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For and on behalf of
S & D Postlethwaite

Rugby Local Plan Review Issues & Options Consultation

Land at Ryton Fields Farm

**Prepared by
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January 2024





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1.0 INTRODUCTION

- 1.1 These representations have been prepared by DLP Planning Ltd on behalf of S & D Postlethwaite in response to Rugby Borough Council's Local Plan Review – Issues & Options Consultation.
- 1.2 The representation responds to Section 3, questions 1-6 of the consultation document.
- 1.3 Included within this submission is the Council's Call for Sites Proforma for Land at Ryton Fields Farm. This proforma is supported by an Opportunities and Constraints Plan, and an Indicative Masterplan informed by high-level access appraisal.

2.0 NATIONAL POLICY CONTEXT

- 2.1 The National Planning Policy Framework ("the Framework") sets out the Government's planning policies for England and how these are expected to be applied.

a) Presumption in Favour of Sustainable Development

- 2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision taking (paragraph 11). For plan-making, this means:
- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
 - b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless;
 - i. The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type, or distribution of development in the plan area; or
 - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a

whole.

b) Plan-making

- 2.3 Paragraphs 15 to 37 of the Framework relate specifically to ‘plan-making’.
- 2.4 Paragraph 15 states that the planning system should be genuinely plan-led. Plans should provide a positive vision for the future of each area including addressing other economic, social and environmental priorities.
- 2.5 Paragraph 20 requires that strategic policies should set out an overall strategy for the pattern, scale and quality of development, making sufficient provision for employment development.
- 2.6 Paragraph 31 requires that the preparation of policies should be underpinned by relevant, up-to-date, adequate, and proportionate evidence and take into account relevant market signals.
- 2.7 Paragraph 35 states that plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are;
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with policies in this Framework.
- 2.8 Paragraphs 85 to 89 relate to ‘building a strong, competitive economy’.

2.9 Paragraph 85 requires that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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.

2.10 Paragraph 86 states that planning policies should:

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

2.11 Paragraph 87 requires that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

3.0 ISSUES & OPTIONS SECTION 3: LAND FOR EMPLOYMENT USES

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

3.1 DLP 1 The Coventry and Warwickshire HEDNA (November 2022) identifies an overall employment land need in Rugby for the period 2021 to 2041 of 155.7 hectares (ha), comprising 5.2 ha land for offices and 150.5 ha land for general industrial uses (B2/B8 units

under 9,000 sqm) (HEDNA, Table 15.2).

- 3.2 The requirement for strategic industrial uses (B8 units over 9,000 sqm) is specified as a total requirement figure for the whole Functional Economic Market Area (FEMA) of 551 ha.
- 3.3 Both of these figures include a flexibility margin to allow for the potential delay in some sites coming forwards, current low vacancy rates, and the potential for increases in future demand in excess of the forecasts (paragraph 11.13, HEDNA 2022).
- 3.4 The amount of employment land being planned for in Rugby Borough should, as a minimum, meet the land requirements as set out in the HEDNA, including a minimum 150.5 ha of land for general industrial (B2/B8) uses. It is noted that this figure represents Rugby's own local requirement. In addition to which there is a need for the Council to continue to plan to assist with meeting Coventry's unmet employment land needs (once this figure is confirmed), as well as meeting any strategic employment land needs at the sub-regional level.
- 3.5 The Council states in paragraph 3.4 of the Issues & Options consultation document that the 'local' HEDNA industrial employment land need figure of 150.5ha is a 'gross' requirement which takes account of the fact that "some of the requirement will be met by redeveloping land that is already in industrial use".
- 3.6 It is correct that the industrial need figure set out in the HEDNA is derived from a 'gross completions trend' forecast, which assumes that "past losses will to an extent continue and some of the forecast need may occur on recycled existing industrial premises". However, this is an assumption which has been factored into calculating the requirement or 'demand' side figure and is not an assumption that should be incorporated into the supply.
- 3.7 In other words, the Council should ensure it plans for the HEDNA requirement figure, as a minimum, in full. Whilst some of the supply (in terms of allocations or existing commitments) may involve redevelopment of existing industrial sites, in calculating the contribution of these sites towards meeting the overall requirement, the Council should ensure it is the net increase (i.e. accounting for the planned loss of existing floorspace) that is included in this calculation.
- 3.8 In identifying how much employment land should be allocated within Rugby Borough, it is also important that the Council continues to work with its neighbouring authorities to ensure

that the wider strategic needs of the sub-region and any unmet needs of neighbouring authorities within the FEMA (such as those of Coventry) are met, in accordance with paragraph 26 of the NPPF.

- 3.9 When calculating the amount of land that needs to be allocated for employment use as part of the Local Plan Review, it is also assumed that the Council will be considering whether to carry forward any existing, undeveloped allocation sites. In doing so, it is important that the Council takes an objective view on the deliverability of these existing allocations (particularly those with no recent development activity or planning history) to ensure that only sites that are demonstrably deliverable are carried forward as allocations in the Local Plan Review. This assessment should be undertaken at an early stage to ensure that sufficient consideration can be given to the identification and assessment of new allocations, as necessary.
- 3.10 The table in paragraph 3.37 of the Issues & Options consultation document states that ‘no additional supply’ is needed for the plan period 2021-2041. However, it is unclear how the ‘total supply already identified’ figure of 145.26ha has been derived, including what proportion of this supply and the 2021-2023 completions was originally identified to meet Coventry’s unmet needs (a contribution of 98ha as set out in adopted Policy DS1). Any completions or supply identified as meeting Coventry’s needs, should not be double-counted as contributing towards Rugby’s local supply within the new plan period.
- 3.11 The table in paragraph 3.37 is therefore slightly misleading as this excludes any land required to meet the unmet needs of Coventry, and the source of the 145.26ha ‘total supply already identified’ figure is also unclear. It is considered likely that once any completions/commitments already identified as meeting Coventry’s unmet needs in the current plan period are excluded, and any additional unmet needs for the future plan period are included in this supply figure, it will be necessary for the Council to identify an additional employment land supply to meet both the Council’s own needs and the unmet needs of Coventry.

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

- 3.12 As set out in paragraph 88 of the NPPF, planning policies should enable “the sustainable growth and expansion of all types of business in rural areas...” and “the development and diversification of agricultural and other land-based rural businesses”. Paragraph 89 also

states that “Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport”. In identifying land for employment uses, it is important that the Council allocates sites across the Borough, including in rural areas, in order to ensure the employment needs of rural businesses are met.

- 3.13 In terms of the scale of sites that are allocated for employment use, the Council should look to allocate sites of varying sizes, including ensuring a supply of sites capable of delivering small-medium size industrial units which can meet the needs of smaller businesses. As stated in paragraph 2.27 of the HEDNA (2022), “Across the sub-region, 80% of businesses have less than 10 employees and 99.6% are Small and Medium-Sized Enterprises with less than 250 employees”. It is therefore important that the needs of these smaller businesses continue to be met, including through the provision of high quality, small-medium scale units which are capable of meeting flexible employment needs (including a mixture of E(g)(iii), B2 and B8 floorspace) and provide ‘grow-on’ space capable of allowing future business growth.
- 3.14 We therefore support the recommendation set out in paragraphs 3.10 and 3.11 of the Issues & Options consultation document that the Council should make specific site allocations for B2 industrial and E(g)(iii) light industrial floorspace, particularly that which provides ‘grow on space’ for existing businesses.

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).

- 3.15 The broad location of Ryton is considered suitable given its location close to Coventry, its airport and its good access to A roads and motorways. The location has synergies with existing and recent employment developments on the city’s southeastern edge.

Question 4. How can we provide more space to allow existing businesses to expand?

- 3.16 Supporting existing businesses to grow locally is as important as attracting new businesses to the borough. Making site specific allocations for grow-on space and medium sized units can help to achieve this. The high-level masterplan accompanying this submission demonstrates how Ryton Fields Farm can accommodate a mix and choice of unit sizes to enable existing local businesses to expand as well as generating its own demand for new

floorspace.

Question 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?

- 3.17 This strategy is supported in order to ensure delivery of expansion and 'grow on' floorspace, and in the location put forward in this submission. Ryton Fields Farm is firmly within the broad location of Ryton identified in the Issues and Options consultation document. Given its size, the site is highly deliverable and immediately available to meet an identified need.

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

- 3.18 As set out in paragraph 145 of the NPPF, authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified.
- 3.19 Meeting an unmet need is widely held to be an exceptional circumstance when seeking to amend Green Belt Boundaries. As well as meeting Rugby's own local requirement as identified, and as stated above, there is a need to plan for meeting Coventry's unmet need as well as that identified at the sub-regional level. The site at Ryton Fields Farm is ideally placed to meet that need on the fringe of the city, with easy access to the strategic road network and existing strategic employment sites such as Prologis Park.
- 3.20 The delivery of sites in the most sustainable locations is also considered to be an exceptional circumstance in which a local authority can amend Green Belt boundaries. The site at Ryton Fields Farm is within close proximity to Coventry, its airport and existing strategic infrastructure and would facilitate a sustainable pattern of development in this broad location.
- 3.21 The site identified would have a limited visual impact given its topography, compared to other Green Belt locations.



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