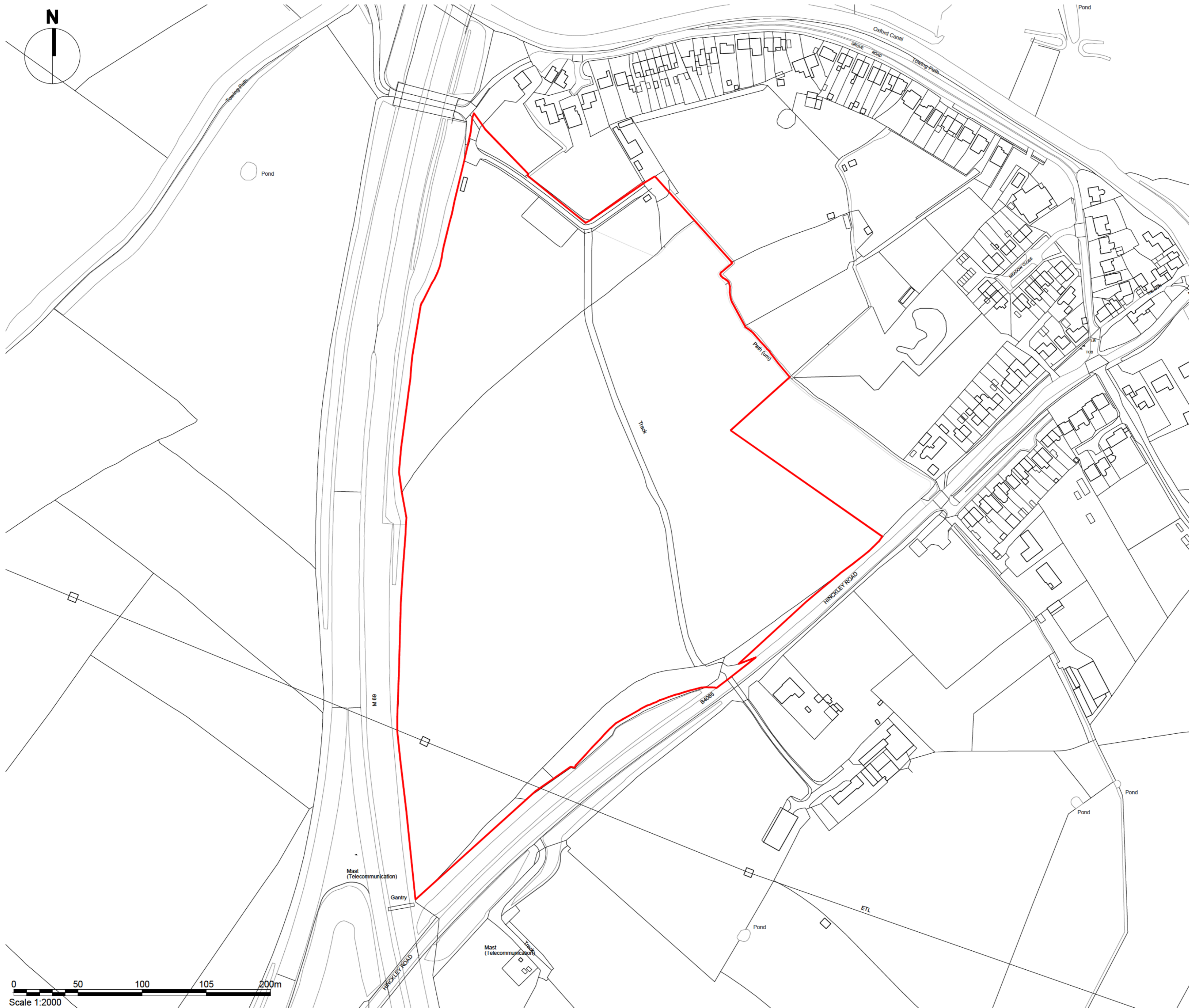
- 6.1 In conclusion, the Site is grey belt and it would not be regarded as inappropriate development in the Green Belt.
- 6.2 In relation to the grey belt tests, there are no designations relating to the Site that would provide a strong reason for refusing or restricting the proposed development.
- 6.3 In addition, it is concluded that the Site makes a “*weak/no*” contribution to Purposes A, B and D. A summary is provided below.
- 6.4 In relation to Purpose A, the Site has a clear relationship with the village of Ansty, which is the settlement to which it is related to. Ansty is a village and therefore is not identified as being a LBUA. The Site boundaries are strong and permanent meaning that the Site is well-defined and is subject to urbanising influences as it is largely enclosed by significant existing development. It is therefore concluded that development at the Site would represent a well-defined and logical extension to the settlement of Ansty.
- 6.5 In relation to Purpose B, the Site forms a very small part of the gap between the town of Bedworth and Coventry, which already includes development, and therefore it is concluded that the Site would have no or negligible impact on the visual separation of the towns.
- 6.6 The Council’s GBA concluded that Rugby’s Green Belt is not considered to make a notable contribution to preserving the setting and special character of historic towns. As such, the Site makes a “*weak/no*” contribution to Purpose D.
- 6.7 Significantly, looking at the Council’s GBA as part of Stage 2, it looks in detail at potential sites for Green Belt release and it is important to recognise that CF_02 which is next to the Site (also adjacent to Ansty) has the potential to be suitable for the definition of grey belt grey belt. We strongly suggest that the Site performs in a comparable manner and this supports our finding that the Site utilises grey belt.
- 6.8 The assessment above also concludes that the Site would not have an impact on the purposes of the wider Green Belt, that there is a clear and demonstrable need for the proposed development and the Site is in a sustainable location for employment-led development.



- 6.9 The assessment therefore demonstrates that the Site passes tests 1 and 2, therefore utilises grey belt and is not inappropriate development in the Green Belt as it passes tests 3, 4 and 5.
- 6.10 The Site (and the proposals) therefore currently pass all relevant grey belt tests.
- 6.11 For the purposes of supporting the Representations to the draft Local Plan, this Report clearly supports the case that the Site should be allocated for employment development.



Appendix 1: Site Location Plan



Client:
BARJANE



Project:
SITE 88 HINCKLEY ROAD
ANSTY

12 Warren Yard,
Warren Park,
Milton Keynes,
MK12 5NW
01908 305 246
info@prc-group.com
www.prc-group.com

Drawing Title:
SITE LOCATION PLAN

Scale @ A2: 1:2000
Checked by: ME
Date: 001

Job No: 11644
Stage: FE
Drawing No: MAY 25
Rev: *

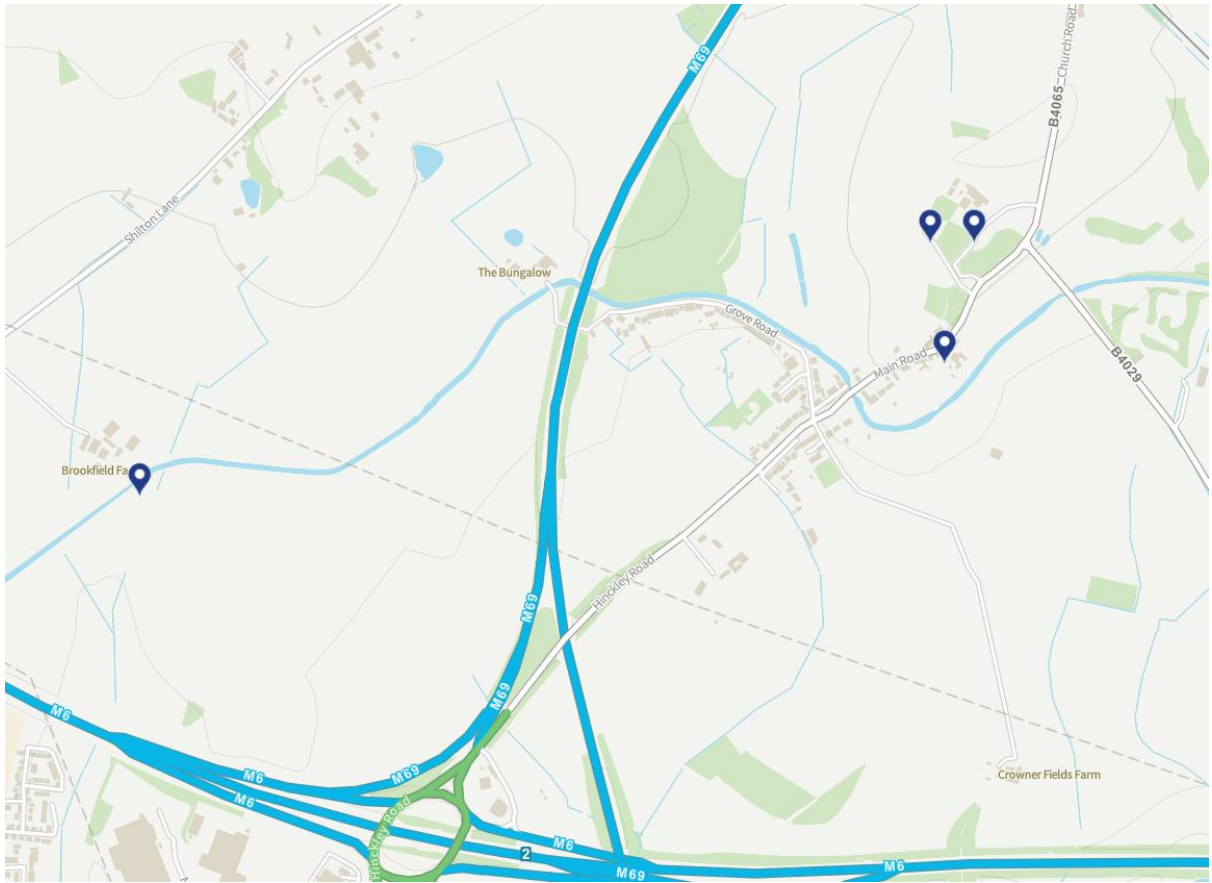
Issue Status:
Construction Preliminary
Information Approval
Tender

Architecture
Planning
Master Planning
Urban Design
Interiors
Landscape

Offices
Woking
London
Milton Keynes
Warsaw



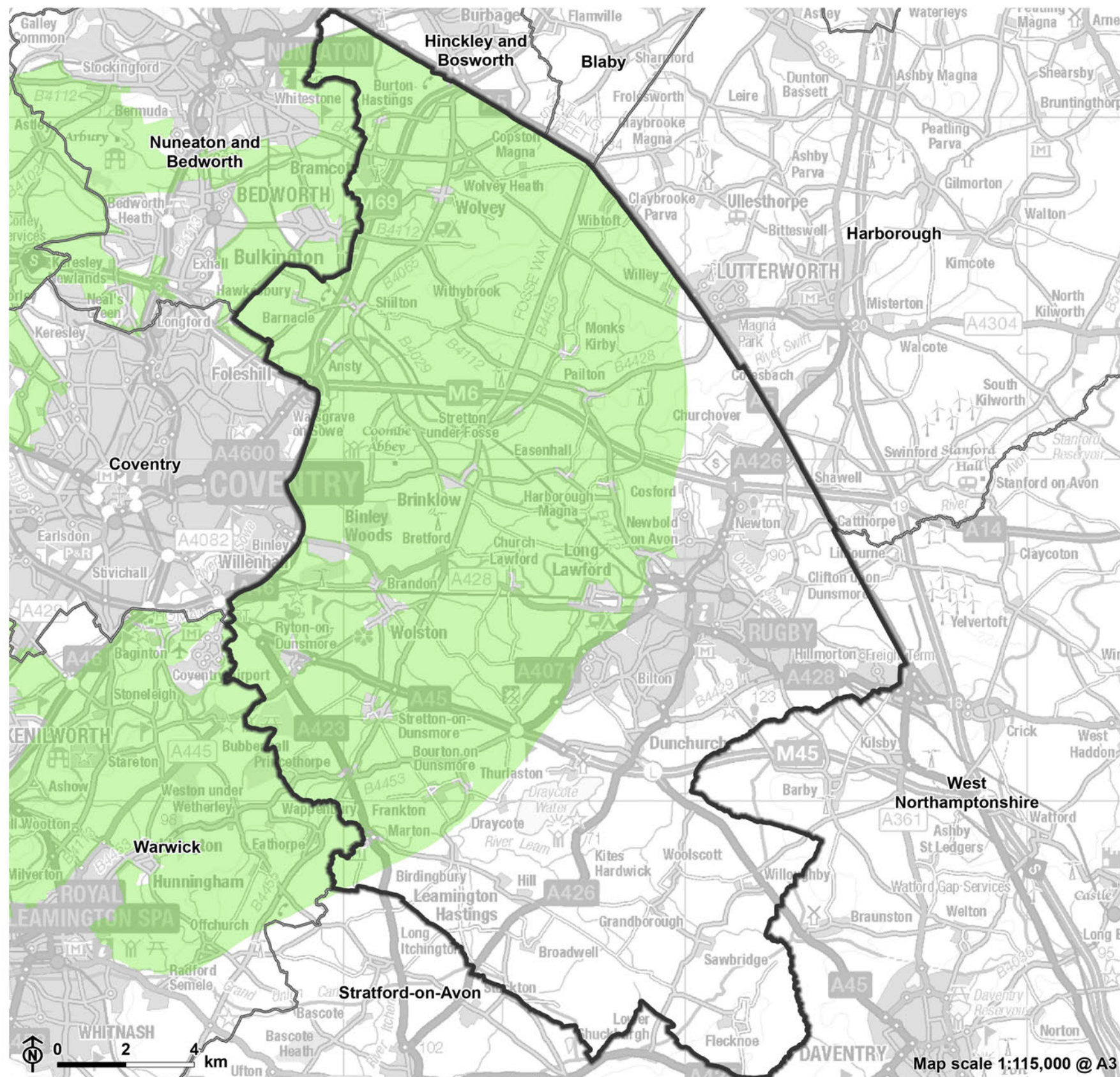
Appendix 2: Map of Surrounding Listed Buildings





Appendix 3: Extent of Green Belt in Rugby




Figure 2.1: Rugby Borough's Green Belt



Rugby Green Belt Contribution Study
Rugby Borough Council



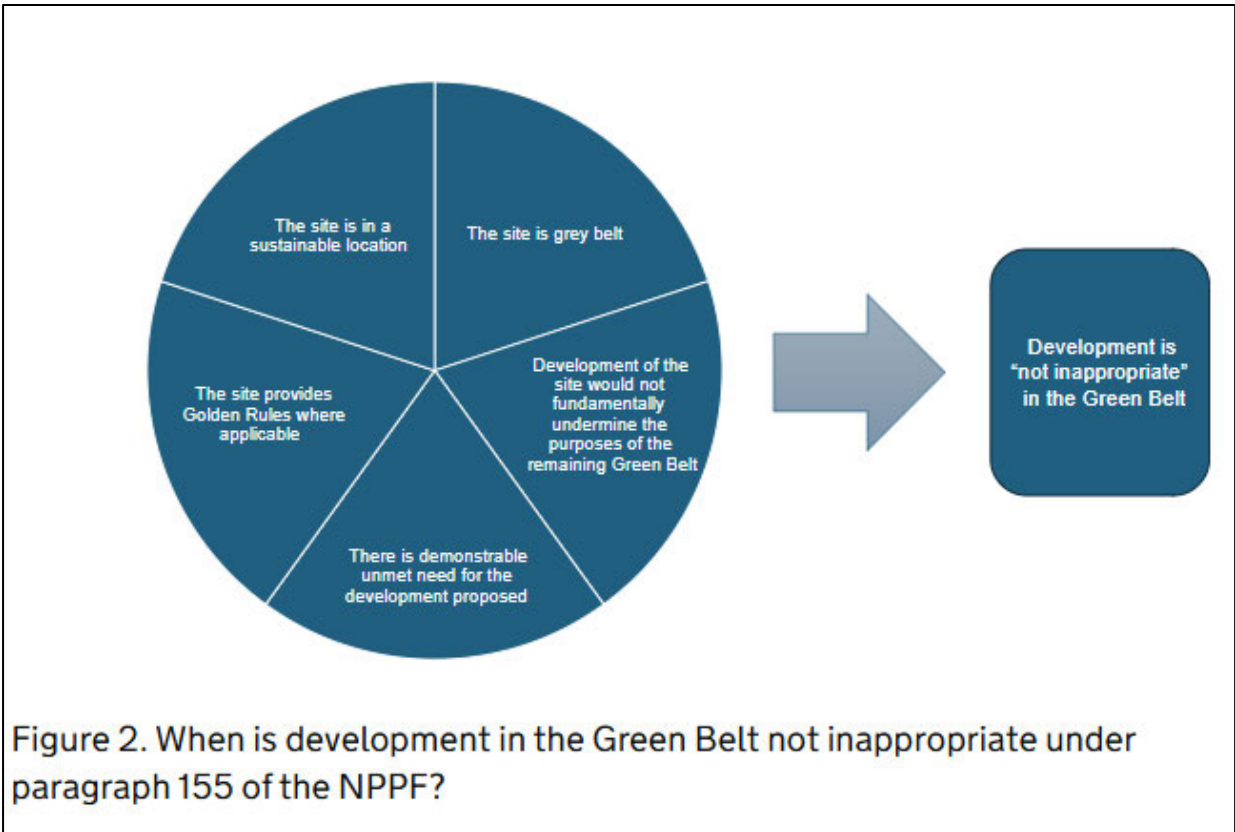
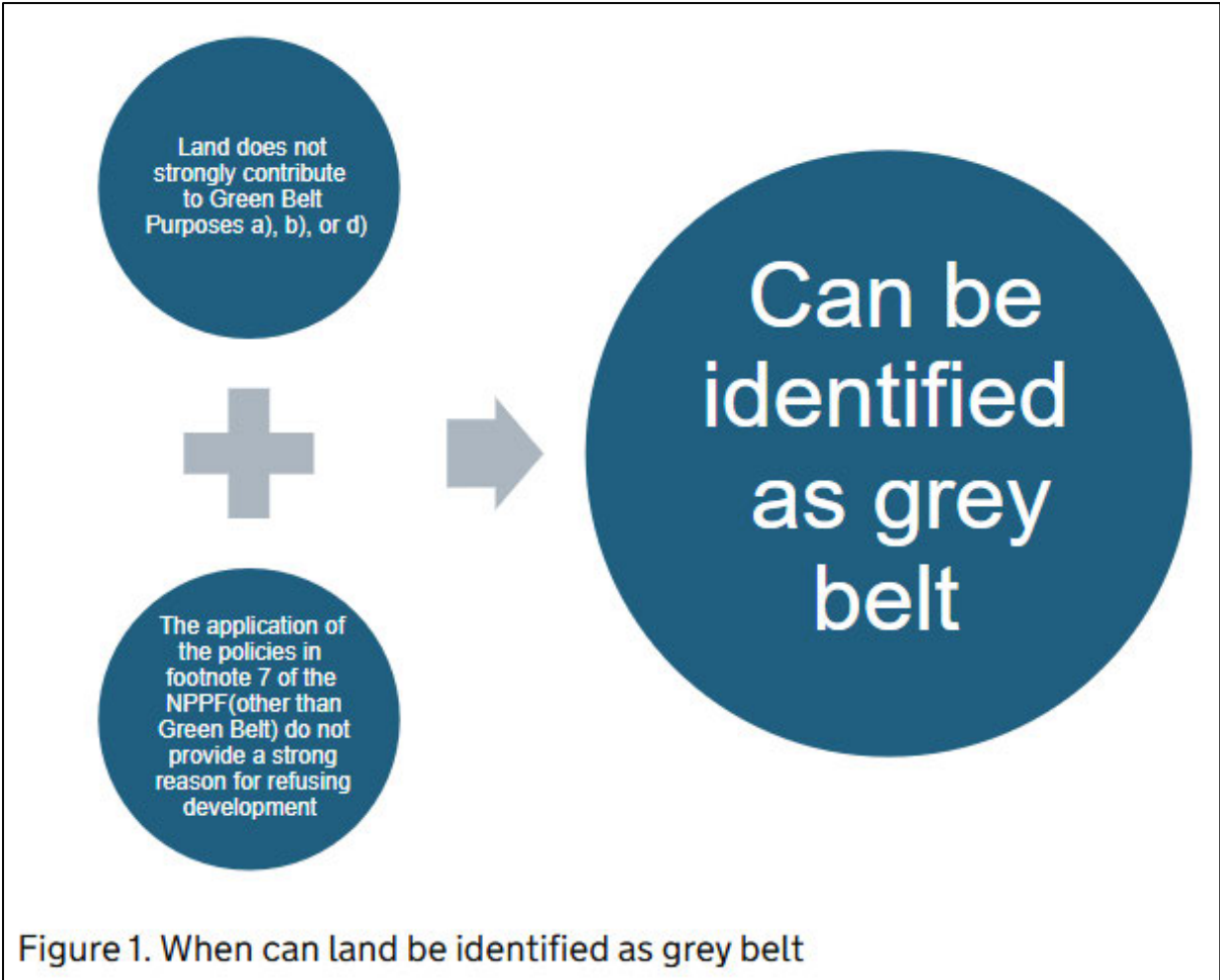
Figure 2.1: Rugby Borough's Green Belt

-  Rugby Borough Boundary
-  Neighbouring authority
-  Green Belt

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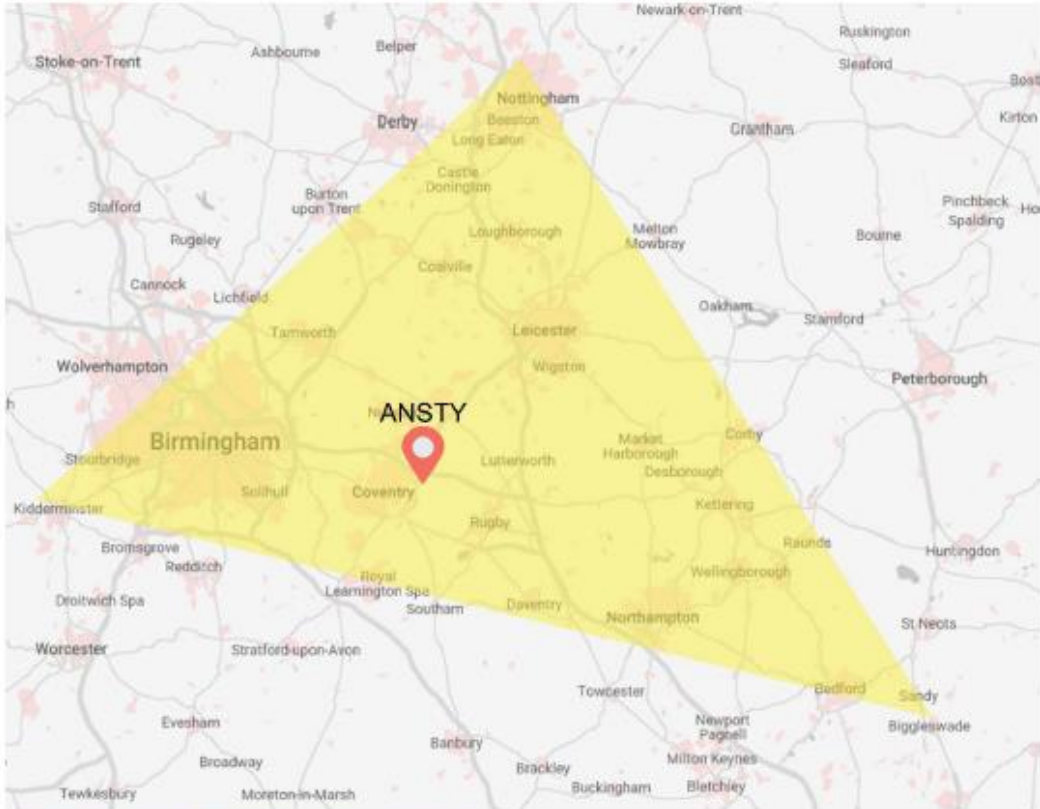


Appendix 4: Figures 1 and 2 of the NPPG





Appendix 5: Connectivity of the Site



EXTENT OF GOLDEN TRIANGLE



NATIONAL CONNECTIVITY



Document 5

LANDSCAPE & VISUAL APPRAISAL REGULATION 19 CONSULTATION

BARJANE



MARCH 2026



SITE 88
HINCKLEY ROAD
ANSTY
CV7 9JF



Document Management.

Version	Date	Author	Approved	Reason for revision
02	13.03.26	DW	JE	Final



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Appendices.

Appendix A: Extract from the Landscape Sensitivity Assessments – Smaller Sites (updated Nov 2025)

Appendix B: Extract from the Validation of Landscape Sensitivity Assessments (Dec 2025)

1. Introduction.

- 1.1. This Addendum to the Reg. 18 Site 88 Landscape & Visual Appraisal has been prepared by Pegasus Group on behalf of BARJANE in respect of Land at Hinckley Road, Ansty, Coventry, CV7 9JF (the 'Site'). Rugby Borough Council (the 'Council') have recently published their Proposed Submission (Reg. 19) Local Plan (Regulation 19) for public consultation, with all comments required by 13th March 2026. This Addendum has been prepared as part of representations to the emerging Local Plan to support the Site's allocation for employment use.
- 1.2. The Site was identified as **Site 88: Hinckley Road, Ansty** in the Housing and Economic Land Availability Assessment (HELAA)¹. The HELAA records the 12.3ha Site as being in agricultural use (Grade 3) and considered for 40,000sqm of employment yield. It concluded that the Site is available, achievable, and 'potentially' suitable.
- 1.3. The overall conclusion states: *"Not currently developable - changes to policy would be required"*. The 'major planning application' to the south refers to the Frasers Group site (the 'FG Site'), identified as **Site 95: Land bound by M69, M6 and B4029, Ansty**, that recently received planning permission. Both sites are illustrated at **Figure 1** (below):

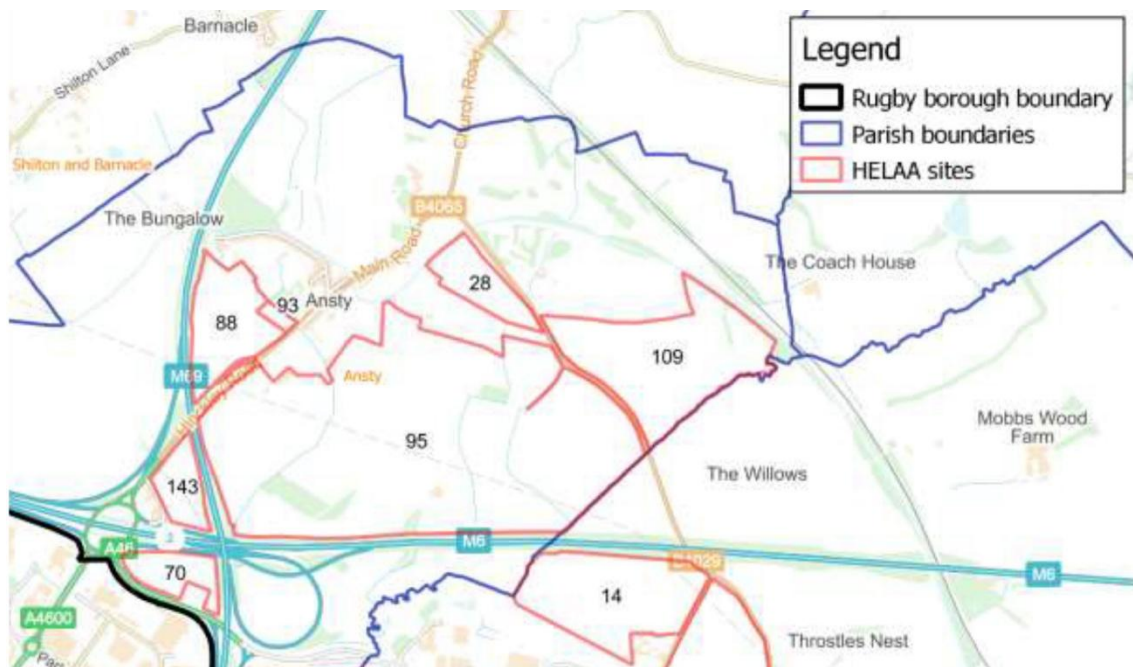


Figure 1: Extract from HELAA – Appendix 5

- 1.4. The Site was subsequently included in the second stage of the site selection process, that considered more detailed technical analysis of various site constraints and opportunities to site options for inclusion in the sustainability appraisal.

¹ [Housing & Economic Land Availability Assessment \(2025\) – Rugby Borough Council](#)

Local Plan Evidence Base

Landscape Sensitivity Assessments (March 2025, updated November 2025)

- 1.5. Of relevance to this Addendum, the Council’s Development Strategy team prepared a Landscape Sensitivity Assessment² that considered the Site. Site visits were conducted between August and November of 2024, with a small number of additional visits occurring in March 2025. The assessment concluded that the Site’s overall landscape sensitivity was **Low** (please refer to **Appendix A**). In particular, the Smaller Sites assessment concluded the following levels of sensitivity for the Site, as set out in **Table 1** (below):

Criteria	Susceptibility	Sensitivity	Commentary
Scale and enclosure	The Site is an approximate triangle, bound by the M69 to the west, Hinkley Road to the south-east, and the back of development fronting the Oxford Canal and Ansty in the north. It comprises medium sized fields which are delineated by hedgerows and some mature trees.	Medium / Low	Agreed
Landform	Relatively flat topography, minimal features.	Low	Agreed
Landcover (including biodiversity)	The Site comprises pastoral fields bounded by hedgerows with trees	Medium / Low	Agreed
Man-made influences	The Site is largely free from man-made influences, apart from obvious pastoral uses. The M69 runs along the western boundary, and Hinkley Road along the south-eastern boundary, both of which are aural detractors.	Low	Agreed
Scenic quality and character	The Site lies at the urban fringe of Ansty, surrounded by key transport infrastructure, reducing its rural character.	Low	Agreed
Remoteness / tranquillity	The M69 along the western boundary reduces the level of tranquillity.	Low	Agreed
Skyline and settings	The skyline is primarily shaped by hedgerows and trees, although the presence of the M69 which sits above the level of the site is quite evident. A pylon corridor crosses the southern end of the site.	Low	Agreed

² [Landscape Sensitivity Assessments – Smaller Sites \(2025\) – Rugby Borough Council](#)

Movement	Movement along Hinkley Road and the M69 is quite evident, despite the screening provided by hedgerows and trees.	Low	Agreed
Visibility, key views, vistas and typical receptors	Long distance views from within the site are limited by the presence of hedgerows and trees. The PROW south of Ansty affords visibility over the Site and the Site is visible to southbound traffic on the M69.	Medium / Low	Agreed
Views to and from important landscape and cultural heritage features	There are no known landscape or cultural heritage features within or adjacent to the Site that are likely to be affected by the development proposals.	Low	Agreed
Landscape value	A public right of way runs along much of the northern boundary provides some recreational value. The Site has limited other landscape value.	Medium / Low	Agreed
Visual value	Road users may notice a largely rural and undeveloped site, and views from PROWs would be varied due to varying levels of enclosure from hedgerow and tree cover. There are no known views to designated features or valued community views.	Low	Agreed
Mitigation potential	Additional tree planting along roads can help to soften views and integrate new buildings into the landscape. Areas of woodland could be maintained and expanded.		
Overall landscape sensitivity (landscape, visual and value) of the assessment unit	This is a large Site composed of fields located between the M69, Hinkley Road and Ansty. The Site's rural character is diminished by noise and movement from traffic along nearby roads. Sensitivity to change is most likely to arise from the PROW and natural or semi-natural elements of the Site.	Low	Agreed

Table 1: Summary of landscape & visual sensitivity

Landscape Sensitivity Assessment of Small Sites (December 2025)

- 1.6. This document provides an independent review³ (by Lepus Consulting) of the Council's previous Landscape Sensitivity Assessment as set out in **Table 2** (below):

Criteria	Susceptibility	Sensitivity	Commentary
Scale and enclosure	This Site comprises two pastoral fields, one large-scale and one small sized, with a fenced paddock / enclosure located in the northern area of the Site. The Site is primarily defined by thick boundary trees and mature hedgerows. Part of the most northern area of the Site is bounded by wooden fencing. The Site is located between the village of Ansty and the M69.	Low	Agreed
Landform	The topography of the Site is mostly flat and uniform. The adjacent motorway lies on an imposing embankment to the west of the Site.	Low	Agreed
Landcover (including biodiversity)	The Site comprises improved grassland with trees dispersed across the Site. The northwest and southwest parts of the Site are enclosed by woodland, whilst the eastern boundary connects to an area of woodland and allotments. Hedgerows that border the Site may link to habitat corridors connecting to the green spaces, and the 'Oxford Canal'.	Low	Agreed
Man-made influences	T Within the northern area of the Site, two disused mobile homes are situated adjacent to the road that runs internally alongside the northern boundary. Prominent vehicular tracks traverse the Site from north to south, connecting to Hinckley Road delineating the Site to the south. Pylons traverse the Site to the south. The M69 is a prominent detractor to the west of the Site. There is likely some intervisibility towards residential development in Ansty.	Low	Agreed

³ [Validation of Landscape Sensitivity Assessments – Smaller Sites \(2025\) – Lepus Consulting](#)

Scenic quality and character	<p>The Site comprises of flat and uniform land, surrounded by man-made influences on the urban fringe of the small settlement of Ansty. Dispersed trees in the Site contribute to some scenic qualities; however, the close proximity of the M69 and the residential area act as scenic detractors. The presence of disused mobile homes and prominent vehicular tracks further detract from the scenic quality and character of the Site.</p>	Low	Agreed
Remoteness / tranquillity	<p>The Site lacks a sense of remoteness and tranquillity primarily due to the adjacent M69, where constant, loud vehicular noise is a strong auditory detractor. Hinckley Road may also be audible and visible from the east of the Site.</p>	Low	Agreed
Skyline and settings	<p>Skyline views are characterised by short distance views towards the M69 to the west and the residential area of Ansty to the east. Pylons are visible on the skyline within the south of the Site.</p>	Low	Agreed
Movement	<p>Views of motor vehicles are present and strongly audible along the M69 embankment. However, movement of vehicles along Hinckley Road to the south is primarily obstructed by woodland, although occasional filtered views of movement may be possible where the vehicular track within the Site intercepts.</p>	Low	Agreed
Visibility, key views, vistas and typical receptors (both within and outside each site)	<p>Clear views into the Site are available from the residential housing located at the far northern extent of the Site. The PRoW that traverses through the residential area towards the Site also acquires views into the Site. The vehicular track within the Site connecting to Hinckley Road similarly acts as a viewpoint. It is likely that visibility to and from the M69, will be slightly filtered, as will the majority of Hinckley Road, the allotment, and the remainder of the residential area of Ansty.</p>	Low	Agreed

Views to and from important landscape and cultural heritage features (both within and outside each site)	Views to and from important landscape and cultural heritage features are unlikely.	Low	Agreed
Landscape value	Mature hedgerows have been retained on the far eastern and southern edge of the Site, with new plantations of hedgerows occurring in the late 1990s on the western edge, bordering the M69. The PRoW traversing the Site from northwest to east provides some recreational connectivity through the Site, although enjoyment is likely detracted from by the prominence of the M69. However, the scale of development proposed is likely to overwhelm the small settlement of Ansty and be inappropriate to the residential setting.	Medium / Low	Agreed
Visual value	The Site retains limited visual value where a PRoW traverses the northernmost Site boundary.	Low	Agreed
Mitigation potential	The landscape appraisal shows that proposed development will construct new grassland areas, woodlands, public realm, new cycleways and pathways and vehicular aspect routes. It is recommended that the allotment area in the east should be directly accessible to the proposed development. Mature and native vegetation with the Site should be retained and enhanced. The scale of development should be reduced in order to be more appropriate to the small scale of Ansty. There is potential for improved PRoW access and connectivity.		
Landscape sensitivity summary	The Site comprises two pastoral fields, including a small, fenced paddock to the north, defined by boundary trees, mature hedgerows, and areas of woodland. It lies between Ansty village and the M69, with a tributary of the Oxford Canal along the eastern boundary. The land is mostly flat and uniform with improved grassland and scattered trees. Existing features include disused mobile homes, vehicular tracks linking to Hinckley Road, pylons, and a PRoW crossing from northwest to east. Surrounding infrastructure such as the M69 and nearby housing reduces scenic quality and tranquility, while	Low	Agreed

filtered views are available toward adjacent roads and residential areas.

Table 2: Summary of landscape & visual sensitivity

- 1.7. When considered in the round, Lepus Consulting conclude that the Council’s existing landscape sensitivity is sound, lowering the sensitivity for some criteria (i.e. scale and enclosure, land cover, and visibility (key views, vistas and typical receptors); leaving the overall landscape sensitivity as **Low** (the lowest ranking possible).

Stage 2 Site Options Assessment (December 2025)

- 1.8. In relation to landscape matters, the *Stage 2 Site Options Assessment (2025)*⁴ concluded that the overall landscape sensitivity is **Low** (emphasis added):

“The site comprises two pastoral fields, including a small, fenced paddock to the north, defined by boundary trees, mature hedgerows, and areas of woodland. It lies between Ansty village and the M69, with a tributary of the Oxford Canal along the eastern boundary. The land is mostly flat and uniform with improved grassland and scattered trees. Existing features include disused mobile homes, vehicular tracks linking to Hinckley Road, pylons, and a PRow crossing from northwest to east. Surrounding infrastructure such as the M69 and nearby housing reduces scenic quality and tranquillity. There is filtered visibility towards adjacent roads and residential areas. Sensitivity to change is most likely to arise from the PRow and natural or semi-natural elements of the site.

The landscape appraisal shows that proposed development will construct new grassland areas, woodlands, public realm, new cycleways and pathways and vehicular aspect routes. It is recommended that the allotment area in the east should be directly accessible to the proposed development. Mature and native vegetation within the site should be retained and enhanced. The scale of development should be reduced to be more appropriate to the small scale of Ansty. There is potential for improved PRow access and connectivity.”

- 1.9. The concern raised about the scale of development being inappropriate to the small scale of Ansty is overstated. The Site is well-contained by boundary vegetation, particularly along its northern boundary with the village and along the boundary with Hinckley Road that together serve to limit intervisibility with the local area. Whilst there is some potential for residents of dwellings on Grove Road to have rear facing and upper floor views towards the Site, these houses benefit from well-vegetated rear gardens and are generally separated from the Site by large paddocks with mature field boundaries and dense tree belts that interrupt views towards the Site.
- 1.10. Additionally, the development proposals would incorporate a substantial landscape buffer along the northern boundary of the Site to create a green corridor through which the PRow

⁴ [Stage 2 Site Options Assessment \(2025\) – Rugby Borough Council](#)



would pass. The buffer would incorporate a berm that would be planted with appropriate tree species to supplement and enhance the existing vegetation along the northern edge of the Site. Intervisibility between the development and the village is therefore predicted to be very limited and should not prevent further consideration of the Site for allocation.

- 1.11. Nonetheless, the Stage 2 assessment concluded that the Site should not be progressed in part because of its relationship to the village of Ansty:

*“... Neither heritage nor ecological sensitivity was identified, and **overall landscape sensitivity is low**. The site is adjacent to the village of Ansty with **potential for adverse visual and noise impacts**. The developer has included **mitigations such as green buffers in the site plans but relationship with the village is still poor ...**”*

- 1.12. BARJANE commissioned Pegasus Group to prepare a Landscape & Visual Technical Note as part of the Reg. 18 representations **to demonstrate that there are no landscape or visual impediments to the allocation of the Site for employment purposes.**

2. Reg. 18 Landscape & Visual Appraisal.

- 2.1. A landscape and visual appraisal was included as part of BARJANE's Reg. 18 representations to the emerging Local Plan. This Addendum summarises the findings of that appraisal, taking into account Council's new evidence as part of the Reg. 19 Draft Local Plan, and confirming the Council's own findings that the Site has a **Low** landscape and visual sensitivity to employment uses.

Landscape Sensitivity of the Site

- 2.2. The Site is located slightly to the north of Junction 2 of the M6 / M69, and slightly to south of the nucleated village of Ansty. The Site is separated from the village of Ansty by a collection of small paddocks and allotments. The Site is triangular in shape with an area 12.3ha and is currently used for horse grazing. It is bound by the M69 motorway to the west and Hinckley Road (B4065) to the south-east. The Site is accessed from Hinckley Road and a track bisects the Site on a north-south alignment. There are currently no buildings within the Site, other than a decrepit caravan and small summerhouse and shed; however, there is a pylon and OPL passing over the southern part of the Site.
- 2.3. The Site comprises two fields separated by a mature hedgerow. The northern boundary and boundary with Hinckley Road are also formed from mature, outgrown hedgerows. The western boundary with the M69 is more open to the south of the Site, with traffic movement along the motorway clearly visible from within the larger southern field. The motorway climbs as it routes northwards, and the boundary with the smaller northern field is formed from a well-wooded embankment that serves to reduce intervisibility.
- 2.4. The landscape value of the Site:
- **Natural heritage:** the Site is not covered by any landscape designations, although the existing hedgerows and trees are considered to be notable features. The majority of the Site is washed over by the strategic green infrastructure network, and the brook on the northern boundary is identified as part of the strategic blue infrastructure network.
 - **Cultural heritage:** the Site forms part of the setting to the village of Ansty, and potentially part of the setting to the Grade II* Listed Church of St. James, where overlooking views of the Site are possible from the churchyard. Otherwise, there is no clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape.
 - **Landscape condition:** the Site is generally in poor condition, with the grassland sward damaged by heavy grazing and compacted by trampling. The hedgerows are unmanaged; however, they do convey some impression of the historic field pattern. The layby on the boundary with Hinckley Road shows evidence of fly tipping.



- **Associations:** there are no known connections to notable people, events or the arts.
- **Distinctiveness:** the Site does not demonstrate a strong sense of identity.
- **Recreational:** there is a public footpath that passes along the northern boundary of the Site; however, whilst the Site is fully accessible from Hinckley Road, there is no obvious signage to indicate the routing through the western part of the Site. There is no evidence of regular use of the footpath, and whilst the underpass below the M69 is accessible, the onward footpath connection is not identifiable. The Site is in use for horse grazing and therefore private recreational use.
- **Perceptual (scenic):** The Site is well-enclosed by boundary vegetation and there are no long-range or panoramic view outwards, towards the surrounding landscape. There are intermittent views towards the village of Ansty through gaps in the vegetation along the northern boundary, typically dwellings on Grove Road that face onto the Oxford Canal. There is an electricity pylon within the southern part of the Site, with overhead power lines passing through this area. Traffic movement is visible on the M69. Ansty business park is visible to the south, beyond the M69 corridor.
- **Perceptual (wildness & tranquility):** There is a limited sense of remoteness given the close proximity of the Site to Junction 2 of the M6 / M69 motorways, with the M69 forming the western boundary. Tranquility levels are disturbed by traffic noise from these motorways, and frequent movements along Hinckley Road.
- **Functional:** The Site is in use for horse grazing and offers a degree of separation between the village of Ansty and the M69 motorway.

2.5. It would be expected that a 'valued landscape' would demonstrate the presence of a number of indicators of landscape value, as set out above. On balance, the Site is **not** considered to be a valued landscape in accordance with Paragraph 187(a) of the NPPF. Taking the factors above into account, the Site is judged to have a **Low** landscape value

2.6. Overall, the well-enclosed nature of the Site and its limited intervisibility with the village of Ansty suggests a **Low** susceptibility to the type of employment development proposed.

2.7. When considered in the round, the Site is considered to have a **Low** value, with a **Low** susceptibility, resulting in an overall **Low** sensitivity.

2.8. This conclusion is consistent with the Council's own judgement of sensitivity.

Visual Sensitivity of the Site

2.9. Overall, the Site benefits from a limited visual envelope and no longer-range panoramic views towards the Site have been identified. In views from the north, the Site is typically screened by intervening vegetation at Ansty House and the churchyard at the Church of St. James.

Elevated views from churchyard are characterised by the urban edge of Coventry, pylons and OPLs, and the M6 and M69 motorway corridors.

- 2.10. Views from other parts of the surrounding countryside are very restricted and would be limited to partial and filtered views of the tallest parts of the development proposals within the Site, typically seen within the context of existing built form and other urbanising features.
- 2.11. Once implemented, the consented development within the Fraser Group site (ref: R23/1027) will make a perceptible change to the visual baseline, resulting in the proposed built form featuring in a number of views towards the Site, particularly those from the east.
- 2.12. Typically, views towards the Site from the surrounding PRow network are extremely limited; however, some overlooking views from footpath R29 to the north of the Site are available (but feature visual detractors including the pylons and OPL). Vehicle movement on the M69 is also visible. On this basis, the proposed development would be partially visible above the existing vegetation that separates the Site from the village of Ansty; however, the consented development at the Fraser Group Site would also be visible (once implemented), resulting in a perceptible change to the existing visual baseline.
- 2.13. It is inevitable that users of PRow R30a, passing along the northern edge of the Site, would experience a change to their existing views as a result of the introduction of the proposed built form and the creation of a vegetated bund to the south of the footpath. Fieldwork has confirmed that whilst the PRow is accessible from Hinckley Road, the route is not well used, and there is no obvious connection to the wider PRow network to the west. There is a clear lack of signage and obvious footfall.
- 2.14. The visual effects experienced from locations in the surrounding context are predicted to be **Limited** and would not result in a material change to any identified view, and where the existing visual baseline is likely to change significantly following the delivery of the consented development within the Fraser Group site.
- 2.15. Overall, the conclusions drawn by the Council's own sensitivity study are supported and considered accurate, concluding a Low visual value and sensitivity (please refer to **Table 2** above).

3. Summary

- 3.1. This Addendum to the Reg. 19 Site 88 Landscape and Visual Appraisal has been prepared by Pegasus Group on behalf of BARJANE in respect of Site 88: Hinckley Road, Ansty, Coventry, CV7 9JF. The Council have recently published their Proposed Submission (Reg. 19) Local Plan (Regulation 19) for public consultation, with all comments required by 13th March 2026. This Addendum has been prepared as part of representations to the emerging Local Plan to support the Site's allocation for employment use.

Local Plan Evidence Base

- 3.2. The Site was identified as **Site 88: Hinckley Road** in the HELAA, comprising 12.3ha of land in agricultural use (Grade 3) and considered for 40,000sqm of employment yield.
- 3.3. The Council's own landscape sensitivity appraisals (as validated by Lepus Consulting) concluded that the Site has a **Low** overall landscape and visual sensitivity to the type of employment development proposed (emphasis added):

*"The Site comprises two pastoral fields, including a small, fenced paddock to the north, defined by boundary trees, mature hedgerows, and areas of woodland. It lies between Ansty village and the M69, with a tributary of the Oxford Canal along the eastern boundary. The land is mostly flat and uniform with improved grassland and scattered trees. Existing features include disused mobile homes, vehicular tracks linking to Hinckley Road, pylons, and a PRow crossing from northwest to east. **Surrounding infrastructure such as the M69 and nearby housing reduces scenic quality and tranquillity**, while filtered views are available toward adjacent roads and residential areas."*

- 3.4. The Site was not progressed through the site selection process. It is understood that there were no absolute landscape or visual constraints identified; however, it is noted that the Stage 2 selection process observed that the Site is adjacent to the village of Ansty with **potential** for adverse visual and noise impacts. This potential harm can be successfully mitigated and should not prevent the allocation of the Site for employment purposes.
- 3.5. In particular, the Site is well-contained by boundary vegetation along its northern boundary with the village and along the boundary with Hinckley Road that together serve to limit intervisibility with the local area. Residential views towards the Site are limited as these houses benefit from well-vegetated rear gardens and are generally separated from the Site by large paddocks with mature field boundaries and dense tree belts that interrupt views.
- 3.6. The development would also incorporate a substantial landscape buffer along the northern boundary of the Site, featuring a berm that would be planted with appropriate tree species to supplement and enhance the existing vegetation along the northern edge of the Site.
- 3.7. **Intervisibility between the development and the village is therefore the predicted to be very limited and should not prevent further consideration of the Site for allocation.**



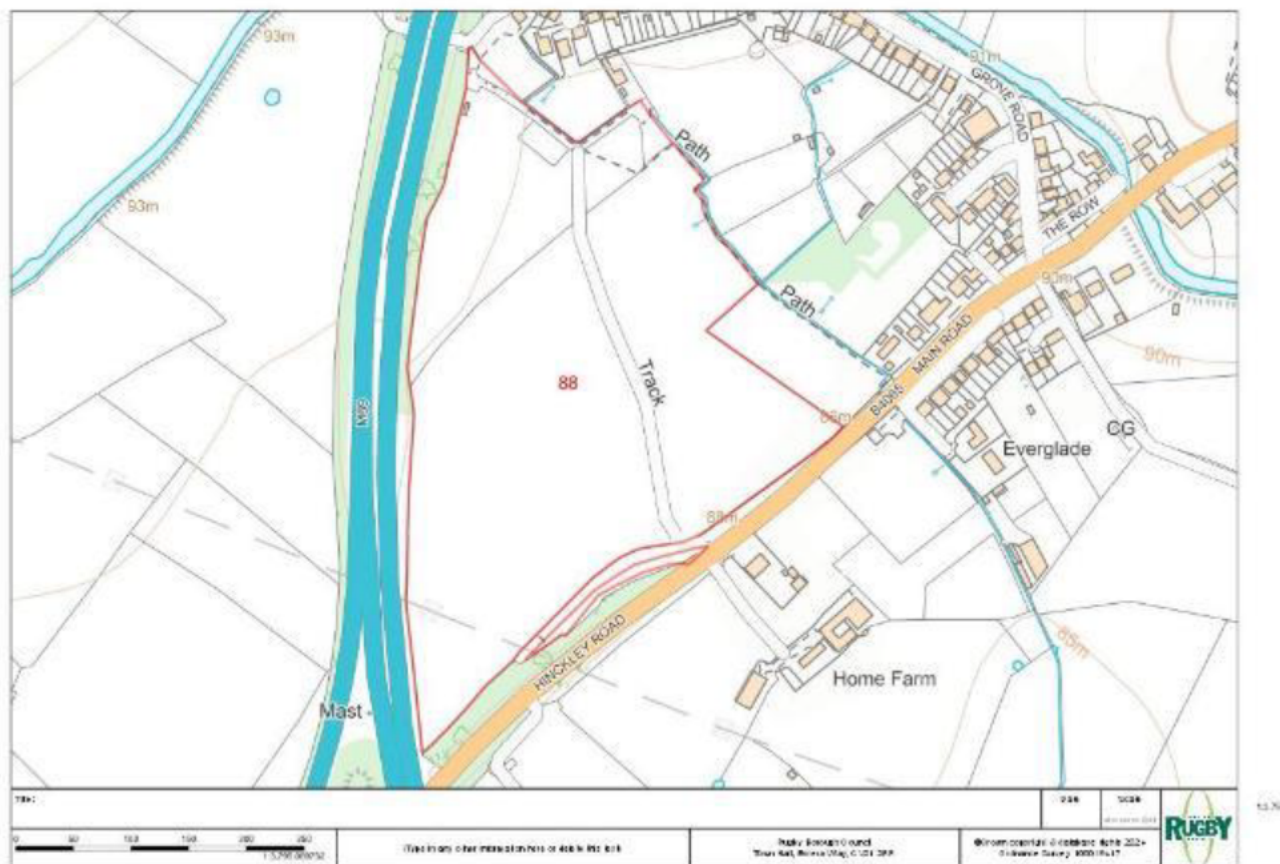
Landscape & Visual Sensitivity

- 3.8. The existing well-enclosed nature of the Site offers the capacity to accommodate development of the type proposed, and this Addendum acknowledges and confirms the findings of the Council's own evidence base that the Site has a **Low** landscape and visual sensitivity to employment uses.
- 3.9. A major planning application by the Frasers Group on land to the east of the Site has recently received planning permission (ref: R23/1027). The implementation of this permission will introduce a range of significant landscape and visual effects that will fundamentally change the landscape and visual baseline.



Appendix A

Site 88: Hinckley Road, Ansty



Site reference	88
Site name	Hinckley Road, Ansty
Location	West of Ansty
Site size (ha)	12.29
Development type	Employment
National Character Area	Dunsmore and Feldon
Landscape Character Area	Dunsmore Parklands
Date of site visit	21/11/2024

Criteria	Susceptibility	Sensitivity				
		H	HM	M	ML	L
Landscape						
Scale and enclosure	The site is an approximate triangle, bound by the M69 to the west, Hinkley Road to the south-east, and the back of development fronting the Oxford Canal and Ansty in the north. It comprises medium sized fields which are delineated by hedgerows and some mature trees.				M/L	
Landform	Relatively flat topography, minimal features.					L
Landcover (including biodiversity)	The site comprises pastoral fields bounded by hedgerows with trees.				M/L	
Man-made influences	The site is largely free from man-made influences, apart from obvious pastoral uses. The M69 runs along the western boundary, and Hinkley Road along the south-eastern boundary, both of which are aural detractors.					L
Aesthetic, perceptual and experiential						
Scenic quality and character	The site lies at the urban fringe of Ansty, surrounded by key transport infrastructure, reducing its rural character.					L
Remoteness/tranquillity	The M69 along the western boundary reduces the level of tranquillity.					L
Visual						
Skyline and settings	The skyline is primarily shaped by hedgerows and trees, although the presence of the M69 which sits above the level of the site is quite evident. A pylon corridor crosses the southern end of the site.					L
Movement	Movement along Hinkley Road and the M69 is quite evident, despite the screening provided by hedgerows and trees.					L
Visibility, key views, vistas and typical receptors	Long distance views from within the site are limited by the presence of hedgerows and trees. The PROW south of Ansty affords visibility over the site and the site is visible to southbound traffic on the M69.				M/L	

Views to and from important landscape and cultural heritage features	There are no known landscape or cultural heritage features within or adjacent to the site that are likely to be affected by the development proposals.						L
Value							
Landscape value <ul style="list-style-type: none"> • Strength of landscape character/quality and condition • Rarity • Geological, topographical, geomorphological • Historic landscape • Natural value • Recreational value • Scenic – aesthetic, perceptual, experiential 	A public right of way runs along much of the northern boundary provides some recreational value. The site has limited other landscape value.					M/L	
Visual value <ul style="list-style-type: none"> • Iconic views • Views from designated and landscape features • Regional/local valued views • Community valued views 	Road users may notice a largely rural and undeveloped site, and views from PROWs would be varied due to varying levels of enclosure from hedgerow and tree cover. There are no known views to designated features or valued community views.						L
Mitigation potential							
Mitigation potential	Additional tree planting along roads can help to soften views and integrate new buildings into the landscape. Areas of woodland could be maintained and expanded.						
Overall landscape sensitivity (landscape, visual and value) of the assessment unit	This is a large site composed of fields located between the M69, Hinkley Road and Ansty. The site’s rural character is diminished by noise and movement from traffic along nearby roads. Sensitivity to change is most likely to arise from the PROW and natural or semi-natural elements of the site.						L



View from the midway along the southern boundary of the site, Hinkley Road, looking west. The M69 is behind the tree line in the distance.



View from the midway along the southern boundary of the site, Hinkley Road, looking north.



Appendix B

7.21 Site 88: Hinckley Road, Ansty

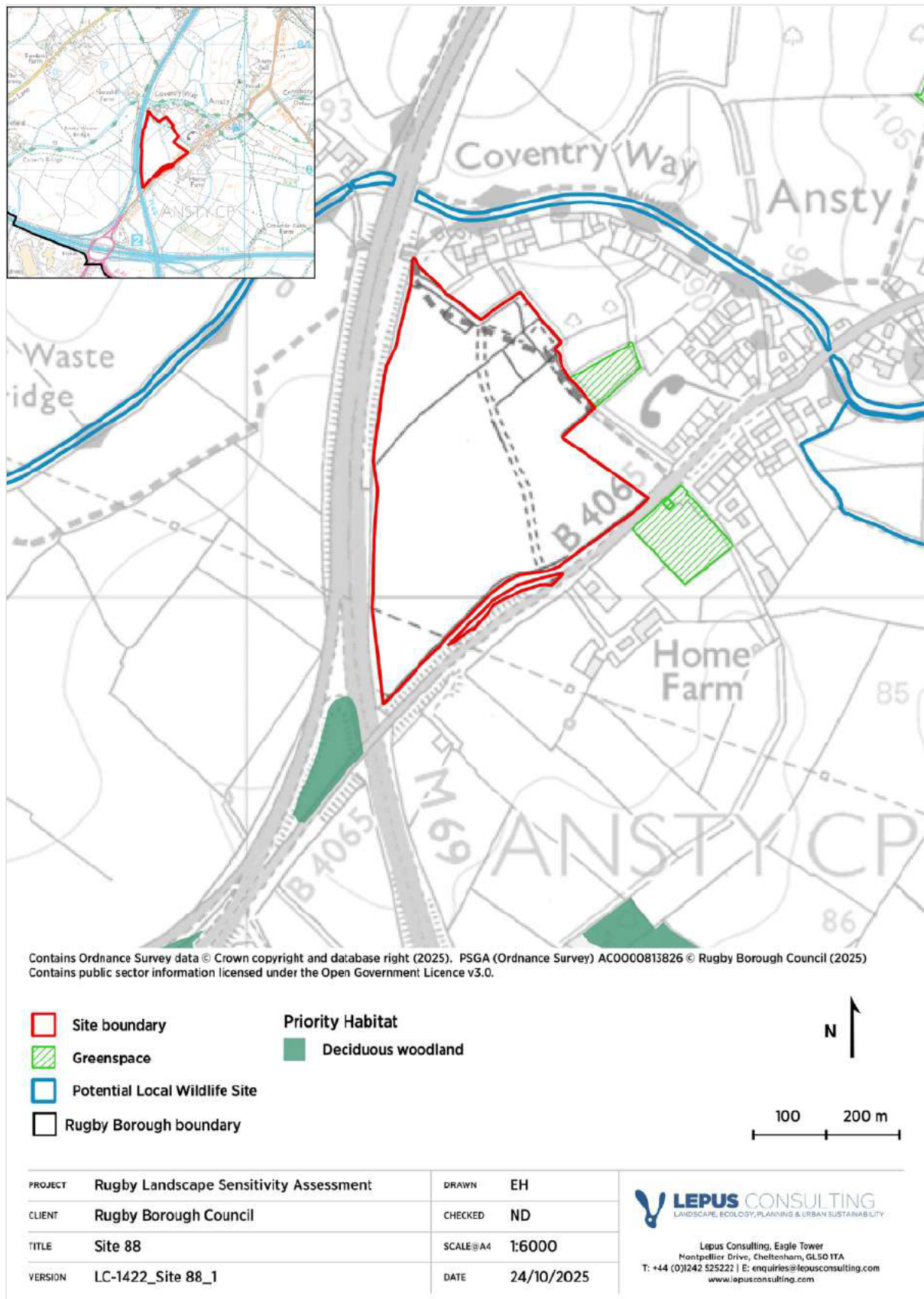


Figure 7.19: Site 88 – Hinckley Road, Ansty

Site information	
Site reference	88
Site name	Hinckley Road, Ansty
Site size	12.29ha
Development type	Employment
Capacity	4.00ha employment land
Landscape Character Area and Type	Dunsmore, Parklands
Date of site visit	28/10/25

Criteria	Description	Score
Landscape susceptibility		
Scale and enclosure	This site comprises two pastoral fields, one large-scale and one small-sized, with a fenced paddock / enclosure located in the northern area of the site. The site is primarily defined by thick boundary trees and mature hedgerows. Part of the most northern area of the site is bounded by wooden fencing. The site is located between the village of Ansty and the M69.	L
Landform	The topography of the site is mostly flat and uniform. The adjacent motorway lies on an imposing embankment to the west of the site.	L
Landcover (including biodiversity)	The site comprises improved grassland with trees dispersed across the site. The northwest and southwest parts of the site are enclosed by woodland, whilst the eastern boundary connects to an area of woodland and allotments. Hedgerows that border the site may link to habitat corridors connecting to the green spaces, and the 'Oxford Canal' pLWS.	L
Man-made influences	Within the northern area of the site, two disused mobile homes are situated adjacent to the road that runs internally alongside the northern boundary. Prominent vehicular tracks traverse the site from north to south, connecting to Hinckley Road delineating the site to the south. Pylons traverse the site to the south. The M69 is a prominent detractor to the west of the site. There is likely some intervisibility towards residential development in Ansty.	L
Scenic quality and character	The site comprises of flat and uniform land, surrounded by man-made influences on the urban fringe of the small settlement of Ansty. Dispersed trees in the site contribute to some scenic qualities; however, the close proximity of the M69 and the residential area act as scenic detractors. The presence of disused mobile homes and prominent vehicular tracks further detract from the scenic quality and character of the site.	L
Remoteness and tranquility	The site lacks a sense of remoteness and tranquility primarily due to the adjacent M69, where constant, loud vehicular noise is a strong auditory detractor. Hinckley Road may also be audible and visible from the east of the site.	L
Visual susceptibility		
Skylines and settings	Skyline views are characterised by short distance views towards the M69 to the west and the residential area of Ansty to the east. Pylons are visible on the skyline within the south of the site.	L
Movement	Views of motor vehicles are present and strongly audible along the M69 embankment. However, movement of vehicles along Hinckley Road to	L

	the south is primarily obstructed by woodland, although occasional filtered views of movement may be possible where the vehicular track within the site intercepts.	
Visibility, key views, vistas and typical receptors (both within and outside of each site)	Clear views into the site are available from the residential housing located at the far northern extent of the site. The PRoW that traverses through the residential area towards the site also acquires views into the site. The vehicular track within the site connecting to Hinckley Road similarly acts as a viewpoint. It is likely that visibility to and from the M69, will be slightly filtered, as will the majority of Hinckley Road, the allotment, and the remainder of the residential area of Ansty.	L
Views to and from important landscape and cultural heritage features (both within and outside of each site)	Views to and from important landscape and cultural heritage features are unlikely.	L
Value		
Landscape value	Mature hedgerows have been retained on the far eastern and southern edge of the site, with new plantations of hedgerows occurring in the late 1990s on the western edge, bordering the M69. The PRoW traversing the site from northwest to east provides some recreational connectivity through the site, although enjoyment is likely detracted from by the prominence of the M69. However, the scale of development proposed is likely to overwhelm the small settlement of Ansty and be inappropriate to the residential setting.	M/L
Visual value	The site retains limited visual value where a PRoW traverses the northernmost site boundary.	L
Overall		
Mitigation potential	The landscape appraisal shows that proposed development will construct new grassland areas, woodlands, public realm, new cycleways and pathways and vehicular aspect routes. It is recommended that the allotment area in the east should be directly accessible to the proposed development. Mature and native vegetation with the site should be retained and enhanced. The scale of development should be reduced in order to be more appropriate to the small scale of Ansty. There is potential for improved PRoW access and connectivity.	
Landscape sensitivity summary	The site comprises two pastoral fields, including a small, fenced paddock to the north, defined by boundary trees, mature hedgerows, and areas of woodland. It lies between Ansty village and the M69, with a tributary of the Oxford Canal along the eastern boundary. The land is mostly flat and uniform with improved grassland and scattered trees. Existing features include disused mobile homes, vehicular tracks linking to Hinckley Road, pylons, and a PRoW crossing from northwest to east. Surrounding infrastructure such as the M69 and nearby housing reduces scenic quality and tranquility, while filtered views are available toward adjacent roads and residential areas.	L

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Cirencester

33 Sheep Street, Cirencester,
Gloucestershire, GL7 1RQ
T 01285 641717
E Cirencester@pegasusgroup.co.uk
Offices throughout the UK

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