

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 (Regulation 19)

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

Mrs

First Name

Tanya

Last Name

Cosford

Job Title
(where relevant)

Senior Associate

Organisation
(where relevant)

Manse Opus and
Rolls-Royce plc

David Lock Associates

Address Line 1

50 North Thirteenth Street

Line 2

Central Milton Keynes

Line 3

Line 4

Post Code

MK9 3BP

Telephone Number

E-mail Address
(where relevant)

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

Name or Organisation:

Manse Opus and Rolls-Royce plc

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

Paragraph		Policy	S3	Policies Map	
Site ID	345				

4. Do you consider the Local Plan:

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

Clarification of Committed Employment Floorspace at Prospero Ansty and Ansty Park

As the developers for Prospero Ansty and Ansty Park, Manse Opus (MO) and Rolls-Royce plc (RR) wish to clarify the level of committed employment floorspace expected to be delivered on the site during the next plan period 2025-2042, in the context of draft Policy S3 (Strategy for Employment Land).

MO and RR anticipate delivering **39,765 sqm** of employment floorspace within Use Classes B2, B8 and E(g)(iii) across Prospero Ansty and Ansty Park in the next plan period. This figure is substantially higher than the 26,663 sqm referenced in the draft policy, and reflects the most up-to-date position, including permitted schemes yet to be implemented, allocated land identified for delivery, and pending applications expected to come forward within 2025-2042.

A detailed schedule of the committed floorspace is appended to this representation as at **Appendix A**.

Accordingly, MO and RR request that draft Policy S3 be updated to reflect the accurate quantum of deliverable employment floorspace at Prospero Ansty and Ansty Park. As currently drafted, the Policy is unsound, as it is not based on proportionate and up-to-date evidence in accordance with paragraph 36(b) of the NPPF.

Inclusion of Ansty Park North West (Site 345)

MO and RR have submitted a separate representation under draft Policy S7 (Employment Allocations) proposing the allocation of Ansty Park North West (Site 345)

for employment development. The site is capable of delivering an additional 15,000 sqm of B2/E(g)(iii) employment floorspace within the plan period.

To ensure consistency between draft Policies S3 and S7, and to maintain an accurate employment land trajectory, the anticipated 15,000 sqm from Ansty Park North West (Site 345) should also be incorporated into total employment floorspace figures under Policy S3.

Revised Total Floorspace Under Draft Policy S3

With the inclusion of 39,765 sqm committed floorspace at Prospero Ansty and Ansty Park and 15,000 sqm proposed at Ansty Park North West, the total employment floorspace for Use Classes B2, B8 and E(g)(iii) under draft Policy S3 should be updated to **1,062,345 sqm**.

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.

Please see the amendment to the policy wording below in blue:

S3 Strategy for employment land

A. To meet Rugby Borough's need for employment land in the period 2025-2042 the following levels of new employment development will be delivered:

- i. 19,761.3m² of use class E(g)(i) and (ii) office floorspace (approx. 3.95 hectares)
- ii. ~~1,034,000m²~~ **1,062,000m²** (approx. ~~287~~ **291** hectares) of floorspace for use classes B2, E(g) (iii), and B8

B. New floorspace in use classes B2, B8 and E(g) (iii) will be delivered in the locations set out in the table below:

Source	Approximate square metres of floorspace 2025-2042
Prospero Ansty and Ansty Park	26,663 39,765
Coton Park east of Castle Mound Wy	26,421
Padge Hall Farm	137,730
Houlton remaining employment land	15,000
Employment planning permissions on small sites as of 1 April 2025	13,429.4
New allocations under Policy S7:	
Crowner Fields Farm, Ansty	275,000
Coton Park East	115,000
South West Rugby phase 2	60,000
Ansty Park North	75,000
Land at Walsgrave Hill	290,000
Ansty Park North West	15,000
Total	1,034,243 1,062,345

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, 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:

It is necessary for Manse Opus and Rolls-Royce plc to participate in the hearing sessions as key stakeholders responsible for delivering the ongoing high-quality employment development at Prospero Ansty. Their direct experience in bringing forward strategic employment growth enables these developers to provide valuable evidence on the sustainability and deliverability of the site, supporting the employment aspirations in the new Local Plan period.

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Appendix A

Proposed Updated Floorspace Delivery Commitment for Prospero Ansty and Ansty Park

Category	Planning Ref.	Site	Use Class	Floorspace (sqm)	Site Area (Hectares)	Status
Strategic	R23/0727	Plot 8, Prospero Ansty	B8	3,234	1.06	Detailed permission
Strategic	R25/0912	Plot 4, Prospero Ansty	B2/B8	15,244	3.30	Application Pending
Strategic		Plot 9, Prospero Ansty	B2/B8	5,972	1.49	Allocation, anticipated floorspace figure
Strategic	R22/0861	Land Off Viggen Way, Coombe Fields	B2	4,715	1.04	Detailed permission
Strategic		Land to the south of Fanuc UK Ansty Park	B2/B8	10,600	2.16	Allocation, anticipated floorspace figure
TOTAL				39,765	9.05	-

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Part A

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(if applicable)

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First Name

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Manse Opus and
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David Lock Associates

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

Name or Organisation:

Manse Opus and Rolls-Royce plc

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

Paragraph		Policy	S4	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

Manse Opus (MO) and Rolls-Royce plc (RR) would like to highlight the need for the Gypsy and Traveller (G&T) pitches proposed under draft Policy S4 (Sites for Gypsies and Travellers), particularly in association with the Walsgrave Hill employment allocation (Site 121), to be in a sustainable and accessible location.

Policy S4, as currently drafted, is unsound for the following reasons:

- It is not justified because it does not ensure pitches are located in the most sustainable parts of allocated sites.
- It is not consistent with national policy, which requires sustainable patterns of development and the safeguarding of the Green Belt.
- It is not effective because the absence of locational guidance risks inconsistent application at the planning stage.

Section B of draft Policy S4 sets out requirements for planning applications for G&T pitches. The policy should include explicit reference to the need for G&T pitches to be located in sustainable locations where possible, with good accessibility to services, facilities and public transport. This ensures that G&T pitches meet the requirements of draft Policy I1 (Transport) to direct development to locations where car travel can be minimised and opportunities for walking, cycling and public transport can be maximised and provide direct, clear, safe and convenient walking, wheeling and cycling links to existing and proposed local facilities. This is further supported by paragraph 11 of the National Planning Policy Framework, December 2024 (NPPF) and Policy B in Planning Policy for Traveller Sites, December 2024 (PPTS), which sets out a presumption in favour of sustainable development. In addition, paragraph 26 of Policy H in the PTTS

states that "Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements".

Draft Policy S4 does not provide explicit policy direction to ensure the G&T pitches are located in the least harmful part of sites to reduce visual impact, nor does it adequately safeguard the Green Belt. Policy E of PTTS sets out that G&T sites in the Green Belt are inappropriate development unless the exceptions set out in Chapter 13 of the NPPF apply. In the case of Site 121, there are suitable locations within the allocation and outside of the Green Belt and therefore specific locational criteria should be stated within Policy S4, because exceptional circumstances cannot be demonstrated for locating in the Green Belt.

Without explicit locational guidance within draft Policy S4, there is also a risk of uncertainty at the planning application stage, potentially undermining timely and coordinated delivery. The proposed modification would ensure the effective implementation of the allocation.

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Please see the suggested policy wording modification below in blue:

S4 Sites for Gypsies and Travellers

B. Planning applications for Gypsy or Traveller pitches must accord with national policy and other policies of this plan. Additionally:

- i. there must be adequate provision of on-site services for water supply, power, drainage, sewage and waste disposal; ~~and~~*
- ii. the site must be of sufficient size to allow adequate outdoor amenity space and privacy for residents and accommodate necessary on-site facilities;*
- iii. **the site must be located in a sustainable location with safe and convenient walking, wheeling and cycling access to existing and proposed services, facilities and public transport; and***
- iv. **the site should be located to minimise visual impact and avoid harm to the Green Belt.***

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.**

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

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

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

It is necessary for Manse Opus and Rolls-Royce plc to participate in the hearing sessions as key stakeholders responsible for delivering the ongoing high-quality employment development at Prospero Ansty. Their direct experience in bringing forward strategic employment growth enables these developers to provide valuable evidence on the sustainability and deliverability of the site, supporting the employment aspirations in the new Local Plan period.

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Name or Organisation:

Manse Opus and Rolls-Royce plc

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

Paragraph		Policy	S5	Policies Map	S5
Site ID	345				

4. Do you consider the Local Plan:

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(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes	X	No	

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Manse Opus (MO) and Rolls-Royce plc (RR) would like to object to the Proposed Submission Plan on the basis that is unsound under paragraph 36 of the National Planning Policy Framework (NPPF) insofar as it fails to allocate land named "Ansty Park North West" (Site 345, referred to as "the site" in this form) for employment development and fails to include the site as part of the exceptional circumstances case for removing employment land from the Green Belt boundary accordingly. This response form should be read alongside the separate representations proposing the site for employment allocation under draft Policies S3 (Strategy for Employment Land) and S7 (Employment Allocations).

Removal of Green Belt Designation

Although the Green Belt Contribution Study: Strategic Assessment (October 2025) (GB Assessment) concludes that the site makes an overall strong contribution to GB purposes, MO and RR consider that, when assessed on its actual characteristics and context, the site makes a **weak contribution** to the GB purposes set out in NPPF paragraph 143 and its release is therefore justified. An assessment of the purposes is set out below:

- (a) **To check the unrestricted sprawl of large built-up areas:** The Green Belt Assessment identifies the site as making a strong contribution to this purpose. However, when applying the Planning Practice Guidance on assessing the land against the Green Belt purposes (Paragraph 005, Reference ID: 64-005-20250225), the site's actual performance is more limited. While it is clearly separated from Coventry by M69 to the west despite their proximity, it is also visually and

physically contained by significant and established features, including the adjoining Ansty Park development and surrounding permanent road infrastructure. This strong containment restricts any realistic perception that the site plays a role in preventing the sprawl of the large built-up area. Additionally, with the adjacent proposed employment allocations (Site 121 Walsgrave Hill Allocation and Site 95 Crowner Fields Farm) in the Proposed Submission Local Plan, the release of the site would not create an incongruous pattern of development, but rather sit within an emerging and logically defined employment cluster, without breaching any defensible Green Belt boundary. On this basis, the site makes only a weak contribution to this GB purpose.

- (b) **To prevent neighbouring towns merging into one another:** The site is assessed to contribute moderately to this purpose in the GB Assessment. The site lies between Coventry and Ansty Park. However, Ansty Park is not a large built-up town, so the Site does not sit within a strategic gap between major towns. Its contribution to this purpose is therefore limited.
- (c) **To assist in safeguarding the countryside from encroachment:** The site is assessed to contribute strongly to this purpose in the GB Assessment. However, the Site is bordered by existing development (including Ansty Park to the east), proposed employment allocations to the north and south and a defined road network to the west, which has a moderate contribution to purpose C. This results in the land being wholly contained from the wider countryside, and if development took place there would be no strong urbanising impact on adjacent Green Belt land. The site lacks openness, rural character and landscape that are associated with the countryside. While some harm would arise from development (as is inherent in most Green Belt releases), that harm would be localised and contained rather than strategic in nature.
- (d) **To preserve the setting and special character of historic towns:** The site is assessed to contribute weakly to this purpose in the GB Assessment. The site has no visual, experiential, or heritage relationship with Coventry's historic assets, thus not contributing to the setting of a historic town.
- (e) **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land:** Not applicable to the site as per the GB Assessment.

Exceptional Circumstances for Green Belt Release

The NPPF confirms that Green Belt boundaries may be altered through the Local Plan process where exceptional circumstances are fully evidenced and justified. The Green Belt Exception Circumstances Paper (December 2025) identifies the policy rationale for Green Belt changes related to strategic employment need. MO and RR consider that all the exceptional circumstances apply directly to this site, namely:

- **The Need for Employment Land at Coventry:** The evidence base identifies strategic employment growth requirements across the Coventry and Rugby Opportunity Area. Coventry has a significantly larger labour force, higher unemployment, and higher deprivation levels than Rugby. The site's proximity to Coventry makes it well-placed to meet the region's identified strategic

employment need, consistent with the justification for Ansty Park and Walsgrave Hill.

- **The Commuting Consequences of a “Beyond-the-Green-Belt, Outer-Edge” Approach:** As per above, the location of the site near Coventry’s urban edge and integration with the established Ansty Park minimises car dependency and aligns with sustainable transport objectives, ensuring sustainable travel patterns.
- **Diversification, Agglomeration and Clustering Opportunities and Other Benefits of Sites at the Coventry Urban Fringe:** The site is uniquely positioned to reinforce the high-value manufacturing and R&D cluster centred on Ansty Park, benefiting from proximity to universities, existing advanced engineering occupiers and specialist skills. These synergies cannot be replicated on non-Green-Belt alternatives.

When weighed collectively, the strategic economic, sustainability and cross-boundary benefits for removing Site 345 from the Green Belt clearly outweigh the localised and contained Green Belt harm identified above. Exceptional circumstances for release are therefore demonstrated.

Grey Belt Considerations

In the case that the Council does not allocate the site or release it from the Green Belt, MO and RR consider that the site should be identified as grey belt in accordance with the NPPF and PPG.

Although the GB Assessment categorises the site as “potentially not suitable,” the above appraisal has sufficiently demonstrated that the land makes only a weak contribution to the relevant Green Belt purposes. It therefore meets the NPPF definition of grey belt.

In line with paragraph 148 of the NPPF, when releasing GB land for development, plans should give priority to previously developed land, then consider the grey belt which is not previously developed. Considering the site is not previously developed land, MO and RR strongly consider that the identification of the site as grey belt is justified with an appropriate strategy and consistent with national policy in relation to the grey belt definition set out in the NPPF and PPG. Accordingly, it falls within the category of land making a limited contribution to Green Belt purposes and should be prioritised ahead of land with stronger strategic value.

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.

See relevant suggested policy wording for representations to Policies S3 and S7.

The necessary modification is the allocation of Site 345 for employment use under Policies S3 and S7 and the consequential alteration of the Green Belt boundary on the Policies Map.

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Name or Organisation:

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

Paragraph		Policy	S7	Policies Map	
Site ID	121				

4. Do you consider the Local Plan:

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

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As key stakeholders responsible for the ongoing delivery of high-quality employment development at Prospero Ansty, Manse Opus (MO) and Rolls-Royce plc (RR) are, in principle, broadly supportive of Policy S7 and the proposed employment allocation at Walsgrave Hill (Site 121) and its operation as a self-contained business site.

MO and RR have made comments on draft Policy S4 (Sites for Gypsies and Travellers), submitted under a separate representation on that policy, which are relevant to the allocation of Site 121 in Policy S7. In summary, these representations express a concern that draft Policy S4 does not provide sufficient policy direction to ensure Gypsy and Traveller (G&T) pitches are in the most sustainable locations and safeguard the Green Belt, and would therefore be inconsistent with the National Planning Policy Framework, December 2024 (NPPF) and Planning Policy for Traveller Sites, December 2024 (PPTS).

The Sustainability Appraisal (December 2025) acknowledges that "*pitches within employment sites may not be ideally located in the sense of being distant from the existing communities from where needs arise*" (paragraph 5.2.62). However, for Site 121, there is an opportunity to locate the G&T pitches in a sustainable location. It is therefore critical that their siting ensures:

- good accessibility to established communities;
- convenient access to community facilities, services and public transport; and
- overall sustainability for future residents.

The western, eastern and southern parts of Site 121 have materially different characteristics in terms of accessibility to services, relationship to existing communities and Green Belt, as well as heritage sensitivity. The absence of locational guidance in Site 121 therefore creates a genuine risk that development could be directed to less sustainable and more environmentally sensitive parts of the allocation. This is not simply a matter of detailed layout but goes to the fundamental justification and effectiveness of the G&T allocation.

It is therefore appropriate for the 8 pitches associated with the Walsgrave Hill employment allocation to be located towards the west of that site, close to local facilities in Coventry and the proposed walking and cycling route across the A46 bridge. This would support a more accessible and sustainable location for future residents.

To conclude, the Proposed Submission Local Plan does not sufficiently assess alternative configurations within Site 121 and given the materially different sustainability and environmental impacts between the western, eastern and southern parts of the site, this makes the policy insufficiently justified.

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Please see the suggested policy wording modification below in blue (see p.147 of the Proposed Submission Local Plan):

Annex: Development site allocations

Site ID: 121

Site name: Land at Walsgrave Hill

Development requirement:

- 1 acre (0.4ha) of land for an 8 pitch Gypsy and Traveller site. *The Gypsy and Traveller pitches should be located towards the west of the allocation near Coventry and the A46 bridge to ensure a sustainable and accessible location and minimise harm to the Green Belt and heritage assets.*

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, 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:

It is necessary for Manse Opus and Rolls-Royce plc to participate in the hearing sessions as key stakeholders responsible for delivering the ongoing high-quality employment development at Prospero Ansty. Their direct experience in bringing forward strategic employment growth enables these developers to provide valuable evidence on the sustainability and deliverability of the site, supporting the employment aspirations in the new Local Plan period.

***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.*

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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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 (Regulation 19)

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

Mrs

First Name

Tanya

Last Name

Cosford

Job Title
(where relevant)

Senior Associate

Organisation
(where relevant)

Manse Opus and
Rolls-Royce plc

David Lock Associates

Address Line 1

50 North Thirteenth Street

Line 2

Central Milton Keynes

Line 3

Line 4

Post Code

MK9 3BP

Telephone Number

E-mail Address
(where relevant)

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

Name or Organisation:

Manse Opus and Rolls-Royce plc

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

Paragraph		Policy	S7	Policies Map	
Site ID	345				

4. Do you consider the Local Plan:

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

As key stakeholders responsible for the delivery of employment development at Prospero Ansty, Manse Opus (MO) and Rolls-Royce plc (RR) object to the Proposed Submission Plan on the basis that it is unsound under paragraph 36 of the National Planning Policy Framework (NPPF), insofar as it fails to allocate land named "Ansty Park North West" (Site 345, referred to as "the Site" in this form) for employment development in policy S7, which is not justified or effective when assessed against the evidence base.

This response form should be read alongside the separate representation forms proposing the Site's removal from the Green Belt under draft Policy S5 (Countryside Protection) and inclusion within draft Policy S3 (Strategy for Employment Land).

The Site is capable of delivering approximately **15,000 sqm** of employment floorspace across Use Classes B2, E(g)(ii) and E(g)(iii). The site boundary is provided in **Appendix A**.

Although the Site was assessed within the Stage 2 Site Options Assessment (December 2025), it has not been selected for allocation despite performing strongly against key sustainability and economic criteria. This omission renders the spatial strategy inconsistent with national policy and not based on proportionate evidence, contrary to the tests of soundness in paragraph 36 of the NPPF.

High Connectivity and Sustainable Location

The Stage 2 Site Options Assessment acknowledges that the Site scores strongly on connectivity, benefiting from:

- Immediate access to an established employment corridor at Central Boulevard;
- A bus stop within 500m providing direct services to Coventry;
- Coventry Rail Station within a 15-minute drive; and
- Direct potential for integration with the existing pedestrian and cycle network, enabling meaningful active travel connections to Coventry.

The West Midlands Strategic Employment Sites Study (August 2024) identifies this area as part of Opportunity Area 7, where strategically important employment growth is expected to be focused.

Despite this clear evidence, the Proposed Submission Local Plan does not allocate the Site, which is one of the most connected and sustainable options available. This inconsistency indicates that the Plan is not justified and fails to reflect proportionate evidence, contrary to NPPF paragraph 36.

Natural Extension to Ansty Park as a "Gateway Site"

The Stage 2 Site Options Assessment concludes that the Site does not read as a natural extension to Ansty Park. This conclusion is not supported by the wider spatial context presented in the Proposed Submission Local Plan:

- The Site is physically enclosed by existing and proposed employment allocations, including Crowner Fields Farm and Home Farm (north) and Walsgrave Hill (south);
- This emerging employment cluster forms a coherent regional employment hub on the Coventry fringe; and
- The Council's own draft allocations create a logical framework within which Site 345 becomes a pivotal connecting parcel, instead of an isolated one.

The Illustrative visualisation of an Innovation Centre in **Appendix B** has demonstrated the Site's ability to integrate with adjacent employment areas and enhance connectivity via Public Right of Way R31(a).

The Proposed Submission Local Plan, therefore, presents a contradictory interpretation of the Site's spatial role, leading to an unsound site selection outcome.

Contributing to the Employment Need and Economic Diversification

The Site is considered to be suitable for the delivery of high-quality smaller unit(s) under these use classes for SME businesses:

- B2- general industrial;
- E(g)(ii) - research and development of products or processes; and
- E(g)(iii) - any industrial process which can be carried out in a residential area without detriment to that area.

The Occupier Agent's Letter (**Appendix C**) further identifies the site as well suited for employment development, particularly for research, advanced manufacturing and technology businesses, due to its strong connectivity and proximity to the successful innovation cluster at Ansty Park. It concludes that the site could deliver high-quality B2, E(g)(ii) and E(g)(iii) employment space, supporting economic growth, inward investment and reinforcing Ansty Park's role as a major UK centre for advanced engineering and technology.

By excluding the Site, the Proposed Submission Local Plan fails to, respond to evidenced market demand; support the region's high-value clusters; and build resilience beyond logistics/storage and distribution, undermining the Plan's compliance with the soundness requirement to be positively prepared (paragraph 36 (a) of the NPPF).

A Utility Infrastructure Statement (**Appendix D**) is provided to demonstrate that there are no infrastructure constraints preventing delivery, further weakening the rationale for the Site's omission.

Meeting Exceptional Circumstances to be Removed from the Green Belt

The Site lies wholly within the Green Belt. However, it meets the exceptional circumstances identified in the Council's Green Belt Exceptional Circumstances Paper (December 2025), addressing a demonstrable need for employment land closely aligned to Coventry's large labour force, avoiding unsustainable commuting patterns associated with an "outer edge" approach to accommodating development and taking advantage of clustering, diversification and innovation opportunities on the Coventry urban fringe.

Omitting the Site that clearly satisfies the Council's own exceptional circumstances definition results in a Green Belt strategy that is not effective or consistent with national policy, particularly paragraphs 146–149 of the NPPF.

Overstating Agricultural and Ecological Constraints

As identified in the Stage 2 Site Options Assessment, the Site is located on BMV agricultural land. Although most of the Site falls within Grade 2 agricultural land which historically formed part of a larger contiguous area of farmland, that area is now severed by the extensive road network (M6, M69 and Coventry Bypass/Central Boulevard), and is also surrounded by the proposed employment allocations (Crownier Fields Farm and Home Farm to the north and Walsgrave Hill to the south). This results in the complete isolation of the Site from the wider agricultural land holdings. As such, the Site's agricultural value is severely constrained and retaining the Site in the Green Belt for agricultural protection is not evidence-based.

In terms of the ecological impact, the ecological sensitivities identified in the Stage 2 Site Options Assessment are localised and manageable, with no primary constraints that would prevent allocation. Such matters can be addressed at the application stage, consistent with accepted planning practice and should not present a barrier to allocation.

Conclusion

For the reasons set out above, the non-allocation of the Site is:

- Not justified as it is contrary to the evidence base;
- Not positively prepared as it fails to respond to the evidenced employment land needs;
- Not effective as it undermines the coherence and resilience of the strategy for accommodating employment land needs; and
- Not consistent with national policy, including the NPPF's requirements for Green Belt review and sustainable economic growth.

The Site is a highly sustainable, well-connected, deliverable parcel that forms an integral part of the Coventry–Ansty employment cluster. Its exclusion exposes a noteworthy flaw in the site selection process.

Therefore, to ensure soundness, the Site should be allocated for employment use under Policy S7 and released from the Green Belt.

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.

Please see the amendment to the policy wording below in blue:

S7 Employment allocations

- A. *The sites shown on the policies map and set out in the development site allocations annex to this plan are allocated for development as detailed below.*
- B. *The development of the sites shall accord with the development principles set out in the development site allocations annex and with other policies of this plan.*

<i>Site ref.</i>	<i>Site name</i>	<i>Floorspace</i>
64	Coton Park East	Circa 115,000m ²
17	South West Rugby employment phase 2	Circa 60,000m ²
14	North of Ansty Park	Circa 75,000m ²
95	Crowner Fields Farm and Home Farm, Ansty	Circa 275,000m ²
121	Land at Walsgrave Hill	Circa 290,000m ²
345	Ansty Park North West	Circa 15,000m ²
	<i>Total</i>	<i>830,000m²</i>

The suggested policy wording for the proposed allocation of Ansty Park North West (345) is set out as follows:

Annex: Development site allocations

Site ID: 345

Site name: Ansty Park North West

Site area: 6.76 ha

Allocation: circa 15,000m² of floorspace for employment use in use classes B2, E(g)(ii) or E(g)(iii)

Development requirement:

- Vehicular access through Ansty Park.
- Employment floorspace to be only for uses within use classes B2, E(g)(ii) and E(g)(iii) of the Town and County Planning (Use Classes) Order 1987 (as amended).
- Buildings to be set within a managed, high-quality landscaped environment consistent with Ansty Park.

- Site to be developed as a "gateway" feature to Ansty Park that connects the wider employment development in the locality to create a cohesive strategic employment hub.
- Dedicated cycle and pedestrian links to be provided, which connect with existing routes on Central Boulevard, within Ansty Park and Crowner Fields Farm.
- The existing Public Right of Way (PROW) must be incorporated, and the design of the development must ensure it is pleasant to use. Wherever possible PROW should be routed through public open space, be segregated from roads, and be well overlooked. PROW should be maintained on their existing lines, with diversions only occurring where this is not practicable. PROW should be accessible to as many people as possible, including those who are disabled or less mobile.

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.**

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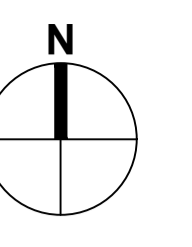
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Appendix A

Site Location Plan



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REV	DATE	NOTES	PF	MS
FE01	05/02/2026	First Issue		

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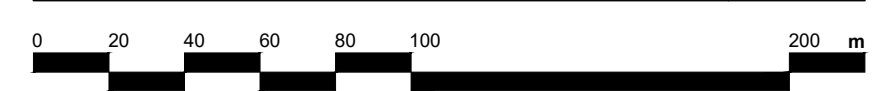
CLIENT
MANSE OPUS

DOCUMENT TITLE
SITE LOCATION PLAN

SCALE
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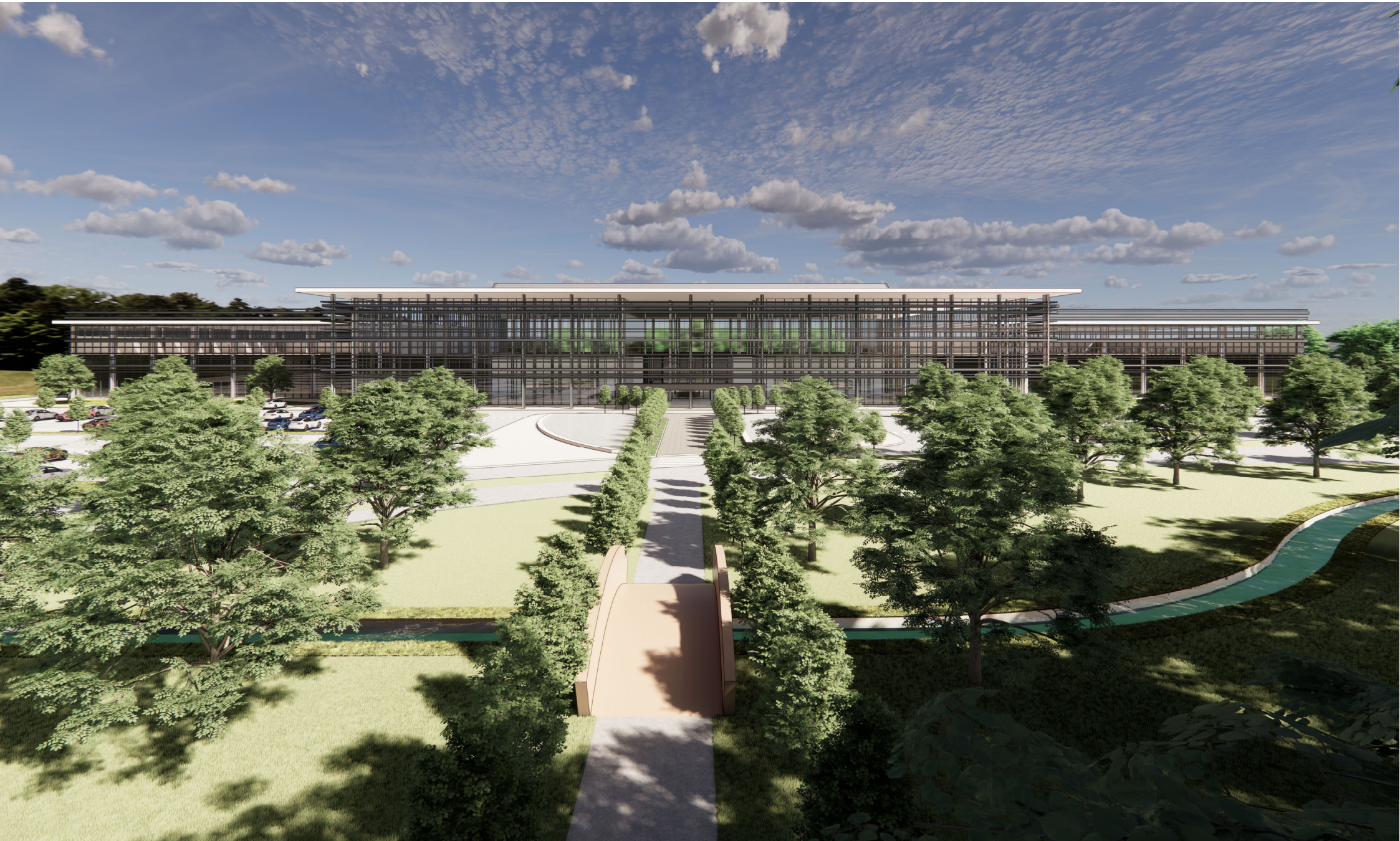
DOCUMENT NUMBER
31315-MSA-FE-00102

STATUS
FEASIBILITY FE01



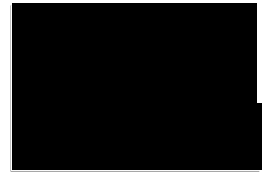
Appendix B

Illustrative Visualisation of an Innovation Centre



Appendix C

Newmark Letter



9 March 2026

T Cosford
Senior Associate
David Lock Associates Limited
50 North Thirteenth Street
Central Milton Keynes
MK9 3BP

Dear Tanya

‘Ansty Park North West’ Land, Coventry

Newmark has been instructed to provide professional advice on the merits of bringing forward the site referred to as ‘Ansty Park North West’ for employment development. The site occupies a prominent and highly accessible location adjacent to the M6 motorway, immediately adjoining the established employment cluster at Ansty Park.

Newmark has extensive experience in the industrial, manufacturing and technology sectors across the Midlands and nationally. The firm has been actively involved in advising on development, leasing and occupier activity at Ansty Park, giving us detailed knowledge of occupier requirements and the factors driving demand at this location.

Drawing on this experience, this letter sets out the strong planning and market justification for enabling Use Classes E(g)(ii) (research and development), E(g)(iii) (light industrial processes) and B2 (general industrial) at ‘Ansty Park North West’.

The site presents a unique opportunity to create an architecturally significant gateway location at the entrance to Ansty Park, capable of delivering landmark buildings suitable for corporate headquarters, advanced engineering and innovation-led businesses. In doing so, the development would reinforce Ansty Park’s established reputation as one of the Midlands’ leading centres for high-value manufacturing, research and technology businesses.

1. Rugby as a Strategic Central UK Location

Rugby and the wider Coventry - Warwickshire area occupy one of the most strategically advantageous locations in the United Kingdom for nationally and internationally operating businesses.

The area sits at the centre of the UK’s “Golden Triangle” logistics and manufacturing corridor, located around the intersection of the M1, M6 and M69 motorways. This provides exceptional connectivity to national markets and supply chains.

From this location, businesses can reach approximately 90% of the UK population within a four-hour HGV drive time, which is a widely recognised benchmark for national distribution and supply chain operations.

The location also benefits from proximity to several major urban centres including Birmingham, Coventry, Rugby, Daventry, Leicester, Northampton and many more. Together these cities provide access to a substantial labour market, extensive supply chain networks and a diverse business ecosystem.

In addition to motorway connectivity, the region benefits from strong rail freight links, access to major international airports including Birmingham Airport, and strategic road connections to key ports such as Felixstowe and Southampton.

These locational advantages have positioned the Rugby - Coventry corridor as one of the UK's most significant locations for advanced manufacturing, engineering, logistics and research-led industries.

2. Ansty Park's Appeal to National and International Occupiers

Ansty Park has established itself as one of the Midlands' most successful advanced manufacturing and technology business parks. Over the past decade it has attracted a number of major international occupiers and research institutions.

The park is anchored by the Manufacturing Technology Centre (MTC), a globally recognised research organisation specialising in advanced manufacturing technologies. The MTC works with leading international companies to develop new production methods, automation systems and digital manufacturing technologies.

The park is also home to the High Temperature Research Centre (HTRC), a partnership between the MTC and global aerospace manufacturer Rolls-Royce, focusing on advanced materials and manufacturing processes for next-generation aerospace components.

Other major occupiers at Ansty Park include:

- FANUC UK – the UK headquarters of the global robotics and automation manufacturer
- Meggitt – a major aerospace and defence engineering company
- AVL – an international automotive engineering and powertrain technology specialist
- The London EV Company (LEVC) – manufacturer of electric vehicles and advanced mobility technologies

Several of these occupiers operate significant national or regional headquarters functions from the park, reinforcing its role as a centre for innovation, engineering and advanced manufacturing.

The success of Ansty Park reflects a combination of factors:

- Exceptional motorway connectivity
- Access to a highly skilled regional workforce
- Proximity to leading universities including Warwick and Coventry
- A strong cluster of advanced engineering and technology businesses

These clustering effects create significant benefits for occupiers, including shared supply chains, collaborative innovation opportunities and access to specialist skills.

As a result, Ansty Park has developed a strong reputation as a location for high-quality corporate headquarters, advanced engineering facilities and innovation-led businesses.

3. 'Ansty Park North West' Land as a Gateway Site

'Ansty Park North West' Land occupies a particularly prominent location immediately adjacent to the M6 motorway, providing exceptional visibility to passing traffic. This prominence creates an opportunity to deliver a gateway development of architectural significance, capable of accommodating landmark buildings that would form a distinctive entrance to Ansty Park.

The site could accommodate high-quality headquarters buildings, advanced manufacturing facilities or research and development campuses designed to reflect the innovation-led character of the wider park.

Development at this location could incorporate:

- Architecturally striking HQ buildings
- High-quality landscaping and public realm
- Modern, sustainable building design
- Prominent corporate branding opportunities visible from the motorway and entrance to Ansty Park

This type of development would reinforce the identity of Ansty Park as a centre of excellence for advanced engineering, manufacturing and technology businesses. Enabling Use Classes E(g)(ii), E(g)(iii) and B2 would provide the necessary flexibility to attract the types of occupiers that already characterise the park, including research institutions, advanced manufacturers and technology companies.

By providing a high-quality gateway development, 'Ansty Park North West' Land would strengthen the overall attractiveness and profile of Ansty Park as a destination for international investment.

4. Planning Policy and Employment Land Justification

The development of 'Ansty Park North West' Land for employment uses is strongly supported by national planning policy.

The National Planning Policy Framework (NPPF) places significant weight on supporting economic growth. Chapter 6 (Building a Strong, Competitive Economy) requires planning policies to create the conditions for businesses to invest, expand and adapt, while identifying strategic sites capable of supporting inward investment and modern business needs.

The NPPF also recognises the importance of supporting the locational requirements of different sectors and clustering of related industries, particularly in sectors such as advanced manufacturing, research and development, and innovation-led businesses. 'Ansty Park North West' Land is well suited to this role given its direct relationship with the established advanced engineering and technology cluster at Ansty Park, its strong motorway connectivity and its prominence along the M6 corridor.

The site is capable of delivering approximately 160,000 sq ft of employment floorspace for E(g)(ii), E(g)(iii) and B2 uses, including research and development buildings, corporate headquarters and advanced manufacturing facilities. This would provide a meaningful addition to the supply of high-quality employment floorspace within the Coventry - Rugby corridor while complementing the existing employment ecosystem at Ansty Park.

Given the site's accessibility, prominence and proximity to an established innovation cluster, employment development represents the most appropriate and efficient use of this strategically located site, supporting economic growth, inward investment and the continued development of Ansty Park as a nationally significant centre for advanced engineering and technology.

5. Conclusion & Recommendations

'Ansty Park North West' Land represents a highly sustainable and strategically located opportunity for employment development. The site benefits from exceptional motorway connectivity, immediate proximity to a successful advanced manufacturing cluster and high visibility along the M6 corridor.

Ansty Park has already established itself as a nationally significant location for advanced engineering, research and technology businesses, hosting major occupiers including the Manufacturing Technology Centre, FANUC UK, AVL, Meggitt and LEVC. Bringing forward 'Ansty Park North West' Land for E(g)(ii), E(g)(iii) and B2 employment uses would build upon this success by providing an architecturally distinctive gateway development capable of accommodating corporate headquarters, innovation facilities and advanced manufacturing operations.

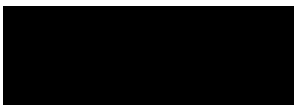
The site has the potential to deliver approximately 160,000 sq ft of high-quality employment floorspace, contributing to the supply of modern accommodation for high-value businesses in the region.

In planning policy terms, the proposal aligns strongly with the objectives of the National Planning Policy Framework, which emphasises the need to support economic growth, encourage business investment and provide sites capable of meeting the needs of modern industry.

Development of this site would therefore support economic growth and inward investment, strengthen the advanced manufacturing cluster at Ansty Park, deliver high-quality employment opportunities, create an architecturally significant gateway to the park and enhance the reputation of Ansty Park as a premier UK business location.

For these reasons, enabling E(g)(ii), E(g)(iii) and B2 uses at 'Ansty Park North West' Land represents a well-justified and policy-compliant form of development that would deliver significant benefits for both the local economy and the wider region.

Yours sincerely

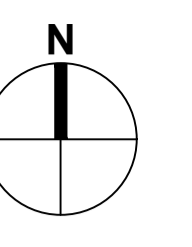


Charles Spicer
National Head of Industrial & Logistics Agency





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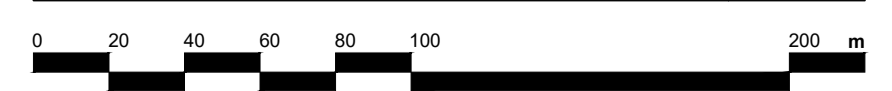
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31315-MSA-FE-00102

STATUS
FEASIBILITY FE01



MSA JOB No. **31315**

DATE 05/02/26
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Appendix D

Utility Infrastructure Statement



Where
buildings
come alive

MANSE OPUS

North-West of Ansty Park

251484

**Utility Infrastructure Statement
For Planning**



Sustainability at our core.

Document Revision History

Ref

254184 – North-west of Ansty Park

Rev	Author	Verification By	Date	Suitability	Comments / Status
A	R. Ho	A. Cox	20/02/2026	S3	For Planning Submission
B	R. Ho	A. Cox	04/03/2026	S3	Updated per client's comments – for Planning Submission

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3.0	Water (Severn Trent Water)	5
4.0	Electricity (National Grid-NGED)	5
5.0	Telecommunications	6

Utility Statement

1.0 Introduction

1.1 This project is for the development known as North-West of Ansty Park comprising of commercial unit B2/E(g)(ii)/E(g)(iii) use and associated development including drainage, earthworks, highway, landscaping and other associated works.

This utility statement has been produced on behalf of Manse Opus (Ansty) LLP with regards to the planning application. The statement has been prepared in order to appraise the natural gas, water, electricity and BT networks and their availability for the proposed development.



Figure 1 – Proposed Site Layout Plan

2.0 Gas (Cadent)

2.1 Record drawings show no existing gas services in the area proposed for development, therefore no diversions would be required. There is local Gas infrastructure located on the existing Ansty site to the south.

2.2 It is proposed to feed the site from the existing medium pressure gas network routed up through Central Boulevard; the gas services will terminate within the site boundary with a new pressure reducing station to provide low pressure natural gas to the facilities inclusive of a billing gas meters.

The intention being that the gas is provided for any future process loads, if required. It would not be used for general building heating.

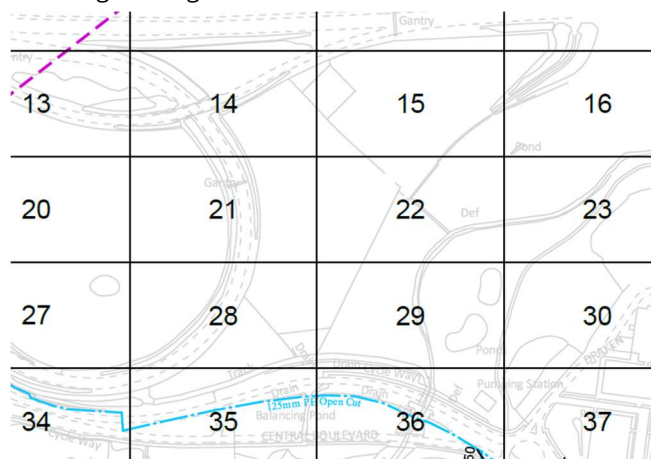


Figure 2 – Record Drawing of Cadent Gas

Utility Statement

3.0 Water (Severn Trent Water)

- 3.1 Record drawings show no existing water services in the area of the proposed for development, therefore no diversions would be required. There is local water infrastructure located on the existing Ansty site to the south of the development and Combe Fields Road to the East.
- 3.2 It is proposed that the site supplied from this existing water network via the southern boundary. The water service connection will terminate within site with a new billing water meter.

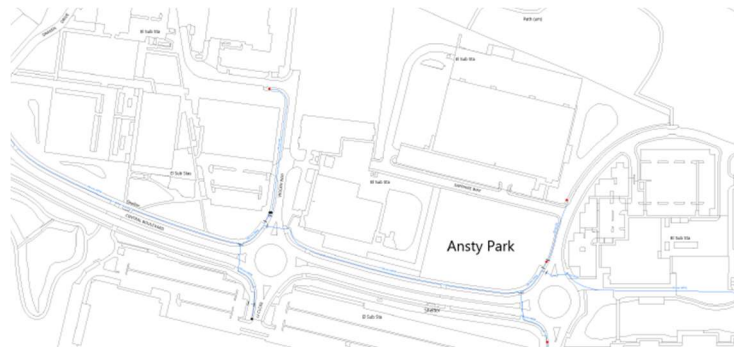


Figure 3 – Record Drawing of Severn Trent (Clean Water)

- 3.3 No public sewage pipes are recorded near the site. The Civil Engineer will assess the feasibility and cost implication of providing a drainage connection.

4.0 Electricity (National Grid-NGED)

- 4.1 A 33 kV to 11 kV primary substation is located to the east of Ansty Park, along Combe Fields Road. This substation currently serves buildings across the existing Ansty Park and is likely to be used to supply the proposed development.
- 4.2 Power to the site is expected to be supplied from existing 11 kV network cables or a new circuit run from the existing 11kV primary substation, these will feed new on-site 11 kV substations for the buildings. The new substations will be positioned along the southern boundary to allow NGED maintenance access. From the substations, private cables will be installed to serve the private transformers and buildings.

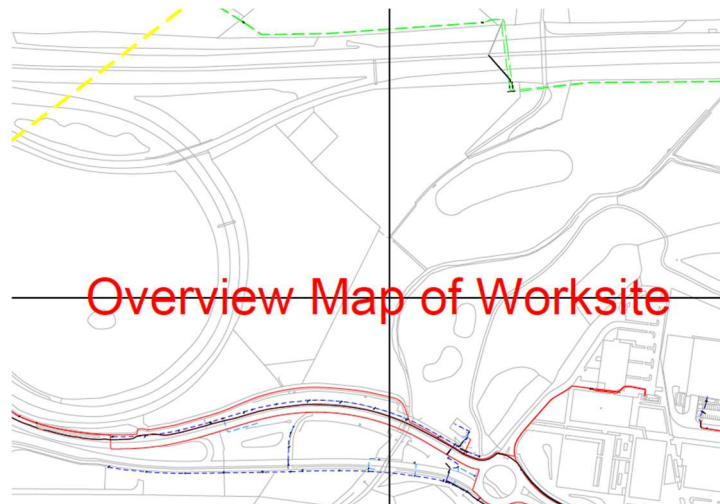


Figure 4 – Record Drawing of National Grid (Red - 11kV underground)

Utility Statement

5.0 Telecommunications

5.1 Record drawings show no existing BT Openreach or Virgin media services in the area of the proposed for development, therefore no diversions would be required. The closest BT Openreach telecommunication infrastructure is located beneath Central Boulevard, as indicated on the BT Openreach record drawings, connect into the BT network and across the existing Ansty Park. This duct network will allow the proposed development to connect to the BT Openreach infrastructure, enabling high-speed fibre connectivity to the local exchange and providing the occupier with flexibility for diverse routing if required.

Telecommunications services for the proposed buildings will be arranged and ordered directly by the occupiers using the installed cable ducts.

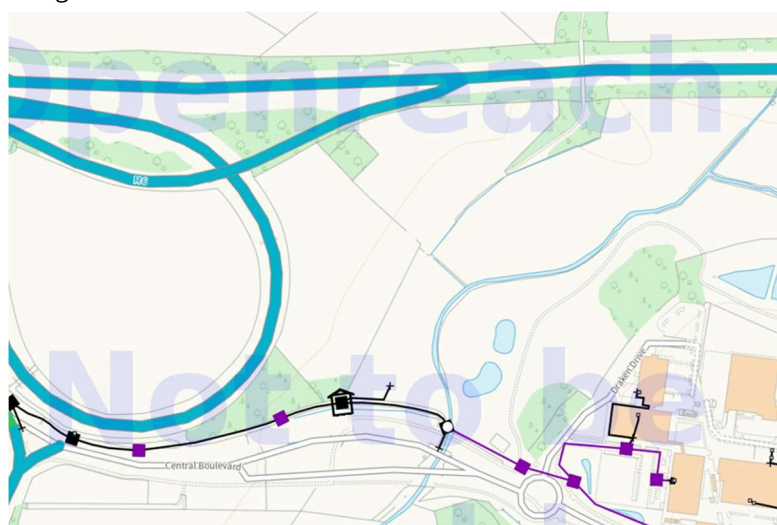
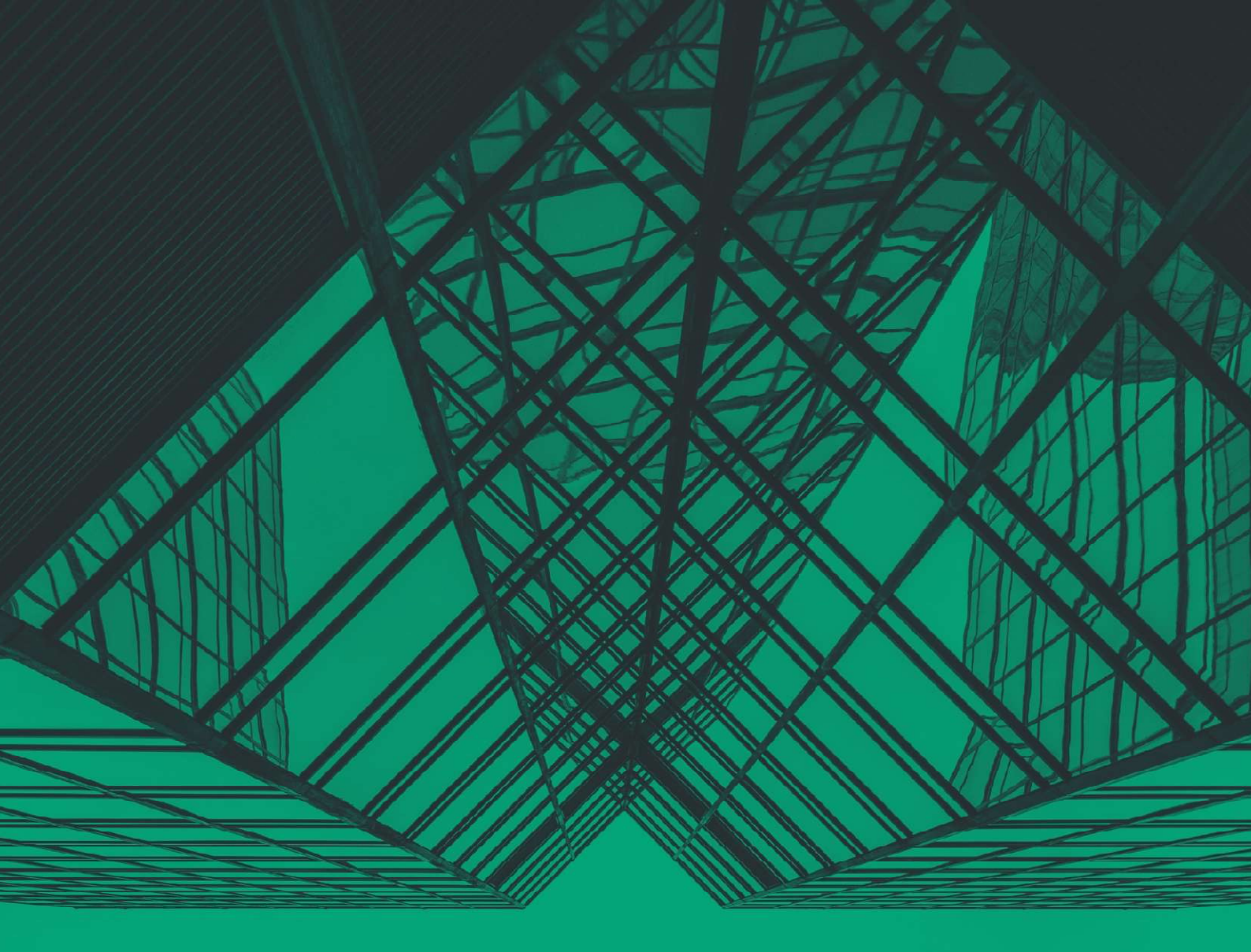


Figure 5 - Record Drawing of BT Openreach



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Summary of Rep 374: Manse Opus and Rolls Royce Plc

N.B. This is a summary produced by a planning officer. It was not submitted by the consultee.

S3 is unsound because it incorrectly reports the level of committed employment floorspace to be delivered at Prospero Ansty and Ansty Park, and therefore, is not based proportionate and up-to-date evidence.

MO and RR anticipate delivering 39,765 sqm of employment floorspace within Use Classes B2, B8 and E(g)(iii) across Prospero Ansty and Ansty Park in the next plan period. This figure is substantially higher than the 26,663 sqm referenced in the draft policy, and reflects the most up-to-date position, including permitted schemes yet to be implemented, allocated land identified for delivery, and pending applications expected to come forward within 2025-2042.

To make S3 sound, the figure for committed development at Prospero Ansty and Ansty Park should be updated to 39,765 sqm.

S4 is unsound because it does not direct Gypsy & Traveller pitches towards the most sustainable locations where harm to the Green Belt is avoided, and therefore is inconsistent with national policy.

To make S4 sound, part B of the policy should be modified to specify that G&T sites must be located in sustainable locations that minimise visual impact and avoid harm to the Green Belt.

S7 is unsound because site 345 has not been allocated, contrary to evidence showing the site's suitability and the need to positively plan for employment land needs, and despite the site only making a weak contribution to Green Belt purposes (in the view of the consultee), and there being clear exceptional circumstances for the release of the site from the Green Belt.

To make S7 sound, site 345 should be allocated and released from the Green Belt. If the site is not allocated, the land should be identified as grey belt.

The allocation of Site 121 is unsound because its development requirements do not include any locational requirements for the proposed G&T pitches, thereby risking them being located in areas that are less sustainable and more environmentally sensitive.

To make the allocation of Site 121 sound, a requirement for the G&T pitches to be located to the west of the site should be included.