

AC LLOYD

Rugby Local Plan Review Issues & Options Consultation

Response by AC Lloyd in respect of land at
Coton Park East

January 2024



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1. Introduction

- 1.1. This statement has been prepared on behalf of AC Lloyd and provides a response to the questions raised by the Council in respect of the Rugby Local Plan, Issues & Options consultation. AC Lloyd's interest with regard to this submission relates to land at Coton Park East. A separate submission has been made with regard to AC Lloyd's land interests at Ansty Park.
- 1.2. Coton Park East is currently a mixed-use allocation in the adopted Local Plan. AC Lloyd has obtained outline planning permission for a residential development on the majority of its site at Coton Park East. Having considered the site's location and characteristics and strong interest received from commercial developers, AC Lloyd considers that the site presents a better employment opportunity and is therefore seeking the site's reallocation to employment uses.
- 1.3. Rugby Borough Council has commenced a full review of the Local Plan. The current consultation is the first public stage in the preparation of the review. It provides an opportunity for local residents and stakeholders to shape the new policies of the Local Plan.
- 1.4. The consultation document states that it identifies the most significant planning issues facing the borough and seeks views on a number of questions and accompanying options to address the identified issues. The first matter the document focuses on, at Section 3, is the need for employment land and how to meet identified requirements. Section 9 considers land for housebuilding.
- 1.5. As AC Lloyds land is currently allocated for residential uses and has an extant planning permission for housing, this statement firstly provides information on the site and its planning history.
- 1.6. Given AC Lloyd's intention to bring its Coton Park East site forward for employment uses, this statement then provides a comprehensive response to the relevant questions raised on employment land provisions. These are:
 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?

1.7. In addition to this statement, AC Lloyd has also submitted its Coton Park East site to the 'call for sites'. The site concept plan submitted with the 'call for sites' submission is appended for ease.

2. Background and relevant context to Coton Park East

- 2.1. The adopted Rugby Local Plan 2011-2031 allocates land at Coton Park East for a mix of employment (7.5ha) and residential (800 dwellings) uses under Policy DS7. A masterplan for the allocation was prepared by the Council and published as the Coton Park East Masterplan SPD in December 2019. This shows an employment development on the northern part of the site adjoining the M6 and existing business park, and residential uses to the south.
- 2.2. Following the adoption of the Local Plan and publication of the masterplan in 2019, planning permission has now been granted for the employment element and the majority of the residential allocation.
- 2.3. In February 2021, Persimmon obtained full planning permission for 225 dwellings on the southern part of the allocation with access through the existing residential areas from Long Hassock to the west and Snellsdale Road to the south. The development is now under construction and well advanced.
- 2.4. With regard to the employment allocation on the northern part of the Coton Park allocation, planning permission was granted to Newlands Development for the construction of a B8 distribution facility (Ref. R22/0551) with access from Castle Mound Way via the existing business park in February 2023. This follows an earlier planning approval for a mix of employment uses (Ref. R20/0272).
- 2.5. In April 2023, AC Lloyd obtained outline planning permission (Ref. R20/0787) for the erection of up to 475 dwellings, a primary school, provision of either secondary school or residential development, and associated green infrastructure and public open space on land at Coton Park East. All matters are reserved for future determination apart from access which is to be taken off Central Park Drive through the adjacent business park with an additional emergency vehicle access off Newton Lane. This site sits between the Newland proposed distribution facility and Persimmon's residential scheme and lies immediately to the east of the existing business park.
- 2.6. A parcel of land on the north-eastern part of the allocation is also owned by AC Lloyd. No planning application has been submitted for this part of the allocation to date.
- 2.7. Whilst AC Lloyd has promoted its land at Coton Park East for residential uses through the previous Local Plan and has subsequently been successful in securing outline planning approval for residential uses on the majority of the site, it has recently re-evaluated the site's development potential. AC Lloyd has been restructuring its business and as it no longer builds houses itself, it

will now require a development partner to bring forward its Coton Park East development. However, the interest expressed in the site has been mainly from commercial developers looking for employment land and buildings in this location.

2.8. In light of the market interest for employment uses on the site, AC Lloyd has reconsidered the site's development potential and has come to the conclusion that this land provides a better employment opportunity than a housing site for the following reasons:

- The land lies immediately to the east of a well-established business park providing a mix of employment uses and is located to the south of the recently permitted distribution facility on the northern part of the Coton Park East allocation. Access to the site is gained via the existing business park off Central Drive. There is easy access to the motorway network with Junction 1 of the M6 located 500m to the north of the Central Drive/A426 junction. The site's location and characteristics make it very suitable and sustainable for employment use. There is strong demand for high-quality local and strategic employment land in this location which this site could help to address. It is therefore considered that the site would provide a logical extension to the existing business park.
- Whilst attractive to commercial developers, the surrounding employment uses and vehicle access via an existing employment area is limiting the site's appeal to the residential market.
- Rugby Borough Council has been successful in delivering new homes and is currently well ahead of the housing target in its adopted Local Plan. The Issues & Options document shows that there is a healthy level of supply going forward and that depending on which housing target is selected there might already be enough identified housing supply in the pipeline to meet requirements to 2041 even without the delivery of homes at AC Lloyd's Coton Park site.
- There is, however, an identified need and strong demand for additional employment land which this site could help to address. We explore this particular point in more detail in the subsequent section.

3. Response to Consultation Questions

- 3.1. AC Lloyd considers that its land at Coton Park East provides a suitable employment location, which could help to address both local and strategic employment land needs.

Q1. How much employment land should we be planning for?

- 3.2. Rugby Borough lies within one of the most economically dynamic parts of the West Midlands and given its excellent accessibility to the strategic road network including the M6, it is one of the prime locations for both local and strategic logistics users. This is acknowledged at Para 3.16 of the consultation document. It is also a hub for manufacturing and R&D uses as highlighted at Para 3.20 of the consultation document.
- 3.3. The Issues & Options document recognises the need to plan for both local employment uses (including manufacturing, R&D and local warehousing in buildings of less than 9,000 sq.m.) and strategic logistics sites (defined as facilities with a floorspace larger than 9,000 sq.m.).
- 3.4. Based on the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA), which was prepared by Icenl and published in November 2022, the following employment land requirements are identified in the Issues & Options document.

Table 1: HEDNA (Icenl, November 2022), Employment Land Needs

Type of employment land	Land needed 2021-2041 (ha)	Land needed 2021-2050 (ha)
Strategic warehousing across Coventry and Warwickshire	551	735
Office land (Rugby Borough only)	5.2	6.5
Industrial land (Rugby Borough only)	150.5	218.2

- 3.5. As the Issues & Options document considers the need for local employment land separately from land requirements for strategic logistics, our response below firstly looks at land requirements to meet local employment land needs before turning to strategic requirements.

Local employment land requirements

- 3.6. The Issues & Options document considers both forecast periods considered in the HEDNA (i.e. 2021/2041 and 2021-2050) as at present the time period for the plan has not been confirmed.

- 3.7. The consultation document indicates that the Local Plan should plan to accommodate the local employment land requirements identified by the HEDNA of 150.5ha to 2041 or 218.2ha to 2050.
- 3.8. In order to establish how much additional land the Local Plan will need to allocate to meet the identified local employment land requirements, the Issues & Options document then considers the Borough's existing supply. The consultation document states that there is currently approximately 178ha of supply comprising of 32.65ha of completions (2021-2023) and 145.26ha of identified supply (including sites under construction, sites with planning permission and outstanding allocations). As a result, it concludes that no additional local employment land is needed to 2041, and some 40ha is needed to 2050. We consider that this conclusion is flawed.
- 3.9. The Issues & Options document notes that the analysis is based on the Council's latest Annual Monitoring Report 2022/23 (AMR). We understand that following the publication of the Issues & Options document, the AMR was updated to rectify a mistake and the latest monitoring information now shows a supply of circa 159ha including 32.65ha of completions (2021-2023) and 126.06ha of identified local employment land supply. This is lower than the stated supply in the Issues & Options document (by circa 20ha), but would not alter the Issues & Options' conclusions that no additional land needs to be identified to 2041 as the stated supply (159ha) would still outstrip the requirement of 150.5ha. However, if the Local Plan period was extended to 2050 circa 60ha would now need to be identified.
- 3.10. We have undertaken our own review of the Council's employment land supply information and have found significant discrepancies in the Council's calculations. In particular, although the Issues & Options document suggests at Para 3.37 that the identified supply excludes strategic warehousing, our own analysis shows that the majority of the Council's existing supply is actually made up of strategic-scale development with very little supply that would fall within the local employment land bracket (i.e. facilities smaller than 9,000 sq.m.).
- 3.11. Specifically, we consider that developments at Ryton, South-West Rugby, Coton Park and most of Prospero Ansty Park are all of a strategic nature and should therefore be excluded from the local employment land supply. Our full analysis of Rugby's local and strategic employment land supply is included at Appendix 1. This is based on the Council's latest AMR, but as this only covers the period to 31/03/2023, we have supplemented this information with more recent permissions for strategic employment sites.

- 3.12. Our own analysis shows that, overall, there is currently 179ha of supply which is made up of 40ha of local employment land and approximately 139ha of strategic employment land as set out in the table below.

Table 2: Local Employment Land Requirements

	Employment land	Plan Period	
		2021-2041	2021-2050
A	HEDNA requirement	150.5ha	218.2ha
B	Local employment land supply set out in I&O	177.91ha	177.91ha
C	Local employment land supply needed to be found as set out in I&O (A-B)	no additional supply needed	40.29ha
D	Local employment land supply as set out at Appendix 1 to representations	39.92ha	39.92ha
E	Strategic employment land supply as set out at Appendix 1 to representations	138.73ha	138.73ha
F	Total employment land supply as set out at Appendix 1 to representations	178.65ha	178.65ha
G	Local employment land supply needed to be found (A-D)	110.58ha	178.28ha

- 3.13. As our analysis clearly shows the local employment land supply (39.92ha) falls significantly short against the identified needs of 150.5ha to 2041 or 218.2ha to 2050 set out in the Issues & Options document. Against the identified requirements, there would be a need to identify a further 111ha of local employment land to 2041. This increases to 178ha if the period to 2050 is considered.
- 3.14. Clearly, the Local Plan will have to identify a significant amount of additional local employment land to ensure a sufficient supply to meet the identified needs.

Strategic employment requirements

- 3.15. With regard to the need for strategic employment land, we acknowledge that the Issues & Options document does not provide a figure for the level of strategic employment land to be provided in Rugby borough. The reason for this is that the HEDNA only provides a sub-regional needs figure and work is ongoing to establish how much supply remains to be found across Coventry and Warwickshire to meet the sub-regional need and how this will be split between the different local authority areas. The Issues & Options document makes clear that the outcome of the West Midlands Strategic Employment Site Study is awaited to provide further clarity on the level of strategic land that needs to be identified and that following the publication of this study

further discussions between the Coventry and the Warwickshire authorities will have to take place to apportion strategic land requirements across the sub-region.

- 3.16. Notwithstanding this, it is clear from the evidence presented in the HEDNA, and as noted in the Issues & Options document, Rugby Borough has seen significant and sustained growth in strategic employment land in recent years and demand continues to be strong. Our own assessment of Rugby's employment land supply at Appendix 1 also clearly evidences the strength of the strategic employment land market in the borough.
- 3.17. Rugby Borough continues to be one of the most attractive locations for industrial and transport and warehousing businesses in the sub-region, as acknowledged by the consultation document, and we therefore urge Rugby Council to plan to accommodate a significant proportion of the sub-regional strategic employment land needs.
- 3.18. Our own analysis at Appendix 1 shows that Rugby currently has a reasonable short-term supply of strategic employment sites (some 139ha), but a significant proportion of that supply is either recently built or under construction and all of it has planning permission. Therefore, significant extra land will need to be provided if growth is not to be constrained in the longer term as all of the current supply is likely to be built out in the early part of the plan period.
- 3.19. This is also the case across the wider sub-region. As shown at Appendix 1, there is currently a supply of sites of some 334ha coming forward across the sub-region. However, the vast majority of this supply will again meet short-term needs as sites have either been recently built or are under construction and significant levels of additional supply will therefore need to be identified to meet longer-term requirements for strategic employment land across Coventry and Warwickshire. Against the HEDNA figures, as a very minimum, the additional strategic supply across the sub-region will need to be in the order of 217ha to 2041 and 401ha to 2050 as set out below. We consider that Rugby should be stepping up to provide a significant proportion of this supply.

Table 3: Strategic employment land requirements

	Strategic employment land	Plan Period	
		2021-2041	2021-2050
A	HEDNA requirement for Coventry and Warwickshire	551ha	735ha
B	Strategic employment land supply for the sub-region as set out at Appendix 1 to statement	334ha	334ha
C	Supply needed to meet HEDNA (A-B)	217ha	401ha

- 3.20. Rugby has a strong logistics and industrial market with a number of well-established locations that operate successfully and offer potential for expansion given their excellent road accessibility, proximity to labour, existing utilities and infrastructure connections and separation from incompatible land uses; all matters highlighted in the HEDNA as key locational considerations in determining whether sites are appropriate. This includes AC Lloyd's land at Coton Park East as further outlined below.
- 3.21. As noted above, the Issues & Options document does not quantify the amount of strategic employment land to be provided within Rugby borough and leaves this for further discussions between the Warwickshire authorities and Coventry. As the HEDNA forms a key part of the evidence base that will inform these discussions, we outline some of our concerns regarding the HEDNA assessment and conclusion below.

Critique of HEDNA

- 3.22. We are concerned that the HEDNA suggests that it might be an option to divert development away from established employment locations in existing areas of market demand. Whilst it identifies a number of locations which could accommodate strategic warehousing development in the future including the M42/A446, M6 corridor (where the Coton Park site is located), M45/A45 and A5 corridor, it suggests that there is the potential that over concentration of development in these areas could create pressures particularly in terms of the highways network and labour market. The HEDNA therefore recommends that the potential for other corridors within the sub-region, particularly in South Warwickshire, to play a greater potential role in providing strategic warehousing development than they have historically, should be considered.
- 3.23. We strongly disagree with this general assertion as it runs contrary to policies of the NPPF, both in terms of supporting economic growth, and in striving to deliver more sustainable development. The NPPF clearly encourages economic strategies that build on an area's strength (Para 85) and recognise and address the specific locational requirements of different sectors including for storage and distribution operations at a variety of scales and in suitably accessible locations (Para 87). We consider that priority should be given to expanding existing employment locations, as refocusing supply towards South Warwickshire (as recommended in the HEDNA) risks allocating sites in less sustainable locations and outside areas of market demand.

3.24. We are also concerned that the HEDNA has underestimated the need for strategic employment land for the following reasons:

- The strength of the industrial market in the sub-region is noted in the Issues & Options document and evidenced in the HEDNA, but the need for strategic industrial (B2) sites (larger than 9,000m²) is not specifically addressed. The HEDNA, and consequently the Issues & Options document, only looks at general industrial uses of a local scale and the sub-regional need for strategic warehousing. The collective strategic employment land need (i.e. strategic B2 and strategic B8) across Coventry and Warwickshire will be higher than strategic warehousing on its own. We would encourage the Council to work with neighbouring authorities to consider the scale of strategic B2 (as well as strategic B8) needs across the sub-region and how needs can best be met.
- We are also concerned that the HEDNA underestimates the effect of the continuing trend of online retailing (e-commerce) on the need for additional logistics floorspace. Whilst it clearly acknowledges that e-commerce is a key driver of demand (at Para 10.42), it forecast requirements based on completions trends for the initial 10-year period (2021-31) and slower growth in line with the traffic growth and replacement demand modelling for the next decade. In our view this approach does not take account of the still increasing role of e-commerce on the strategic logistics market.
- The HEDNA also fails to tackle Warwickshire's role in meeting unmet employment land needs arising from neighbouring authorities, in particular Birmingham. Whilst the HEDNA highlights the need for Stratford and North Warwickshire to consider unmet needs from Birmingham in setting housing targets within their respective local plans, it does not recommend that unmet employment land requirements are taken into account in the same way. We consider that this is equally important and should have been considered in forecasting the strategic employment land needs to be met within the Coventry and Warwickshire area.
- It is also not clear from the HEDNA whether the identified strategic land requirements relate to gross developable areas or site areas. This needs to be clarified and then consistently applied when considering existing employment land supply and when identifying additional strategic sites.

3.25. There also clearly needs to be a recognition that some areas of the sub-region will be able to contribute little in terms of strategic employment land supply such as Coventry which has a tightly drawn administrative boundary

and few options to accommodate further growth. As argued above, other areas of the sub-region are less attractive to the strategic industrial and warehousing market given their locational characteristics. We consider that the Local Plan cannot shy away from these facts and the Council should be proactively seeking to identify additional strategic employment land within the borough as it is a sustainable and attractive location with existing sites offering further growth potential.

- 3.26. In conclusion, we consider that the HEDNA is likely to have underestimated the sub-regional need for strategic employment land as it fails to take account of requirement for strategic B2 (as well as B8), does not appropriately consider the rising role of e-commerce and ignores unmet needs arising from neighbouring authorities. Rugby borough is well placed to meet a significant proportion of the sub-regional need given the area's market attractiveness, accessibility and availability of additional supply in well-established employment locations such as Coton Park. This will no doubt be supported by the West Midlands Strategic Employment Sites Study when it is published later this year.

Conclusions on employment land requirements

- 3.27. Overall, our initial findings and conclusions are as follows:
- Rugby needs to identify a minimum of 111ha of additional land to meet local employment land requirements to 2041, and 178ha of additional local employment land for the period to 2050. This is based on the HEDNA requirements and a more accurate assessment of existing supply. The employment requirement tables need to be updated and a much higher local requirement identified in the emerging policy;
 - The HEDNA significantly underestimates the need for strategic employment land. The HEDNA should be reviewed and updated taking account of the issues highlighted above;
 - Even using the HEDNA estimates, the sub-region needs to identify additional strategic land for at least 217ha to 2041 and 401ha to 2050;
 - A significant proportion of the strategic need should be met within Rugby Borough, given its locational characteristics, historic supply levels, and land availability. Coventry and the South Warwickshire authorities are unlikely to provide a significant contribution and therefore we would suggest that Rugby borough will continue to be one of the best places to accommodate sub-regional needs.

Q2. What type of employment should we be planning for?

- 3.28. As set out above, there is a need to identify additional supply to meet both local and strategic employment needs building on the strengths of the borough in manufacturing, R&D and strategic warehousing. A range of sites is needed that can provide a variety of building types and sizes in order to retain and grow existing businesses in the area, but also to attract new investment.
- 3.29. In selecting sites, priority should be given to expanding existing employment locations such as Coton Park, which tend to be more attractive to businesses looking to grow and generally benefit from existing infrastructure connections and proximity to labour markets.

Q3. Please provide any comments you have on the suitability of any of the broad locations listed

- 3.30. It is our view that the consultation document correctly focuses on growing existing employment locations rather than creating new ones. Such a strategy is fully in line with the NPPF's approach to economic development and Para 85 which states that *"Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."*
- 3.31. One of the locations identified in the Issues & Options document for strategic employment growth is M6 Junction 1. We are fully supportive of growth around M6 Junction 1, but consider that within this broad search location land to the east of Coton Park should be included. The current focus is to the west of M6 Junction 1, but as AC Lloyd is now proposing to bring its land at Coton Park East forward for employment uses, there is suitable land available to grow this existing employment location in an easterly direction as further outlined below.
- 3.32. In terms of other suggested locations, the only comments we have to make at this time are twofold.
- 3.33. Firstly, the suggestion that land at A45 Walsgrave Junction might be suitable is not justified. This location was promoted through the previous Local Plan and roundly rejected by the Inspector who noted in particular that such a location was incompatible with the adjacent Coombe Park, with its Grade 2* registered park and garden, Coombe Abbey (Grade I) and Coombe Pools Site of Special Scientific Interest. We would suggest this location be removed from further consideration through the Local Plan Review.

- 3.34. Secondly, in relation to the suggested location to the south of Hinckley, it is of note that planning permission was recently granted for circa 40ha (net) of development in this location at Padge Hall Farm, Watling Street, Burbage. That site now forms part of committed supply but it is important to note that this site, and indeed any other potential locations considered along the A5 corridor, are more closely related to serving Leicestershire's employment land needs rather than Warwickshire's. Indeed, this was specifically acknowledged in Hinckley & Bosworth's committee report in relation to the Padge Hall Farm application. We consider that these close links between Rugby and Hinckley & Bosworth need to be taken into account in identifying an appropriate employment land requirement. There are also other potential overlaps between Rugby and West Northamptonshire, which need to be fully recognised and considered.

Q4. How can we provide more space to allow existing businesses to expand?

- 3.35. In answer to this question, we would suggest that expansion plans of existing businesses are best met by allocating sufficient local and strategic employment land adjacent to existing employment locations. We support a focus on expanding existing employment locations as many existing businesses will be looking for opportunities to expand where they are already located and have confidence that their operational needs and aspirations can be met.
- 3.36. As outlined by these representations, AC Lloyd is promoting land at Coton Park East for employment uses. This site provides a logical extension to the existing business park and could meet a variety of business needs across the industrial, R&D, and local and strategic warehousing market with the potential to accommodate a range of different unit types and sizes in an already established employment location.

Q5. 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?

- 3.37. No, we do not consider that there is a need or robust justification to pursue this option and allocate specific sites for industrial or light industrial uses. The occupier requirements in terms of site location and characteristics are similar for all employment users and there is a significant overlap in the type and size of buildings that are taken up by industrial/light industrial companies and logistics occupiers.

- 3.38. Also, many operations do not fall neatly into one employment category with companies often looking for flexible employment space to accommodate both industrial and warehousing/logistics uses under one roof.
- 3.39. By identifying sites specifically for one segment of the market, it could unnecessarily constrain employment growth in the borough and we therefore do not support the allocation of sites specifically for industrial and light industrial uses. Such an approach would run contrary to the NPPF which seeks to ensure that planning policy are flexible enough to accommodate needs not anticipated in the plan, to allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances.
- 3.40. Instead of identifying specific use allocations, the Local Plan should focus on identifying a range of sites that can provide buildings of varying sizes. This will ensure that the needs of industrial and light industrial occupiers as well as other employment uses can be met in Rugby borough.

Q6. Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?

- 3.41. As outlined above, there is very clearly a significant need for both local and strategic employment land and, as our own analysis shows, a limited existing supply. AC Lloyd's site at Coton Park is a potential employment allocation outside the Green Belt.

Section 9: Land for housebuilding

- 3.42. Section 9 of the Issues & Options document deals with the key questions on housing land. Taking account of existing supply, the consultation document at Para 9.23 sets out how much housing supply still needs to be found to meet identified requirements. The Council's assessment is replicated below.

Table 4: Housing Needs (2021-2041)

Scenario	Min. local housing need	HEDNA 2022
Houses each year	506	735
Total houses (2021-2041)	10,120	14,700
Total houses (2021-2041) with 10% supply buffer	11,132	16,170
Total supply already identified	13,056	13,056
Supply still needing to be found	No additional supply needed	3,114

Table 5: Housing Needs (2021-2050)

Scenario	Min. local housing need	HEDNA 2022
Houses each year	506	735
Total houses (2021-2050)	14,674	21,315
Total houses (2021-2050) with 10% supply buffer	16,141	23,447
Total supply already identified	15,346	15,346
Supply still needing to be found	795	8,101

- 3.43. We have no particular view on which housing target is more appropriate, but what the tables above clearly show is that the Council currently has a healthy supply of residential sites. Based on the Council's own analysis, it currently has 25.8 years of identified supply based on the minimum local housing need (506 dpa) or 17.7 years of supply against the HEDNA figure (735 dpa).
- 3.44. The identified supply of 13,056 dwellings to 2041 includes the 575 dwellings at AC Lloyd's Coton Park East site. Should the Council agree with us and reallocate the land for employment uses, the already identified housing supply would reduce by 4.4% to 12,481 dwellings which equates to 24.7 years of identified supply based on the minimum local housing need or 16.9 years against the HEDNA.
- 3.45. In light of this, we consider that it is not critical to retain previously allocated sites that are better suited for employment uses as part of the housing land supply. Against this backdrop, we would respectfully request that consideration be given to reallocating AC Lloyd's land at Coton Park East for employment uses.

4. Coton Park East

- 4.1. As outlined above, we consider that there is a significant need to identify additional local and strategic employment land to meet identified requirements.
- 4.2. AC Lloyd's land at Coton Park East offers an opportunity for additional employment growth. Although it is currently allocated for residential uses in the adopted Local Plan and has an extant permission for residential uses on the majority of the site, in the opinion of AC Lloyd the land would be better suited to employment uses given its location and site characteristics.
- 4.3. The site comprises approximately 36ha (gross) of land immediately east of the existing business park with existing and planned employment uses to its western and northern boundary. It would form a logical extension to this employment area with the southern boundary of the site providing a clear delineation between the previous phases of employment and residential development at Coton Park. Access to the site would be taken off Central Drive via the existing employment area.
- 4.4. In terms of technical issues, the site is unconstrained and available for development. Potential impacts were considered in detail as part of the determination of the previous application for residential uses on the site. This did not reveal any issues that could not be addressed through appropriate mitigation and although an employment scheme would have slightly different impacts (particular in terms of visual/landscape effects), the previous technical work clearly shows that the site is suitable for development.
- 4.5. An initial development concept has been drawn up and is included as Appendix 2 to these representations. This shows that circa 20ha of employment (net developable area) could be brought forward comprising a number of development parcels with access gained from Central Drive through the existing business park. There is scope to provide a number of buildings and a range of unit sizes set within a high-quality business park that includes green corridors and landscape buffers to integrate the development into its surroundings. The existing watercourses and utilities infrastructure could be retained and incorporated into the development.

5. Summary and Conclusions

5.1. These representations have been prepared on behalf of AC Lloyd and provides a response to the questions raised by the Council in respect of the Rugby Local Plan, Issues & Options consultation. AC Lloyd's interest relates to potential re-allocation of its site at Coton Park East from residential to employment uses.

5.2. Our key points in relation to the main questions raised by the consultation document are as follows:

- We agree that Rugby should be planning to accommodate at least 150.5ha of local employment land to 2041 (and 218ha to 2050) as identified in the HEDNA. However, we are concerned that the Council has not correctly categorised its current employment land supply which has led to the incorrect assertion that the current local supply is 177ha. A significant proportion (some 139ha) of the current supply is of strategic scale (i.e. buildings over 9,000sq.m.) and should be categorised as such. Accordingly, the Council still needs to identify some 111ha of land to meet local employment land requirements to 2041, and 178ha to 2050.
- We are concerned that the need for strategic employment land has been significantly underestimated in the HEDNA and that more than the 551ha currently forecast as the sub-regional need will have to be accommodated in Coventry and Warwickshire to 2041. The same issues apply to the 735ha employment land requirements forecast to 2050. There are a number of concerns over the HEDNA methodology and these need to be addressed to provide a robust basis for further discussions across the sub-region on the level of strategic employment land needs and how to apportion these.
- Notwithstanding our HEDNA concerns, Rugby Borough continues to be one of the most attractive locations for businesses looking for strategic employment land in the sub-region and given Rugby's locational advantages and availability of suitable sites, the Local Plan should seek to accommodate a significant proportion of the sub-regional strategic employment land needs (whatever final numbers are agreed).
- Even using the HEDNA figures, the sub-region needs to identify additional land for at least 217ha of strategic sites to 2041 and 401ha to 2050. These are the very minimum requirements as we consider that strategic employment land needs have been under-estimated.

- A significant proportion of the strategic need should be met within Rugby Borough, given its locational characteristics, historic supply levels, and land availability.
- We agree with the Council that the expansion of existing employment locations offers the most sustainable option for growth. Our view is that one such location should be M6 Junction 1 on land immediately to the east of the established Coton Park employment area.
- AC Lloyd's land at Coton Park East offers an opportunity for additional employment growth. Although it is currently allocated for residential uses in the adopted Local Plan and has an extant permission for residential uses on the majority of the site, the land would be better suited to employment uses given its location immediately adjacent to an established employment area, access route through the existing business park and market interest in the site.
- Whilst Rugby has a healthy supply of residential sites, there is very clearly a significant need for both local and strategic employment land and a limited existing supply. AC Lloyd's land at Coton Park East could therefore be reallocated for employment uses, helping to make an important contribution towards meeting local and strategic employment land requirements whilst not significantly impacting the supply of housing land.

Appendix 1 – Analysis of Employment Land Supply

Rugby Borough's Employment Land Supply

The analysis is based on Rugby Borough Council's Annual Monitoring Report 2022/23 and planning history searches utilising the Council's online planning information system.

Table 1 below considers the Council's local employment sites (facilities smaller than 9,000sq.m.; excluding offices). Table 2 sets out Rugby borough's strategic supply (facilities larger than 9,000sq.m.).

Table 1: Local Employment Land Supply for the Period from 2021 (as at December 2023)

Site	Planning Status	Application Ref.	Floorspace (m ²)	Site Area (ha)
Rolls Royce, Ansty (Plot 1b, Apollo)	Completed 2022/23	R21/1165	23,239m ² across three buildings	6.35
Land on west side of A5, Watling Street, Clifton upon Dunsmore (Rugby Radio Station)	Completed 2022/23	R20/0919	3,128m ²	2
Land south of A5 Watling Street, adj to M69 Jct 1	Hybrid planning permission	R20/0422	7,520m ²	5.25
Unit 17, Europark, Watling Street, Newton	Change of use	R22/0966	2,070m ²	0.25
Land off Parkfield Road, Rugby	Full planning permission	R21/0664	1,408m ²	0.32
6 Paynes Lane, Rugby	Change of Use	R22/0462	1,130m ²	0.19
A5 Watling Street, Clifton upon Dunsmore (Rugby Radio Station site)	Reserved Matters approval	R22/0380	12,161m ² ; HQ facility	0*
A5 Watling Street, Clifton upon Dunsmore (Rugby Radio Station site)	Outline planning permission	R17/0022	106,000m ² , but restriction on unit sizes	16**
Rolls Royce, Ansty (Prospero)	Outline planning permission	R19/1540	33,939m ² ; B1/B2	9.56
Total				39.92

*site area included as part of wider Rugby Radio station site and recorded as 0ha to avoid double counting

**AMR notes site area as 31ha, but this is incorrect as site area was reduced to 16ha following S73 consent

Table 2: Strategic Employment Land Supply for the Period from 2021 (as at December 2023)

Site	Planning Status	Application Ref.	Floorspace (m ²)	Site Area (ha)
Prologis Park Ryton (DC8 and DC9)	Completed 2022/23	R17/2019	45,275	13.74*
Tritax Symmetry, Land North of Coventry Road, Thurlaston (SW Rugby, Plots 1 and 2)	Completed 2022/23	R20/1026	29,817	5.5
Rolls Royce, Ansty (Prospero, Plot 5)	u/c (as at 31/03/23)	R21/0525	27,900	16.3
Rolls Royce, Ansty (Prospero, Plot 3)	u/c (as at 31/03/23)	R22/0485	15,922	6.43
Rolls Royce, Ansty (Prospero, Plots 6 and 7)	u/c (as at 31/03/23)	R22/0491	35,739	7.45
Land north and east of Castle Mound Way, Rugby (Newlands, Coton Park)	Full planning permission	R22/0551	26,421	8.61
Land north of Coventry Road, Thurlaston (SW Rugby, Zone C, Tritax)	Reserved Matters approval	R22/0803	59,997	0**
Land north of Coventry Road, Thurlaston (SW Rugby, Zone D, Tritax)	Reserved Matters approval	R21/0789	50,965	0**
Land north of Coventry Road, Thurlaston (SW Rugby, Zone D eastern part, Tritax)	Reserved Matters approval	R21/0790	35,600	0**
Land north of Coventry Road, Thurlaston (SW Rugby)	Outline planning permission	R16/2569	156,733	40.7
Land at Padge Hall Farm, Watling Street, Burbage	Hybrid planning permission	R21/0985	136,350	40
Total				138.73

*AMR records site area as 16.7ha, which is incorrect

**site area included as part of wider SW Rugby site and recorded as 0ha to avoid double counting

Table 3: Overall Employment Land Supply for Rugby Borough Council for the Period from 2021 (as at December 2023)

Type of supply	AMR* (ha)	Our supply analysis (ha)
Completions (2021-2023)		
Local	(10.45)	8.35
Strategic	(22.2)	19.24
Sub-Total	32.65	27.59
Sites u/c or with planning permission		
Local	(46.57)	31.57
Strategic	(79.49)	119.49
Sub-Total	126.06	151.06
Overall Identified Supply		
Local	(57.02)	39.92
Strategic	(101.69)	138.73
Overall Total	158.71	178.65

*AMR does not distinguish between local and strategic sites. AMR site areas are shown, but split between uses results from our own analysis.

Sub-Regional Strategic Employment Land Supply

The analysis is based on Council's published AMR data and review of planning history information on Council's online planning systems. Information has been supplemented with market data where available and relevant.

Table 4: Sub-regional Strategic Employment Land Supply for the Period from 2021 (as at December 2023)

Site	Planning Status	Application Ref.	Site Area (ha)
Coventry			
Land At Lower Precinct and Retail Market Lower Precinct, Coventry (Whitley Business Park)	Completed 2021/22	FM/2019/2611	2.00*
Lyones Park, Former Lawrence Automotive Site, Sayer Drive	Completed 2022/23	FUL/2020/2794	9.19
Sub-Total			11.19
North Warwickshire			
Core 42, Dordon (Area D)	Completed 2021/22	PAP/2017/0014	5.42
South-east of Junction 10 M42, Dordon (Unit 5)	Completed 2021/22	PAP/2018/0149	5.02
Hams Hall (DC2, DC3, DC4)	Completed 2022/23	PAP/2021/0168	8.61
Sub-Total			19.05
Nuneaton and Bedworth			
Faultlands (Allocation EMP1)	Under construction	380406 and 38687	26.00
Wilson Lane (Allocation EMP2)	Outline planning permission	37237	18.00
Plot K, Prologis Park (Allocation EMP3)	Outline planning permission	38023	5.99
EMP7: Bowling Green Lane	Local Plan allocation	n/a	26.00
Sub-Total			75.99
Rugby			
Prologis Park Ryton (DC8 and DC9)	Completed 2022/23	R17/2019	13.74
Tritax Symmetry, Land North of Coventry Road, Thurlaston (SW Rugby, Plots 1 and 2)	Completed 2022/23	R20/1026	5.50
Rolls Royce, Ansty (Prospero, Plot 5)	Under construction	R21/0525	16.30
Rolls Royce, Ansty (Prospero, Plot 3)	Under construction	R22/0485	6.43
Rolls Royce, Ansty (Prospero, Plots 6 and 7)	Under construction	R22/0491	7.45
Land north and east of Castle Mound Way, Rugby (Newlands, Coton Park)	Full planning permission	R22/0551	8.61
Land north of Coventry Road, Thurlaston (SW Rugby, Zone C, Tritax)	Reserved Matters approval	R22/0803	0
Land north of Coventry Road, Thurlaston (SW Rugby, Zone D, Tritax)	Reserved Matters approval	R21/0789	0
Land north of Coventry Road, Thurlaston (SW Rugby, Zone D eastern part, Tritax)	Reserved Matters approval	R21/0790	0
Land north of Coventry Road, Thurlaston (SW Rugby)	Outline planning permission	R16/2569	40.70

Site	Planning Status	Application Ref.	Site Area (ha)
Land at Padge Hall Farm, Watling Street, Burbage	Hybrid planning permission	R21/0985	40.00
Sub-Total			138.73
Stratford**			
Redditch Gateway South (Allocation REDD.1: Winyates Green Triangle)	Reserved Matters approval	22/01142/REM	12.44
Sub-Total			12.44
Warwick***			
Gateway South (Unit 1)	Outline planning permission	W/18/0522	19.00
Gateway South (Unit 2A)	Outline planning permission	W/18/0522	5.60
Gateway South (Unit 2B)	Outline planning permission	W/18/0522	5.10
Gateway South (Unit 3A)	Under construction	W/22/1704	12.10
Gateway South (Unit 3B)	Outline planning permission	W/18/0522	4.40
Gateway South (Unit 3C)	Outline planning permission	W/18/0522	2.50
Gateway South (Unit 4A)	Under construction	W/21/1655	12.60
Gateway South (Unit 4B)	Under construction	W/22/0679	3.90
Gateway South (Unit 4C)	Under construction	W/22/0679	2.60
Land at Stratford Road, Warwick (Allocation E2)	Committee resolution to grant outline permission	W/22/1077	8.78
Sub-Total			76.58
Overall Sub-Regional Strategic Employment Land Supply			333.98

*half the site area of 4.04ha is assumed to contribute to strategic supply as development only includes one unit above 9,000m²

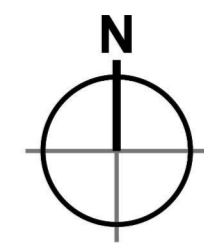
**Gaydon has not been included as safeguarded for specific occupier

***Gigafactory site at Coventry airport not included as for specific use and not general employment

Appendix 2 – Coton Park, Concept Plan



- Dimensions are in millimeters, unless stated otherwise.
 - Scaling of this drawing is not recommended.
 - It is the recipient's responsibility to print this document to the correct scale.
 - All relevant drawings and specifications should be read in conjunction with this drawing.



Key

- Development Area
- Landscape Buffer
- Attenuation
- Diverted PROW Footpath
- Diverted PROW Bridleway
- Vehicle Access
- Utilities (8m easement)
- Gas Mains (7m easement)
- Water Pipe (8m easement)
- Existing Watercourse
- Biodiversity Corridor



P02	Biodiversity corridor indicated, existing watercourse added, footpath amended to align with existing informal path.	LM	MS	12.01.24
P01	Initial Issue	RAC	MS	21.12.23
rev	amendments		by	ckd date

Coton Park, Rugby

Concept Plan - Option 2

LOD 1	LOI 1
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AC LLOYD



RIBA PoW Stage:	2 - Concept Design
Document Suitability:	S1
Drawn / Checked:	RAC / MS
Date:	21/12/2023
Scale:	1:2000 A1
UMC Project Number:	23476
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