



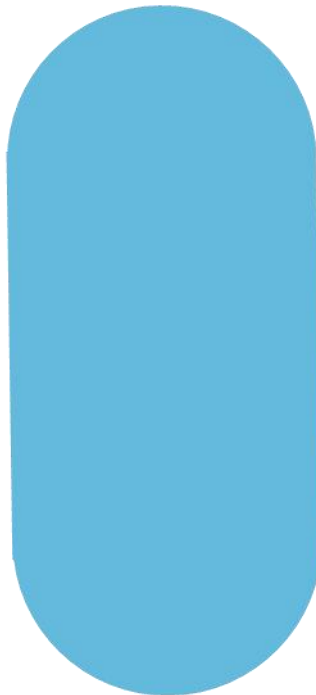
Harworth

Representations

Rugby Borough Local Plan Review –
Regulation 18 Issues and Options Consultation

Submitted on behalf of Harworth Group

January 2024





1. The following representations are made in response to the Rugby Borough Local Plan Review (RBLPR) Regulation 18 Issues and Options Consultation document (October 2023) on behalf of Harworth Group, in respect of their land interest at Ansty.
2. Rugby Borough Council will be aware that a planning application has been submitted by Frasers Group to deliver an operator specific employment-led, campus development on the site. Harworth has been working closely with Frasers Group on the preparation of the planning application and consider that the proposed campus development offers a number of significant economic, design, environmental and social benefits. As such, the planning application has Harworth's full support. However, as the landowner, Harworth is continuing to promote the site through the Local Plan to ensure that its status as a development site is secured, should this planning application be refused.
3. These representations should be read alongside the accompanying supporting documents, namely:
 - a. An Initial Employment Needs Assessment produced by Marrons which reviews the extent of employment land needs within Coventry and the wider functional market area of Coventry and Warwickshire (September 2023).
 - b. An Employment Land Report published by the Coventry and Warwickshire Chamber of Commerce which considers the employment land supply situation in the County (June 2023);
 - c. A Site Location Plan which identifies the boundaries of Land at Ansty (January 2024);
 - d. A completed Call for Sites form which provides the necessary information to consider Land at Ansty as a potential site allocation (January 2024); and
 - e. Developing Ansty: Delivering Growth for the West Midlands Development Statement which sets out why Land at Ansty is an appropriate location for development and the key benefits which can be delivered (November 2023);



Chapter 3 – Land for Employment Uses

Question 1: How much employment land should we be planning for?

4. In response to Coventry City Council's Issues and Options consultation, Harworth Group commissioned Marrons to undertake an Initial Employment Needs Assessment (September 2023) to consider the extent of employment land needs within Coventry and the wider functional market area of Coventry and Warwickshire.
5. As set out in the Initial Employment Needs Assessment, national planning policy requires that local authorities account for the local business needs and wider opportunities for development within their Local Plans.
6. The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022) identifies a need for 8.5ha of office space and 147.6ha of general industrial land. In addition, a further 551ha has been identified as needed across Coventry and Warwickshire to meet strategic B8 demand; an exercise to distribute this strategic logistics need across the various Coventry and Warwickshire authority areas has yet to be published.
7. The property market assessment contained within the Initial Employment Needs Assessment confirms Warwickshire to be one of the most important industrial markets in the UK, and the HEDNA considers that strategic B8 employment needs should be met along key potential corridors, including J2 and J3 of the M6 to the north of Coventry. This suggests that there will be significant demand on the boundary of Rugby and Coventry to meet strategic B8 employment needs.
8. Details are still awaited as to the West Midlands Employment Sites Study which will update the position on supply and identify potential future supply, however given that Coventry is unable to meet its own employment needs there will continue to be a need for Rugby to contribute to meeting some of the identified need for strategic warehousing for Coventry and the wider Warwickshire area.
9. There is an established history of Rugby Borough supporting the growth requirements of Coventry (and Warwickshire), including in the adopted Rugby Local Plan 2011-2031 (June 2019) which makes provision for 2,800 dwellings and 98 hectares of



employment land to contribute towards Coventry's unmet needs. Delivery of Ansty Park and the former Peugeot site at Ryton (Prologis Park) employment developments are recognised in the adopted Rugby Local Plan as supply to contribute towards Coventry's employment needs.

10. The Employment Land Report prepared by the Coventry and Warwickshire Chamber of Commerce (June 2023) highlights the chronic shortfall in employment land in the County, including strategic sites, and recommends that Councils allocate 20 percent more land than recommended by the HEDNA due to the historic take up of sites and the demand for good quality sites within the area.
11. Rugby Borough has a key role to play in the economic prosperity of the region as it controls prime strategic employment sites along the M6 corridor around Coventry, such as Ansty.
12. Harworth Group consider that the Council should be mindful of the above factors in setting their employment requirement in the RBLPR, to ensure employment land needs of the Borough and unmet needs arising from Coventry (and elsewhere within the West Midlands) are being met in full, to support economic growth and prosperity of the region.

Question 2: What type of employment land should we be planning for?

13. Harworth Group consider that the RBLPR should plan for a range of employment land uses, but most importantly strategic B8 given the significant demand identified in the HEDNA and shortfall in such sites set out in the Employment Land Report, as described in response to Question 1 above.

Question 3. Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed).

14. Harworth Group fully support the identification of M6 Junction 2 as a potential strategic employment location to be allocated in the RBLPR. Harworth Group are promoting land at Ansty for strategic employment development in the RBLPR. The Site is identified in the attached Site Location Plan, and a completed Call for Sites form has been submitted with these representations.



15. The attached Developing Ansty: Delivering Growth for the West Midlands Development Statement (November 2023) identifies that the Site is a strategically important location for employment use given its proximity to the urban edge of Coventry and accessibility to the M6 and M69. The M6 and M69 provide ready accessibility to urban centres such as Birmingham, Leicester and Northampton, and the wider UK market.
16. The site is accessible to Junction 2 of the M6 (Ansty Interchange) which falls adjacent to the site, and any necessary improvements to accommodate traffic from the development will be explored further in due course, working with National Highways and the Highway Authorities of Warwickshire and Coventry where necessary.
17. The Site's location on the edge of Coventry will enable employers to benefit from a sizeable skilled workforce within easy reach of the City by sustainable modes of transport, which is an important consideration for strategic B8 development. The potential exists for an active travel link between the site and Ansty Park, via the existing bridge over the M6. Ansty Park is of course already well connected to the City via active and sustainable travel links, with the City Council aspiring to deliver Very Light Rail from the City Centre to Ansty Park in the future.
18. Land at Ansty mirrors Ansty Park, which has seen particularly strong take-up and has plans for expansion / intensification, in terms of its relationship with Coventry and the wider M6 and M69 motorway network and the A46. Land at Ansty can therefore build on the success of Ansty Park, and support its continued role as a key economic asset of the region. Land at Ansty is the only quadrant of land around M6 Junction 2 where no development has taken place, and is a great opportunity.
19. The Site is well contained in Green Belt and landscape terms by virtue of the strong physical and permanent features bounding the Site to the south and west, namely the M6 and M69 motorway network, and to the north and east by Ansty village and the B4029. The new Green Belt boundaries created would therefore be consistent with paragraph 147 of the Framework.
20. The Site is free of constraints that would render the site unsuitable as an allocation for development. There are no environmental designations or heritage assets that



would preclude the principle of development, and any on site features of ecological or landscape value can be satisfactorily addressed through careful masterplanning and design. Similarly, there are no off-site constraints or features that would preclude development.

21. Taking the above into account, an Illustrative Masterplan is provided in the Developing Ansty: Delivering Growth for the West Midlands Development Statement which sets out how development could be brought forward on the Site.
22. This shows how the existing settlement of Ansty can be protected and buffered from development such that residential amenity is not harmed. Further, it shows how a sizeable area of green infrastructure can be utilised to create areas for recreation, wildlife and other sustainable uses. The form and function of the proposed green infrastructure area will be explored in further detail in due course to maximise this opportunity, including potentially to contribute towards Biodiversity Net Gain.
23. The Developing Ansty: Delivering Growth for the West Midlands Development Statement also sets out the significant associated construction and operational benefits, including notably circa 825 full-time equivalent construction roles and around 3,330 full-time equivalent jobs created by the development, plus a further 5,745 indirect jobs created locally. This equates to an estimated contribution to economic output of some £190m, of which £104m is likely to benefit the local Rugby economy.
24. Harworth Group consider that Land at Ansty should be removed from the Green Belt and allocated for strategic employment use in the RBLPR.

Question 6: Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?

25. Yes, as set out in response to Question 1 above, there is a significant need for employment land which provides the basis for exceptional circumstances.
26. Having regard to the tests of paragraph 146 of the NPPF, the needs of Coventry cannot be met within the City through the utilisation of its brownfield land and higher densities, or elsewhere outside of the Green Belt. Meeting those needs beyond the



Green Belt would not promote a sustainable pattern of development as required by paragraph 147 of the NPPF.

27. Paragraph 81 of the NPPF advises that significant weight should be placed on the need to support economic growth and productivity, and advises Councils to build on its strengths and address the challenges of the future. Paragraph 83 of the NPPF further advises that planning policies should recognise and address specific locational requirements of different sectors, including making provision for clusters and for storage and distribution operations in suitably accessible locations.
28. As set out in response to Question 3 above, Land at Ansty is situated in a strategically significant location for employment development given its proximity to the urban edge of Coventry and the local motorway network. Furthermore, development of Land at Ansty can deliver significant economic, environmental, and social benefits, notably through significant job creation and local investment, and also positively impact the local environment by adopting a nature positive approach that integrates development with biodiversity and amenity.
29. As also set out in response to Question 3 above, Land at Ansty has permanent and defensible boundaries that limit the impact of development to the purposes of the Green Belt in this location, and can prevent further countryside encroachment.
30. As such, Harworth Group consider that exceptional circumstances do exist to justify releasing Land at Ansty from the Green Belt and subsequently allocating the Site for strategic employment development.

Chapter 7 – Climate Change Policies

Question 21: Should we adopt a minimum tree canopy policy for new development?

31. Should the Council seek to adopt a minimum tree canopy policy in the RBLPR, Harworth Group consider that sufficient flexibility should be incorporated.
32. Design and landscaping considerations need to take into account the existing features of a site, and in some cases it may not be appropriate for significant tree planting in a landscape where this would be incongruous within the landscape setting.



Furthermore, requirement for tree canopy coverage may negatively impact the ability of a development to achieve 10% Biodiversity Net Gain, where other biodiversity measures may be more valuable.

33. As such, Harworth Group consider that a policy which encourages development proposals to incorporate the provision of new trees, where appropriate, would be more suitable.

Question 26: We are considering requiring all new non-residential development to be net zero. Do you agree?

34. Should the Council seek to adopt a policy which requires all new non-residential development to be net zero in the RBLPR, Harworth Group consider that sufficient flexibility should be incorporated.

35. There may be instances where non-residential development (particularly commercial or industrial operations) by virtue of its operational requirements and energy needs are not able to achieve net zero, and economic development should not be stifled in such circumstances.

36. As such, Harworth Group consider that a policy which encourages non-residential development proposals to achieve net zero, where appropriate, would be more suitable.

Question 28: Should we require non-residential development to meet higher water efficiency standards to reduce water usage?

37. Should the Council seek to adopt a policy which requires non-residential development to meet higher water efficiency standards in the RBLPR, Harworth Group consider that sufficient flexibility should be incorporated.

38. There may be instances where non-residential development, through its operational requirements, are not able to achieve higher water efficiency requirements, and economic development should not be stifled in such circumstances. In addition, there could be an impact on development viability, particularly on brownfield sites.



39. As such, Harworth Group consider that a policy which encourages non-residential development proposals to achieve net zero, where appropriate, would be more suitable.