

Response to Rugby Borough Local Plan Review: Issues and Options Consultation 2023/24 submitted on behalf of Windsor Developments Ltd.

1.0 Proposed Site Allocation at Brandon Road within the Rugby Borough Local Plan Review

- 1.1 This representation is made on behalf of Windsor Developments who own the freehold of 38.3 acres (15.5 Ha) of open land adjacent to the Coventry Ring Road (A46) near its junction with the A45 and adjacent to the Toll Bar End roundabout with vehicular access from Brandon Lane (see attached location plan). Further details are also contained in the accompanying "Call For Sites" submission
- 1.2 Although the Brandon Lane site is within the administrative area of Rugby Borough Council, the site's strategic location with its proximity to the City of Coventry, Coventry airport and centers of employment, such as the JLR operations, UKBIC, Segro Park and the proposed sub regional "gigapark" - means that this strategically located site represents an important source of available land which can make a significant contribution of meeting both Rugby's, Coventry's and the wider sub region's growing employment needs over the plan period..
- 1.3 It is therefore considered that the Brandon Lane site needs to be allocated in the new Rugby Borough Local plan for employment led development in order to help meet the employment needs of not only Rugby Borough Council but also the employment needs of the Coventry and Warwickshire sub region over the plan period to 2050.
- 1.4 For reasons outlined below, it is considered that the Issues and Options of the proposed review of the Rugby Borough Plan underestimates both the local and sub regional employment needs over the plan period. Consequently, the proposed review of the Rugby Borough plan needs to amend the existing green belt boundary at Brandon Road and release the site's green belt designation because there are "exceptional circumstances" to do so.
- 1.5 Specifically, because the site is within a single ownership and there are no environmental impediments for the development of the site, the site is both "deliverable" and "developable" over the plan period to meet local and sub regional employment needs.

2.0 Background context for the representation

- 2.1 Windsor Developments welcomes the opportunity to make representations to the Issues and Options Consultation on the proposed review of the current Rugby Borough development plan. The pace of economic change and the recent circumstances (largely negative factors such as the Covid pandemic), which have impacted growth on the UK economy, require a revised and updated policy framework. Moreover new planning related legislation also requires the development plan to be updated.
- 2.2 Windsor Developments consider that the proposed policies given in the Issues and Options consultation relating to the determination of future employment requirements over the plan period is partial and incomplete.
- 2.3 In particular, and for reason given in the following paragraphs to this representation, Windsor Developments do not consider that the draft plan's proposed employment policies and site allocations have are made in accordance with paragraph 31 of the NPF which states that: *"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."*

- 2.4 Specifically, Windsor Developments objects to the way the draft proposals have derived the housing and employment land requirements to 2050 drawing mainly on the sub regional Coventry and Warwickshire HEDNA 2022. In our opinion there appears to be confusion in this section relating to employment land **needs** with the overall employment land **requirements**. It is made clear in government guidelines that these elements are not the same.
- 2.5 This deficiency derives from the central fact that the HEDNA projections used should be only one element of the methodological approach to accurately determine likely future employment allocations.
- 2.6 The Coventry and Warwickshire HEDNA 2022 figures on their own are unsound, inconsistent and methodologically weak and indeed appear to contain mathematical errors. The effect of this relating to the provision of overall employment land is that the estimates of requirements for Rugby Borough to 2050 seriously underestimate employment land and other commercial requirements that would allow the local economy to flourish. In particular, the Issues and Options consultation contains little or no consideration of current market conditions, activity and where sectoral shortages are occurring.
- 2.7 Paragraph 31 of National Planning Practice Guidance (NPPG) makes clear that in reviewing plans, local authorities need to examine current evidence about market characteristics and in particular examine so called "Market Signals" for the plan area. This would be represented by both "hard" statistical evidence and also "soft" information drawn from local market practitioners and experts. This is absent from this analysis .
- 2.8 It is also worth noting that in 2019 the C&W sub regional local authorities jointly local authorities commissioned a major study relating to the characteristics of local employment markets (Coventry and Warwickshire Market Signals Study BBP consultants 2019). This study includes a detailed look at the market across Rugby Borough. There is no evidence that this work has had any impact on the analysis set out in the Issues and Options consultation. We consider that this study is highly recommended as an up to date source of the information required to inform this whole matter.
- 2.9 In effect the use of the HEDNA figures in isolation postpones confronting some of the difficult issues associated with providing sufficient allocations and locating employment development to meet Rugby's needs. Overall it leads to an underestimate of Rugby's current requirements for a wide range of employment requirements. The overall effect of the inadequate provision will be to compound the shortages that already exist in certain market sectors in Rugby Borough, around the Coventry and in the sub region.
- 2.10 Reliance on the HEDA figures will also likely result in the loss of inward investment opportunities and frustrate the ability of some local businesses to expand and move premises. Growth of employment/commercial markets is in part driven by having a range of sites and offering investors and business a degree of market choice. It seems clear from these proposals that there will be little choice for potential investors in this local market. This will frustrate the Councils own ambitions to develop the local economy and spread the benefits across wider sections of the current and future working population.
- 2.11 It is essential that in future stages of this Local Plan review process that a wider and more comprehensive analysis is employed to address the whole question of employment land provision. In this sense the proposed new Economic Strategy (ref para3.13) will provide an important source of up to date market evidence.

3.0 Questions posed by the Issues and Options Consultation.

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

As noted in the general section of this response the analysis presented in this consultation document is a partial and incomplete evaluation of the range of issues needed to accurately consider and estimate the future provision of employment land in Rugby and its surrounding areas. As stated in this submission the simple answer is considerably more than currently indicated. Widely available market evidence suggests a higher level than the figures set out in para 3.37 which derive mainly from the C&W HEDNA 2022. Please see the comments in Section 2 above.

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

Reference to the range of source material referred to in this representation will assist in addressing this particular question. Shortages exist in all sectors relative to current Borough and the wider region's market demand for new employment land allocations. In particular, up to date local evidence points to shortages of local industrial land and small scale accommodation and "grow-on" space. As noted in research a significant proportion of new businesses begin associated with individual householders homes and those that grow them migrate into full time business premises. As the 2019 Market Signals study showed affordable accommodation to meet the needs of small scale businesses is a particular issue across the sub region.

Particular consideration should be given to facilitate new and changing requirements on both existing stock and with new allocations. Thought should be given to the size of allocations –again recommendations in the Market Signals study indicated that smaller size new allocations should be brought forward. These have a greater chance of yielding smaller units that meet the needs of new and growing local businesses.

Infrastructure needed to accommodate changing trends and requirements should be examined alongside the process of allocating new employment land. For example, many new modern growth economy sectors are driven by handling and processing large volumes of data.

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

This representation considers that in order to make the plan sound the site at Brandon Road needs to be allocated for employment development over the plan period.

The Brandon Road site can make a significant contribution to meeting the identified deficiencies in the supply of employment land to meet Rugby's employment needs. It is noted that this land sits on the boundary of Rugby Borough and Coventry and close to the Warwick district boundary. Given the history of joint working and the positive actions that have emerged from the Duty to Cooperate requirements, the subject site has good potential to meet both local and regional employment requirements. Moreover, the land is:

- Readily available and in a single ownership
- Has no major physical or environmental constraints to its implementation
- Has excellent location and accessibility characteristics offering access by all modes of transport and movement. It is well served by public transport.
- Has potential for a wide range of employment types as well as characteristics that would allow it support related infrastructure provision.
- Lies in an area likely to be subject to considerable additional growth pressures and change .

Windsor Developments consider that in order to make the plan sound, the RBC Local Plan Review needs to comprehensively address the whole issue of the future employment needs including the contribution of the Borough Council and its adjoining local authorities. In particular, it is considered that there are exceptional circumstances for the removal of the green belt designation at Brandon Road to help meet future employment needs both locally and for West Midlands sub region.

Reference to the current review of the West Midlands Employment Land Study is noted and this will be important in setting a framework for the identification of larger employment sites around Coventry. The previously published version of this study (West Midlands Strategic Employment Sites Study 2019) highlighted the potential of land well related to RBC.

The subject land has been promoted through the West Midlands Strategic Land Study 2019. The West Midlands Employment Land Study 2015 acknowledges the importance of Coventry and Rugby in meeting high demand for larger scale industrial space (Paras 4.72-4.74). It is noted that the Issues and Options consultation does not address these specific matters and leaves a significant gap in its consideration.

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

Allocation of additional sites in the plan which can deliver employment space needs for a wide range of occupiers already established in the sub region. For example, the subject site at Brandon Lane is suitable for a large distribution and logistics unit and would also be suitable to accommodate a range of smaller and medium sized units within a bespoke business park environment with good access to the strategic road network.

3.5 Q5. We are minded to allocate sites specifically for industrial (B2) and light industrial (E(g)iii) uses?

The Coventry and Warwickshire Market Signals (2019) research study referenced above contained key recommendations that future employment allocations should in appropriate **circumstances** be more “fine grained” and in some instances should address specific uses and business classes.

Sites to be allocated only for Class B2 industrial use should only be made where there is market evidence that such development is needed in isolation from other employment led uses and where significant adverse environmental impacts that would adversely affect adjacent residential amenity. There will be some sites that can accommodate a mix of Class B2 and other employment- led uses. Restrictions on use that suppress economic activity must not be encouraged.

4.0 Need for property market evidence of employment generating needs and type of floorspace requirements across the sub region

Windsor Developments consider that that too much emphasis has been placed on demographic forecasts. It is the client’s view that in order to establish deliverable employment provision within both Rugby Borough and the wider sub region more emphasis needs to be placed on market intelligence and “signals” and consultation with employers, property experts and the wide ranging employment development sector.

Given the relationship of the tightly drawn administrative boundary between Rugby and Coventry and the close functional interaction of major employment centres such as Segro Park, the proposed “Gigapark” at the airport (WDC area), the expanding developments at Ansty Park (RBC area). The recent announcement in the Governments Autumn Statement (Dec 2023) that this strategic area will make up part of the West Midlands Investment Zone not only reinforces the importance of this particular locality but sets a challenge that the new Local Plans being produced should maximise the opportunities likely to be created.

In this context, it is essential that cooperation between adjoining authorities must acknowledge and address important cross boundary issues that will require cooperation between the local authorities in the sub-region. Consequently the proposed recognition in the text of the draft document is welcomed. However specific site allocations – including an allocation Brandon Lane for employment use should be developed in future iterations of the development plan documents.

The forthcoming review of West Midlands Strategic Employment Sites Study will introduce greater clarity how the 551ha “strategic requirement” identified in the HEDNA is addressed. Future stages of the plan preparation process must establish key principle related to accessibility, labour supply availability, power supply issues and other factors important to provide “infrastructure “ for the growth of both strategic and local employment areas. It seems clear from information currently available that there will be a serious challenge to accommodate the residual levels identified in the HEDNA. It is important that future iterations of the draft plan need to address these difficult matters and make a comprehensive package of provision for the sub region.

Windsor Developments own a key strategic land area off Brandon Lane, Coventry which is located inside the RBC boundary but which also functionally relates to the City of Coventry. The site has excellent potential to meet a wide range of employment needs either local or regional. The allocation of the site for employment uses will assist both Coventry City Council and Rugby Borough Council in meeting a range of local and sub- regional employment needs over the plan period.