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31 January 2024

**Our ref:**

**Your ref:**

Dear Sir or Madam

## **Rugby Borough Local Plan: Issues and Options Consultation Response: PA Wright and Sons Ltd**

### **Introduction**

Gerald Eve has been instructed by their client PA Wright and Sons Ltd to submit representations to the Rugby Local Plan Issues and Options consultation that is currently available for comment until 2<sup>nd</sup> February 2024. Alongside this consultation a 'Call For Sites' process is also available for comment and a separate submission has been made in respect of this process which should be read alongside this letter.

PA Wright and Sons Ltd own a site known as 'Land Adjacent to Hinckley Park' (the Site) located to the south of the A5 close to Junction 1 of the M69. A Site Plan is enclosed with this letter illustrating the extent of the site boundary. The site is currently available for development for an employment-led mixed-use development and our client is keen to present the site to the Local Planning Authority (LPA) as a sustainable location for growth that should be allocated within the emerging plan to help assist with meeting the Council's development needs. Set out below is a description of the site and comments to the Issues and Options document that are of relevance to the promotion of the site through the review of the Local Plan.

### **Site Description**

The Site extends to approximately 350 hectares and comprises greenfield agricultural land on the north western side of Rugby Borough Council's administrative boundary to the south of Hinckley. It is located to the south of junction 1 of the M69 and is bound by the A5 along its northern boundary, Hinckley Road is located in part along the western boundary and the B4114 Smockington Lane crosses the middle of the site. There are some existing businesses located to the north of the site outside the boundary including a restaurant and bar, a law firm and computer business, lakeside fishery and a number of employment units at Asfare Business Park accessed off Hinckley Road. The Site is identified within the adopted Rugby Borough Local Plan as within the Green Belt.

On the opposite side of the A5 to the north is an existing industrial and logistics employment development known as Hinckley Park that is located within the administrative boundary of Hinckley & Bosworth Borough Council. Hinckley Park houses a number of units including an Amazon warehouse, a DPD parcel depot, two units have been pre-let to Geosynthetics and Octopus Energy along with a Leonardo Hotel.

The Site is located within an area established for a mix of employment uses and is an excellent location to direct additional growth over the plan period.

## **Response to the Issues and Options Consultation**

### **Land for Employment Uses**

#### *Question 1 – How much employment land should we be planning for?*

It is important that the LPA ensures that it plans for an ambitious and deliverable programme of growth for the area building on the Borough's excellent locational strengths and opportunities. Supporting the growth of the local economy will be crucial to ensuring the future prosperity of the area. The NPPF requires planning policies and decisions to 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. Policies are required to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. It goes onto suggest that local plans should address the specific locational requirements of different sectors including making provision for storage and distribution operations at a variety of scales and in suitably accessible locations. Any employment land targets must provide flexibility, should land not come forward as envisaged, as required by NPPF.

It is critical that Rugby Borough Council does not underestimate the true level of employment land that is going to be required to meet its needs over the plan period. This is particularly the case in the north of the Borough given its locational advantages with the motorway and trunk road network. Much of the available employment land within Rugby such as the remaining plots at Antsy Park is further south close to the border with Coventry and the LPA should ensure that an appropriate mix of employment land is provided in a variety of locations to meet future requirements. The promotion Site is in an established employment area and is a logical location to provide future requirements to the north of the Borough.

The LPA will need to plan for its own needs as well as contributing towards meeting some of the identified strategic warehousing land in Coventry and Warwickshire. The Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) identifies that demand for logistics and distribution space looks likely to remain strong buoyed by the growth in e-retailing. It goes onto identify that available industrial space remains low and whilst new supply does appear to be coming forward, not least because of sites allocated in the last round of local plans starts to progress but identifies that there will likely be a continuing need to replenish industrial supply over time if economic growth is not to be constrained.

#### *Question 2- What type of employment land should we be planning for?*

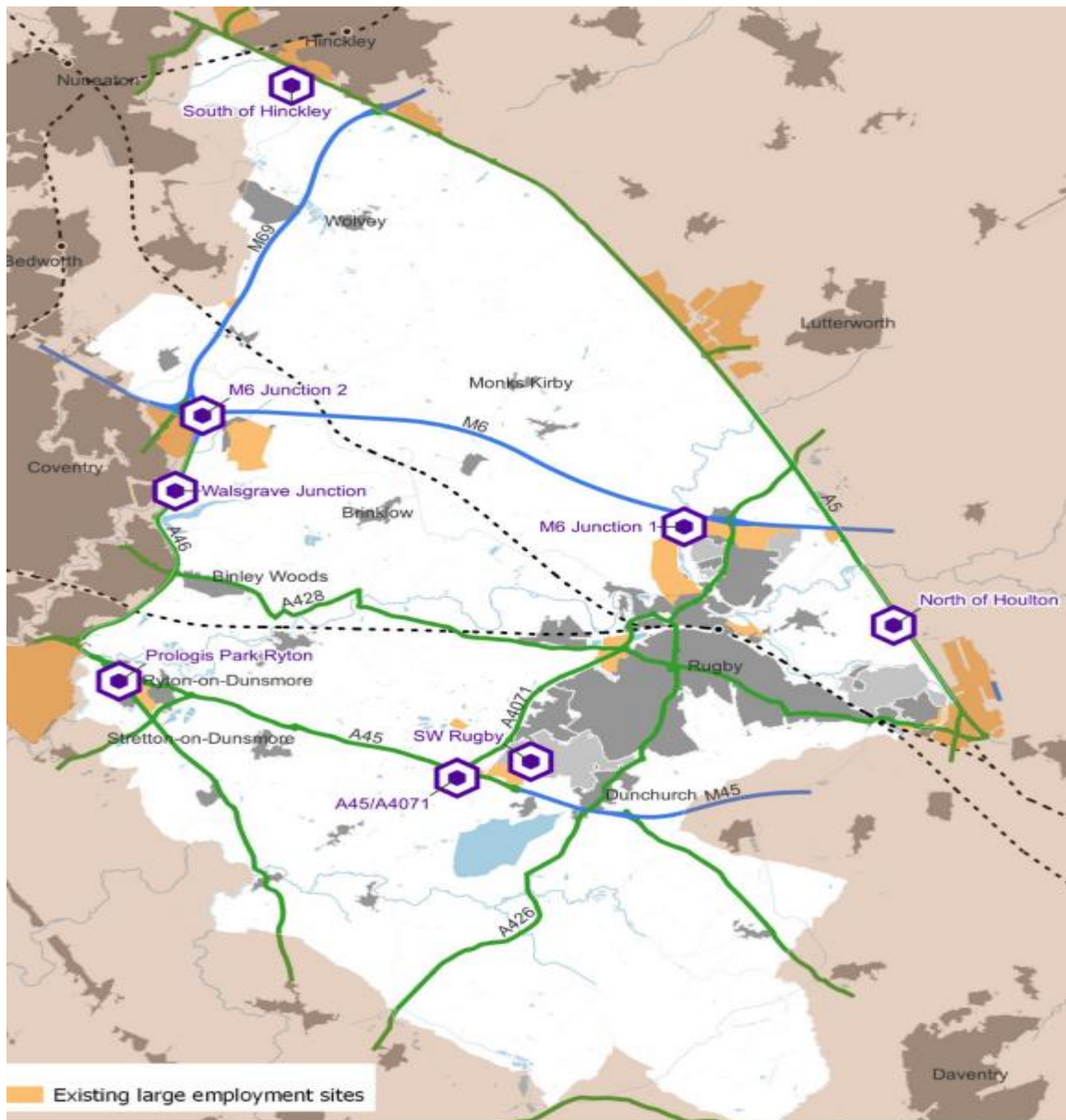
The LPA should be planning for a variety of employment land requirements. In particular, the Local Plan strategy should ensure that it takes into account the scale and locational requirements of new employment uses in Class E(g), B2 and B8. The Plan needs to provide an effective policy to ensure that a suitable range of sites in the most appropriate locations is adopted to meet the Council's needs in full over the plan period. The plan needs to ensure that sufficient land and a wide mix of employment sites will be allocated in order to deliver the growth ambitions for the Council area.

In terms of strategic employment land, there is a need for additional land due to low levels of supply and a shortage of premises and land both nationally and within the region. Strategic employment land is vital to supporting economic growth and attracting inward investment to the region and a sufficient supply of strategic scale opportunities underpins the aims and objectives of national and regional economic policy. The LPA should ensure that sufficient land is identified for strategic employment sites.

Additionally, the LPA should adopt a proactive approach to ensure that it accommodates and attracts the requirement for industrial and warehouse floorspace at a local level. This should include the identification of a new portfolio of sites that can provide a range of choice and cater for local needs in the short, medium and long term.

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

The document has identified the following potential strategic employment locations:



<b>Potential strategic employment locations</b>
M6 junction 2 (north of junction)
Ansty Business Park expansion/A45 Walsgrave Junction
Prologis Park Ryton expansion
Safeguarded land within the South West Rugby allocation
A45/A4071 junction
A5 north of Houlton
M6 Junction 1
South of Hinckley

The Issues and Options document confirms that at this stage, these are broad locations not sites. Most of these locations currently lie within the Green Belt and it is clear that there is not enough brownfield land to meet the Local Planning Authority’s requirements which will necessitate a pragmatic approach to altering the Green Belt boundary to be adopted to ensure that future growth requirements are met.

In accordance with comments made above, the LPA will need to ensure that a sufficient portfolio of sites is identified that can provide a range of choice of sites to cater for the needs of the area. It is considered that there may be a need to identify additional locations for development to ensure an ambitious and deliverable programme of growth that is appropriate for Rugby.

In respect of ‘South of Hinckley’ as a potential strategic employment location this general area for growth is supported albeit it is considered that our client’s site located on the southern side of the A5 close to Junction 1 of the M69 on land opposite the existing Hinckley Park employment site offers the most appropriate strategic employment location in this broad area.

This Site offers an excellent location to direct additional growth over the plan period. It is close to the existing motorway network in an established employment area opposite Hinckley Park. The site is available and deliverable and is an excellent opportunity to assist in meeting the development needs for the area. The Site is a sustainable location for additional development with sufficient land to provide a sympathetically designed proposal taking into consideration landscaping and BNG requirements along with any necessary mitigation measures. The site is located within the Green Belt in the adopted Rugby Local Plan. However, it is low performing in Green Belt terms and has a low impact in landscape terms and the opportunity exists now to make an amendment to the Green Belt boundary to meet future needs through this review of the Local Plan.

The site is identified on the plan below:



Support is given to the identification in the Issues and Options document that land for large-scale manufacturing and distribution uses needs to have good access to A-roads and motorways. The document suggests that this will avoid inappropriate routing of HGVs through residential areas and country lanes. It is considered that this is a sensible approach to adopt. It is recommended that the Local Plan should make suitable provision for a range of employment uses in appropriate areas, including the need to locate large scale warehousing developments close to the strategic transport network. Our client's site on land adjacent to Hinckley Park would support this approach being located adjacent to junction 1 of the A69 and accessed off the A5.

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

It is important that the LPA accommodates existing business needs in accordance with advice within the NPPF. The LPA should permit the expansion of existing established businesses through providing a flexible approach to schemes that include upgrading, improvement or redevelopment of existing premises. It is also important that the Council ensures it provides a sufficient land supply to allow businesses to grow as and when required.

*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?*

It is considered that the LPA adopts a flexible approach to accommodating all types of employment land requirements. Whilst there could be a justification for specifically allocating sites for Industrial and Light Industrial uses this should not be at the expense of precluding other employment generating uses.

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

It is considered that there are exceptional circumstances that justify the amendment of the Green Belt boundary to assist in meeting the need for employment land. These include the following considerations:

- The scale of employment land required cannot be met without Green Belt release;
- The need to accommodate a wide range of sites including strategic sites that need to be close to the motorway and highway network that are currently washed over as Green Belt;
- The fact that the Site lies opposite the Hinckley Park employment site and is an established area for employment use;
- The requirement to provide a sufficient supply of sites to meet the national and regional economic policy objectives;
- The importance of supporting economic growth and inward investment as identified in NPPF.

### **Climate Change Policies**

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

It is suggested that the LPA could consider adopting a minimum tree canopy policy for new development but this should provide some flexibility within its wording. Any policy should allow exemptions from a minimum requirement for sites where this would be difficult to provide due to site constraints or other issues such as viability concerns.

*Question 22 – Should we identify priority locations or allocate sites for biodiversity net gain for sites which are unable to provide all the net gain on site, and if so, where?*

The Environment Act 2021 has introduced a mandatory 10% Biodiversity Net Gain (BNG) that is due to come into effect in February. It is considered that the LPA could specify priority locations or allocate sites for offsite biodiversity net gain as this may assist those sites where on-site provision may be a challenge.

*Question 24 – Should we require developers to prioritise the delivery of biodiversity gain within close proximity to the development?*

It is considered that developers should be encouraged to prioritise the delivery of biodiversity gain within close proximity to the development, but a flexible approach should be adopted where this is not feasible. The Site adjacent to Hinckley Park is of a size that would enable biodiversity net gain to be provided on site because of its scale, its single ownership, and existing features which could be enhanced. This would provide a positive improvement to the environment through enhancing biodiversity and consequent benefits for reducing greenhouse gas emissions and adapting to climate change.

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

It is considered that Building Regulations are an appropriate way to set standards for building energy performance and they have recently been updated in June 2022 with an uplift in standards. It is considered that the provision of setting more stringent standards within planning documents may have a negative impact on the viability of schemes and potentially become out of step with any Building Regulations requirements.

## **Design Coding and Guidance**

*Question 29 – Should we produce design codes as part of our new local plan?*

Given the increasing emphasis on design from central government it is recommended that design codes should be a consideration by the LPA. These should not however be too prescriptive in detail and should allow for a flexible approach to be adopted. It may be more appropriate for design codes to cover individual areas and sites at a certain scale rather than utilising a borough-wide approach. Design codes for employment B2 and B8 buildings should also reflect occupier requirements and not place inappropriate restrictions which would hinder the successful occupation of the building now or in the future.

## **Land for Housebuilding**

*Question 31. How many homes should we be planning for?*

- (a) Minimum local housing need*
- (b) The HEDNA 2022 need*
- (c) Other (please specify)*

The LPA should ensure that they provide for an ambitious level of growth particularly in light of the fact that the Borough's population growth between 2011 and 2021 was the highest among the local authority districts within the West Midlands. It is not considered appropriate to provide a minimum local housing need but a more ambitious target. The social and economic consequences of not providing a sufficient amount of housing could severely hinder the Council's ability to address housing and affordability issues facing Rugby's communities and could also hinder the Borough's growth aspirations.

*Question 33 Please provide any comments you have on the suitability of any of the broad locations listed above for new housing. Are there any location that we have missed?*

It is considered that insufficient sites have been identified to the north of the Borough and there are opportunities to provide additional locations to support the housing requirements for the Borough and the wider area.

We trust that the information included within this letter will be taken into consideration within the next stages of the Local Plan process and we would like to be kept informed of updates to the plan process.

Yours faithfully