

## Nurton Developments Ltd

### Representations to Rugby Borough Local Plan Review – Issues and Options

#### Introduction

1. Nurton Developments Ltd (NDL) is a Birmingham based promotor of strategic development opportunities and developer of industrial and warehouse premises.
2. NDL is particularly active in the West Midlands. It has successfully promoted Branston Locks, a mixed use sustainable urban extension to Burton-upon-Trent. This development has consent for up to 2,500 homes, 1 million sq ft of B Class industrial and logistics floorspace, and other uses. The industrial element of the scheme is marketed as Quintus. 425,000 sq ft has already been built and let.
3. NDL has a controlling interest in Equation Properties, a specialist developer of industrial and warehouse premises – both big box (100,000 sq ft plus) and mid-box (25,000 sq ft to 100,000 sq ft). Equation Properties is actively pursuing development opportunities on allocated and consented sites in the West Midlands. This includes an allocated site within Coventry which they consider to be attractive to the local and sub-regional market.
4. NDL is promoting a number of strategic employment sites in the wider sub-region (i.e. Coventry and Warwickshire) which are particularly suitable for large scale industry and logistics. One of these sites is in Rugby Borough at Cross-in-Hand, near Magna Park. NDL considers this site to be eminently suitable to meet need for new general industrial land for Rugby, or to meet need for strategic warehousing land for Coventry and Warwickshire, or both.
5. Full details of this potential strategic employment site are provided in response to the Call for Sites exercise being undertaken simultaneously by the Council. This includes a Vision Document prepared by UMC Architects with the support of a full team of technical consultants. A summary of this document is provided in our response to Question No.3 of the Consultation Questions posed by the Issues and Options.
6. As well as this summary, these representations also provide a response to the Consultation Questions posed in relation to Section 3 of the Issues and Options: Land for Employment Uses. These are dealt with below in turn.

**Response to Question No.1 – How much employment land should we plan for?**

7. The Issues and Options rightly refer to the Coventry and Warwickshire HEDNA in setting out the potential need for employment land. This need is set out in the first table in Section 3. It differentiates between the need for general industrial land for Rugby Borough and the wider need for strategic warehousing land across Coventry and Warwickshire. In addition, the table provides figures for need to both 2041 and 2050.
8. These figures should not be interpreted as maximums or ceilings. Section 3 refers subsequently to the new West Midlands Strategic Employment Sites Study. This study is currently being produced (by Icení – the authors of the HEDNA) and we understand its scope includes projections of need for strategic employment land, with specific regard to the Big Box sector. These projections could lead to a greater quantifiable need. If so, then the HEDNA projections should be interpreted as minimum figures of need for the purposes of plan-making.
9. The quantum of new employment land required depends also on what need it meets and how this need is currently being supplied. The second table in Section 3 (under the heading of How Much More Employment Land do we Need to Find?) sets the supply against the HEDNA derived need for general industrial land for Rugby only. For ease of reference, this table is extracted and provided below.

	Plan period 2021-2041	Plan period 2021-2050
Requirement for industrial land (excluding strategic warehousing and offices)	150.5ha	218.2ha
Completions 2021-2023	32.65ha	32.65ha
Total supply already identified	145.26ha	145.26ha
Supply still needing to be found	No additional supply needed	40.29ha

10. NDL considers this table to be a misrepresentation of the quantum and quality of land required. It takes no account of any unmet need for Coventry or Rugby Borough contributing to meeting the wider need for strategic warehousing.

11. The possibility of Rugby Borough helping to meet unmet need for Coventry is referenced in paragraphs 3.30 and 3.32 of the Issues and Options. This notes that Rugby Borough contributed 98 hectares to help meet Coventry's need in the last development plan cycle, but states that it is:

*“.....yet to be decided whether Coventry City Council will be able to meet its own need for industrial land and, if not, where any unmet need will be met.”*
12. The HEDNA projects a need for Coventry of general industrial land (excluding offices and strategic warehousing) of 147.6 hectares to 2041 and 214 hectares to 2050. The Coventry Local Plan Review Issues and Options identifies an available employment land supply of 60.35 hectares (as at March 2023), of which 53.02 hectares is suitable for industrial and non-strategic warehousing. It is to be noted that this supply includes allocations which are difficult to deliver (e.g. 25 hectares at Baginton Fields) and, therefore, should be a notional maximum figure. In addition, there are few, if any, obvious new employment sites emerging in Coventry given its tight boundaries, increasing urbanisation and surrounding Green Belt.
13. For these reasons, NDL considers that the net unmet need for Coventry will be a minimum of 95 hectares (i.e. 147.6 less 53.02) for the period 2041 and 161 hectares (i.e. 214 less 53.02) for the period to 2050. Given the close geographical, functional, and economic relationship between Coventry and Rugby, Rugby should be a significant contributor in meeting this further element of need.
14. NDL has checked the supply figures provided in the above table, with specific reference to the Annual Monitoring Reports (AMRs) maintained by the Council, in consultation with Neil Holly, the Development Strategy Manager for the Council. This has identified an accountancy inconsistency with the entry for remaining consented land at Rolls Royce, Prospero, Ansty being quoted in gross terms (28.76 hectares) where it should be quoted in net terms (9.56 hectares). This reduces identified supply by 19.2 hectares to 126.06 hectares.
15. Conversely, since the Issues and Options were published for consultation, a large site in the Borough south of Hinckley (land at Padge Hall Farm) has been granted planning permission (application Ref No: 21/0985). This site has a developable area of 30.626 hectares accommodating 135,000 sq mtrs, of which 55,000 sq mtrs represents a pre-let to Syncreon, a logistics company. This permission thus increases the total supply to 156.32 hectares.
16. However, this total supply does not distinguish between the three separate identifiable needs - Rugby general industrial, Coventry's unmet needs and strategic warehousing. NDL has undertaken this analysis, and this is set out below in Table 1.

**Table 1 – Analysis of how Supply could meet the Different Identified Needs**

**Completions 2021 – 2023 (source AMR)**

Site	Meeting Rugby General Industrial Need	Meeting Coventry Unmet Need	Meeting Strategic B8 Need	Total
Rolls Royce, Ansty (Prospero)		8.45		
Prologis Park, Ryton		16.7		
Symmetry Park, SW Rugby			5.5	
Clifton-upon-Dunsmore	2			
<b>Sub Total</b>	<b>2</b>	<b>25.15</b>	<b>5.5</b>	<b>32.65</b>

**Under Construction as at 31.3.2023 (source AMR)**

Prospero (Plots 3, 5, 6 & 7)		30.18		
<b>Sub Total</b>	<b>-</b>	<b>30.18</b>	<b>-</b>	<b>30.18</b>

**Extant Permissions (source AMR as corrected)**

Castle Mound Way (Central Park), Rugby	8.6			
Land south of A5, Jn 1 M69	5.25			
Europark, Newton	0.25			
Parkfield, Rugby	0.32			
Paynes Lane, Rugby	0.19			
Symmetry Park, SW Rugby			40.7	
Rugby Radio Station	31			
Rolls Royce, Ansty (Prospero)		9.56		
<b>Sub Total</b>	<b>45.62</b>	<b>9.56</b>	<b>40.7</b>	<b>95.88</b>

**Others**

Padge Hall Farm, Hinckley			30.26	
<b>Total</b>	<b>47.62</b>	<b>64.89</b>	<b>76.46</b>	<b>188.97</b>

17. The corresponding need for the three different sectors is summarised below in Table 2:

**Table 2 – Need for the Three Different Sectors.**

	Rugby General Industry	Coventry unmet (net)	Strategic B8
Need to 2041	150.5	95	551
Need to 2050	218.2	161	735

18. This means the net need, once account is taken of supply, for Rugby general industry will be between 102.88 ha and 170.58 ha. Current supply equates to 32% of the need to 2041 and 22% of the need to 2050.
19. Rugby can contribute 64.89 ha to Coventry’s net need of 95 ha (to 2041) or 161 ha (to 2050). This equates to 68% of the need to 2041 and 40% of the need to 2050.
20. Rugby can contribute 76.46 ha to the wider strategic B8 need. This equates to 14% of need to 2041 and 10% of need to 2050, subject to all consented land coming forward for development.
21. This comparative analysis indicates that there is a significant net requirement to find more land to meet Rugby’s general industrial needs. This seems to be far more pressing than meeting the unmet need for Coventry.
22. In addition, there is clearly scope for Rugby contributing substantially more land to ensure the wider need for strategic distribution land is met. This is particularly so given Rugby’s competitive advantages in attracting this sector, as explained by paragraph 3.14 – 3.21 of the Issues and Options.

**Response to Question No.2 – What type of employment land should we be planning for?**

23. In simple terms, this should be led by the available evidence. The evidence is pointing to a particular need to meet Rugby’s general industrial needs and the wider needs for strategic warehousing.
24. Our response to Question No.1 provides an analysis of current supply against the principal different needs. This indicates a large shortfall for both.
25. As referred to above, paragraphs 3.14 – 3.21 of the Issues and Options sets out the extent Rugby has witnessed growth in the logistics sector. This is because of its location on a nodal point on the UK’s motorway and strategic road network, access to strategic rail freight terminals (e.g. DIRFT), and the availability of land and labour. NDL sees demand levels for this sector continuing, requiring the identification of new large strategic employment sites.

**Response to Question No.3 – Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed)?**

- 26. The plan on page 18 of the Issues and Options shows eight potential locations. Five of these are located in the Green Belt. As such, there is a much higher bar for these locations to be selected over locations outside the Green Belt. This is commented on further in our response to Question No. 6.
- 27. Three of the potential locations are closely related to Coventry. These locations are also within the Green Belt. These locations are best suited to meet the unmet needs of Coventry, subject to these needs passing the test of exceptional circumstances.
- 28. Two of the locations – M6 junction 1 and SW Rugby – are already extensively developed or allocated in the current plan for mixed use development (including substantial housing at SW Rugby). It is unclear how much capacity remains at both locations for further substantial employment development.
- 29. NDL is promoting a large site at Cross-In-Hand on the A5, opposite Magna Park. The location of this site is marked on the base plan provided by the Issues and Options and extracted below.



30. The location of this site is marked by an orange hexagon. The plan also shows the extent of the Green Belt (shaded green). As referred to in the introduction, a Vision Document has been produced to support NDL's response to the Call for Sites. This document contains a worked up indicative masterplan supported by a full suite of technical studies and surveys.
31. It demonstrates the suitability of the Cross-in-Hand site for allocation in the Rugby Borough Local Plan as a strategic employment site. NDL considers that the site is uniquely suitable for the following reasons: -
- Located at the heart of the UK's motorway and strategic road network.
  - Easy access to the rail freight terminals serving this part of the Midlands.
  - Close relationship to Magna Park, a very successful and established business location.
  - Reach to a large labour catchment.
  - Access to an existing network of buses, both public and private, cycle routes and public footpaths.
  - Scale, with the site being over 90 hectares (225 acres) in size.
32. The site is relatively free of constraints: -
- Outside the Green Belt.
  - Located away from any residential property or other sensitive uses to industrial operations.
  - No landscape designation.
  - No designated or non-designated heritage assets affected.
  - Agricultural Land Quality classification of Grade 3b, outside the definition of Best and Most Versatile.
  - No flood risk.
  - Little ecological value, with the site farmed principally for arable land.
  - Limited number of trees of value within the site.
  - No obvious archaeological imprint.
  - Relatively flat site with only gentle gradients.
  - No issues with ground conditions.
33. The site is fully deliverable: -
- The site is in one ownership and in the control of Nurton Developments Ltd (NDL).
  - Road access is available from Lutterworth Road, with only a limited need for off-site improvements.
  - Full utility connections are available, including a plentiful power supply, with reinforcement rather than installation necessary.
  - All identified constraints have been mapped and mitigated within the masterplan. These include: -
    - A no development zone along the route of a high-pressure gas main.
    - Retention of the most valuable habitats (i.e. hedgerows, ditches, and ponds).
    - Large drainage attenuation basins and swales.
    - Landscape strategy which screens and softens the development and provides generous areas for staff recreation and welfare.

34. The site has a potential capacity of 300,000 sqm (3.2 million sq ft) and can provide a range of different sized industrial and warehouse premises, including a unit of 1 million sq ft. Moreover, given the site's relative lack of constraints, the land's availability, and the strength of the underlying market, the proposed development can be delivered in the short term – i.e. the first years of the Plan.
35. In summary, NDL considers that the site at Cross-in-Hand is a highly suitable location for large scale industrial and logistics development. It is in a prime location, on the doorstep of Magna Park, and falls outside the Green Belt.
36. For these reasons, NDL considers this site will prove to be a valuable addition to the Borough's employment land portfolio, drawing inward investment from both the manufacturing and logistics sectors.

**Response to Question No.4 – How can we provide more space to allow existing businesses to expand?**

37. A shortage of 'grow-on space' in the Borough to allow existing businesses to expand is referenced in paragraph 3.11 of the Issues and Options. This is an acknowledged issue also within the wider market for the West Midlands.
38. Principally, the viability of developing smaller sized units (say from 2,500 sq ft to 25,000 sq ft) is much more challenging than the Big Box sector (i.e. units of 100,000 sq ft plus). This is due to higher unit construction costs and a softer investment yield (due to the higher risk and greater management involved) and, hence, lower value.
39. One means of bringing forward smaller units is through enablement by the development of much larger big box schemes. NDL would be open to consider this at its proposed development at Cross-in-Hand, subject to the overall scale of smaller units being proportionate, viable and suitable in design terms.

**Response to Question No.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?**

40. This would not be supported by NDL. Instead, NDL's preference would be for employment sites to be allocated for all types of employment uses to provide maximum flexibility in attracting occupiers.
41. Certainly, this is the case with NDL's site at Cross-in-Hand. NDL considers this site to be very marketable for both industrial and warehouse uses.



**Response to Question No.6 – Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?**

42. NDL considers that there may be exceptional circumstances which point to Rugby Borough Council considering whether to choose to alter or review the existing boundaries to the Green Belt. These exceptional circumstances are derived by the substantial need for new employment land, as referred to in our answer to Question No. 1.

43. However, these possible exceptional circumstances are tempered by the requirements of paragraph 146 of the revised NPPF (December 2023). This states:

*“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”*

44. In the case of Rugby, NDL has identified three difference sources of need: -

- Rugby general industrial.
- Coventry unmet need.
- Strategic warehousing.

45. The options to meet Coventry’s unmet needs are constrained by the Green Belt. On that basis, it would be reasonable to review the Green Belt boundaries around Coventry, but **only** in respect of meeting Coventry’s unmet needs.

46. In contrast, there are options **outside** the Green Belt to meet Rugby’s general industrial needs and its contribution to meeting the wider need for strategic warehousing. These options include NDL’s site in Cross-in-Hand, which is suitably located to meet both needs, is available and achievable. As such, there is no need to review the boundaries of the Green Belt in allocating land to meet these two strands of need.



1 February 2024