



Rugby Borough Council

Local Plan Review: Issues and Options Consultation

Representation on behalf of Mountpark Properties Limited

February 2024

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Vision Document – Mountpark Ryton

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1.0 INTRODUCTION

- 1.1 These representations are made by Oxalis Planning Limited on behalf of Mountpark Properties Limited (hereafter 'Mountpark'). Mountpark is a leading developer of logistics and industrial property in the UK and continental Europe, with a proven record of delivering high quality developments in the sector.
- 1.2 Mountpark is promoting land west of the A423/A45 Intersection (known as 'Mountpark Ryton') for employment purposes. The site is located to the immediate west of 'Prologis Park Ryton', on the urban edge of Coventry. In this regard, we have also separately submitted a response via the 'Call for Sites' consultation which includes a completed Call for Sites Proforma, an accompanying 1:1250 scale Ordnance Survey map identifying the boundaries of the site, and a document which seeks to aid Rugby Borough Council's assessment of the site.
- 1.3 These representations are a direct response to the Local Plan Review: Issues and Options Consultation document and are focused on Section 3 of the document: "Land for employment uses". The response is broadly structured around the questions in the consultation document:
1. **How much employment land should we be planning for?**
 2. **What type of employment land should we be planning for?**
 3. **Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed).**
 4. **How can we provide more space to allow existing businesses to expand?**
 5. **We are minded to allocate sites specifically for industrial (B2) and light industrial (E(g)(iii)) uses. Do you support this and if so, where?**
 6. **Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?**

2.0 “HOW MUCH EMPLOYMENT LAND SHOULD WE BE PLANNING FOR?” AND “WHAT TYPE OF EMPLOYMENT LAND SHOULD WE BE PLANNING FOR?”

2.1 The Local Plan Review evidence base includes the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (2022) which sets out independent forecasts for a range of floorspaces and land uses.

2.2 The HEDNA does not however include an assessment of existing supply to then identify the areas residual employment land needs. In this regard, the evidence base is not yet complete. It will be essential that this process is completed and takes fully into account the evidence from the market, the need for flexibility and choice and the need to address unmet needs from neighbouring authority areas as well as to work closely with neighbouring authorities to identify strategic employment sites that can meet sub-regional needs.

2.3 At a national level, the NPPF (2023) is clear about the importance of the planning system in supporting the economy and meeting the specific requirements of the logistics sector; Paragraph 85 states that:

“Significant weight should be placed on the need to support economic growth and productivity”

And paragraph 87 states:

“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for (...) storage and distribution operations, at a variety of scales and in suitability accessible locations”

2.4 The Government is also clear about the importance of assessing economic needs and then putting in place a plan to meet those needs. Paragraph 86 of the NPPF requires Planning Policy to, amongst other things:

“set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”

2.5 The NPPF goes on to require planning policies to *“be flexible enough to accommodate needs not anticipated in the Plan”*.

2.6 The planning principles set out by the Government are quite simple. They require Local Authorities to undertake a full and thorough assessment of land use needs and to then set out a strategy, through allocation of strategic sites, to meet those needs, and thereafter be flexible to changing circumstances during the plan period.

2.7 The HEDNA includes an assessment of general industrial requirements and an assessment of requirements specific to strategic B8 distribution, defined as buildings of 9,000sqm and over. The HEDNA identifies a need for 621.9ha for general industrial uses and concludes a demand

forecast figure of 551 hectares (including a 5-year margin) for strategic B8 warehousing land, across Coventry and Warwickshire over the 20-year period 2021-2041.

- 2.8 The 621.9 ha figure is split between local authority areas with 150.5ha assigned to Rugby and 147.6ha assigned to Coventry. However, the same is not done for the Strategic B8 need figure of 551ha. However, given Rugby's ideal positioning within the strategic road network and its western boundary being along the urban edge of Coventry, it is clear that a significant proportion of this overall figure will need to be met by Rugby Borough Council.
- 2.9 In combination, there is clearly a very significant need for employment land in the area across the Plan period which Rugby Borough Council should be positively planning for.
- 2.10 In assessing specific needs, for strategic B8 for example, it should be recognised that large scale strategic employment sites often accommodate a mix of development, spanning different use classes. The land requirement for B2 and B8 frequently overlap and large-scale employment sites will often accommodate some smaller B8 units, which would not meet the 9000sqm minimum criteria to be classed as strategic B8.
- 2.11 The Plan should ensure that it allocates sufficient land to meet overall needs and is flexible enough to accommodate needs not currently anticipated. It should also ensure that it is not unduly restrictive on how sites are brought forward so that companies wishing to expand in the area or relocate to the area have a choice of sites and locations.
- 2.12 We are concerned that the HEDNA does not fully reflect the need for choice and competition and the need to reflect all the trends in the market. The HEDNA does not appropriately consider all factors which should feed into the assessment of strategic land requirements. We have set out below our key areas of concern, which demonstrate why the HEDNA figure should be used as a minimum land requirement in the emerging Local Plan, and why a further buffer should be applied to the forecast position.
- 2.13 Firstly, the HEDNA does not account for suppressed demand. A limited availability of land and buildings has a consequential effect of suppressing demand, as occupiers cannot find space. Completions data only represents actual delivery over time and does not factor in losses to the local economy, where occupiers have had to go outside of the study area or have not been able to expand due to lack of availability. The British Property Federation's (BPF's) 'Levelling Up – The Logic of Logistics Report' identifies a market equilibrium level, where supply and demand are broadly balanced and rents are more stable, of around 8%. The HEDNA acknowledges that the supply of available industrial space remains low, with strong demand. The impact of suppressed demand should consequently be factored into the figures.
- 2.14 Secondly, whilst the HEDNA acknowledges the fact that the industrial market is being buoyed by the growth in online retailing, particularly through the lasting post-pandemic effects on consumer trends, this point from the 'market overview' does not appear to have suitably been

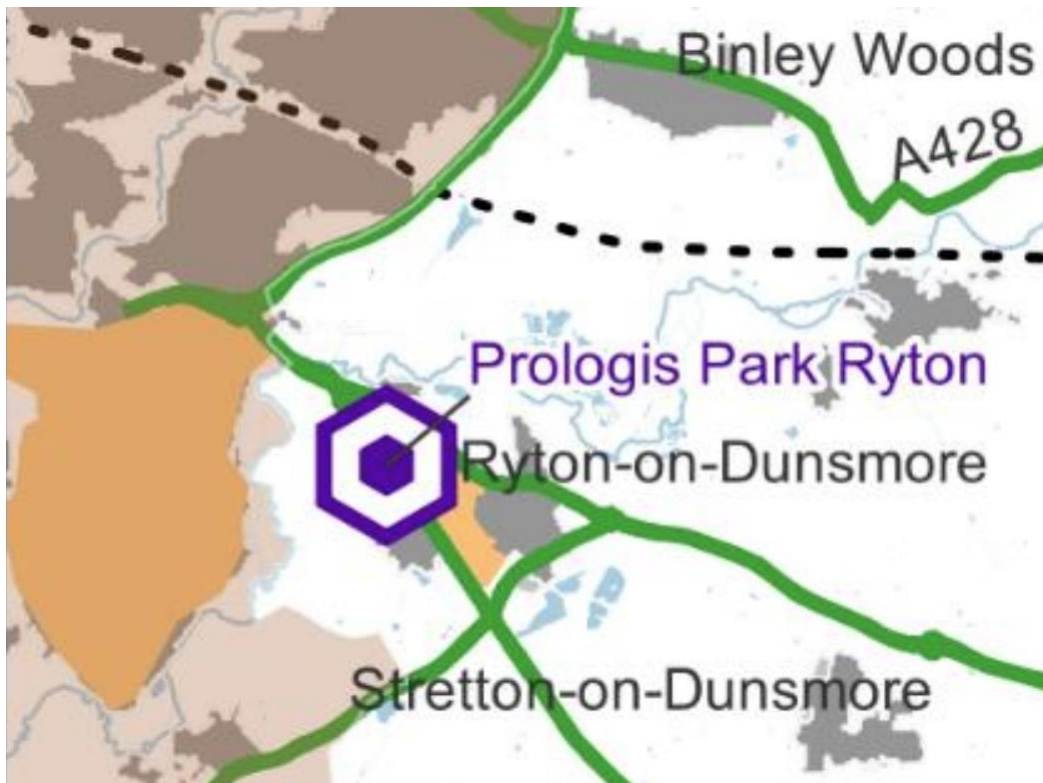
accounted for in arriving at the strategic land requirement. The growth in online retailing has inevitably led to an increased need for distribution centres, close to the populations they serve. Space to accommodate the increased demand for distribution needs to keep pace with not only population growth, but with the new normal for consumer habits. The HEDNA's final figures do not appear to have given this relationship due consideration.

- 2.15 The changing consumer habits have resulted in many traditional high street operators increasing, or indeed swapping to, online retailing (a prominent recent example being Wilko following its acquisition by The Range). The BPF's report also identifies that online retailing requires circa three times the amount of logistics space when compared to traditional 'bricks and mortar' retailing. This factor, again, does not appear to have been considered.
- 2.16 Recent changes and international events, such as Brexit, the pandemic, and the war in Ukraine, have led to supply chain uncertainties. These uncertainties have encouraged trends of 'reshoring' or 'near-shoring' by logistics operators in a bid to develop better supply chain resilience through proximity to the UK. This trend similarly has an impact on the need and demand for new space, a point which appears to be underplayed in the HEDNA analysis.
- 2.17 It is vital, in order to continue to attract inward investment into Warwickshire and the wider sub-region, that a sufficient supply of sites, qualitatively and quantitatively, is provided. Without this, companies within Warwickshire will look elsewhere to grow, which would have a detrimental impact not only on the local economy, but also on those employees living within the area.
- 2.18 These matters are highlighted and expanded upon in The Chamber of Commerce's Employment Land Report (2023), which recommends that 20 per cent more land than that recommended in the HEDNA is allocated. In this overall context, we concur with this recommendation. The uplift is required to ensure that a sufficient supply of sites is available to encourage inward investment, enable companies to grow within Warwickshire and to provide adequate choice for businesses.
- 2.19 It is positive to see in the Local Plan Issues and Options document that Rugby Borough Council has jointly commissioned a strategic employment sites study (the 'West Midlands Strategic Employment Sites Study') to further understand the position on the supply of strategic employment sites and to help find sites for potential future supply. We would encourage that the above weaknesses/omissions in the HEDNA are addressed in the forthcoming study to enable a more robust assessment of employment and in particular strategic warehousing needs.
- 2.20 In addition, and in the interests of flexibility, it is important that the emerging evidence base is drawn together with an understanding of the potential for change over the Plan period. The last few years have shown, albeit in unprecedented circumstances, how quickly change can

come about. This has served to highlight the need for the ability to provide rapid responses to a changing context throughout all forms of plan making.

3.0 “PLEASE PROVIDE ANY COMMENTS YOU HAVE ON THE SUITABILITY OF ANY OF THE BROAD LOCATIONS LISTED ABOVE (OR ANOTHER LOCATION WE HAVE MISSED)”

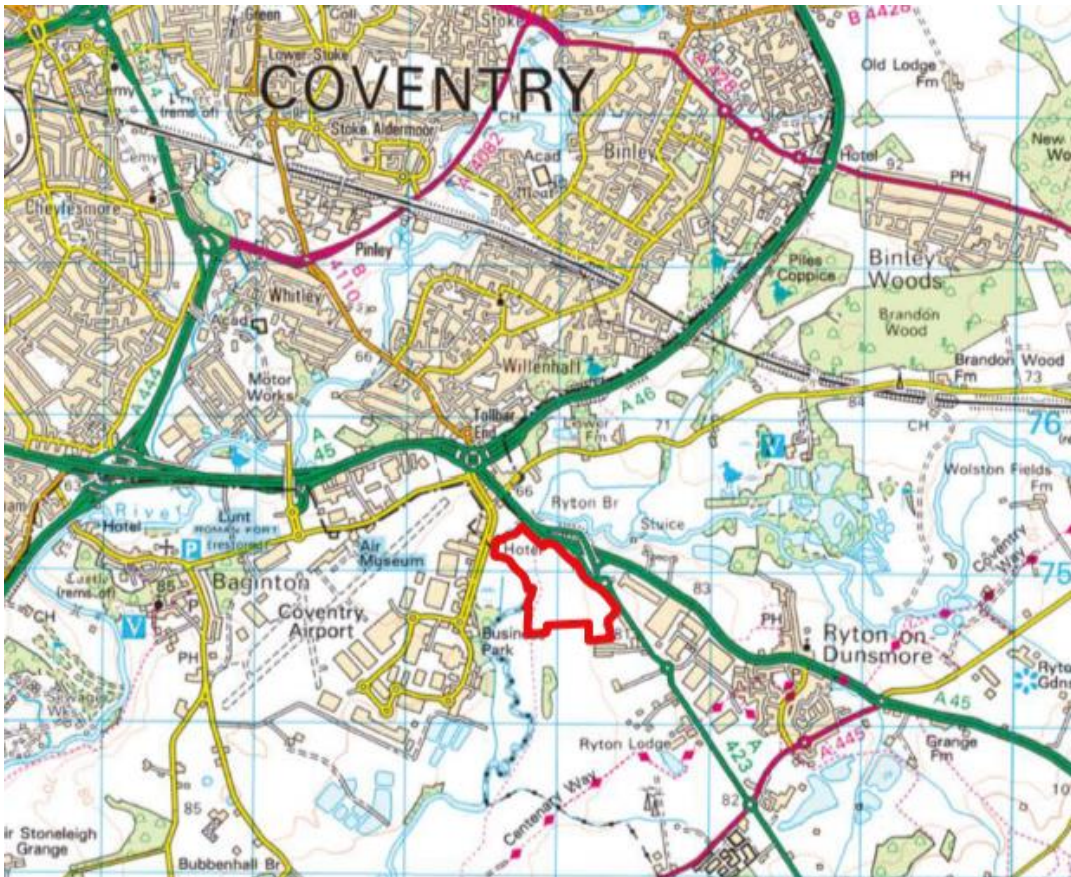
3.1 The consultation document identifies land west of Prologis Park Ryton as a potential location for strategic employment growth (an extract is provided at Figure 1 below).



**Figure 1: Extract of ‘Potential Strategic Employment Locations’ map
(page 17 of consultation document)**

3.2 This area is a highly sustainable location for strategic employment due to its positioning relative to the strategic highway network, close proximity to a significant pool of labour, and sustainable access; the area around Prologis Park Ryton is connected to Coventry by existing footpaths and cycleways, as well as buses.

3.3 Mountpark are promoting 30.5 hectares of land west of the A423 in Ryton-on-Dunsmore, south of Coventry, for a B2/B8 campus. This site has been submitted to the separate ongoing Call for Sites Process. The location of the site is outlined in red on Figure 2 below, for context.



- 3.4 A Document has been appended to the Call for Sites submission which explains the merits of the site and sets out master planning concepts for the site. A copy of that Document is attached to these representations at Appendix A.
- 3.5 As set out in the Document, the site is exceptionally well placed to meet strategic employment and in particular, logistics needs. It meets all the relevant locational and physical site characteristics required to deliver a strategic scheme and it is capable of being developed in a manner that ensures the environmental effects of the scheme are appropriately mitigated and the benefits maximised.
- 3.6 The following is a summary of the key components and merits of the site
- Scale: The site extends to approximately 30.5 hectares and is capable of delivering approximately 775,000 sqft of employment floorspace;
 - Location / Road Accessibility: The site is exceptionally well located relative to the strategic highway network with access to the A423 which in turn provides access to the A46 to the north and the Coventry conurbation, its markets, labour and associated businesses. It also provides access to the A45 providing connections to Rugby. These routes in turn provide strategic access to the M6, M69, M1 and M40 motorways and therefore exceptional national accessibility.

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- **Need:** The site is located within an area where there is proven demand for strategic employment and is well contained by existing commercial development either side. with 'Prologis Park Ryton' to the East, Middlemarch Business Park and Coventry Airport (including the consented Gigafactory) to the north and west, and Coventry and Warwickshire Gateway to the south-west.
 - **Context:** New development in the site's location would not be out of context, it would not extend the built extent of Coventry any further south into open countryside given the extent of built form established by the surrounding developments. Development of the site would, in effect, fill a logical gap in between existing commercial developments to create a more comprehensive employment area.
 - **Accessibility to Labour:** The location of the site provides the opportunity for sustainable travel connections to and from the surrounding area and its extensive labour pool. This includes excellent bus links and established strategic cycle and pedestrian connections.
 - **Sustainable access:** There are strong opportunities to improve (enhance and extend) existing bus, cycle, and pedestrian connectivity to the site, ensuring genuine sustainable access options for future employees. These improvements can help to reduce congestion on the roads, which delivers environmental benefits, and encourage active and sustainable forms of travel which should be prioritised.
 - **Landscaping:** There is significant opportunity within the site to incorporate meaningful landscaping, comprising approximately 22ha of land, including large areas dedicated to publicly accessible green space as well as areas for habitat creation and other biodiversity enhancement. The proposed scheme would be set within an extensive landscape framework, with development plots placed within a landscaped setting, with planting around the perimeter of the scheme to substantially screen the development from outside view.
 - **Biodiversity and Nature Recovery:** The site does not contain any environmental features that would preclude development and provides ample opportunity to deliver significant biodiversity gains. The scheme is predicated on a positive response to the landscape and the aspiration to deliver significant benefits in terms of biodiversity.
 - **Public access to nature for amenity and health:** The proposals include an extensive area of green space to the west of the site and along the River Avon corridor. This green space could link into the community park being delivered as part of the Coventry and Warwickshire Gateway scheme to provide new and enhanced public access to open spaces alongside areas for ecological enhancement and areas dedicated to nature recovery.

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- Response to the Climate Emergency: In addition to the incorporation of green infrastructure and the advantages of the site location in terms of labour and market accessibility, the scheme will provide a framework for carbon neutral construction together with renewable energy generation and use.
 - Economic Benefits: The scheme will deliver flexible, large-scale plots for strategic B2/B8 facilities essential for a thriving economy. In terms of direct economic benefits, the site is capable of creating around 900 jobs once operational.

4.0 “WE ARE MINDED TO ALLOCATE SITES SPECIFICALLY FOR INDUSTRIAL (B2) AND LIGHT INDUSTRIAL (E(G)(II)) USES. DO YOU SUPPORT THIS AND IF SO, WHERE?”

4.1 No. Having regard to paragraphs 2.10 and 2.11 above we think that the Council should be cautious in identifying sites specifically for these use classes, to the exclusion of others. Whilst it is important that the Council ensures that it allocates sites to meet all of its employment land needs, the most appropriate way to achieve this is through the identification of sufficient land, of a variety of sizes and locations, such that there remains choice and competition throughout the Plan period as well as flexibility to accommodate needs not currently anticipated.

4.2 It is essential that as part of the mix of employment land supply there are a number of large strategic employment sites that are capable of meeting a variety of needs, including those of occupiers requiring large buildings.

4.3 This approach would then fully accord with the requirements of the NPPF.

5.0 “ARE THERE EXCEPTIONAL CIRCUMSTANCES THAT MEAN WE SHOULD AMEND GREEN BELT BOUNDARIES TO MEET THE NEED FOR EMPLOYMENT LAND?”

5.1 Yes. The NPPF (para 145) states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The demonstrable need for strategic scale employment land, coupled with its specific locational requirements, will clearly provide the basis for exceptional circumstances. The HEDNA provides a firm starting point for the appropriate evidence, although as explained in paragraph 2.2, further work is required to identify the *residual* needs and to further explore the locational requirements.

5.2 The NPPF requires strategic policy-making authorities to demonstrate that they have examined all other reasonable options for meeting identified needs for development before concluding exceptional circumstances exist (para 146). Having regard to the criteria set out in the NPPF para 146 it is clear that ‘reasonable’ alternative (non-Green Belt) options are unlikely to exist for meeting the identified strategic logistics needs. The evidence demonstrates:

- That as much use as possible of brownfield and underutilised sites is being undertaken but significant residual needs will remain;

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- A suitable approach to density will be taken into account having regard to the advice in the HEDNA and specific requirements of strategic employment including logistics;
 - Neighbouring authorities are unlikely to be able to meet a greater proportion of needs on non Green Belt sites and indeed it is likely that Coventry will not be able to meet all of its needs. Given the importance of Coventry to the Region, sites which are able to respond to its needs and its opportunities will be essential.

5.3 Rugby Borough and indeed much of the Coventry and Warwickshire area is covered extensively by Green Belt. For land use needs to be met and for the City and the economy to prosper, changes to the Green Belt have been made in the past, are proposed now and will be required in the future. Within this context, and in accordance with the NPPF, the exceptional circumstances are likely to be demonstrated to justify the alteration to the Green Belt to meet the need for employment land.

6.0 CONCLUSIONS

6.1 This representation has formed a direct response to the Local Plan Review: Issues and Options Consultation document and has focused on Section 3 of the document: “Land for employment uses”.

6.2 The Local Plan Review represents a significant opportunity for Rugby Borough Council to allocate a strong range of new employment sites to meet long-term requirements and encourage economic growth in their area, as well as create planning policies that are flexible to changing economic circumstances.

6.3 The site west of Prologis Park Ryton provides an opportunity to deliver a significant mixed employment scheme on a 75-acre-site which is extremely well located, both strategically and in terms of sustainable access, with the associated benefit of offering substantial green space, comprising publicly accessible land and areas dedicated to ecological enhancement.

6.4 We have separately submitted a response to the ‘Call for Sites’ consultation, promoting land at Land East of A423, Ryton.