10 December 2024

PLANNING COMMITTEE - 18 December 2024

A meeting of the Planning Committee will be held at 5.30pm on Wednesday 18 December 2024 in the Council Chamber at the Town Hall, Rugby.

Members of the public may view the meeting via the livestream from the Council's website.

Mannie Ketley
Chief Executive

Note: Councillors are reminded that, when declaring interests, they should declare the existence and nature of their interests at the commencement of the meeting (or as soon as the interest becomes apparent). If that interest is a pecuniary interest, the Councillor must withdraw from the room unless one of the exceptions applies.

Membership of Warwickshire County Council or any Parish Council is classed as a non-pecuniary interest under the Code of Conduct. A Councillor does not need to declare this interest unless the Councillor chooses to speak on a matter relating to their membership. If the Councillor does not wish to speak on the matter, the Councillor may still vote on the matter without making a declaration.

A G E N D A

PART 1 – PUBLIC BUSINESS

1. Minutes.

   To confirm the minutes of the meeting held on 4 December 2024.

2. Apologies.

   To receive apologies for absence from the meeting.

3. Declarations of Interest

   To receive declarations of –

   (a) non-pecuniary interests as defined by the Council's Code of Conduct for Councillors;

   (b) pecuniary interests as defined by the Council's Code of Conduct for Councillors; and

   (c) notice under Section 106 Local Government Finance Act 1992 – non-payment of Community Charge or Council Tax.

4. Applications for Consideration.

Membership of the Committee:

Councillors Gillias (Chair), S Edwards, Freeman, Harrington, Howling, Karadiar, Lawrence, Maoudis, Russell, Sandison, Srivastava, Thomas.

If you have any general queries with regard to this agenda please contact Lucy Kirbyshire, Democratic Services Officer by emailing lucy.kirbyshire@rugby.gov.uk. Any specific queries concerning reports should be directed to the listed contact officer.

The Council operates a public speaking procedure at Planning Committee. Details of the procedure, including how to register to speak, can be found on the Council's website (www.rugby.gov.uk/speakingatplanning).

Agenda No 4

Planning Committee – 18 December 2024

Report of the Chief Officer for Growth and Investment

Applications for Consideration

Planning applications for consideration by the Committee are set out as below.

Recommendation

The applications be considered and determined.

APPLICATIONS FOR CONSIDERATION – INDEX

Item	Application Ref Number	Location site and description	Page number
1	R23/1027	Crowner Fields Farm and Home Farm, Hinckley Road (B4065), Ansty, Warwickshire, CV7 9JA – Creation of an employment-led headquarters campus development, composed of head office and distribution/warehouse facilities, concept research and development retail and leisure (including gym, swimming pool, sports hall and associated facilities), ancillary food and beverage and convenience retail, onsite accommodation including a hotel and group accommodation, learning and development academy (including auditorium and training rooms), supplier offices, helipad, landscaping and ecological enhancements, sports pitches, site contouring, earth bunds, drainage, surface and multi-storey car parking, cycle parking, access roads, cycleways and footways, permanent ingress/egress points, utility diversions, ancillary buildings and structures, temporary constriction ingress/egress, associated infrastructure and works, and demolition of existing buildings/structures.	3

Reference: R23/1027

Site Address: Crowner Fields Farm and Home Farm, Hinckley Road (B4065), Ansty, Warwickshire, CV7 9JA

Description: Creation of an employment-led headquarters campus development, composed of head office and distribution/warehouse facilities, concept research and development retail and leisure (including gym, swimming pool, sports hall and associated facilities), ancillary food and beverage and convenience retail, onsite accommodation including a hotel and group accommodation, learning and development academy (including auditorium and training rooms), supplier offices, helipad, landscaping and ecological enhancements, sports pitches, site contouring, earth bunds, drainage, surface and multi-storey car parking, cycle parking, access roads, cycleways and footways, permanent ingress/egress points, utility diversions, ancillary buildings and structures, temporary construction ingress/egress, associated infrastructure and works, and demolition of existing buildings/structures.

Web link: Citizen Portal Planning - application details (agileapplications.co.uk)

Recommendation

1. Planning application R23/1027 be approved subject to:

   a. Referral to the Planning Casework Unit

   b. the conditions and informatives set out in the draft decision notice appended to this report; and

   c. the completion of a legal agreement to secure the necessary financial contributions and/or planning obligations.

2. The Chief Officer for Growth and Investment be given delegated authority to make minor amendments to the conditions and informatives outlined in the draft decision notice.

3. The Chief Officer for Growth and Investment (in consultation with the Planning Committee Chair) be given delegated authority to add, vary or remove any of the financial contributions and/or planning obligations outlined in the heads of terms within this report.

4. In the event that the National Planning Policy Framework (NPPF) (2023) is updated between the resolution to grant and the issuing of the decision notice, the Chief Officer for Growth and Investment be given delegated authority to:
   a) consider whether those changes to the NPPF are sufficiently significant that it would change the recommendation within the report; and/or
   b) make any minor amendment to the conditions, informatives and/or planning obligations (including financial contributions) that they deem are necessary to reflect the updated NPPF or whether the application requires reporting back to Planning Committee.

1. Introduction

1.1. This application is being reported to Planning Committee for determination because the proposed development falls within the definition of major development, is a departure from the Development Plan and 15 or more letters of objection have been received.

1.2. The development proposed is considered to be an Environmental Impact Assessment (EIA) development and as such, in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 is accompanied by an Environmental Statement (ES). The ES provides an overview of the environmental impact of the proposals with a summary of mitigation measures proposed and contains a methodology for assessing the significance of the environmental effects and the cumulative impact. A series of technical papers (appendices to the ES) consider the range of environmental factors. The topics considered as part of the ES as agreed within the scoping opinion and as addressed within the relevant sections of this report are:

- Site and Setting
- EIA Methodology
- Alternatives
- Description of Development
- Construction
- Socio-Economics
- Cultural Heritage
- Water Resources and Flood Risk
- Ecology
- Agricultural Land and Soils
- Waste & Materials
- Landscape and Visual Impact
- Transport and Access
- Noise and Vibration
- Air Quality
- Climate Change and Greenhouse Gases
- Light Pollution
- Effect Interactions

2. Description of site

2.1. The application site is located approximately 100m to the south-west of the village of Ansty and approximately 6.7km to the north-east of Coventry City centre. It is situated entirely within the West Midlands Greenbelt and within the administrative area of Rugby Borough Council.

2.2. The site covers an area of 112.9 hectares and is bounded to the south by the M6 Motorway. The M69 runs adjacent to the site's western boundary for a distance of 480 metres and two B class roads frame the remainder of the site; the B4065 Hinckley Road to the northwest, which connects the M6 junction 2 to Ansty and Wolvey and B4029 to the northeast and southeast. The northern boundary is defined by agricultural fields and a section of the Oxford Canal. The site is located within the ‘Golden Triangle’ for logistics and distribution businesses, thus named for the benefits this defined area affords in terms of access to the strategic road network.

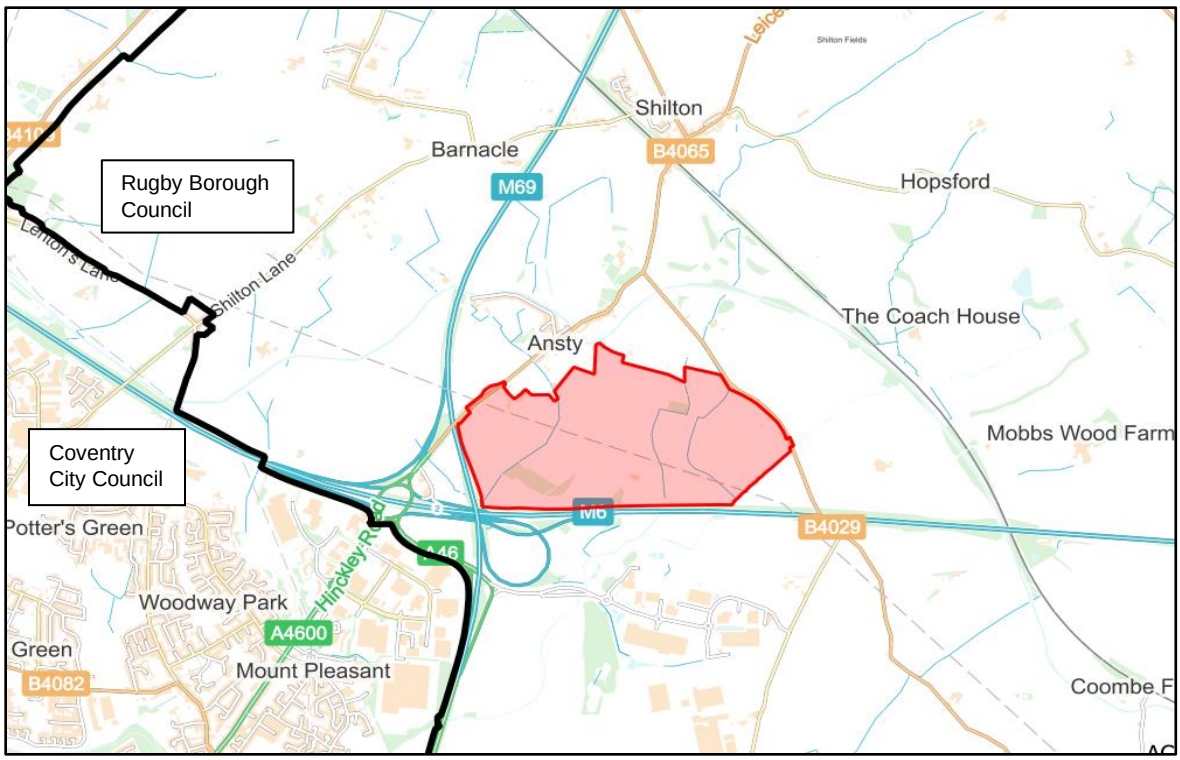


Figure 1: Site Location

2.3. The site is predominantly arable farmland with Crowner Fields Farm located centrally to the south and Home Farm at the northwest boundary. There are three public rights of way that cross the site:

- Footpath route 104/R31/1 routed between the M6 footbridge and the B4029 in a northeast to southwest orientation.
- Footpath route 104/R31a/1 routed between the M6 footbridge and the Oxford Canal in a north to south orientation.
- Footpath route 104/R31b/1 routed between the Oxford Canal and the B4029 in an east to west orientation, along the northern boundary of a Local Wildlife Site.

2.4. The site includes two areas of woodland and contains mature hedges along field boundaries. Some mature trees are found within hedgerows and others are located within the fields. To the north of the site and within the red line boundary is a Local Wildlife Site, 'Home Farm Grasslands'.

2.5. Two water courses sit within the redline boundary of the site and one wet ditch. A statutory main river runs along the southeast site boundary, whilst the northern site boundary abuts the Oxford Canal.

2.6. There are two existing vehicular access points to the site, Hinckley Road in the northwest and one farm access gate from the B4029 to the east.

2.7. The topography of the site is one of a gently rolling landscape. The site slopes from its highest point at approximately 89m above ordnance datum (AOD) to 80m AOD, giving a

9m level change across the site. The highest points are the northwestern, northern and northeastern edges, the lowest is at the southeast corner.

2.8. An existing overhead electricity line runs through the site from northwest to southwest with five large pylons crossing the site. In addition, there is a large telecommunications mast to the western edge of the site close to the crossing of Hinckley Road and the M69.

3. Description of proposals

3.1. This is a full application which seeks consent for a campus headquarters for Frasers Group. Frasers Group's primary headquarters are currently located in Shirebrook in Derbyshire with warehousing and other company facilities scattered throughout the country. This proposal seeks to relocate the headquarters and to condense the warehouse operation into one location. The 112.9 hectare site will be arranged with a 'campus heart' at the centre of the site which will include the office headquarters, concept retail research & development (R & D), leisure R&D, development and learning academy, hotel, mobility hub, convenience retail and food and beverage uses. To the northwest of this, the group accommodation is proposed, and to the south of the site from west to east five logistics buildings with associated offices and parking are proposed. A number of ancillary structures will support utilities and security for the site.

3.2. The proposed main access to the site would be from Hinckley Road where a new roundabout is proposed with a secondary access from B4029. The current footpaths across the site would be retained however the north-south footpath (104/R31a/1) and M6 bride eastern footpath (104/R31a/1) are both proposed to be realigned to facilitate the development. Additional secondary footpaths are proposed across the site and would be maintained for public use however would not be formally classed as definitive footpaths. The active travel link proposed to the south of the site from the M6 footbridge to Central Boulevard would be a footpath and cycleway. Upgrades to the existing walking and cycling infrastructure are proposed from the site entrance east into Ansty and West to the M6 Junction 2 roundabout and into Coventry. Upgrades are also proposed to the Oxford canal towpath between the site and Grove Road, Ansty.

3.3. The proposals also include the demolition of existing structures/buildings on the site, three 5v5 3G sports pitches, utility diversions for the power lines which currently dissect the site, temporary construction ingress/egress points and associated infrastructure and works.

3.4. In July 2024, the application was updated to include the provision of a children's day care nursery on the site which is proposed to be located in the campus heart adjacent to the retail R&D.

3.5. The proposed schedule of accommodation is set out below (breakdown of area uses included):

Building/Use	Breakdown (if required)	Gross Internal Area (sqm)
Office Headquarters and Supplier Hub		**17,911 m²**
Concept Retail Research & Development (R&D)	(not including Food & Beverage, Convenience or Nursery floorspace)	**20,755 m²**

Nursery	Not inclusive of 105 m² external play space	**547 m²**
Learning and Development (L&D)	Auditorium (750 seats)	823 m²
	Services/Back of House/Plant	591 m²
	Training Rooms (10)	1,223 m²
	Cafe/Foyer	541 m²
L&D Total		**3,179 m²**
Hotel	100 Rooms	**4,311 m²**
Food and Beverage		**592 m²**
Concept Leisure R & D	Gym	1,893 m²
	Studios	388 m²
	Swimming Pool 25m x 13m (6 lane)	585 m²
	Flexible Fitness Studio/Sports Hall (34.5 x 21.3m - 4 padel courts)	824 m²
	Services/Back of House/Plant	709 m²
	Changing Rooms (wet & dry)	653 m²
Concept Leisure R & D Total		**5,054 m²**
Mobility Hub		**190 m²**
Convenience Retail		**369 m²**
Group Accommodation	80 units and shared common room space	**2,309 m²**
Logistics Buildings	Logistics Building 1	100,382 m²
	Logistics Building 2	53,890 m²
	Logistics Building 3	23,228 m²
	Logistics Building 4	23,264 m²
	Logistics Building 5	50,180 m²
Logistics' Buildings Total		**250,944 m²**
	Logistics Building 1 Office	11,953 m²
	Logistics Building 2 Office	4,125 m²
	Logistics Building 3 Office	1,743 m²
	Logistics Building 4 Office	1,747 m²
	Logistics Building 5 Office	3,876 m²
Logistics' Buildings Offices Total		**23,444 m²**
Service/Back of House/Plant Buildings	Including Vehicle Maintenance Unit & gatehouses	**943 m²**
Multi Storey Car Parks (MSCP)	MSCP HQ	16,568 m²
	MSCP East	20,526 m²
	MSCP West	16,333 m²
	MSCP Concept Retail R & D	11,881 m²

Multi Storey Car Parks Total		**65,344 m²**
TOTAL		**395,856 m²**

4. Planning History

4.1. **R22/0925** - Environmental Impact Assessment Scoping Request to assess the likely effects of an employment-led development for the creation of a sui-generis 'campus' headquarters facility, composed of head office and distribution/warehouse facilities, concept retail Research & Development (R&D), accommodation onsite including a hotel and halls of residence, supplier offices as well as sporting and recreation facilities, a helipad, landscaping and ecological enhancements and associated infrastructure and works – EIA Scoping Opinion issued 7th October 2022.

5. Relevant Planning Policies

5.1. As required by Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposed development must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.2. The Statutory Development Plan for the area relevant to this application site comprises of the Rugby Borough Local Plan 2011-2031. The relevant policies are outlined below.

Rugby Borough Local Plan 2011-2031, June 2019

- Policy GP1: Securing Sustainable Development
- Policy GP2: Settlement Hierarchy
- Policy DS1: Overall Development Needs
- Policy ED3: Employment Development outside Rugby Urban Area
- Policy ED4: The Wider Urban and Rural Economy
- Policy TC2: Rugby Town Centre – New Retail and Town Centre Uses
- Policy HS1: Healthy, Safe and Inclusive Communities
- Policy HS2: Health Impact Assessments
- Policy HS4: Open Space, sports Facilities and Recreation
- Policy HS5: Traffic Generation, Air Quality, Noise and Vibration
- Policy NE1: Protecting Designated Biodiversity and Geodiversity Assets
- Policy NE2: Strategic Green and Blue Infrastructure
- Policy NE3: Landscape Protection and Enhancement
- Policy SDC1: Sustainable Design
- Policy SDC2: Landscaping
- Policy SDC3: Protecting and Enhancing the Historic Environment
- Policy SDC4: Sustainable Buildings
- Policy SDC5: Flood Risk Management
- Policy SDC6: Sustainable Drainage
- Policy SDC7: Protection of the Water Environment and Water Supply
- Policy SDC8: Supporting the Provision of Renewable Energy and Low Carbon Technology
- Policy SDC9: Broadband and Mobile Internet
- Policy D1: Transport
- Policy D2: Parking Facilities

- Policy D3: Infrastructure and Implementation
- Policy D4: Planning Obligations

Supplementary Planning Documents

- Planning Obligations SPD (2012)
- Climate Change, Sustainable Design and Construction SPD (2023)
- Air Quality SPD (2021)
- Shop Fronts Design Guide SPD (2024)

National Planning Policies and Guidance

- National Planning Policy Framework (NPPF)(2023)
- Planning Practice Guidance (PPG)
- National Design Guide (2019)
- Ministerial statement – Building the homes we need – 30th July 2024
- Proposed reforms to the National Planning Policy Framework and other changes to the planning system - NPPF Consultation – 30th July 2024 to 24th September 2024

Other relevant guidance/documents

- Employment Land Study (2015)
- Housing and Economic Needs and Distribution Assessment (2022) (HEDNA)
- Retail and Town Centre Uses Study (2015)
- West Midlands Strategic Employment Sites Study 2023/24 (July 2024) (WMSESS)
- Green Infrastructure Study 2009
- Coventry and Warwickshire joint Green Belt Review (2015)
- Landscape Assessment (2006)
- Landscape Sensitivity Study (2016)
- Open Space, Play Pitch and Built Facilities Study (2015)
- Warwickshire Minerals Local Plan (2022)
- Warwickshire Waste Core Strategy (2013)
- Playing Pitch & Outdoor Sport Strategy (2023)
- Warwickshire County Council Place-Based Needs Assessment – Rugby Rural North – Warwickshire Joint Strategic Needs Assessment (March 2020)
- Coventry & Warwickshire HEDNA – WMSESS Alignment Paper

6. Technical consultation responses

6.1. An initial consultation was carried out for 30 days on the 20th November 2023. Two further re-consultations were carried out for 30 days from 8th July 2024 and 31st July 2024 based on additional information being submitted. Further consultation with associated highway and flood risk/drainage authorities was also undertaken. The below technical consultation summary provides the final position of all consultees at the publication date of this report. Where required this report will state the detail of any previous comments from technical consultees made throughout the application timeline.

6.2. The following consultees have no objections, some subject to conditions, on the application:

- Canal and River Trust
- Cadent Gas
- Forestry Commission England
- Historic England

- Health and Safety Executive (HSE)
- Invest in Warwickshire (WCC Business, Economy & Skills Group)
- National Gas Asset Protection Team
- NATS Safeguarding
- Natural England
- Nuneaton and Bedworth Council
- RBC Environmental Health
- RBC Sports and Recreation
- RBC Tree Officer
- RBC Works Services Unit
- Warwickshire Fire & Rescue Service
- Warwickshire Fire & Rescue Service Water Officer
- Warwickshire Police
- WCC Minerals and Waste
- WCC Planning and Infrastructure Team
- WCC Ecology
- Severn Trent Water
- RBC Economic Development
- WCC Local Lead Flood Authority

6.3. Objections have been received from the following consultees:

- Coventry City Council Planning
- Coventry City Council Highways
- Campaign to Protect Rural England (CPRE)
- Ramblers Warwickshire
- WCC Archaeology
- Sports England
- Environment Agency
- Transport for West Midlands
- WCC Rights of Way
- Active Travel England
- WCC Highways
- National Highways recommend deferral further information required.

6.4. No response was received from the following consultees:

- RBC Parks and Cemeteries
- NHS Clinical Commissioning Group
- Western Power Distribution
- Coventry City Council Environmental Health
- Inland Waterways Association (Warwickshire)
- Inland Waterways Lichfield
- Coventry Airport
- Warwickshire Wildlife Trust
- The Woodland Trust
- Stagecoach
- DEFRA
- Coventry and Warwickshire Chamber of Commerce
- Coventry City Council Economic Development

6.5. The Parish Councils of Ansty, Brinklow, Combe Fields, Wolvey, Pailton, Monks Kirby, Stretton under Fosse and Shilton & Barnacle, have objected, and their comments are summarised below:

- Inappropriate development in the Green Belt.
- Harmful visual impact caused by numerous large buildings and the overall size of the site.
- The bridge over the canal in Ansty is not wide enough for HGVs.
- No current employment requirement in Warwickshire.
- Jobs will be filled by existing staff moving from the current site.
- Local infrastructure will not be able to support the development and volume of additional traffic. The impact form cumulative impacts on the road network would be severe. All of the proposed uses within the site will generate a high volume of traffic.
- Traffic in the rural area will also be impacted by other developments such as the Hinckley Rail Hub.
- The development and associated extra vehicle movements would place intolerable additional pressure on already congested local roads and motorways.
- The creation of jobs in an area of near full employment where local job vacancies for similar sectors are widely unfilled will increase the competition for labour within that sector and also other sectors.
- The environmental impact of the creation and operation of such a large new facility on green belt land does not demonstrate the "very special circumstances" required by green belt policy.
- The construction costs in terms of Carbon (including that emitted through manufacture of concrete and steel in particular) will be enormous as compared with organic growth of existing sites and brown field alternatives.
- Much is made by the developers of the claim that there are no alternative sites. This is disputed.
- The development contradicts the government's policy of levelling up.
- Significant harm and impact upon the environment during construction and ongoing throughout its operation.
- The proposal will have an enormous detrimental effect on the local parish at Ansty as well as on the surrounding parishes.
- To develop this site for a major business enterprise is seeking to meet the economic objective of the NPPF but it does so whilst causing severe harm to the social and environmental objectives and is therefore harmful to the local character of rural countryside which is also protected by being designated green belt.
- Brinklow neighbourhood plan aims to improve road traffic, pedestrian and cyclist safety and to pursue traffic calming and reduction in traffic measures. The development presents harm to these aims.
- The environmental impact would be huge. Loss of countryside, agriculture, public footpaths, visual impact upon a rural setting.
- The development will bring a high intensity of light pollution to existing countryside that currently has a reasonable level of dark sky.
- It will have a detrimental effect on air quality over and above the current environment.
- The development does not accord with Local Plan Policies;
    - the development would not reduce the carbon footprint nor enhance the area; The site is not in a sustainable location and there are no safe solutions for pedestrians or cyclists to travel to and from the site.

- This site is not allocated in the local plan, nor does it meet the criteria for small scale exceptions as set out in policy ED3;
- The proposals would be contrary to Policy HS5 Traffic generation and air quality, noise and vibration;
- The scale of the buildings and infrastructure required to develop the site will be harmful to the biodiversity and have a harmful impact on local wildlife and other ecological habitats and contrary to policy NE1;
- a development of this size, scale and intensity would detract from the landscape and countryside character and not contribute to it in any positive way contrary to Policy NE3
- the development is of such a vast scale that it would be seen as an urban extension to Coventry.
- The proposal falls outside the definitions and measures advised by policy D1 and therefore is contrary to the policy.
- The site lies within the Princethorpe Biodiversity Opportunity Expansion Area which aims to protect corridors for the movement of wildlife and protection of flora and fauna. These areas are described in Policy NE2. New developments must provide suitable green and blue infrastructure corridors that link to adjacent corridors. The development will not protect or enhance the existing landscape and biodiversity features but will destroy those features to the detriment of the countryside.

7. Publicity/Third party comments

7.1. The application has been publicised by sending out letters to local residents. Five site notices were also posted within the vicinity of the site and a notice was displayed in the local press.

7.2. Throughout the lifetime of the application, 191 letters of objection from 124 addresses have been received. The concerns raised are as follows:

<u>Greenbelt</u>

- Loss of Geen Belt Land and harmful impact.
- Green Belt is protected and damage to the Geen Belt is irreversible
- Building on the Green Belt is not in accordance with national or local planning policies.
- No very special circumstances to allow the development.
- The Green Belt between Ansty Village and Ansty Business Park is a buffer of utmost importance.
- The approval of the application will set a precedent for other Green Belt development to be allowed.
- Rishi Sunak pledged that he won't concrete over the countryside.
- The application goes against the government's own aim to prevent urban sprawl by keeping land permanently open around urban areas.
- Alternative Brownfield sites have not been considered.
- The Green Belt is being completely ignored.
- The Green Belt land currently contains farming livestock, so I cannot see how this could be considered grey, or any other colour, and therefore is against the current planning regulations.
- The Green Belt is being destroyed for the expedience of private business interests.

Traffic and Highways

- The increase to traffic will be significant and increase vehicle movements through Ansty and local villages creating significant harm for residents.
- There will be Lorries passing close to windows at all hours and houses shake with excess traffic.
- Will negatively impact road safety
- The existing road infrastructure will not cope with the additional traffic.
- The wear and tear will lead to higher maintenance need for village roads and bridges.
- The site will create 127 HGV movements per day which will cause a high impact on the levels of traffic within Ansty.
- There is insufficient parking on site for the number of employees
- Traffic related stress affecting well-being of village residents
- HGV'S travelling towards Coventry, wing mirrors overhang the foot path making it dangerous for pedestrians
- If the development did go ahead, they would need a dedicated access off one of the motorways or a Major reconstruction of the M6 junction
- Pulling out of Grove Road onto the main road currently is very dangerous even with the traffic lights there. You cannot see up the road by the bridge to judge when to pull out.
- An extra island will be built on Hinckley Road (B4065) to allow traffic into the site. The creation of an island in our village would not address traffic problems and will be dangerous.
- There will be no difference to model shift - no evidence has been provided.
- The site offers nothing by way of sustainable travel options for Rugby residents.
- The developer has already stated their intention to further develop the site in the future. Further development will only increase the pressures on the road network in this part of Warwickshire.
- As you enter Shilton from Coventry a bend in the road creates poor visibility and cars do not observe the speed limit, meaning any time you cross you are taking your life in your hands.
- Increased air pollution due to increased traffic.
- The increase in traffic, together with the noise air and pollution that goes with it is an objection in itself and a contravention of article 24 of The Human Rights Act 1998 in respect everyone has the right to rest and leisure.
- Unrealistic to think people will use public transport/buses
- The canal bridge has been half closed for years now and it is only a matter of time before the side that is still open crumbles away under the terrific strain of taking all the cars and trucks it is having to cope with.
- Although WCC have tried to control traffic between M6 and Magna Park A5 for years they have been unsuccessful
- Residents were assured that all heavy traffic leaving the site would only be permitted to turn left to the M6/M69. However, the proposal shows a roundabout at the exit – what is to stop vehicles turning right through the villages (a short cut) instead of left?
- The development would bring the traffic to a standstill and blight our community. The DPD and Amazon depots have seen an increase in commuter traffic which normally starts at 5am in the morning.
- The proposed main entrance to the site involves introducing a new roundabout as you enter Ansty village, this will cause congestion and traffic pollution in this area.
- Increased traffic affecting delivery of goods and services to the village

- People working at the development will not all be driving ecofriendly vehicles.
- I can't believe Frasers will want their drivers to sit in stationery traffic at either end of their journeys.
- Large Lorries are now using main road through the village as a route to Ansty Business Park
- There are no footpaths for the majority of Top Road in Barnacle, a cut through used by many drivers travelling to Shilton and Ansty. Safety of pedestrians will be put at risk.
- Current pavement infrastructure is inadequate given the already high volumes of traffic the village experiences with the B4065 being used as a "cut through" to Bulkington, Nuneaton, Rugby and so on.

Local Plan and Policy related

- Not allocated in the Local Plan
- People make decisions on their future based on local plans
- The Local Plan and planning rules should apply equally to all
- The development is contrary to the government's levelling-up policy
- Contravenes local & national policies
- Not sustainable development as outlined in policy
- Policies are out of date
- The application opens up an extremely dangerous precedent threatening any future protection of Warwickshire countryside.
- The Government keep saying more land is needed for HOUSING not developments of this kind.
- The Warwickshire Structure Plan, states that 'It is important that developments in rural settlements are genuinely meeting a local housing/ employment need and are seen to have the expressed support of the local community'.

Impact on Ansty Village and surrounding area

- Ansty and the surrounding villages will be overwhelmed and swamped. Ansty village is a small village within the civil parish of Rugby. Ansty has a long history and was listed in the Doomsday book.
- Harmful impact on Ansty village and community spirit, as well as local communities.
- No tourism benefit to Ansty Village
- Loss of Privacy to the villagers of Ansty
- People have moved to the village for peace and quiet
- Crowner lane has been used as public footpath for over 35 years and should remain accessible to the people and public. It is used most days.
- The development proximity to the village and the local park will endanger children accessing the park.
- Village residents are relying on RBC to support them and their wellbeing
- Harmful impact of the health of local residents.
- Will create a lot of industrial noise and industrial smells in what is currently a small residential village.
- Ansty will no longer be the country village that it is known to all. The cumulative impacts form this and Ansty Park will be a complete wipe out of our village.
- The Ansty development on the Rolls Royce site is huge. We have enough disruption already from this.

- The M6 has always signified a dividing line between urban and rural and now the village of Ansty risks being swamped by this development merging the two.

Design comments

- The considerable size of the development dwarfs anything around it. It presents a visually polluting prospect and changes the local character of the area.
- It will merge with Magna Park and Hinckley A5 development
- Helipad is unnecessary and noisy
- Will affect Public Right of Way, a conservation area and a listed building
- Don't need another gym, swimming pool and conference centre
- There is no need for an additional hotel, as there are of 6 hotels within 5 miles of Ansty village.
- Great Britain is admired for its beautiful countryside, but this is being destroyed by development of distribution hubs where metal buildings dominate the skyline.
- Unsustainable location
- As I understand it the proposal includes a helipad. Only a few miles down the road is Coventry airport. A helicopter on approach is a disruptively noisy machine and is unacceptable noise pollution.
- Just calling it a Campus is disingenuous, as it is mainly warehouses
- This development cannot be integrated into the area as stated by the Frasers Group but will completely dominate the skyline and alter the very rural nature of Ansty and Shilton.
- Use of the phrase 'Where possible' by the developer. Where possible is simply a get out clause to allow developers to do what they want once planning is obtained.
- No mention of any security measures being employed to mitigate the increase in crime and anti-social behaviour (ASB).
- The design will damage all aspects of the landscape and be unsightly.

Drainage infrastructure

- Sewage infrastructure not able to cope
- Drainage problems arising from the extent of the built form
- Impact on surface water drainage arising from increased built form with a potential to cause flooding.
- There is a problem with flooding in Ansty. Houses are flooded on a regular basis Building on the greenfield site will exasperate this issue.
- Underground service pipes undoubtedly under constant strain, development will create further problems
- The canal bridge carries sewage pipes in a cradle attached to the side. More than one occasion has traffic damage to the bridge caused the pipes to leak. Mains water pipes running across the bridge also regularly burst, extra traffic especially large delivery lorries and construction vehicles are bound to weaken it and make this kind of event more frequent.
- The rainwater run-off from the buildings and vast expanses of paved/tarmacked ground would not be mitigated by the token green spaces illustrated on the plans. In all likelihood they would be deluged during heavy rains leading to an increased likelihood of Ansty suffering significant flooding, tree/wildflower planting failing and even landslip/subsidence especially given that the Frasers Group intend to excavate into a slope in the building process to "lessen" the visual impact of the development.

Impact on landscape and wildlife comments

- The Frasers Group website claims the campus will be landscape-led. This seems rather hollow, when you are proposing to rip out the landscape
- Damage to rural landscape and countryside
- Loss of green space
- Eyesore on the Landscape and natural beauty and history of the area.
- Allowing the “development” of this land is just another nail in the coffin of Britain’s already threatened wildlife and is irreversible
- This is a huge area of prime farmland, and this development would also contravene the protection of such land for much needed farming and to maintain the existence of our wonderful wildlife habitation. This concern has recently been raised by Steve Reed, Secretary of State for the Environment, Food and Rural Affairs, who stated at the end of July 'Nature is dying' and that the Government plans to develop a new statutory plan to protect & restore our natural environment.

Environmental related comments

- Increased air pollution from increased traffic
- Increased noise and light pollution, and unpleasant smell.
- Due the nature of the scheme there will ongoing and constant noise at most times of the day
- During construction the local area will be overwhelmed by heavy machinery removing spoil and delivery of materials.
- Health Impact Statement acknowledges potential for noise and vibration effects from changes in traffic volumes and noise once the development is operational. Academic studies cite the negative health impact of such noise on humans and wildlife.
- The residents of Ansty use this Greenland to walk, exercise and enjoy the open air. It’s good for their mental and physical health. People live in a village to be in the countryside not to be penned in by warehousing, juggernauts, noise and pollution 24/7 52 weeks a year.
- The construction costs in terms of Carbon emission (including that emitted through manufacture of concrete and steel in particular) will be enormous as compared with organic growth of existing sites and brown field alternatives.
- Do not need economic growth at the expense of our environment, air quality and future health
- The proposed 24-hour warehousing operations, frequent HGV movements, and the addition of a helipad signify a looming threat of immense noise, disturbance, and round-the-clock light pollution which are all adverse effects on quality of life for residents.
- The Site lies within the Combe Pool SSSI impact risk zone for developments which include helipads which are a part of this proposal. Therefore, the incidence of bird strike and increased disturbance to the qualifying features of the SSSI needs to be closely considered.
- The Frasers Group falsely claims that the sites within their planned development area are of little to no ecological value, but this is clearly incorrect when considering the process of determining the lands status as a LWSs and given that the ecological surveys were conducted in the wrong season! A site this large and containing multiple LWS should have been surveyed multiple times across seasons to gain an accurate picture of its ecological state.

Jobs, Employment and benefit

- No Employment need - application exceeds local targets. Rugby area has as a percentage, 85.9% of economically active persons aged 16-64 which is above the national average. Coventry has a percentage of 75.9%, which is still above the national average of 73.2%.
- No benefit to local communities, the only benefit is to Frasers Group
- Employment numbers aren't as good as they seem as some employees will travel from current Frasers Group sites
- Rugby has adequate employment, so the jobs created are not for local people
- There are already unskilled jobs with local company's struggling to get people to work
- The employment requirements would be better suited to the current Frasers HQ location rather than Rugby or Coventry
- Other designated employment sites are better for development
- We already have 2 industrial estates in Ansty - Ansty Park and Ansty Technology Park (Rolls Royce) we don't need or want a third.
- Large businesses are more likely to get approval without regard for local residents
- Frasers Group think they are bigger than the local community and don't care about the local community
- There has been a large Gateway development on J24 on the M1 why didn't they go there?
- Provides absolutely no economic benefits to the village of Ansty and the surrounding area. The only economic benefit appears to be for the outside commercial interests who want to build this monstrosity.
- Most of the employment would be in lorry driving.
- Fraser campus will generate are likely to be low-wage, low-skilled, temporary, with high staff turnover and low job security
- This area doesn't need additional job creation, as the job market tension is high. It will become a threat for established businesses, as it will create even more tension on the job market.
- There will be a negative impact to local business. For this site to prosper then there will be a pull from regular local businesses to these new ones.
- How many of these jobs will actually be for robots which is seen as the future for warehousing? The employment figures for Warwickshire show 85% employed and highly skilled.
- The lease on the current HQ for the Frasers group has more than 10 years left, so they have time to explore other sites and leave our village and beautiful green belt well alone.
- The area, particularly along the A5, has multiple warehouses and distribution centres. Whilst retail in our towns and cities is struggling. We should be helping defuse this situation, not building more outlets in the countryside.
- RBC have fulfilled their commercial property allocation set out in their local plan therefore this development is not one of compulsion but of choice.

Canal Bridge related comments

- The new entrances on site will add more disruption and disturbance in traffic to a temporary traffic lights situation, on the bridge which has been ongoing for the past 3 years and no sign of being resolved.
- The bridge over the canal has been partially closed for over 2 years as it cannot cope with the weight of vehicles.

Other comments

- Why don't they expand the existing Shirebrook site
- Potential impact from more future development on the site
- Housing development will follow
- The residents in this area already have to tolerate rubbish being dumped on a regular basis (Barnacle) and Travellers who do not respect planning regulations, and this is going to top it off.
- Devaluation of local land and property to surrounding areas
- Loss of view and open aspect from garden.
- This application is to provide warehousing to house products that will ultimately end up in landfill
- These proposals alone are causing me so much stress and anxiety. I have recently been to the doctors with various stress reactions.
- The sale of our properties will be difficult with this monstrosity looming around us.
- Ansty is near to Coventry, a big City, so if there is need for development, why not do this on the Coventry side, where there is an established road network etc
- Nothing more than a scheme to further line the pockets of millionaires who already have more money than can be spent in their lifetime.
- Frasers Group have an appalling track record vis-a-vis staff welfare. Their owner's mantra of profit at any cost is abhorrent to me.
- The various undercover documentaries filmed at their former warehouse distribution centre in Shirebrook show this business to be unethical, unsafe and immoral. This business would bring absolutely no benefit to what is already a thriving area of the Midlands, quite the contrary.
- We have turned into a nation of warehouses and distribution centres. We need to protect our small island, the inhabitants, human and animal. Passing these plans would be immoral.

7.3. One letter of support was received from one address relating to economic prosperity and increase in jobs.

7.4. Ward Councillors were notified, and 1 objection was received for the following reasons:

- Inappropriate development in the Green Belt, a brownfield site should be used
- A large warehousing development has been dressed up as a campus to circumnavigate the planning system.
- There are no special circumstances
- The jobs are not new jobs, existing staff will move from the current site.
- Increased pressure on the highway network
- Ansty village will be swamped with air, light and noise pollution
- The automation of some of the warehousing raises questions in regard to the number of jobs available.

8. Assessment of proposals

8.1. The key issues to assess in the determination of this application, which will feed into the planning balance, are as follows:

- Assessment against strategic planning policies
- Settlement Hierarchy and Green Belt
- Integrated campus
- Alternative sites

- Principle of Employment development
- Principle of Main Town Centre Uses
- Need for Sport Pitches
- Learning and Development Academy
- Group Accommodation
- Need for Development
- Agricultural Land and Soil Resources
- Economic, Social and Community Benefits
- Design
- Landscape and Visual Impact
- Trees, Hedgerows, Green Infrastructure & Landscape Strategy
- Ecology
- Traffic Flows, Highway Safety and Parking Provision
- Public Rights of Way and Public Access
- Flood Risk and Drainage
- Water Resources
- Heritage
- Archaeology
- Air Quality
- Noise and Vibration
- Contamination
- Lighting
- Residential Amenity
- Climate Change, Carbon Emissions, Energy, Sustainable Design and Construction
- Health
- Fire Safety
- Mineral Safeguarding, Waste and Materials
- Broadband
- Utilities
- Community Infrastructure Levy
- Planning Obligations
- Other Matters

9. Assessment Against Strategic Planning Policies

9.1. Paragraph 2 of the National Planning Policy Framework (NPPF) (December 2023) states that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise and that the NPPF is a material consideration in determining applications. Paragraph 12 of the NPPF confirms that the presumption in favour of sustainable development does not change the statutory status of the Development Plan as the starting point for decision-making.

9.2. Local plan and policy related objections have been received as set out in section 7.3 of this report.

9.3. Paragraph 11 of the National Planning Policy Framework (NPPF) and Policy GP1 of the Local Plan (LP) set out a presumption in favour of sustainable development, and state that development proposals that accord with the development plan should be approved unless other material considerations indicate otherwise. The development plan in this instance consists of the adopted Local Plan (2019).

9.4. The Local Plan (2019) sets out the spatial vision for the borough and Policy DS1 sets out the overall development needs, including the need for employment. Policy GP2 of the Local Plan sets out the settlement hierarchy in order to deliver the spatial strategy. The Local Plan identifies and provides allocations for employment and other development within the context of the settlement hierarchy.

9.5. Policy GP2 of the Local Plan states that development will be allocated and supported in accordance with the settlement hierarchy whereas Policy GP1 of the Local Plan states that the Council will take a positive approach that reflects the presumption in favour of sustainable development and seek to secure development that improves the economic, social and environmental conditions in the area. The application site is located within the Green Belt as defined by Policy GP2 of the Local Plan. As such only development which accords with National Planning Policy is permitted.

Location Sustainability

9.6. Whilst the development is within the Green Belt and the principle of development in this location will be assessed in various sections of this report it is important to assess the sustainability of the site as a whole.

9.7. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

9.8. The application is located at the junction of the M6, M69 and A46 which are part of the Strategic Road Network. Therefore, whilst it is a considerable distance from Rugby (the main town in the Borough) it is adjacent to the boundary of the city of Coventry. It is also in close proximity to Ansty Business Park which currently has sustainable transport links to Coventry and the surrounding area. The type of development proposed is considered to be in a sustainable location, such that it would offer a genuine choice of transport modes.

The Presumption in Favour of Sustainable Development

9.9. The Local Plan is now more than 5 years old, and paragraph 33 of the NPPF states that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should be updated as necessary. The Local Plan review is underway however, this report sets out the relevant Local Plan policies and notes any NPPF inconsistencies between them or any other material consideration which could render a policy out of date.

9.10. Paragraph 225 of the Framework states that existing policies should not be considered out-of-date simply because they were adopted prior to the publication of the Framework. Due weight should be given to them according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). Furthermore, it is recognised by the courts that out-of-date

policies can still be given some weight, particularly where their overall strategic aims might be designed to operate on a longer time scale than a particular plan period.

9.11. The application site is within the Green Belt, which is an NPPF footnote 7 policy consideration. The conclusion on the tilted balance and if the presumption in favour of sustainable development is engaged will be concluded within the planning balance.

National Planning Policy and Statements

9.12. The proposed reforms to the NPPF were publicly consulted on 30th July 2024 – 24th September 2024 and are a material consideration for this application. However, as the scope of change from the consultation version to a future new published version is unknown, this limits the weight that can be accorded to this document.

9.13. The 'Building the homes we need' ministerial statement published 30 July 2024 is clear that 'sustained economic growth is the only route to improving the prosperity of our country'. This statement also referenced the need for authorities to review their Green Belt boundaries where they cannot meet their identified housing, commercial or other development needs. The ministerial statement reflects the NPPF consultation stating that there will be a sequential approach to Green Belt release, with brownfield land being top of the list followed by 'grey belt' sites and then to higher performing Green Belt land. It is stated that any Green Belt release must benefit both communities and nature. The ministerial statement sets out the direction of travel for planning policy however it is considered that the NPPF and the ministerial statement ought to only be afforded limited weight at this stage given they are not current policy and the former has only been consulted upon and thus could change. An assessment relating to grey belt will be referenced within section 10 of this report. It is ultimately concluded that whether the scheme is considered pursuant to the current or consultation versions of the NPPF, there would be no difference in the ultimate recommendation in this instance. Accordingly, were the NPPF to be updated following the consideration of this application, provided it is materially aligned in respect to the consultation version of the NPPF, officers would not consider this triggers a need to bring this matter back to the committee. Officers will reach a planning judgment if this does occur as to whether any changes to a new NPPF are material to this application. In accepting this recommendation for approval, officers take it as affirmed that members agree that provided officers are satisfied there is no material difference with any new NPPF to the application, the delegated authority to the Chief Officer for Growth and Investment to grant permission remains, despite a new iteration of the NPPF and or associated PPG.

10. Settlement Hierarchy and Green Belt

Settlement Hierarchy

10.1. Policy GP2 of the Local Plan outlines a sequential settlement hierarchy which seeks to ensure that development is directed to the most sustainable locations within the Borough. In this case the application site is located within the West Midlands Green Belt which is classified as being the least sequentially preferable location for development. The policy consequently sets out that development will be resisted in such areas unless permitted by national policy on Green Belts.

West Midlands Green Belt

10.2. Local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955. The Green Belt was not formally approved by the Secretary of State until 1975. Today the Green Belt covers approximately 231,290ha, surrounding the Black Country, Coventry, Birmingham and Solihull.

10.3. Rugby has 20,590ha of Green Belt land, representing 58.2% of the Borough's total area. At 112.5ha, the application site forms 0.55% of Rugby's Green Belt.

National Policy on Green Belts

10.4. National policy on Green Belts is set out within the Framework at section 13. Paragraph 152 is particularly relevant and stipulates that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Inappropriate development includes the construction of new buildings other than those listed as exceptions in paragraph 154 of the Framework. The proposed development would not meet any of the listed exceptions and is therefore inappropriate development in the Green Belt – albeit some aspects of the scheme in isolation could be considered to be appropriate development.

Impact on Openness and Permanence

10.5. In regard to openness, paragraph 142 of the Framework states that the fundamental aim of Green Belt policy is to keep land permanently open with the essential characteristics being its permanence and openness. It is important to note that openness in terms of the Green Belt has a spatial aspect as well as a visual aspect and is not limited to volumetric comparisons. Both spatial and visual dimensions, duration, remediability to the original or an equivalent state of openness, and degree of activity likely to be generated by a development all need to be considered.

10.6. Objections have been received in relation to the site's Green Belt designation as set out in sections 6.5 and 7 of this report. Ramblers Warwickshire object to the Green Belt loss and the cumulative impact from this application and the proposal that IM Properties are progressing near Cudworth (Junction 9 of the M42) for a campus development. It should be noted that there is no formal planning application for this IM properties site but that public consultation is being undertaken by IM Properties currently. Campaign to Protect Rural England (CPRE) objects to the erosion of the Green Belt.

10.7. The applicant has submitted a Green Belt Assessment (GBA) which contends that the proposed development would result in 27% of the 112.9ha site being occupied by buildings. It indicates a further 20% would be occupied by hardstanding including roads and car parks. According to the GBA, a total of 47% of the site (52.8ha) would be developed.

10.8. The GBA does not quantify the amount of land that would be subject to engineering operations to create large, artificial and unnatural landscape bunds, attenuation ponds and SuDS features. Paragraph 155 of the Framework sets out that such engineering operations are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.

10.9. The applicant claims that the attenuation ponds do not "diminish Green Belt openness or conflict with any of the NPPF's Green Belt purposes" and are consequently not

inappropriate development. This is accepted. However, for the avoidance of doubt, the scheme as a whole is inappropriate development and the scheme is considered on this basis.

10.10. The applicant does not reach a conclusion in respect of landscape bunds and rather highlights their role in seeking to mitigate the impact of built development. The reason for their inclusion is acknowledged but it is equally considered that the bunds themselves further erode the openness of the Green Belt. In particular, their height, breadth and form are substantial within an otherwise relatively flat landscape with gentle gradients. They consequently constitute inappropriate development in the Green Belt and should be included within the total area of the site to be developed. No figure has been provided for these bunds but the implication is that the percentage of the site which would be developed is greater than the 47% being claimed.

10.11. The area of the site not subject to development would include an existing woodland and Local Wildlife Site. It would also include incidental areas of open space around and between buildings together with areas of landscape planting and landscape buffers around the perimeter of the site.

10.12. The extent to which the developed parts of the site would impact on the openness of the Green Belt varies. The greatest impact would arise from the five logistic units which would have a combined footprint of 277,780 sq.m (GEA). The height of these units would vary from 20-27m. These units would be positioned across the entire width of the site from east to west. Other buildings across the site would have a further impact on openness, together with the associated roads and parking areas. Even taking proposed landscape mitigation into account it is clear that the proposed buildings would be highly visible and prominent features in what is currently an open agricultural field. Their impact on the openness of the Green Belt would consequently be substantial.

10.13. Having regard to the spatial and visual aspects of development, it is considered that the proposal would clearly cause substantial and permanent harm to the Green Belt by reducing its openness. This harm must be given substantial weight in accordance with paragraph 153 of the Framework.

10.14. Furthermore, paragraph 142 of the Framework makes absolutely clear that the fundamental aim of Green Belt policy is to keep land permanently open. It further states that “the essential characteristics of Green Belts are their openness and their permanence.” In this case, the application site is part of land which was first designated as Green Belt nearly 50 years ago. Harm is therefore identified in relation to paragraph 142 of the framework which carries substantial weight against the development.

Other Harm in relation to Green Belt

10.15. Aside from the impact on openness, paragraph 143 of the Framework sets out that the Green Belt serves five purposes: (a) to check the unrestricted sprawl of large built up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

10.16. To inform the Local Plan (2019) a Joint Green Belt Study (2015) was prepared by LUC on behalf of Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council. It assessed Green Belt land across the authority areas, against the five purposes of the Green Belt as set out in the Framework. The application site was not the subject of a specific assessment and instead it formed part of a 'Broad Area' of assessment ('Broad Area 1'), which covers land north of the M6, east of Nuneaton/Bedworth and west of Lutterworth. The site represents the south western corner of Broad Area 1, which extends northwards and eastwards encompassing all land other than parcels defined around the village of Wolvey.

10.17. The 2015 Study identified that the principal role of Broad Area 1 is in preventing the sprawl of Coventry, Nuneaton and Bedworth (purpose a), and in safeguarding the countryside from encroachment (purpose c). As largely open and undeveloped countryside between the principal settlements, all broad areas were considered to make a 'considerable contribution' to these Green Belt purposes. It was also found that it plays a significant role in preventing the merging of neighbouring towns (purpose b), particularly Nuneaton and Hinckley which lie close to one another in the northern part of the broad area. However, the southern two-thirds of the area, which includes the site, makes a less significant contribution. Aside from this, it found that it plays a lesser role in preserving the setting and special character of historic towns (purpose d), due to its limited relationship with the historic cores of surrounding towns. The contribution to assisting in urban regeneration by encouraging the recycling of derelict and other urban land (purpose e), was not assessed on a parcel-by-parcel basis. It was considered that all land within the Housing Market Area made an equally significant contribution to this purpose.

Purpose 'A' – Checking the Unrestricted Sprawl of Large Built Up Areas

10.18. The application site takes the form of large open agricultural fields and is situated in open countryside beyond the northeast corner of the urban area of Coventry. The M6 and A46/M69 currently provide a clear, hard and well-defined boundary to the urban area. It is particularly noteworthy that land north of the M6 in this location is free from sprawling urban development. Instead, there are only small villages such as Ansty and Shilton. The site currently performs strongly in meeting the purpose of checking the unrestricted sprawl of large built up areas.

10.19. Coventry City Council have objected on Green Belt grounds as they consider that the proposals will effectively fill a gap between the motorway and Ansty village and as such are contrary to purpose A of the Green Belt. They state that whilst it doesn't merge neighbouring towns it does effectively consume Ansty village into the built-up area of Coventry, the motorway and the application site.

10.20. The proposed development would breach the clearly defined development boundaries of Coventry. It would most notably be the first development of this size and nature to sprawl north of the M6 in this location. This is distinctly different to Ansty Business Park and Prospero Ansty which were developed on primarily brownfield land washed over by Green Belt to the east of Coventry and south of the M6. The consequence is that the proposed development would result in the unrestricted spawl of a large urban area into open agricultural countryside. The applicant noted that the proposal would impact highly on this purpose and this is agreed – substantial weight is given to this harm.

Purpose B – Preventing Neighbouring Towns Merging Into One Another

10.21. Ansty is not a town. The nearest towns to the application site are Nuneaton and Bedworth. Therefore, in the strict sense of this purpose, the proposal would not in itself lead to the merging of neighbouring towns. However, the countryside and open land between towns is constantly under pressure from development and it is rarely the case that a single development, on its own, would cause neighbouring towns to merge. Moreover, the areas between towns where there is a dynamic and growing economy can be lost incrementally and can over time lead to the merger of neighbouring towns. This would harm this purpose of the Green Belt.

10.22. In this case there would be a sizeable loss of Green Belt land between the towns and Coventry. This would contribute to the diminution of the gap between these towns. Therefore, the proposal would contribute to the possibility of these towns merging, which would be more of a possibility with the application proposal in place. As a result, whilst it is considered that the proposal would not directly lead to the merging of neighbouring towns, it would not assist that purpose of Green Belt policy. Limited weight is therefore given to this harm.

Purpose C - Assisting in Safeguarding the Countryside from Encroachment

10.23. Coventry City Council state the proposals are contrary to this purpose and significant weight should be given to the impact upon Green Belt.

10.24. The site is comprised entirely of agricultural land and therefore constitutes 'countryside'. The proposed development would result in buildings, roads and car parking across the site. As a result, the application proposal would represent the encroachment of built development into the countryside surrounding Coventry and therefore harm this purpose of the Green Belt. Substantial weight is given to this harm.

Purpose D - Preserving the Setting and Special Character of Historic Towns

10.25. Although Coventry can be considered a historic town, much modern development lies between its historic core and this site. The site does not have much visual relationship with the historic core of Coventry, and does not have any characteristics which contribute to Coventry's character or historic setting. The site therefore does not make a contribution to preserving the setting and special character of Coventry.

Purpose E - Assisting in Urban Regeneration by Encouraging the Recycling of Derelict and Other Urban Land

10.26. The proposed development includes main town centre uses such as retail, offices and a hotel. The applicant's Main Town Centre Uses Assessment indicates that this would have a negative trading effect of over 3% on Coventry and Nuneaton town centres. It is contended that it is likely this will not have a significant adverse impact on these towns for retail purposes. However, both Coventry and Nuneaton have ongoing urban regeneration projects seeking to recycle vacant and urban land within the centres. The success of such projects relies on investor confidence and private investment. As has been identified, the proposed development would have a negative impact on Coventry and Nuneaton town centres. In terms of Green Belt purposes, the proposed development would therefore not assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Limited weight is consequently given to this harm.

NPPF Consultation and Ministerial Statement

10.27. Paragraph 9.8 and 9.9 of this report set out the context for the most recent NPPF consultation and the 30th July ministerial statement. Whilst the consultation has limited weight and the ministerial statement has moderate weight they are both material considerations for this application and therefore it would be remiss not to address the proposed green belt changes within the consultation.

10.28. For the purposes of plan-making and decision-making 'grey belt' is proposed to be defined as land in the green belt comprising Previously Developed Land (PDL) and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes, but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).

10.29. The application site has no footnote 7 designations other than that of Green Belt. There are two existing farmsteads on the application site however these do not fall within the definition of previously developed land as they are associated with an agricultural use. The site is therefore not PDL. The above assessment sets out the how this development has been assessed against the five purposes of Green Belt (which are not proposed to be altered) therefore the assessment cannot be made that the site would make a limited contribution to the Green Belt purposes either. Therefore, the site would categorically not be classed as Grey Belt.

10.30. The proposed direction of planning policy therefore would have limited impact upon the Green Belt assessment as set out within section 10 of this report.

Green Belt Conclusions

10.31. It has been established that the proposal would give rise to harm to the Green Belt by reason of inappropriateness, impact on openness, impact on permanence, and impact on four purposes of including land in the Green Belt (with the principal harm being to purposes A and C). Other potential harms resulting from the proposal are considered and dealt with in the sections below. This harm must be given substantial weight in accordance with paragraph 153 of the Framework. Very special circumstances will not exist unless that harm is clearly outweighed by other considerations. Such considerations are set out in detail throughout this report and will be weighed up in the planning balance at the end of this report.

11. Integrated Campus

11.1. The description of development for this application refers to an 'employment-led campus headquarters facility'. This element needs to be assessed as it impacts upon how other sections of this report are concluded.

11.2. Section 8 of the submitted Operator Statement sets out the applicant's case in relation to why the proposed uses within the development need to be integrated into a campus. It states that the creation of an efficient and sustainable campus will enable the business to achieve its preferred business model of serving all functions from a central national destination. It goes on to set out the necessity that drives the integration of the facilities; corporate vision, sustainability and linked uses. Section 2 of the Planning Statement also sets out the existing operational context for the Group and highlights locational inefficiencies across the operation. It also sets out how Shirebrook currently operates as an integrated campus.

11.3. In relation to the different uses proposed a summary of the Operator Statement is provided below:

- **Office Head Quarters** – imperative for the group to have an office that attracts top talent. Several departments (commercial, photography, web copy, customer services, etc.) within the head office require regular access to warehouse stock, particularly within unit 1. The head office is therefore designed to link physically with unit 1. If these two units occupied separate sites it would compromise the day-to-day efficiencies of the business. In addition, heads of department or directors manage multiple teams with large spans of control. Having multiple uses in one location therefore increases efficiency.
- **Brand Partner Space** – the relation with brand partners and suppliers is an essential part of achieving the vision to deliver the world's most admired and compelling brand ecosystem. Office space is needed for these partners so that they can provide support for key campaigns, marketing insight, retail training and product sessions for Frasers Group teams. Some partners also have access to the group's stock management system and are responsible for maintaining stock levels which requires daily interaction with the head office and warehousing teams.
- **Learning and Development Academy** – The academy sees staff from all departments, stores and locations across the UK come through its doors. At Shirebrook over the 12 month period 19,000 hours of training were undertaken and 500 new staff were recruited and taken through the academy. Rooted in the group's training is practical learning. Currently at Shirebrook the L&D facility is physically linked to the retail element of the site. The academy also has access to the offices, leisure (gym only in existing location) and warehousing.
- **Concept Retail Research & Development** – the ability to test new concepts, develop merchandising displays and sales strategies with input from all areas of the business in one location is key to the group's success in bricks and mortar retail. The retail element of the campus forms an integral part of the campus on a day to day basis by providing an experimental concept development site for formats, displays, shop-fronts, stockroom operational development, marketing and training. Alongside the learning academy, the head office staff also visit the retail space throughout the week to actively monitor progress and make required adjustments.
- **Concept Leisure Research & Development** – this element of the site includes the gym, swimming pool, fitness studios, sports hall and 3G pitches. It incorporates equipment trials, new gym concepts, team training, emerging sport testing, guest athletes and brand events. The provision of this facility on site reflects the leisure and sport focus of the business by working with the largest sports brands in the world. This use complements the L&D events and conferencing space by offering an area for sporting and team building activities.
- **On-site accommodation** – the hotel and group accommodation are to be provided for the regular flow of visitors to the site. The hotel is for short-stay visitors, including international visits, brand partners, conference attendees, investors and suppliers. By providing this use on site i**t** allows the group to control the capacity for visitors as capacity work in the area submitted as part of the application suggests there is limited hotel capacity to meet the groups accommodation needs off site. It also reduces unnecessary daily traffic movements. The group accommodation is intended for employees staying for extended periods e.g. week long training programmes.

- **Ancillary Food and Beverage and Convenience** – this is an ancillary facility for the group's staff and visitors already on site alongside any cafeteria provision.

11.4. It is proposed that the above elements, alongside the nationwide logistics facilities (warehouses), deliver an integrated campus that will enable the group to continue to support the retail sector specifically bricks and mortar retail and contribute to the national and local economy.

11.5. Due to the location of the application site and the identified designations it is important to assess if the uses proposed act as an integrated campus as a whole or if it is considered that some of the uses could be on a different site.

11.6. Coventry City Council have stated that the proposals fail to consider disaggregation of the proposals to reduce the proposed take-up of Green Belt land. They state that 'the applicant's desire for a 'campus' style development is not a demonstration of operational need - there are multiple individual uses within the proposal that do not have to be co-located e.g. the retail, hotel or residential uses.'

11.7. In relation to disaggregation, it does not have to be essential for all the uses to be together, it can be a desire from the applicant for all the uses to be together with the benefits individually and cumulatively contributing towards this.

11.8. The assessment in relation to the integrated campus is one of planning judgement. The above evidence has been considered alongside a site visit to Shirebrook which showed the operation of the various units and both the physical and non-physical departmental links. It is clear that the core uses of the site (warehousing, office, L&D and concept retail) all have various interdependencies and there is an added efficiency to locating all of these uses on the same site. The on-site accommodation whilst not integral to the campus meets an identified need and it is not uncommon for employment uses to have associated accommodation (e.g. Ansty Park/Prospero Ansty has an approved hotel as does Mira Business Park). The food and beverage and convenience element is ancillary to the development and is a reflection of the 24 hour operation of the site.

11.9. The campus approach proposed by the group is not unique. Many other major businesses such as Google, McLaren, Dyson, Nike and Adidas have implemented this internationally, although there are no examples of this scale in the UK. Each campus is however specific to the requirements of the business but include a range of uses that are co-located together.

11.10. Overall, based on the evidence presented it is considered that the proposal would form an integrated campus as a matter of planning judgement. Put another way, the development would provide a strong sense of place.

12. Alternative Sites

12.1. As the proposals are EIA development, the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Schedule 4, Part 5 requires an alternative site assessment for inclusion within the Environmental Statement.

12.2. An Alternative Sites Assessment (ASA) was submitted as an appendix (4.1) to the Environmental Statement (ES) in support of the application. Its purpose is to consider

whether there are any alternative sites which could accommodate the proposed development or if it could be accommodated in another format. One particular purpose of the ASA is to consider whether the development could be accommodated outside of the Green Belt or in alternative locations where the impact is lower.

12.3. An ASA Addendum (ASAA) was also prepared and submitted within the course of the application following a review of the information. The ASA and its Addendum have both been considered for the purpose of this assessment.

12.4. Chapter 4 of the ES sets out the current position for Frasers Group, which is at Shirebrook, Mansfield. The existing site combines national distribution warehouses, headquarter offices, training and development, concept retail and leisure, and research and development floorspace. The document however puts forward that the space, layout and design of Shirebrook is not considered optimal for the scale of operations now needed in order to support business growth. As such, a new purpose designed campus is required. The ES sets out that the site has been chosen for a number of reasons including:

- Highways and Amenity – Strategic location in close proximity to the M6 and M69.
- Carbon Emissions – Site is located 6.4 miles south-west of the theoretical optimum location ('centre of gravity') for a new campus development at the heart of the Golden Triangle. The further the site is from this location the higher mileage-penalty incurred.
- Energy – Connection to Coventry North Bulk Supply Point (BSP) is achievable which enables a dedicated supply from a 33kV substation which is suitable to serve the development.

12.5. If a site has been screened out on the basis of a technical constraint (e.g. heritage, landscape, etc.) this has been reviewed by the relevant specialist and any relevant comments are made within this section of the report. If no specific comment is made within this section then the conclusion is that the assessment is agreed with.

12.6. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report - particularly in relation to why the development cannot go elsewhere and in respect of the robustness of the alternative sites assessment.

12.7. Coventry City Council states that only a limited search has been undertaken and the justification for selecting this site has not been made by the applicant. They state that the restriction of the search to site of 50 hectares or more in area is not justified. Various sites have been stated as being discounted incorrectly. This section of the report sets out the detail of the Alternative Sites Assessment and its Addendum alongside RBC's assessment.

Search Area

12.8. The ASA has defined a search area by taking gravity model outputs which generated a theoretical 'centre of gravity' near Hinckley, identifying a 30 min drivetime from this which was then widened to include all of the Golden Triangle (broadly Northampton-Birmingham-Nottingham) and some peripheral local authorities whose boundaries fall partly within the area.

12.9. The search area adopted is comprehensive and covers the whole of the Golden Triangle, which is recognised as the prime location for National Distribution Centres (NDCs) given that the majority of the UK population fall within a 4.5 hr drivetime of it.

Methodology

12.10. A four stage methodology is adopted in the ASA which initially considers site size (minimum 50ha due to development area of proposal) and accessibility to the Strategic Road Network (5km from motorway or 2.5km to strategic A-road) in Stage 1; then additional factors affecting suitability e.g. flood risk, environmental designations, etc. (Stage 2); before moving on to assess wider issues affecting market attractiveness, site suitability and deliverability, including Green Belt performance where appropriate, in Stages 3 and 4. The principle of the staged approach is reasonable – and enables more detailed assessment to be focused on real contenders.

12.11. Overall comments on the methodology are as follows:

- Site Identification – the approach adopted is reasonable and comprehensive. The applicant has sought to engage with LPAs across the study area and taken account responses received (where an 85% response rate was achieved);
- Site Size Threshold – it is considered that the site size threshold of 50 ha which has been adopted is reasonable. Whilst the application is for 112.5 ha, it is reasonable to expect the core functions would require a site area of at least 50ha. At a standard 0.35 plot ratio for NDCs, the warehousing space proposed alone would typically require a site of c. 80ha meaning sites towards the lower end of the range (nearer 50ha) would be sub-optimal.
- Access to Strategic road Network (SRN) – this is a key locational consideration for NDCs, and it is therefore the approach is reasonable.
- Qualitative Assessment (Stage 4) – the ASA methodology has now been developed to consider Green Belt and landscape considerations, which is positive and supports robustness.

Assessed Sites

12.12. An important component of the robustness of the ASA is that it comprehensively considers alternative potential sites. A total of 84 sites have been considered in the original ASA. Of these 55 are discounted at Stage 2, and a further 21 at Stage 3; with 8 sites therefore progressing to Stage 4. The ASAA then considers a further 24 sites including other potential sites identified through more recent information.

12.13. As of January 2024, 10 sites omitted before stage 4 were in dispute and warranted further consideration. Section 3 of the ASA Addendum addresses points raised by the Council with a further 3 sites progressing to stage 4 (ASA70, ASA81 & ASA85). Having reviewed the ASAA it is agreed that the other 7 sites should not progress to Stage 4. A number of other sites within the ASA were also identified as requiring further work in relation to their development potential. The applicant has responded to this through the ASAA (section 4) with ASA70 and ASA81 also progressing to Stage 4. In addition, ASA47, ASA48 and ASA79 identified as part of the addendum also progressed to Stage 4. Section 7 of the ASAA also captures 28 further sites which warrant assessment. Three of these sites progressed to stage 4 analysis (ASA85, ASA94 & ASA108).

12.14. Of all of the sites identified it is considered that four sites within Rugby Borough could have been progressed to the Stage 4 Analysis within the ASA. Officers have therefore made a further assessment of these sites based on the Stage 4 assessment criteria. Comments on these sites are as follows:

- **ASA95 Land north of Houlton, Rugby** – removed at Stage 3 on the basis of constraints – topography and separation distance to Grade II listed building. These

are not considered to be significant constraints to negate an assessment at stage 4 for this site. The location of the site on the A5 which does not have allocated RIS funding before the delivery of this scheme is proposed is however an issue as is access to labour workforce. It is considered that the site could have been taken forwards to the Stage 4 analysis, however relative to the application site, its access to the SRN is not as strong, nor is the accessibility of labour at this location which is a particularly important component for the form of development envisaged. This site is therefore discounted at Stage 4.

- **ASA99 Prologis Park** - removed in the ASAA at Stage 3 (ASAA Table 7.3) on the basis of constraints - flood risk, ecology and nearby sensitive uses – which create a shape which is irregular and inefficient for a large scale campus development. It is estimated that a developable area of c. 100 ha could be achieved having regard to the site constraints (particularly flooding) but noted that the site wraps around an existing lower grade employment area, which would not be commercially attractive for an HQ Campus development. This site is therefore discounted at Stage 4.
- **ASA102 Land East of Harborough Magna** - Green Belt site to the west of the existing Swift Valley Industrial Estate at Rugby. The ASAA seeks to screen this site out at Stage 2 on the basis that "it does not have immediate access to the SRN via an A-road or B-road." It is considered that it would be possible to access the site via Brownsover Road which currently provides access to the Swift Valley Estate and connects this to the A426. Development of the site would effectively form a westwards extension of the estate and could potentially avoid areas within Flood Zone 3 and include suitable buffering to listed buildings in Newbold. The site access is measured as 2.2 miles from M6 J1. It is considered that the site could have been taken forwards to the Stage 4 analysis but noted that the site scored relatively highly in the 2015 Green Belt Study. However relative to the application site, its access to the SRN is not as strong, nor is the accessibility of labour at this location which is a particularly important component for the form of development envisaged. This site is therefore discounted at Stage 4.
- **ASA103 Land North of M6 Junction 1** - dismissed in the ASAA on topographical grounds (the ASAA indicating an undulating landscape varying from 90 – 130m with some stepper inclines) which the applicant indicates undermines its suitability. This site is within the Golden Triangle but falls outside of the Green Belt. The site itself is relatively free of constraints, although there is a cluster of listed buildings (including Grade II* listed Holy Trinity Church) and conservation area in the hilltop village of Churchover and the site forms part of the setting of those designated heritage assets. Its development would also result in the merging of the village and the Rugby Urban Area. The rising land away from Rugby would also make the development of this site relatively visually prominent. This site relates more closely to the M1 Junction, but as with ASA102 above does not perform as strongly as the application site in terms of labour accessibility. This site is therefore discounted at Stage 4.

Stage 4 Assessment of Shortlisted Sites

12.15. The results of the earlier stages of the assessment yield 16 alternative sites which progress to the Stage 4 analysis in either the original ASA Report or the ASA Addendum. These are as follows:

- ASA12 Land south of the M69, Burbage;
- ASA16 Land to the north and east of Ansty Park, Ansty;
- ASA25 Loughborough Science & Enterprise Park, Loughborough;
- ASA26 Land south of A45 Daventry Road, Willoughby, Rugby;

- ASA28 Land at Drayton Grange Farm, Fenny Drayton;
- ASA47 Land south of Europa Way, Warwick;
- ASA 48 Land at Wedgnock Park Farm, Warwick;
- ASA51 Grove Wood Farm and Cofton Richards Farm, Longbridge;
- ASA55 Land SW of East Midlands Airport, Castle Donnington;
- ASA70 Rushcliffe Gateway, Nottingham;
- ASA79 Land at Gailey Lee Farm, Penkirdge;
- ASA81 Radclife-on-Soar Power Station, Nottingham;
- ASA85 Land north of Curdworth/ West of M6 Toll, Birmingham;
- ASA88 – Kettering Energy Park, Burton Latimer;
- ASA94 – Land at Cross-in-Hand Farm;
- ASA104 – Land north of Shelford, east of M69;
- ASA108 – East Midlands Intermodal Park, Etwall.

12.16. The conclusions drawn on each of these sites and their relative performance relative to the application site are commented on below.

12.17. ASA12 Land South of M69, Burbage adjoins existing employment development and falls outside of the Green Belt. Whilst it could in theory accommodate employment development, it is currently being promoted for a residential-led development by IM Properties and is therefore not to be considered available. It is appropriate to therefore discount the site at Stage 4a. In addition, it is noted that there are recognised highways constraints to further strategic development along the A5 Corridor in the short-term in the absence of confirmed funding for dualling works – strategic development is potentially not therefore deliverable in the short-term. Labour accessibility at this location is also weaker.

12.18. ASA16 Land to the North & East of Ansty Park is a Green Belt site in Rugby Borough. It is not considered that the site can be simply discounted on availability grounds as it is being promoted by AC Lloyd, as the ASA suggests. However, the ASA also notes access limitations, with a requirement for third party land to access the site through Ansty Park, which represent an unacceptable commercial risk as they could create a ransom situation which potentially affects both development viability and delivery timeframes. It is therefore agreed that there are thus short-term delivery challenges.

12.19. ASA25 Loughborough Science and Enterprise Park is identified, and allocated through policy, as a Science and Enterprise Park associated with the University, which it is understood has control of the land. Whilst outside of the Green Belt, this site is not available for the form of development proposed.

12.20. ASA26 Land South of A45 Daventry Road is in a rural location, to the south of Rugby and outside of the Green Belt. Whilst it is close to the Daventry SRFI, its location affords poor labour accessibility and public transport accessibility and there are notable power supply challenges. Having regard to key locational drivers, it is not therefore suitable for the form of strategic employment development envisaged.

12.21. ASA28 Drayton Grange Farm, Fenny Drayton is located to the north of Nuneaton and west of MIRA. Whilst not a Green Belt site, it is identified as having a high landscape and visual sensitivity, comprising Grade 2 (very good) agricultural land. Critically there are recognised highways constraints to further strategic development along the A5 Corridor in the short-

term in the absence of confirmed funding for dualling works or junction enhancements – strategic development is not therefore considered deliverable in the short-term. Labour accessibility to this site would also be notably weaker than for the application site.

12.22. The applicant's assessment of ASA47 Land south of Europa Way, Warwick identifies key constraints related to landscape and visual sensitivity, including high landscape sensitivity to development, and impact on setting of heritage assets – incl. Warwick Castle and Greys Mallory. A significant proportion of the site is Grade 2 agricultural land. The site is also locationally weaker for the form of development proposed: it is peripheral to the Golden Triangle and at distance from SFRIs. Whilst the site falls outside of the Green Belt, it is a less commercially attractive and sub-optimal location a National Distribution Centre. Improvements to access to the M40 would also potentially be required which impact on the potential for this site to be brought forwards in the short-term.

12.23. ASA48 Land at Wedgenock Park Farm, Warwick is a Green Belt site located to the NW of the A46. The ASAA identifies the site as making a stronger contribution to Green Belt Purpose 4 as Warwick is a historic town and there is greater intervisibility; and identifies the site as within historic boundary of the deer park. As for ASA47 above, this is a sub-optimal location peripheral to the Golden Triangle, there are power supply challenges and the site is at distance from SFRI. It is therefore a less commercially attractive location.

12.24. In respect of ASA51 Longbridge has notable constraints in terms of HGV access, which would be through existing villages of Hopwood and Westmead to access the M42 Junction 2. This site is also not as locationally strong, with the application site more strongly aligning with the Golden Triangle and having better access to strategic rail freight interchanges. This site also falls within the Green Belt and the ASA identified complex power arrangements.

12.25. ASA55 Land SW of East Midlands Airport is being promoted to NW Leicester DC as a location for a new settlement and therefore is not currently considered available for an employment development.

12.26. ASA70 Rushcliffe Gateway is a Green Belt site on the A453 to the south of Nottingham with reasonable access both to labour from the Nottingham urban area and an SRFI at East Midlands Gateway. The Green Belt performance appears relatively similar. 132kV power infrastructure crosses both this and the application site. However, the majority of the agricultural land is Grade 2 agricultural (very good) at Rushcliffe Gateway whereas a lower proportion is very good at the application site. The site is at the periphery of the Golden Triangle and sub-optimally located relative to the application site.

12.27. ASA59 Gailey Lee Farm, Penkridge is a Green Belt site located close to M6 Junction 12. The ASAA identifies a particularly high Green Belt harm, albeit it is noted that in due course the WM Interchange site, which is due to be developed close by, would sit within the backdrop from key viewpoints identified. Whilst the site thus benefits from strong potential access to an SRFI, it is within a more rural location currently separated from the West Midlands conurbation with weak public transport accessibility. It is weaker, locationally, in these terms relative to the application site.

12.28. As the ASAA identifies, redevelopment of ASA81 Radcliffe-on-Soar Power Station is being progressed for a zero carbon technology and energy hub, supported by Freeport status. It is in the Green Belt but is previously-developed land. There is a Local Development Order in place to support redevelopment which caps logistics space at 180,000 sq.m which

is insufficient to accommodate the application proposals. Whilst the LDO does not preclude planning applications for alternative forms of development, it is accepted that the site vision, which has extensive stakeholder support, is for an alternative form of development focused on low carbon and energy technologies (with VSCs developed on this basis).

12.29. ASA85 Land North of Curdworth/ West of M6 Toll includes 120 ha of land which is part owned and part under option to IM Land. Again, this is a Green Belt site. It is being promoted as a 'campus for manufacturing, logistics and high growth businesses.' It is considered that the conflict with an emerging vision for the site, given the stage of progress of its promotion, is overstated within the ASAA however the delivery of the Frasers Group campus would limit the potential for manufacturing development as well. It is screened out on the basis that it is not considered available (and therefore no Stage 4b assessment undertaken). Whilst IM Properties do typically retain a freehold interest, examples of IM Properties and other developers selling the freehold to occupiers have been noted elsewhere - as the Mercia Park example demonstrates. Whilst this location performs relatively strongly in terms of access to labour and SRFI, current public transport access is weaker. Ultimately it is noted that there is a need for multiple strategic employment sites to come forwards to meet the region's strategic needs and find no evidence that this site performs more strongly than the application site.

12.30. ASA88 Kettering Energy Park is a well-established development which is focused on energy infrastructure and businesses with high energy needs. The vision for the site is therefore not aligned to Frasers Group proposals and there are restrictions in the emerging masterplan with which the proposed development would not comply with. This site is therefore not suitable for campus development envisaged.

12.31. ASA94 Land at Cross in Hand Farm is a 66 ha site outside of the Green Belt on the A5 close to Magna Park, Lutterworth – an existing large cluster of logistics development. It is marginally closer to the nearest SRFI. Potential landscape sensitivity issues are noted, but this is a less favourable location in terms of labour access in particular, as the site is located at some distance to larger population centres. Junction improvements would also be required to access the M1 and with A5 constraints also impacting on potential deliverability/ development timeframes.

12.32. The A5 constraints also impact on the deliverability/ delivery timeframes for potential development of ASA104 Land North of Shelford, East of M69, which again is a Green Belt site.

12.33. ASA108 East Midlands Intermodal Park, Etwall falls marginally outside of the search area. It is considered that limited weight should be given to the points made on availability. It is noted that part of the focus of the EM Freeport is on supporting manufacturing growth, and this site is well placed to do so – adjoining the Toyota Plant at Burmanston. The direction of travel is for delivery of a rail-served SRFI site, the timescales for which are unclear and have been progressing slipping.

Alternative Sites Conclusion

12.34. Overall, the ASA and ASAA read together provide a detailed and comprehensive assessment of alternative sites. Invariably when looking across much of the East and West

Midlands, the assessment identifies a number of potential alternative sites which could in theory support development of a similar scale.

12.35. The shortlisted sites which sit outside the Green Belt relate in particular to those on the A5 Corridor (ASA12, ASA28, ASA94) where there are recognised highways constraints to the delivery of new strategic employment development because of a lack of current funding for improvements and dualling along the corridor. There are equally potential highways constraints affecting delivery timeframes at ASA47. Generally, the non-Green Belt sites generally also perform less strongly in terms of access to labour, which is a key locational consideration for the form of development proposed in this application.

12.36. The strategic employment evidence base (HEDNA and WMSESS) identifies that some Green Belt sites will need to be brought forward to meet identified needs for large-scale warehousing and support the region's economy.

12.37. The application site essentially adjoins the city of Coventry, one of the major urban areas within the region; and is also accessible from other parts of Coventry & Warwickshire, Birmingham and further afield. This supports strong labour accessibility. In terms of road access, the site is located within the core Golden Triangle area with strong and immediate access to the M6 and M69, which are SRN.

12.38. Given that the development also includes an HQ function and training academy for Frasers Group, to which staff will need to travel from across the country, strong access to the national rail network is also an important consideration. The site is c. 5 miles from Coventry Railway Station which is on the West Coast Mainline which includes Avanti West Coast, West Midlands Railway, London Northwestern Railway and Cross Country train services which serve multiple long distance destinations across the UK. It also provides links to Birmingham International Airport.

12.39. Overall, when considering the range of locational requirements, it is not considered that any alternative site has an overall higher performance for the specific form of development proposed.

13. Principle of Employment Development

13.1. Policy ED3 of the Local Plan states that with the exception of sites allocated for employment, employment development will not be permitted outside of the Rugby urban area except for in the following circumstances:

- Conversion of a building for employment purposes, subject to its location and character, including historic or architectural merit, being suitable for the proposed use and it having been in existence for at least ten years; or
- Redevelopment, at a similar scale, of an existing building or vacant part of an existing employment site for employment purposes, where this would result in a more effective use of the site; or
- Sustainable expansion of an existing group of buildings for business uses where the site is readily and regularly accessible by means of transport than the private car; or
- A building or structure related to agriculture, horticulture or forestry where it is genuinely required as an ancillary use for an existing rural employment development.

13.2. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

13.3. The overall site area of the application site is 112.9ha. This includes strategic warehousing (25 ha) (Class B8) and associated offices (2.3ha) alongside an Office HQ (1.8ha) (Class E). The proposal is not within the Rugby urban area and does not meet any of the above bullet points and therefore the proposal is contrary to Policy ED3.

13.4. It is considered that the proposed development does not align with the spatial strategy of the Borough as set out within Local Plan policy GP2 which identifies Rugby town as the main focus for all development in the Borough. However, Policy GP2 permits development to come forward in the Green Belt in line with national policy where there are very special circumstances.

13.5. Paragraph 85 of the NPPF places significant weight on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

13.6. The provision of distribution and industrial buildings is considered to be a type of use that contributes to the overall employment development needs of the Borough as detailed in Policy DS1. This policy confirms that 208 hectares, including 98 hectares to contribute towards Coventry's unmet need, will be provided within the Borough of Rugby in the period 2011-2031. This policy is considered to be out of date due to more recent evidence of employment needs being published in the last two years (HEDNA and WMSESS). Policy ED2 of the Local Plan seeks to support provision for employment in the most sustainable locations of the Borough by permitting new employment development within the Rugby Urban area, and Policy ED3 resists employment development outside the Rugby urban area except in specific circumstances.

13.7. The Local Plan requirement for employment land over the 2011 – 2031 period equates to approximately 10 hectares per year. The latest Authority Monitoring Report (AMR) (2022-2023) identifies within the plan period 191.53ha of employment land has been delivered or is under construction. Given the 208ha local plan requirement that therefore leaves 16.47ha as a remaining requirement. The AMR also sets out that a further 95.88ha of employment land has planning permission but is not currently under construction, therefore all of the requirement within the Local Plan is currently delivered, under construction or permitted. The sites identified within the Local Plan to meet the Borough's strategic economic needs consist of a variety of sites and sizes.

13.8. The Local Plan does provide flexibility over and above the land required purely based on the quantitative need, to allow for further growth in not only Rugby's economy but also that of Coventry and Warwickshire. It is also noted that the requirement is not a maximum requirement for this reason.

13.9. The balance of employment and housing needs within the Local Plan has been assessed as a sustainable strategy for the Borough of Rugby through the Local Plan process. A development of this size in addition to what is allocated, could potentially tilt the balance between employment and housing needs, which may then increase the housing needs of

the Borough, resulting in unsustainable development. Based on the Local Plan it does not appear, therefore, that there is a 'need' for the authority to permit this application to meet the requirements of DS1.

Additional material considerations

13.10. Since the adoption of the Local Plan, the local authorities within the Coventry and Warwickshire Housing Market Area have undertaken a Housing and Economic Needs Assessment (HEDNA) (2022) (reported to cabinet on 5th December 2022 as an appendix in association with the Local Plan Review).

13.11. The HEDNA concludes the following employment land need for Rugby (2021-2041):

Office	**General Industrial (B2)**	**Subtotal**	**Total Strategic B8 for Coventry and Warwickshire**
5.2 ha	150.5	155.7 ha	606 ha

13.12. Chapter 11 within the HEDNA report provides guidance on identifying suitable locations for Strategic B8 development (9,000sqm), and key corridors within which Iceni (report authors) consider development is likely to be focussed. The considerations are road accessibility, power supply, proximity to rail terminals, labour availability and neighbouring activities. The key corridors identified included the M6 Corridor, to which this site strongly relates.

13.13. Having regard to the above factors, the HEDNA identified that Green Belt development would be needed if identified needs were to be met.

13.14. There is therefore a need for B2 and B8 development above the Local Plan requirement which needs to be considered moving forward however this evidence still needs to be tested through the Local Plan process. It is considered that sites will be selected through the Local Plan Review process to meet this need as this need exceeds the current Local Plan period by 10 years.

13.15. Due to the strategic nature of the B8 need within the HEDNA an additional strategic study was commissioned. The West Midlands Strategic Employment Sites Study 2023/24 (WMSESS) sets out a need between 2022-2045 for strategic employment sites in the West Midlands for 548-841ha of land for road-based needs (taking into account existing supply). It is estimated that of this need approximately 30% is required for manufacturing (B2) and 70% for logistics (B8).

13.16. As with the HEDNA, the WMSESS identifies the need to bring forward additional strategic employment sites to support economic growth and inward investment – particularly in locations which benefit from good strategic accessibility, labour availability (as labour supply is an issue for both manufacturing and logistics occupiers), and electric power capacity.

13.17. Coventry and Warwickshire is identified as contributing strongly to the current supply of strategic sites, including sites such as Coventry Gateway and Symmetry Park Rugby, however it is equally one of the areas of stronger comparative demand. As part of this

study, work was undertaken to consider the achievability of new strategic land parcels across the study area however site specific recommendations have not been made due to the size of the study area and the high level work undertaken. Instead, opportunity areas were developed to provide a guide on optimum locations for future strategic sites. Nine opportunity areas were identified within the study area, the application site forms part of area 7: M6/A45/A46/M45 Coventry & Rugby. Based on the existing supply over the next 20 years it is recommended by the study that in area 7 1-2 50ha B8/mixed sites would be required.

13.18. In addition to the opportunity areas the study then ranks potential junctions within the areas taking account of issues of junction capacity, labour catchment and public transport accessibility. M6 Junction 2 (which is where the application site is located) scores highly against these criteria and is the highest scoring junction in Area 7. This therefore indicates that this is an optimum location for employment development having regard to these criteria.

13.19. The authorities have sought to align the HEDNA and WMSESS needs so that an overall local and strategic employment need is given for each authority. This is set out in the Coventry and Warwickshire HEDNA-WMSESS Alignment Note (Iceni Projects). The local industrial need (B2 and B8 employment land on non-strategic sites – less than 25ha) and supply position for Rugby Borough is shown in the table below:

Total need 2021-2045	68ha (272,000sqm)
Annual need (24 years)	2.83ha (11,320sqm)
Completions 2021-2024	1.7ha (6,704ha)
Commitments as at 31 March 2024	3.5ha (14,012sqm)
Total completions and commitments	5.2 ha
Residual need after completions and commitments	**62.8ha**
Total years' supply from 2021	**<2 years' supply**

13.20. The need and supply position for strategic sites (over 25ha) is a separate need to the presented local industrial need. The application site is a strategic site and so would contribute to meeting this need. The need for opportunity area 7 is set as a net requirement, after existing supply and derives from the WMSESS. The table below presents a 'worst case' scenario, whereby all of the residual requirement for strategic sites in area 7 is met within Rugby Borough. The indicative position on strategic need and supply is set out in the table below:

Commitments in Rugby Borough as 2022 (Iceni alignment note appendix 1)	137ha
Strategic Commitments since 2022 - Padge Hall Farm	64ha
Upper bound residual requirement for opportunity area 7	84ha
Total potential development requirement 2021-2045	285ha

Annual need (24 years)	12ha
Completions and commitments	**201ha**
Total supply from 2021	**16.8 years i.e. to 2037**

13.21. The emerging local and strategic needs set out within the evidence bases (as above) can then be combined to give the following indicative overall supply position against the emerging future need figures:

Total requirement 2021-45	353ha (15ha per annum)
Total completions and commitments	206.2ha
Residual need after completions and commitments	**146.8ha**
Total years' supply from 2021	**13.7 years' supply i.e. to 2035**

13.22. The above table shows based on the emerging evidence base the overall residual need for employment land in Rugby is approximately 146.8ha. This may require Green Belt release however this will be confirmed through the plan-making process which is underway in Rugby.

13.23. The above table also shows that Rugby has a very strong existing supply, particularly for strategic sites. Immediate land release to meet the identified employment need is therefore not required, and new sites to meet the above need should come through the plan-making process. The new Local plan is anticipated to reach Regulation 19 consultation at the start of 2026 and be adopted in 2027. Taking this into account Policy ED3 and settlement boundaries for employment purposes are therefore not considered to be out of date and this policy still holds significant weight in the planning balance. Although there is not a need to grant the application site permission now to meet projected future employment needs, which can be met through the new local plan process, national policy allows land to come forward where there are very special circumstances and this is reflected in local plan Policy GP2.

Conclusion

13.24. The application is considered to be within a sustainable location (para 9.8 of this report) in relation to sustainable transport links and proximity to Coventry. The HEDNA and the WMSESS are evidence bases which set out the significant need for employment development in Rugby Borough however it is considered that this need is to be addressed through local plan-making.

13.25. There is conflict identified with Local Plan Policy ED3. There is also some conflict with Policy GP2 which identifies Rugby as the main focus for all development in the borough, in that the proposed development is very significant in scale and is not at Rugby. The exceptions the plan makes to that are on the sites allocated through Policy DS4, of which the site is not one.

13.26. Policy DS1 of the Local Plan is on track to be met but this policy is now out of date because more up to date evidence has been published in relation to need for employment land. The assessment of the new evidence outlined above shows that there is no short-term quantitative need to release land to meet need, which can be met through the local plan

process. Therefore, policies ED3 and GP2 (which sets the settlement hierarchy and settlement boundaries) are not considered to be out of date. However, policy GP2 allows development where in accordance with national Green Belt policy, which includes where very special circumstances are demonstrated. The very special circumstances case is considered in the planning balance (section 46).

13.27. Therefore, the proposals would need to demonstrate that the overall social, environmental and economic benefits outweigh identified harms. Those harms include the conflict with Local Plan Policy ED3 and the spatial strategy in Policy GP2. These factors will be weighed within the planning balance. The specific need for the development in broad terms has been assessed within section 18 of this report.

14. Principle of Main Town Centre Uses

14.1. Policy TC2 of the Local Plan relates to main town centre uses which include retail development, food and beverage, leisure and hotels. It seeks to ensure that proposals will not harm the vitality and viability of any nearby centres. Furthermore, it sets out that proposals must comply with a sequential approach to ensure that they are located on the most central site available. It explains that this means looking at Rugby town centre first before considering edge of centre sites, then out-of-centre sites well connected to the town centre before considering other out-of-centre sites.

14.2. The application includes proposals for a number of main town centre uses as follows: concept research and development retail; concept research and development leisure (including gym, swimming pool, sports hall and associated facilities); ancillary food and beverage and convenience retail; offices; and a hotel.

14.3. The proposed learning and development use includes provisions for an auditorium and training rooms. These uses are not explicitly listed as main town centre uses in the Local Plan or Framework. However, consideration has been given as to whether these would constitute “conference facilities” which are classified as a main town centre use. In that respect the Council’s independent retail consultant has advised that “there is the potential for an overlap in terms of the use, but we acknowledge this use would be appropriate as part of a HQ development and have not provided further consideration on this matter. We understand this would be appropriately controlled by a condition in any event.”

14.4. It is further noted that the proposed auditorium and training rooms would only be used by the occupier of the campus. Limited and controlled use by community organisations would also be permitted in order to provide a community benefit. Critically, the auditorium and training rooms would not be commercially available for use by other businesses and organisations as would usually be the case for a conference facility. This would be controlled by condition. They are therefore not considered to be main town centre uses.

14.5. The application site is an out-of-centre location and the proposed floorspace of these uses is above 500 square metres. As a result, a sequential test and impact assessment have been submitted. In accordance with policy TC2, the impact assessment only relates to the proposed retail, office and leisure uses.

Sequential Test (Main Town Centre Uses)

14.6. Paragraph 95 of the NPPF states that where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 94, it should be refused.

14.7. As established within the integrated campus section, it is accepted that the proposed development requires all of the individual uses to be provided in a single location. As such, it is agreed that it would not be appropriate or possible to disaggregate elements of the scheme, including the retail and other main town centre uses proposed. The sequential test consequently has to consider alternative development sites for the application proposal as a whole rather than each of the different main town centre use floorspaces.

14.8. In light of the above, the applicant relies on an Alternative Sites Assessment and Site Sequential Assessment which has been submitted with the application and considered above. They conclude that are no sequentially preferable sites available or suitable to accommodate the proposed development and meet the same scheme objective that the proposal is intending to serve. These findings are accepted for the reasons set out in the Alternative Sites section. The sequential test is consequently satisfied.

Impact Assessment (Retail)

14.9. As set out above, the NPPF states that where a proposal is likely to have significant adverse impact on one or more of the considerations in paragraph 94, it should be refused. Paragraph 94 of the NPPF refers to the impact:

a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

14.10. To establish the impact of the proposed development on existing centres, the applicant has submitted a Main Town Centre Use Assessment (MTCUA) and Main Town Centre Use Assessment Addendum (MTCUAA). A Technical Note outlining an Additional Retail Analysis for the Potential Implications of Frasers Group Closures has also been submitted.

14.11. These Assessments consider a range of different scenarios to establish the turnover of the proposed concept retail research and development floorspace and convenience retail. They then set out the trading effects of this on an agreed geographical area. A quantitative and qualitative analysis is then provided to determine the retail impact.

14.12. In relation to Rugby town centre, the proposal would result in an impact on turnover of up to -1%. The greatest impacts would be on Coventry city centre (up to -4% impact) and Nuneaton town centre (up to -3.9% impact). Furthermore, it was considered that the proposals would not undermine or significantly impact planned investments within identified centres (including the Coventry city centre south scheme). The Assessments conclude that the impact would not be significantly adverse (the policy test) either in terms of investment or vitality and viability.

14.13. The Technical Note considers the potential impact on existing defined centres in the event that existing in-centre stores operated by Frasers Group close if planning permission for this scheme is granted. It states that there is no intention to do this and highlights the

different role and catchments of existing in-centre stores. The greatest impacts would be on Coventry city centre (up to -8% impact) and Nuneaton town centre (up to -5.9% impact).

14.14. Coventry City Council (CCC) has raised an objection in respect of the retail impact of the proposed development. They are particularly of the view that an impact on turnover of up to -4% on Coventry city centre should be deemed a significant adverse impact. As such, they consider that the scheme should be refused on this basis unless certain mitigation measures are secured.

14.15. The Council appointed an independent retail consultant to review the submitted documents and objection from CCC. The independent retail consultant concluded that "the scale of retail floorspace proposed at the application site selling primarily fashion and sports wear, in accordance with our understanding of the conditions proposed in the MTCUAA, would have a significant adverse impact on Coventry city centre. This quantum of floorspace used entirely for fashion goods in an out-of-centre location is not acceptable in planning policy terms as it is likely to lead to the closure of one or more of the key comparison retailers in the city centre and the potential loss of a number of smaller retailers as a result of direct impacts associated with the loss of trade and footfall. There would also be indirect impacts on other businesses reliant on linked trips as a result of the decline in footfall. Importantly, it should again be noted that we do not consider that the impacts arising at any other centre [including Rugby town centre] would be of a significant adverse magnitude."

14.16. Consideration has subsequently been given to each of the suggested mitigation measures from CCC. The first request is for a "Restriction on the floorspace of the retail and food and beverage allowance in line with the application details. (There should not be any means for expansion of the retail elements having regard for their retail assessment.)". This is agreed and is controlled by condition.

14.17. The second CCC request is for a "Restriction to use only by Frasers Group – no other external non-Frasers Group companies should be permitted to trade from the R&D retail." Consideration has been given as to whether to only grant personal planning permission for "Frasers Group" as a named occupier for the retail component of the campus. It is considered that this would be too narrow, restrictive and unflexible (e.g. in the event that Frasers Group ceased to trade no one else would be able to occupy the site). It is instead agreed with the applicant that the retail component should be restricted to a "campus company". This is defined as being a single company and any other body corporate which is: its holding company; its subsidiary; any other body corporate which is a subsidiary of that holding company; its parent undertaking; its subsidiary undertaking; or any other body corporate which is a subsidiary undertaking of that parent undertaking, with such terms having the same definition as in the Companies Act 2006 (as may be amended from time to time). This would mean that the retail component could only ever be used by a company who occupy the campus. It would consequently prevent the retail component from being used by any variety of different retailers to form an out-of-centre retail park (e.g. such as that at Elliots Field). This would be controlled by condition.

14.18. The third CCC request is for a "Restriction of 40% of the R&D retail floorspace for the sale of fashion led goods." This is not agreed but an alternative is proposed. The Council's independent retail consultant has advised that a condition should be imposed "Restricting the proportion of floorspace that can be used for the sale of fashion goods, setting out a maximum floorspace figure (instead of a percentage figure)." The applicant has accepted

this and proposed a condition which identifies the level of floorspace for fashion-led retailing to be provided being limited to no more than 10,856 square metres (net) in accordance with the retail assessment scenarios undertaken. They note that this approach is linked to the main town centre use assessment. Furthermore, introducing a quantum of floorspace for fashion-led goods is easier to monitor and enforce than referring to a percentage figure, which is more difficult to measure. This is accepted and would be controlled by condition.

14.19. The fourth CCC request is for "Restrictions on the hours of operation of the retail units so that they are only open to the public during the working day (8.00am to 6.00pm) with no public trading on Sundays or Bank Holidays. This would be in line with the stated R&D purpose." This is not agreed. The Council's independent retail consultant has advised that "the assessment has been undertaken on the basis of standard opening hours and trading days, and that reducing these could untenably impact on the overarching function of the application proposal." Indeed, the retail units are designed to enable research and development in a live store environment. They need to be open to the public on the same days and hours which existing stores across the country are open. For example, they need sales data across the week on different trading days to determine the success of different concepts, fitouts and displays. To restrict this to certain hours and prevent trading on Sundays or Bank Holidays would be unreasonable.

14.20. The fifth request is for a legal agreement "To require the continued operation of the applicant's retail operation within Coventry City Centre and the district centres for a minimum period of 10 years from the opening of the R&D retail." It is agreed that an obligation preventing the closure of existing Fraser Group stores in Coventry city centre and Nuneaton town centre is necessary. This is because the Technical Note identifies that the closure of all Fraser Group stores in these centres could result in impacts of up to -8% and -5.9% respectively. The request for a 10 year clause was rejected by the applicant on the basis that "a period of 10 years from opening is wholly excessive and does not meet the Regulation 122 tests." Advice was subsequently sought from the Council's independent retail consultant who agreed that a period of 5 years would be reasonable. It is considered that this would provide sufficient stability and time for the market to adjust after the retail units are opened. This is particularly so when taking into account the long build period for the development, together with 5 years protection post the retail use commencing. This would be controlled within the s.106 Agreement.

14.21. The Council's independent retail consultant has also advised that "Whilst the impact on Nuneaton town centre is estimated to be -3.9%, we are of the view that subject to the suggested conditions and ongoing presence of Frasers Group operators within the centre, that the impact would not be significant." The latter would be controlled within the s.106 Agreement which would require the continued operation of the applicant's retail operation within Nuneaton town centre for a minimum period of 5 years from the opening of the R&D retail.

14.22. Overall, it is critical to be mindful that national and local policy and guidance does not set out a specified percentage impact at which the impact is deemed to be adverse or significantly adverse. Any percentage impact rather needs to be considered within the context of a qualitative assessment. This includes a need to consider the specifics associated with the proposal and the health of defined centres, assessing whether the defined centres could withstand the assumed trade diversion. To that end, it is considered that there would only be a significant adverse impact on Coventry city centre. The impacts

arising at any other centre would not be of a significant adverse magnitude. Based on paragraph 94 and 95 of the NPPF, the proposal could therefore be refused based on the significant adverse impact on Coventry City Centre. However, other material considerations could outweigh this harm and this will consequently be weighed within the planning balance.

Impact Assessment (Food and Beverage)

14.23. The proposed development includes provisions for food and beverage (F&B) floorspace. The Main Town Centre Use Assessment considers qualitative matters relating to the impact of this on the defined centres nearest to the site. However, it particularly highlights that this F&B floorspace is intended to meet the needs of the on-site population and visitors to the wider complex. Indeed, within the context of the proposed development as a whole it is not considered to be a use which would attract and divert significant trade away from nearby centres.

14.24. The Council's independent retail consultant has considered this and advised that the proposed F&B offering would be "unlikely to undermine the F&B offer in the centres closest to the application site and that such uses are unlikely to be a draw in their own right, and will instead function as an ancillary element to the wider proposal. Again, we consider that the proposed offer will likely be qualitatively different to that which is present in defined centres and that any impact is unlikely to be material." It is consequently agreed that the food and beverage element of the proposed development would have a negligible (if any) impact on neighbouring centres.

14.25. Notwithstanding the above, the objection from CCC includes a request for "Restrictions on the provision of food and beverage uses in line with the retail units (8.00am to 6.00pm)." This is not agreed. Such a condition would not be necessary given the negligible (if any) impact on neighbouring centres. Moreover, this would be unreasonable given the proposed 24-7-365 operation of the site which would result in workers requiring food outside of the requested hours.

Impact Assessment (Leisure)

14.26. The proposed development includes provisions for concept research and development leisure floorspace (including a gym, swimming pool, sports hall and associated facilities). The Main Town Centre Use Assessment highlights that this would be a concept gym which would test equipment and concepts in a live environment whilst being utilised for demonstrations and marketing/promotions. It is noted that this differs from traditional gyms available within the surrounding area. In particular, it highlights that there are no comparable facilities within the nearest defined centres. The impact on such facilities further afield would be negligible and would not adversely impact on their long-term vitality and viability.

14.27. The Council's independent retail consultant has considered this and advised that "the impact of the leisure uses, including the proposed gym, fitness suite and swimming pool would be limited overall, given that they will principally directly serve the needs of those working at the HQ, and that the offer is qualitatively different from that which is provided through local authority and other private leisure facilities in the adjacent authority areas." Overall, it is accepted that the trading effects of the gym and leisure use on existing defined centres would not be significant adverse.

Impact Assessment (Offices)

14.28. Policy TC2 of the Local Plan sets out the need to assess the impact of offices in such out of town locations. This is now inconsistent with the Framework which sets out that impact assessments are only required for retail and leisure proposals. The applicant has nonetheless addressed the office impact with a qualitative appraisal within the Main Town Centre Use Assessment. It is particularly noted that the offices would be an integral component of the wider integrated campus which cannot be disaggregated. They would be purpose built for a particular occupier and would not undermine other office investments within existing centres. The Assessment consequently concludes that "there is no suggestion that the proposed office floorspace is likely to lead to a significant adverse impact on neighbouring centres."

14.29. The Council's independent retail consultant has considered this and noted how it is proposed the offices would be used and why they are needed. They note that "the MTCUAA also includes a series of proposed conditions which would restrict the occupation of the HQ office floorspace by the operator or business entity of the warehouse unit on the site, alongside their brand partners and suppliers." This would be controlled by condition. They consequently advises that "Overall, and noting the requirement to assess the impact of the proposed office floorspace no longer forms part of the policy test within the NPPF, we are satisfied that the impact of the proposed office floorspace will not result in a significant adverse impact on the defined centres." This position is agreed.

Summary (Principle of Main Town Centre Uses)

14.30. It is considered that the proposal does not comply with policy TC2 of the Local Plan. The proposed development, incorporating a number of main town centre uses, would be located on the most sequentially preferable site. However, the impact of the proposed retail uses in this location would have a significant adverse impact on Coventry city centre. Accordingly, this weighs against the proposal and is to be considered in the planning balance.

15. Need for Sports Pitches

15.1. Paragraph 96c of the NPPF states that decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through provision of safe and accessible green infrastructure and sports facilities.

15.2. Paragraph 97a of the NPPF seeks to provide social, recreational and cultural facilities and services the community needs (such as local shops, meeting places, sports venues, open space, etc.)

15.3. Paragraph 102 of the NPPF sets out that access to a networks of high quality open spaces and opportunities for sport and physical activity is important.

15.4. Sport England have commented that it is unclear as to the rationale for the sports provision proposed and how this will meet the need of the community as set out in the Open Space, Playing Pitch and Sports Facilities study (2015). It was also stated that there does not seem to be a need for the 3G pitches proposed either as set out in the Playing Pitch and outdoor sport strategy (PP&OSS, 2023).

15.5. Part of the proposal is for three 5v5 3G pitches to be sited adjacent to warehouse unit 1. This is part of the leisure facilities which form part of the integrated campus however will form part of the community use agreement and therefore will be accessible to the public. The need for the leisure facilities from an integrated campus perspective is covered within section 14 of this report (paragraph 14.26/27).

15.6. The Playing Pitch and outdoor sport strategy (PP&OSS, 2023) shows this site to be within the Northern region of the Borough. It sets out that there is a need for 1 full size 3G football pitch in this region.

15.7. RBC Leisure and Wellbeing have reviewed the application. The pitches would provide some additional training space for clubs in the northern region of the borough and provide informal opportunities for sports participation and physical activity. However, the pitches would not contribute towards meeting RBC's 3G pitch need in the northern area of the borough due to their size and lack of run-off space around the pitches. There is not a provision for the three pitches to be combined into a full sized pitch (RBC's need) due to the size differences between the 5-aside pitches and a full sized pitch.

15.8. The applicant has submitted details in relation to why the location of the pitches was selected and the size. In addition, they have given lighting requirements for both 5-aside and full sized pitches. Given the Green Belt location, the size and lighting arguments are accepted in this instance.

15.9. The acceptance of the justification for the 5 aside 3G pitches however does not negate the fact that these pitches are majorly only meeting Frasers Group's need and the weight to be given to the community benefit of this pitches in the planning balance is therefore limited.

16. Learning and Development Academy

16.1. The proposed learning and development academy comprises 3,234 sqm of flexible learning space, 7 training rooms and a 750-seat auditorium. It would have a dedicated access off the arrival square within the campus heart. Typical learning activities would include:

- Management induction
- Management development
- Manager seminars
- Management without limits
- New business integration programme
- Product training
- Listening groups
- Focus groups
- Warehouse training
- Staff inductions, and
- Ad hoc training and courses

16.2. The academy would also accommodate the Group's apprenticeship and graduate scheme of which in 2030 it is anticipated there will be approx. 200 apprentices and approx. 100 graduates.

16.3. At Shirebrook over a recent 12 month period the Group undertook over 19,000 hours of training and managed the recruitment over more than 500 new staff. With the continued growth of the business, the demand for staff training and development activities is set to increase. The groups training methods are centred around practical learning and therefore this goes to the heart of the integrated campus proposal.

16.4. Shirebrook currently has an auditorium however the auditorium proposed is larger than the existing facility. This is so that the Group can accommodate on site corporate meetings for increased staff numbers and also to hold brand events as required (this is controlled via condition – events management plan). Through the community use agreement local groups will have access to the auditorium – this year 15 community events have been held at Shirebrook however any access arrangements will be controlled through the community use agreement which is appended to the Section 106.

17. Group Accommodation

17.1. The proposal includes 80 group accommodation units and associated shared common room space. These units are not classified as C3 residential dwellings and rather fall under a sui-generis use class. They would be used by those on graduate/apprenticeship programmes (who may be staying on site for up to 24 months) and members of staff visiting for longer periods. This type of accommodation is common on campuses such as Dyson in Malmesbury and Adidas in Germany.

17.2. Set within a parkland setting, these self-contained modular units (each measuring 20sqm) form two-storey clusters together with a communal hub. There would be a total of 64 long-stay units arranged in 8 clusters. Each cluster would comprise of 8 units together with a shared communal kitchen unit. These units would be open plan accommodation and include a bedroom, en-suite bathroom, a desk, private balcony, wardrobe and a coffee/tea point. There would also be a total of 16 short-stay units (which would contain small integrated kitchens) arranged in 2 clusters that would each comprise 8 units. The clusters would be oriented south, southwest or southeast to maximise natural light. The communal hub would also include a communal kitchen and laundry facilities.

17.3. A range of factors have been considered to inform the nature and location of the development. This includes consideration of waste management, fire safety, noise sources, landscape impact, residential amenity and access. The positioning of the group accommodation to the northwest of the site affords the residents privacy, protection and a sense of owned space whilst also being a very short distance to the other uses on the campus. This is assisted by carefully designed landscape bunds which help to reduce noise and protect the residential amenity of an existing dwelling bordering the site. The provision of accommodation on site reduces unsustainable movements to off-site locations and allows residents full immersion in the campus and the breadth of the business.

18. Need for Development

Frasers Group Justification

18.1. The applicant's central hub business model is based on the co-location of its HQ, warehousing, learning & development and R&D retail space on a single site. This is evident from the way that their existing site (Shirebrook) operates. The integration of the uses across the existing site is evidenced within the submitted Operator Statement. Shirebrook is capacity constrained and has a number of evident disadvantages, including the surrounding local labour market for the scale of the applicant's operation and distance from the SRN.

18.2. Based on the above Frasers Group are therefore seeking a new HQ campus which continues to integrate these activities. It is argued by the applicant that there is no available land for further expansion at Shirebrook, due to the evidence presented within the operator statement of numerous other locations across the country the company holds in relation to warehousing this is accepted. A single national distribution centre is common to other retailers and enables coordination of deliveries across the store portfolio. The delivery of this campus will therefore support increased productivity which is identified as a core economic objective is paragraphs 8a and 85 of the NPPF.

18.3. In locational terms, it is commonly recognised that the most commercially attractive location for this type of development would be within the golden triangle. The applicant therefore understandably is proposing this use on a site within the golden triangle. However, additional justification has been put forward in relation to the location of the site. A gravity model was used specifically relating to the current store portfolio of the business. The output of this was a location just north of Hinckley which is a central location within the country, with strong access to the motorway network and accessible to most of the country within a 4.5 hour drivetime. This ultimately underpins the wider strength of the logistics/distribution market in the sub-region.

18.4. It is evident from the existing situation at Shirebrook that the colocation with brand partners, and the concept retail provision on site, helps to support collaboration and innovation (including in respect of marketing, store layouts, staff training, etc). It is also noted that the business operates to draw staff from other areas across into the warehouse in peak periods (Christmas, Black Friday, etc.),

18.5. The NPPF makes clear that objectives of the planning system include to support economic growth and improved productivity (including through the release of land) (para 8) and significant weight should be placed on this (para 85). It is agreed that Frasers model of integrating HQ office, warehousing, learning and development and R&D at a single site will help to support this, and that the interactions and understanding which it enables help to support productivity growth and innovation, in line with Government's economic objectives. The colocation of these functions contributes to reducing costs, but also to providing opportunities for staff to gain from skills development/ training and for career progression.

18.6. The development includes a number of ancillary functions – on-site F&B floorspace, convenience shopping, hotel and group accommodation. Given the size of the on-site workforce, the principle of F&B and convenience retail on site is considered reasonable in relation to the integrated campus (principle of main town centre uses on the site is assessed within section 14 of this report), and indeed is common for the design of modern

business parks and critical to ensuring that the site is an attractive place to work. A range of business parks also include hotel accommodation; with overall the rationale for hotel or group accommodation on-site (rather than more widely in the local area) being commercially driven.

18.7. Overall, it is considered that Frasers Group have justified the need for the development from their business perspective.

Need for Employment Land

18.8. Section 13 of this report set out the need for employment land up to 2041 and the evidence base behind that need. Based on this it is considered that there is a significant need for employment land in the Borough up to 2041 and beyond. Based on current supply, especially that of strategic sites, this need will be addressed through the Local Plan process with a view of adopting a new Local Plan in 2027.

Urgency for Development

18.9. Even though there is a need for employment land in the long term this will be dealt with through the local plan process (section 13), the proposed development is still contrary to the Local Plan and is within the Green Belt. Green Belt boundaries are intended to be reviewed through a Local Plan process and therefore there is a question as to why this development needs to come forward in advance of a new Local Plan for Rugby.

18.10. Based on the planning and operator statement submitted with the application it is clear that there are capacity constraints (including limited pickface space) and inefficiencies associated with the current operation at Shirebrook. Any new campus would need to be operational by 2029/30 given business needs and the lease timeframe that Frasers Group have at Shirebrook. By submitting a planning application now the Operator statement (para 6.28) identifies that the facility would be fully operational by 2030. This is based on a 4-5 year lead in time which is reasonable for a development of this scale.

18.11. The Council is currently progressing a new local plan however it is in its infancy with an Issues and Options Consultation undertaken in Spring 2024. The current Local Development Scheme envisages adoption by June 2027. Based on the Local Plan timeframe this does not give enough time to bring forward a planning application and the development post adoption of the Local Plan for the reasons given above.

Alternative Sites

18.12. The alternative sites review is detailed within section 12 of this report. It concludes that there are not any alternative sites which overall perform higher for the specific form of development proposed than the application site.

Conclusion

18.13. It is considered that the applicant's need for the development now ahead of a Local Plan allocation has been justified based on the assessment undertaken this section of the report and other sections referenced.

19. Agricultural Land and Soil Resources

19.1. The application site extends to 112.9 hectares (ha) of land which is largely undeveloped and mainly in agricultural use, with fields divided by hedgerows and tree boundaries. Paragraph 180 (a & b) of the NPPF and Reference ID: 8-001-20190721 of the National

Planning Practice Guidance are therefore relevant and outline the need to consider the economic and other benefits of the best and most versatile agricultural land. Paragraph 180 (a) places an emphasis on the protection of sites of geological value and soils, with the NPPG highlighting the importance of soil as an essential natural capital asset that provides important ecosystem services such a growing medium for food, timber and other crops.

19.2. This higher quality land represents that which is most flexible, productive and efficient in response to inputs, and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals. In this respect agricultural land is graded on a scale of 1 to 5 where the grades are: 1 (excellent); 2 (very good); 3a (good); 3b (moderate); 4 (poor); and 5 (very poor). The best and most versatile land are classified as being grades 1 (excellent), 2 (very good) and 3a (good).

Approach to Agricultural Land

19.3. The above policy implies that a sequential approach should be considered, with NPPF footnote 62 clarifying that 'where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.'

19.4. The NPPF indicates that it is for Local Planning Authorities to judge the economic and other benefits of the best and most versatile agricultural land. This is consistent with the technical note produced by Natural England entitled 'Agricultural Land Classification: Protecting the Best and Most Versatile Agricultural Land' (2012). This note emphasises the importance of such land as a natural resource which is vital to sustainable development. However, it does note that decisions rest with planning authorities and that the agricultural land classification is not the sole consideration.

19.5. Ramblers Warwickshire have objected to the loss of agricultural land.

Agricultural Land Classification with Warwickshire and Rugby

19.6. According to Natural England's statistics, approximately 12% of land (23,692 hectares) in Warwickshire falls in grades 1 (excellent) and 2 (very good). In Rugby Borough there is no grade 1 (excellent) land but there are 4,186 hectares of grade 2 (very good) land which equates to 11.8% of land within the Borough. The figures for grade 3 (good/moderate) land provided by Natural England do not split grades 3a (good) and 3b (moderate) but indicate that approximately 75.5% of land within the Borough (26,686 hectares) is grade 3 (good/moderate) land.

19.7. The Natural England 2018 West Midlands Agricultural Land Classification map shows the majority of the site to be Grade 3 with a small element of the site classified as Grade 2.

19.8. Chapter 11 of the submitted Environmental Statement details the results of a desk-based assessment of climate, topography (gradient), flood-risk, geology and soil. The baseline for the development site is stated as follows:

> 'The total Site area is 112.9 hectares (ha), of which 104.3ha is agricultural land which primarily in arable use. The soil survey classified 13.6ha of this land as 'best and most versatile' (Grade 3a) which accounts for 12% of the total Site area and

is located mainly in the west of the Site. The remainder is either Grade 3b or non-agricultural land.'

19.9. Appendix 11.1 contains the report prepared by Reading Agricultural Consultants that supports the assessment of chapter 11 within the Environmental Statement and the assessment of land quality has been carried out according to the revised ALC guidelines; MAFF (1988). Agricultural Land Classification of England and Wales. Revised guidelines and criteria for grading the quality of agricultural land. MAFF Publications.

19.10. Based the above there is therefore a difference in the Natural England 2018 grading and the grading proposed by the applicant. The survey results have been analysed and it is considered that the grading based on the survey is appropriate and therefore no grade 2 land is considered to be within the site.

Land Designation and Use Conclusions

19.11. Land classified as Grade 3, Subgrade (a) and (b) is midway between Grade 1 and Grade 5, and is suitable for growing good crops of cereals, pulses, oilseeds and grassland for grazing and/or conservation as hay/silage. The land in Subgrade 3 (a) is more limited than that within Subgrade 3 (b) which is more suited to autumn sown crops and grassland. The land which comprises the site is mainly in arable use with a small area of grass.

19.12. Two soil types were identified in the detailed surveys undertaken at the Site. The most prevalent soil type includes clay loam or clay topsoil, heavy clay loam or clay upper subsoil, passing to calcareous clay at depth. The second soil type is present in the north-west and in parts of the east of the Site. The topsoil is similarly clay or heavy clay loam but directly overlies greyish brown or grey slowly permeable clay, becoming more prominently grey with depth.

19.13. Overall, 13.6ha (12% of the Site) is classified as Subgrade 3a which is 'Best and Most Versatile' (BMV). 90.7ha (80% of the Site) is classified as Subgrade 3b. The remaining 8.7ha (8%) is non-agricultural land.

19.14. The assessment assumes that all of the agricultural land at the site would be permanently removed from agricultural production, representing a worst-case (and most likely) scenario. The magnitude of change on agricultural land is determined according to the area of land that would be permanently removed from agricultural use.

19.15. The land that remains undeveloped is proposed mostly as a Local Wildlife Site where the soil resource will be retained and managed as grassland and woodland but not under agricultural management. Other areas of grassland will be provided widely within the site as species-rich grasslands, with variations in micro-topography and soil conditions created to enable the development of diverse habitats.

19.16. The proposed design shows built development on approximately 50% (6.9 ha) of the total area of Subgrade 3a, seeking to minimise this impact. Whilst the other agricultural land is not proposed to be built on and retained as landscaping it is also not proposed that this land is retained and used for agricultural purposes. More than 50ha of Subgrade 3b would be directly built on and therefore permanently lost from agricultural production. The same approximate hectare of 3a and 3b would be lost from agricultural production as it would be landscaping and biodiversity net gain areas which would not be used for agricultural

production. The magnitude of change would be major and this will be weighed within the planning balance.

19.17. In addition to the loss of agricultural land paragraph 180 of the NPPF recognises the importance of soil function and that it is a finite resource which should be conserved and enhanced. In order to minimise and mitigate potential damage to, or loss of soil and soil structure during the construction phase. A condition will be applied to any consent to secure a Soil Resource Management Plan with the aim of re-using displaced soil resources on-site in the detailed design of open spaces and green infrastructure. The plan would confirm the different soil types (based on the soil surveys already undertaken); the most appropriate re-use for the different types of soils; and the proposed methods for handling, storing and replacing soils on-site. By following best practise on soil handling, storage and reuse, the displaced soil will be able to fulfil the majority of its primary functions and services on-site and reduce the magnitude of change to minor.

19.18. The proposed development would result in the loss of 90.7 hectares of average quality (grade 3b) agricultural land together with the farmhouse and buildings at Crowner Fields Farm and Home Farm resulting in a significant loss to agriculture. In terms of the loss of Best and Most Versatile Land (13.6 hectares of Grade 3a in this case) this would be limited however there is still a loss. This will be weighed within the planning balance.

20. Economic, Social and Community Benefits

20.1. The economic objective of the NPPF is to help build a strong, responsive and competitive economy. The social objective is to support strong, vibrant and healthy communities.

20.2. Paragraph 85 states that 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. Paragraph 96 states that decisions should aim to achieve healthy, inclusive and safe places which promote social interaction and enable and support healthy lifestyles.

20.3. The Environmental Statement submitted in support of the application includes a socio-economic chapter. In addition, an economic benefits statement was submitted in July 2024.

20.4. WCC Business, Economy & Skills and RBC Economic development have both reviewed the application and have no objections. The Council appointed Economic Impact consultants to independently scrutinise, analyse and evaluate the information submitted by the applicant.

20.5. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

20.6. One letter of support was received relating to economic prosperity and increase in jobs.

Economic Activity

20.7. Census data (2021) shows that in the Local Area, the rate of economic activity fell from 62% in 2011 to 56% in 2021. There was also a decline in economic activity during the same time period in Rugby (67% to 66%) and at a regional level (62% to 59%). The national (England) level of economic activity at the time of the 2021 Census was 61%.

20.8. According to Census 2021 data, as many as 44% of residents within the local area aged 16+ were economically inactive, increasing from 38% in 2011. The impact of the covid-19 pandemic needs to be considered in relation to this figure.

Deprivation

20.9. The Government's Index of Multiple Deprivation (IMD) (2019) measures deprivation by combining indicators including a range of social, economic, environmental and housing factors to give a single deprivation score for small areas in England. Income deprivation and employment deprivation are linked to economic activity as the level of deprivation could be reduced as a result of employment opportunities within the area.

20.10. Within the borough of Rugby and the neighbouring borough of Nuneaton and Bedworth and the city of Coventry there are approximately 15 areas of deprivation which are in the category of 10% most deprived.

National Benefits

20.11. Frasers Group has been the fastest growing retailer since 2019 and plans to continue to invest and grow, and expand its contribution to local retail and the national economy. Its current estate of distribution/logistics centres across the country is no longer adequate to support the Groups growth and a change is required in order to enable the Group to keep boosting the national economy and employing over 22,000 people in the UK.

20.12. There are various capacity and productivity gains through the proposed headquarters as Shirebrook was not designed for the growth and capacity now required. The Group estimates that the new facility will increasing processing capacity by up to 50% compared to the current estate. Overall, this would increase units per worker productivity by up to 90%. The value of this to the UK economy could equate to around £50m of additional contribution to Gross Domestic Product (GDP) each year. This would therefore enable the new campus to boost the UK economy by approx. £69 million per year and could potential support up to 750 additional shops with 11,000 new jobs in towns and cities across the country. This aligns with the Group's priority of being a bricks and mortar retail company.

Local Benefits

Construction Jobs

20.13. Approximate average of 480 full time equivalent (FTE) jobs over the course of the 6-year construction period. When the internal fit out of proposed buildings is considered this increases to an average of 585 FTE over the construction period and 800 FTE jobs at the peak. 2028 is estimated to be the peak construction year in which up to 640 jobs would be available on site.

Operational Jobs

20.14. The applicant has estimated the operational jobs to be a net gain of 7,680 jobs on site (6,730 FTE which equates to approximately 7,690 gross workers once part-time working is included). There are currently 10 jobs on the existing site. The breakdown is as follows:

Use	**FTEs**	**Jobs**
Warehouse	3,700	3,950
Ancillary uses to warehouses e.g. office	660	700
Offices (HQ, Supplier hub office)	1,360	1,590
Retail R&D	790	1,140

Other (Learning/training, accommodation, convenience retail, mobility hub and nursery)	220	310
Total	**6,730**	**7,690**

20.15. This represents an uplift of 15% on the total number of jobs currently based in Rugby Borough. Therefore, there would be a permanent, major beneficial effect on the local economy. In the west midlands the uplift would be 0.3% therefore there would be a minor benefit.

20.16. The below table provides a breakdown of the 7,690 jobs:

Socio-Economic Group	**Jobs**	**Percentage**
Manager, directors and senior officials	1,320	17%
Professional employee	180	2%
Intermediate non-manual	345	4%
Supervisor of non-manual	415	5%
Junior non-manual	2,035	26%
Personal Service	185	2%
Foreman of manual	305	4%
Skilled manual	1,385	18%
Semiskilled manual	700	9%
Total	**7,690**	**100%**

20.17. It is noted that some of the proposed activity will be relocated from existing sites in the country however even after accounting for displacement there would still be a significant number of jobs available at the proposed site.

20.18. The council's independent consultant consider that the operational job number would actually be 5,800 FTE jobs. This is approximately 14% lower than Frasers Groups estimate of 6,730 FTE jobs. It is noted that any estimate of job numbers at this stage will be imprecise given the timeline for development as employment numbers will change over time as operations change.

20.19. It is considered that even with the lower estimated number, the scale of job creation represents a significant uplift in employment for Rugby Borough.

Social and Community

20.20. The community use agreement provides the mechanism in which the auditorium (750 seats), leisure and sports facilities will be accessible to the public.

20.21. Local groups will be able to access the training rooms and auditorium as set out within the community use agreement which will be appended to the section 106.

20.22. Local people and companies will be prioritised through the procurement strategy for the site, this includes bringing unemployed people into work.

20.23. Public Transport will be increased in the local area. Extension of bus routes 78/78A with an hourly service and diversion of route X6 into the campus on at an hourly frequency. New route 72 will be provided linking Rugby and Nuneaton via Bulkington and the campus

on an hourly frequency. Bus routes 9, X30 and 60 (Coventry) to also be extended into the campus.

20.24. 48 hectares of new accessible public open space is proposed through the development. The 12ha Local Wildlife site is also proposed to be enhanced. This would therefore increase the amenity greenspace in the parish by 24.46ha (Ansty Parish currently has 0.94ha) and natural and semi-natural greenspace in the parish by 19.43ha (Ansty Parish currently has 0ha of accessible natural and semi-natural provision). This greenspace will be accessible for all and provide a social benefit for the community. The proposals deliver significant enhancements in relation to green space accessibility in the surrounding area. The north of the site comprises enhanced green infrastructure, woodland planting, improvements to biodiversity and extensive new walking and cycling routes across the site.

Employment and Skills

20.25. The section 106 agreement would secure an Employment and Skills Framework. This would ensure Frasers group works with local skills and training providers, including colleges and universities to advertise vacancies and graduate programmes. It would also provide opportunities for the local community to be upskilled including apprenticeship and graduate opportunities.

20.26. In relation to training the new Learning and Development facilities which are an expansion on the Shirebrook facilities would result in the Group being able to offer 30% more training.

Economic Effects

20.27. The new employees at the development are expected to generate economic benefits for the local economy through spending. An estimate of £24.4 million per year has been put forward by the applicant. Due to the draw of workforce across geographical areas the magnitude of impact is considered to be low as the spending would also be spread across the wider geographical area. This would therefore have a minor beneficial effect at Borough level.

20.28. The applicant estimates that the employment supported by the proposed development would contribute approximately £339 million in Gross Value Added (GVA) per year. This is equivalent to growing the Rugby economy by 10%. The council's independent consultant estimates that the GVA uplift would be between £235- £339m per annum (based on the lower job figure the consultant has calculated).

20.29. Other benefits identified by the applicant are:

- Supporting productivity of the logistics and distribution sector
- Closing the gap between top performing and struggling areas – levelling up
- Increasing retail spend outside of the south east.

Economic and Social Summary

20.30. It is clear that there is both a need for economic regeneration (in particular with concentrations of deprivation in Coventry and Nuneaton and Bedworth within close proximity to the site) and substantial local economic benefits and job creation which the development can be expected to support. The scheme would represent a major inward investment into the sub-region.

20.31. There are clear economic and social benefits for the group to undertake core operations on a single site.

20.32. This section sets out various benefits of the scheme however it is important that the quantification of benefits is also considered.

20.33. Overall, the proposed development does represent a substantial inward investment and economic opportunity for the Borough and the wider sub-region. It offers the provision of between 5,800 – 7,690 jobs in the area and GVA uplift of between £250-340 million per year.

20.34. Whilst there is some potential for displacement effects, which will affect the net economic impact, these are reasonably expected to be limited given that this the development is focused on a growing sector within the sub-region and benefits from access to a wide labour pool.

20.35. The delivery of an Employment and Skills Plan, and the on-site training and development provision within the development, will help to support access to opportunities created from local and borough residents. This will include the provision of an Employment, Skills and Training hub to be provided in the urban area of Rugby in order to provide services to enable work readiness. The full specification of the hub is to be included in the Employment and Skills Framework which will be appended to the Section 106.

20.36. Whilst business rates are not classed as a planning benefit and are therefore not a material consideration it is noted that the development would generate rates of approximately £9 million per annum, with £3.6 million being retained by the local authority.

20.37. Ultimately, all other points aside, this huge economic benefit of the proposal to Rugby is such that this gives rise to the very special circumstances case. Indeed, the report elsewhere makes the point that even if the circumstances were different (i.e. the need case was not made out or there was an alternative site), the recommendation would remain unchanged. This is ultimately because the economic benefits and growth that the proposal would give rise to are so significant that this benefit alone justifies the grant of permission, as this clearly outweighs all other collective harms associated with the development (i.e. including harm to the Green Belt necessitating very special circumstances to be made out).

21. Design

21.1. Section 12 of the Framework and policies HS1, SDC1 and SDC2 of the Local Plan set out the importance of good design in new developments. The Climate Change and Sustainable Design and Construction SPD (2023) expands on this and sets out more detailed design considerations. It also encourages consideration of the National Design Guide and National Model Design Code.

21.2. The Council appointed Landscape and urban design consultants to independently scrutinise, analyse and evaluate the information submitted by the applicant.

21.3. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

Context

21.4. From the outset, the applicant has sought to meet the need for the development through the delivery of an exceptional campus environment, reflecting high quality design and operation with aspirational sustainability objectives.

21.5. As a starting point, a comprehensive assessment of the existing site was carried out to understand the physical context which the design would have to respond to. In that respect, the site predominately takes the form of a large area of open agricultural fields interspersed with hedgerows and trees. In association with specialist consultants, a wide range of physical considerations that could affect the proposed development were identified and analysed. This included consideration of: green infrastructure (particularly trees and hedgerows); ecology and natural habitats; hydrology; topography; soils; existing structures; existing utilities; landscape character; public rights of way; visual sensitivity and key views; heritage; surrounding settlements and built form; and the Green Belt designation. The implications and opportunities presented by these factors to a masterplan were then identified.

21.6. Key considerations identified include the presence of predominately residential dwellings within Ansty village to the northwest with associated views from and to this. There are also a range of other sensitive views from surrounding land towards the site. Moreover, public rights of way provide access across the site. At the same time, the M6 and M69 motorways to the southern and western boundaries have a more urban influence on parts of the site. Other physical consideration include a fall in topography from north to south, watercourses running across the site, a local wildlife site to the northern boundary and a plantation woodland to the southwestern boundary.

21.7. All of the considerations fed into the development of seven overarching design principles which were then used to help frame and guide the development of a masterplan. These principles were as follows:

- **Green infrastructure and ecology assets -** Protecting, retaining, conserving, and enhancing the primary existing landscape environment and isolated natural assets.
- **Connectivity and character -** Promoting access to, and enjoyment of, countryside and providing opportunities for outdoor sport and recreation.
- **Setting to Ansty -** Protecting the setting of Ansty and limiting visual impact.
- **Green Belt and openness –** Protecting a sense of landscape and prioritising separation between built forms.
- **Height and massing -** Seeking to minimise land take as far as possible while balancing the consequence of height and associated visual impact.
- **Placemaking and people –** Providing a wide range of employment opportunities with an attractive and healthful physical and social environment.
- **Sustainability and climate change –** Net zero buildings and planning for resilience and mitigation to a changing climate.

21.8. This led to mapping site sensitivities, including easements, buffers, and ecological areas, to identify suitable zones for development with minimal impact on the landscape. This divided the site into distinct areas, mainly separated by hedgerows and ditches. When combined with landscape sensitivity and visual analysis, potential development zones emerged. Additionally, the Public Right of Way (PRoW) (R31a) further divided these zones, influencing the strategic placement and scale of logistics buildings based on the required area for different units.

21.9. Various layout scenarios were explored to prioritise and balance conflicting site requirements. These investigations helped refine two development scenarios, each undergoing environmental testing. Initially, six logistics buildings were proposed, but this number was reduced to five for greater efficiency while maintaining the same space. The operational brief also evolved alongside this process, focusing on logistics flow, functionality, and access.

21.10. A hybrid scenario was ultimately developed which amalgamated the broad alignment of units in one scenario with the focus on preserving a key watercourse in the other scenario. Key features included retaining plantation woodland and category A trees, locating logistics building 1 further east to open a green corridor, and maintaining the watercourse for ecological priority. The PRoW was retained running through a green corridor thus enhancing access. Visual impacts from sensitive viewpoints were mitigated whilst simultaneously supporting biodiversity. Heritage considerations were addressed through the thoughtful orientation of buildings.

21.11. The design process then continued to evolve following further detailed assessment of the landscape and visual impact of the development. A number of improvements were implemented including the introduction of a landscape buffer around the perimeter of the development. At the same time, the applicant engaged in significant and extensive pre-application discussions with the Council and other stakeholders (including the public and nearby residents) to help inform and then refine the design and layout. Numerous changes were made as a result of this and are reflected in the design now being considered.

Proposed Masterplan

21.12. The proposed campus masterplan focuses on integrating development into the natural environment by preserving and enhancing existing landscape features, such as Local Wildlife Sites and specimen trees, while minimising harm. It would also include habitat enhancements to increase biodiversity and maintains wildlife corridors to promote ecological connectivity.

21.13. Notably, built development would be strategically positioned to the south, utilising natural topography to keep the largest structures at lower heights and preserving the open landscape to the north. A series of logistics buildings, with the largest at the centre, form a protective band shielding the northern part of the site from the adjacent M6 transport corridor, while maintaining operational connections between the buildings.

21.14. Connectivity and access enhancements would be made to encourage engagement with the natural environment, outdoor sports, and recreation while ensuring the continuity and improved condition of existing PRoWs. A network of new paths connecting key access points and satellite logistics buildings would be created to promote pedestrian and cycling accessibility throughout the site.

21.15. The “Campus Heart” would serve as a vibrant centre of the project, uniting diverse users, including campus staff and visitors, while acting as the main hub of the wider campus. Located at its western end is a public drop-off area that would connect to leisure and learning spaces, with the Concept Retail R&D ‘street’ extending eastward and the more private Office HQ anchoring the eastern end, characterised by its winged design that reaches into the landscape.

21.16. The Group Accommodation would be strategically situated in the more secluded northwest corner of the masterplan, accessed from the northern road and nestled into landscape bunds and buffer planting to enhance the established woodland edge.

21.17. Overall, the development's layout, density, and form have been designed to minimise urbanising effects, with less than 50% of the area consisting of hardstanding or built structures. Strong green boundaries would be established by reinforcing existing trees and vegetation with native planting, helping to shield the visual impact of the development at its edges.

Logistics Buildings

21.18. The design of the logistics buildings aims to enhance operational efficiency and adaptability in a rapidly evolving logistics landscape by proposing five bespoke warehouses, each tailored to site constraints and operational needs. Instead of replicating what has been done elsewhere, the applicant has sought to push the boundaries of what large logistics buildings can add architecturally to a campus scheme of this nature. This has been done in tandem with consideration of environmental considerations including carbon use, land take and the impact upon the Green Belt.

21.19. As a starting point, the size and scale of the logistics buildings has been informed by a careful and considered understanding of their purpose, function and needs. It is noted that the footprint of warehouses are ideally arranged to a ratio of 1:2 (width : length), which provides sufficient length along the longer elevations for HGV docks and level loading areas, with sufficient depth that internal operations are not compromised. Space is also required for operational offices, ancillary spaces (e.g. breakrooms and drivers facilities) and yard areas for HGV movements and parking.

21.20. The scale of the logistics buildings has been informed a comprehensive understanding of the needs for internal storage solutions. In particular, regard was had to the move towards full robotic automation systems in place of traditional palletised racking system. The former gives rise to a need for a clear internal height of up to 20m to maximise efficiency. Options to increase this height up to 40m were explored but discounted on the basis of landscape and visual impact despite the reduced footprint that would be required.

21.21. In this case, the end user of the building is known and this has enabled a bespoke design to be created to meet their needs. Whilst traditional ratios and heights have informed the design, it has been possible to optimise and push the boundaries to respond to site constraints and opportunities. This has included changing the size and heights of buildings to reduce them to the maximum extent possible whilst still maintaining operational functionality and flexibility internally.

21.22. This has resulted in 5 logistics buildings as follows:

• Logistics Building 1	113,456m² (GEA)	27m high	108.5m AOD (ridge)
• Logistics Building 2	58,603m² (GEA)	26m high	107.7m AOD (ridge)
• Logistics Building 3	25,566m² (GEA)	23m high	105.0m AOD (ridge)
• Logistics Building 4	25,622m² (GEA)	20m high	103.0m AOD (ridge)
• Logistics Building 5	54,533m² (GEA)	27m high	109.6m AOD (ridge)

21.23. By way of comparison, the approved AOD ridge height of the following buildings within nearby Ansty Business Park and Prospero Ansty is:

- Plot 5 (Prospero Ansty) – 106.1m AOD.
- Plot 4 (Prospero Ansty) – 105.4m AOD.
- MTC – 99.7m AOD
- Meggitt – 98.1m AOD.
- LEVC – 96.6m AOD.

21.24. In terms of appearance, a great deal of thought has been given to the design and materiality. Traditional warehouse design tends to utilise grey cladding across the façade. Such buildings can create a stark, monotonous and industrial appearance that often lacks character and fails to engage with the surrounding environment.

21.25. Another alternative is cladding buildings in horizontal bands of green or blue - darker at the base, lighter at the top. The intention is to blend them with natural backdrops like fields or sky. Whilst well intentioned, they can often appear superficial and draw attention to the scale and presence of the building. This is underpinned by frequent changes in weather and landscape meaning it is rare for the intended colour blending effect to ever be achieved. Indeed, when combined with the scale of such buildings, they often fail to fully integrate and harmonise with the wider surroundings.

21.26. In response, the proposed logistics buildings are designed to redefine warehouse architecture by drawing inspiration from high-quality structures like museums and civic buildings, rather than traditional warehouse designs. The focus on advanced materials and minimalistic detailing would allow the buildings to integrate more seamlessly with the landscape, helping to reduce their visual mass. Drawing from examples like the Sky Campus in London, the use of diffused reflective panels at upper levels would create a dynamic facade that responds to changing light, weather, and seasons, adding a visually engaging, ever-changing quality to the buildings.

21.27. At lower levels, each building would feature a solid base and three horizontal grey bands set at varying depths to create a harmonious composition across the campus, with larger glazed areas at entrances for functional and aesthetic emphasis. The horizontal bands would also utilise different asymmetrical profiles to manipulate light and shadow thus enhancing visual interest.

Campus Heart

21.28. The “Campus Heart” serves as the central hub of the campus, integrating all non-logistics functions and providing a vibrant focal point for both Frasers Group staff and visitors. This area encompasses several key facilities, including the Frasers Group Office Headquarters, concept retail and leisure development R&D buildings, food and beverage outlet, nursery, a 100-key hotel and a Learning and Development Academy.

21.29. The arrangement of these buildings is designed to optimise space and enhance synergy, fostering a lively, interactive environment while minimising the overall footprint to protect the surrounding Green Belt. The buildings are strategically oriented in a linear layout from east to west. Public functions would be positioned at the west end, culminating in the Arrival Square, which serves as the main entry point for visitors. A mobility hub facilitates easy transportation within the campus, promoting efficiency and community interaction among diverse occupants.

21.30. The massing and form of the Campus Heart are designed to try and integrate seamlessly with the surrounding landscape. This would be achieved through the utilisation of a continuous planted bund along the northern edge that would conceal the built structures while enhancing visual connectivity between the public realm and natural surroundings. This approach would create an active campus shielded from sensitive views to the north, with inward-facing areas like the Arrival Square and retail street providing generous active frontages. Buildings that do extend beyond the bund have been crafted to signify their functions, with the hotel, auditorium, and sport hall presenting as distinct volumes at the western end, while the Office HQ is volumetrically articulated and designed to soften its presence.

Office HQ

21.31. The design of the Office HQ incorporates a distinctive and visually engaging external appearance, intended to function as a notable landmark feature within the campus. This five-level building would be organised into four distinct wings that converge around a central atrium, creating a varied profile that interacts with the surrounding landscape. The structure's overall form has been shaped to reduce visual mass, employing a set-back top floor and curved junctions between wings to soften the profile when viewed from different vantage points, particularly from Ansty village. Landscaping features, including green roofs and raised planting areas, would be integrated into the design to further connect the building with its natural surroundings.

21.32. The façade would utilise a harmonious blend of materials, with richly toned anodized aluminium and deep-set glass elements reflecting the historic context and colour palette found in Ansty village. The vertical fins on the façade would enhance the building's visual interest through a rhythm of solid and transparent surfaces whilst also serving a functional role in managing light and solar exposure. Furthermore, the interplay of light and shadow across the façade would change throughout the day, adding depth and character to the building while contributing to a visually engaging streetscape.

Leisure and Learning

21.33. The Leisure and Learning complex combines a hotel, a learning and development academy, and a concept leisure R&D facility to minimise its physical footprint while enhancing operational efficiencies and user experience. The hotel features 100 rooms, meeting facilities, and various public amenities. The academy serves as the campus' main public assembly area, offering an auditorium and training rooms for large and small groups. The concept leisure R&D facility includes a state-of-the-art gym, swimming pool, and sports hall.

21.34. The design of the complex seeks to minimise visual impact by concealing the ground floor beneath a landscaped bund. Three distinct buildings rise above this representing the hotel, auditorium, and leisure facility. The hotel serves as the gateway to the campus, featuring a drop-off area that leads to an activated Arrival Square, enhanced by a café with a glazed facade. Strategic orientation and clustering of facilities promote intuitive wayfinding and shared resources, improving overall efficiency and thermal performance.

21.35. The façade of the three key buildings making up the complex would utilise different materials to reflect their functions while maintaining a cohesive design through consistent surface profiling and colour treatment. The hotel would be wrapped in a bronze perforated anodized aluminium "veil" that would control solar gain, views, and light spill, whilst providing a visually light appearance. The auditorium and sports hall would be constructed

from pigmented precast GRC panels that would match the hotel's facade, featuring fluted surfaces to create texture and visual interest. Fully glazed facades for the café and gym would enhance interaction with the Arrival Square, allowing for visibility and connection to the surrounding landscape.

Concept Retail R&D

21.36. The Concept Retail R&D buildings are designed to develop and test new trading formats, shopfront designs, sales strategies, and product displays in a live environment before implementing them in the Group's retail stores. Located within the Campus Heart, it would serve as a central hub for visitors and staff, connecting two squares and enhancing circulation. It would also contain food and beverage units and small convenience store.

21.37. The design principles for the buildings and central 'street' prioritise enhancing landscape flow and movement, fostering connections with the surrounding environment. The northern edge would be defined by a wildflower landscape bund that shapes the first floor and façade while obscuring views from the north. Concept Retail R&D units would line both sides of the ground floor, with full-height glazed facades promoting visibility and engagement. The flexible layout would accommodate various retail unit sizes, encouraging innovation and interaction, and the first floor design would reduce perceived scale while maintaining views, contributing to the overall aesthetic and functionality of the space. A mobility hub would support transport transitions with bike parking and amenities to the west end, while the food and beverage pavilion would anchor the east end, creating an active central square. The nursery would also be accommodated within these units.

21.38. The Concept Retail R&D would feature a straightforward material palette consisting of full-height glazing for active frontages, light silver profiled perforated metal panels for the upper level, and pre-cast concrete for the durable back-of-house spaces. The upper areas would be designed with distinct lighter tones, contrasting with the earthy, bronzed copper hues of adjacent buildings to emphasize separation and distinction.

Group Accommodation

21.39. The proposed group accommodation would consist of 80 self-contained en-suite rooms, designed with a modular approach that clusters units in groups of eight. This arrangement includes three types of accommodation: accessible units, long-stay units with communal kitchens, and short-stay units. Each cluster promotes community interaction while maintaining individual privacy.

21.40. They would be situated within a landscaped woodland setting. Existing trees would be preserved and supplemented by new planting. Landscaped bunds would be strategically placed to provide visual and acoustic screening. The northern clusters would be positioned against a landscaped bund, while the southern clusters would stand alone. The arrangement of the 10 clusters, following a linear pattern, is designed to create an informal, residential character while minimising the scale and massing of the structures. The herringbone layout further enhances light orientation while helping to provide some privacy for residents.

21.41. Upon arrival to this area, visitors and residents would be see a south-facing plaza in front of a communal hub. This central building would serve as a focal point for residents, offering amenities such as laundry facilities, a kitchen, and communal spaces for working and socialising. It is designed to help promote a sense of community while ensuring that residents have private space within their individual units.

21.42. Externally, each modular unit would be constructed from prefabricated cross-laminated timber (CLT) and clad in black timber to help them blend into the woodland surroundings. The use of large glazed areas to the front of each unit would create an active frontage to the central area whilst maximising natural light and ventilation.

Landscape Strategy

21.43. The proposed masterplan adopts a landscape-led approach that prioritises the integration and enhancement of the site's rural qualities into the campus design. It divides the site into nine character areas, each designed to address specific functions, site constraints, and design objectives while minimising visual impact.

1. **Arrival Zone (including the Western Entrance):** The intention is for this zone to create a welcoming experience with a rural parkland feel, characterised by woodland planting that frames views and screens the logistics buildings. The use of existing trees would enhance instant screening and help to maintain landscape character.

2. **North South Green Corridor:** This corridor would function as a "Green Wedge" through the centre of the site. It aims to enhance existing rural qualities and provide a naturalistic landscape. It would retain openness, route the public right of way away from buildings, and integrate new woodland planting to enhance biodiversity.

3. **East West Green Corridor:** This corridor would serve as a buffer between the Local Wildlife Site and development, providing publicly accessible green space. The corridor would be designed to retain openness while screening views of the development, with a distinct surfacing to blend with the rural setting.

4. **Riparian Woodland & Water Meadow (Southern):** This area would enhance existing watercourses for biodiversity and flood compensation. It would consist of native riparian woodland and wildflower meadows, promoting ecological benefits while minimising pedestrian access.

5. **Local Wildlife Site:** The focus here would be on preserving grassland habitat and historical field patterns without introducing new paths. Informal recreation and nature-based learning would be supported in less sensitive areas, ensuring ecological connectivity.

6. **Riparian Woodland & Water Meadow (Eastern):** Similar to the southern area, this area would enhance biodiversity around existing watercourses with native plantings and wildflower mixes. The design would prioritise ecological integrity while maintaining visual screening of adjacent buildings.

7. **Woodland Corridor:** This corridor would reinforce the Dunsmore Parklands characteristics with additional woodland planting, enhancing visual screening of buildings. It would retain existing mature trees and introduce species-rich grassland to support biodiversity.

8. **Woodland Buffer & Site Boundary:** This buffer would provide a naturalistic edge around the site to soften views and enhance biodiversity. Varied native species would be planted to create visual screening while maintaining ecological connectivity and defining the site boundary.

9. **Campus Heart:** This area would foster a high-quality public realm surrounding key facilities, set within a robust green infrastructure framework. The design would reflect local landscape characteristics, creating an inviting and functional environment for users.

21.44. Overall, these character areas are designed to integrate the development into the landscape while enhancing biodiversity, preserving rural qualities, and providing enjoyable spaces for visitors and residents.

Design Assessment

21.45. The proposed development has been submitted by Frasers Group who are the intended end user of the campus development. The amount of floorspace and nature of the proposed development has consequently been driven by their commercial need to expand and consolidate existing UK activities in one central campus. However, the way in which this amount of development could be accommodated on the application site has been given a great deal of consideration.

21.46. As a starting point, consideration was given to the context of the site. This included taking account of site constraints and opportunities. For instance, consideration was given to the Green Belt designation, green infrastructure, ecological habitats, landscape sensitivity, watercourses, topography, rights of way, heritage assets and surrounding built development (including Ansty village). This led to the adoption of seven overarching design principles which informed a range of layout options that were tested and analysed.

21.47. This process led to the chosen masterplan which notably showed built development located to the southern portion of the site along the M6 corridor whilst retaining key natural features including a woodland and Local Wildlife Site. The campus design was then further refined following discussions and in light of technical information. In turn, this led to changes such as the built development being pulled back further to the south. The layout and position of buildings was also changed and consolidated to create a more cohesive development and reduce visual impacts where possible. In addition, building heights were reduced to the maximum extent possible in the context of operational and business needs.

21.48. In visual terms, the logistics buildings would inevitably be the most prominent buildings on the site given their scale and size. It is therefore appropriate that an innovative design approach has been utilised for these units which goes beyond that of more traditional warehouses. Despite this, the nature and use of warehouse units means that the scope to create architecturally interesting buildings is limited.

21.49. The focus has rather been on the materiality of the logistics buildings and trying to create visual interest to break up the massing. Of particular note is the proposed use of diffused reflective panels at upper levels which would create a dynamic facade that responds to changing light, weather, and seasons. The positioning of these buildings away from Ansty village maintains an important degree of separation whilst respecting the different form and character of development there. Furthermore, it allows for the retention of features such as the woodland. The upshot is that the warehouses, having regard to their purpose and nature, go beyond traditional designs and represent a positive step change in how they can appear.

21.50. Logistics building 1 would be the largest warehouse on the site measuring approximately 458m wide, 222m deep and 27m high. The proposed Campus Heart has consequently been intentionally placed along the entire length of this building to the front (north). The buildings which make up the Campus Heart would help to shield and conceal views of the warehouse when viewed from the north. The variety of building types, forms and scales particularly helps to add interest and draw the eye away from the scale of the warehouse building.

21.51. The different constituent buildings that make up the Campus Heart are considered to be high quality in terms of design and appearance. They would create a clear and cohesive group that would form a clear character and create a sense of place. This is achieved in part through the range of architectural detailing employed together with the clever use of different materials that draw on a colour palette informed by the local area. At the same time these details assist in helping to ensure the buildings would achieve high standards of comfort for the end users. Moreover, they contribute to sustainability goals by reducing things like solar gain.

21.52. The proposed group accommodation represents a unique and innovative response to longer term high density accommodation needs. The modular design, low height, cluster groups and positioning within a woodland landscape setting would help to create a distinct character and group within the campus.

21.53. Hard and soft landscaping comprising nine different character areas would further lift and enhance the appearance of this development. Within and around buildings this would to break up the built form and create a softer appearance. Notable elements also include a proposed landscape bund that would run along the northern edges of the Campus Heart. Buffer planting would further be provided around the perimeter of the site. Such features and planting would help to screen and soften the appearance of buildings from wider views.

Design Summary

21.54. It is considered that the proposal complies with policies HS1, SDC1 and SDC2 of the Local Plan and the Climate Change and Sustainable Design and Construction SPD (2023). It is accepted that a campus development of this size invariably represents a significant challenge in design terms. However, in this case the proposed scheme has responded positively to the wider context, constraints and opportunities. It has been demonstrated that careful consideration has been given to building placement, height, and architectural style to help reduce and mitigate potential negative impacts. The range of buildings together with hard and soft landscaping have all been designed in a way that would achieve a cohesive group. It is clear that the proposal would achieve a high quality design which would create a distinct character and sense of place.

22. Landscape and Visual Impact

22.1. Local Plan Policy SDC1 seeks to ensure that development is of a high quality and will only be allowed where proposals are of a scale, density and design that responds to the character and amenity of the areas in which they are situated.

22.2. As previously identified Local Plan Policy SDC2 states that the landscape aspects of a development proposal will be required to form an integral part of the overall design. A high

standard of appropriate hard and soft landscaping will be required. With Policy NE3 stating that new development which positively contributes to landscape character will be permitted.

22.3. A Landscape and Visual Impact Assessment was submitted as part of the application as part of the Environmental Statement (Chapter 13 and associated appendices) which was informed by a site visit, desk based research, initial ZTV modelling and a Google Earth model which identified the key receptors.

22.4. The Council appointed Landscape consultants to independently scrutinise, analyse and evaluate the information submitted by the applicant.

22.5. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

22.6. At a national level, the Site lies within National Character Area (NCA) 96: Dunsmore and Feldon. Within the wider study area NCA 94: Leicestershire Vales is located to the north and east. NCA 97: Arden is also located within the wider study area, although the majority of this NCA within the study area is built up.

22.7. Relevant key characteristics of NCA 96 include:

- The sense of a predominately quiet, rural landscape is heightened by its close proximity to several urban areas, with gently undulating landscape of low hills, heathland plateaux and clay vales separated by the occasional upstanding escarpment.
- Light sandy soils associated with the west supporting mixed farming and some intensive arable.
- Generally low woodland cover across the area, although there are areas of well wooded character and ancient woodland.
- Canals provide important riparian habitats and well-used recreational resource.
- Mainly large fields, with regular or rectilinear shapes, although some smaller fields also feature.
- Predominantly nucleated settlement pattern with a low density of isolated farmsteads and some field barns.
- The strategic roads and large industrial units on the outskirts of the main settlements of Leamington Spa, Coventry and Rugby exert an urban influence on the surrounding area.

22.8. The NCA profile for this area also sets out statements of environmental opportunity. Which include appropriately managing and protecting the historic character, settlement pattern, habitats, landscape character, water networks, tranquillity levels and features of Dunsmore and Feldon.

22.9. At a regional and local level the site is located within the Dunsmore Landscape Character Area (LCA) within the Dunsmore, Parklands Landscape Character Type (LCT). The northern part of the site is located within the High Cross Plateau LCA within the Village Farmlands LCT. The wider study area to the north and east is located within a combination

of the High Cross Plateau, Village Farmlands LCT and High Cross Plateau, Open Plateau LCTs. The north-western part of the study area is located wit the Arden LCA and subsequently within the Industrial Arden LCT. Tables A13-1 and A13-2 of Appendix 13.2 of the Environmental Statement sets out the descriptions of these classification areas at the regional and local level.

22.10. The methodology undertaken for the assessment as outlined in the ES is comprehensive and in line with good practise as set out by Guidelines for Landscape and Visual Impact (Third Edition)(GLVIA3). All viewpoints within the LVIA have not been agreed as the independent consultant felt that viewpoints from the realigned PROW should be considered as part of the LVIA assessment. These viewpoints have not been included by the applicant.

22.11. In relation to impacts it is agreed that minor moderate effects are not considered significant.

Landscape Effects (During Construction)

22.12. The assessment of landscape effects during construction in the LVIA at paragraph 13.7.4 find significant effects for the following:

- The hedgerows within the site due to a loss of over half to facilitate construction of logistics buildings, the campus heart and vehicular routes through the site;
- The hedgerow trees within the site due to a loss of approximately one third to facilitate construction of logistics buildings, campus heart and vehicular routes through the site;
- Arable fields within the site due to complete loss of this feature to the south of the site;
- Field ditches within the site due to a complete loss of ditches D15, D4 and D5 and partial loss of ditch R2 and R3 (Chapter 10 of ES – figure 10.5;
- Vegetation along the M6 corridor due to partial loss of this feature (tree group G24) to facilitate the construction of Logistics Unit 1.; and
- Part of the Dunsmore Parklands Landscape Character Type (LCT) due to construction activities occurring within this area, including the majority of off-site highways works, off-site PRoW works, off-site utilities works and all on site construction.

22.13. It is agreed that all of the above would constitute significant effects.

Visual Effects (Construction)

22.14. Paragraph 13.7.7 of the LVIA sets out the significant visual effects during construction. These are summarised as:

- Southern part of Ansty will have views towards construction activity from the rear of properties and from the Rose and Castle public house and public garden;
- Recreational users of the Oxford Canal and Oxford Canal Walk where construction activity and partly constructed buildings will be visible in more open views from the north-eastern section near Ansty Golf Course and the north western section indicated by Viewpoint 12 (appendix 13.7);

- Users of the four public rights of way (PRoW) which pass through the site (104/R31a/1, 104/R31/2, 104/R31b/1 and 104/R31/1) where the change in view will be significant due to proximity views of construction activity and where such routes will require diversion for the duration of the construction period;
- Users of elevated sections of PRoW to the north/north-east of the site to the south of St James' Church (104/R29/1) and Nettle Hill (156/R73a/1) where there will be clearly perceptible views towards construction activity;
- Users of the Public Right of Way 104/R31/2 which crosses the M6 footbridge due to proximity views north towards Logistics Building 1 and construction activity involved in upgrading the PRoW 104/R31/2 from the M6 to Ansty Business Park;
- Users of the B4065 (Hinckley Road) who will experience change in views resulting from construction of Site access in the form of a new roundabout, Site Access traffic calming in the form of narrowing or speed cushions through Ansty Village and Shilton Village and in-road installation of underground HV cable from the proposed Site entrance and glimpsed views into the Site of construction activity; and
- Users of the B4029 who will experience proximity views over existing hedgerow vegetation towards construction activity including the creation of a new Site access to the Logistics Buildings and multistorey car park, site clearance and earthworks to form visual screening and construction of Logistics Building 3.

22.15. It is agreed that all of the above would constitute significant effects.

Landscape Effects (Operational)

22.16. The LVIA sets out the assessment of landscape effects at operation at paragraph 13.8.4. There will be some permanent loss of landscape features on the site, the geographic and temporal scale of which is summarised in Table 13-30 of the LVIA. The significant effects at operational phase include the following:

- The long-term change in the hedgerow tree resource which will be moderate-major (significant) adverse at year 1. At year 15, the effect reduces to major (significant) and a combination of adverse and beneficial effects where the increase (approx. 560 trees) in hedgerow tree resource across the site will significantly outweigh the loss (approx. 56 trees). The character of the hedgerow trees will change though as they will no longer be associated with field boundaries but rather building and yard perimeters;
- There will be a moderate (significant) adverse effect resulting from the permanent loss of arable fields at both year 1 and 15;
- The significant effect on landscape character in the long-term operational phase will be on LCT Dunsmore Parklands (moderate-major at year 1 and at year 15 with a combination of adverse and beneficial effects with beneficial components increasing during operation as planting matures). This effect will arise as a result of the change in character of the Site from a large scale open arable landscape bounded by hedgerows with mature hedgerow trees to a developed site with new built form comprising a campus and logistics warehouses in a parkland setting. The development will also contain a central campus. Built form will be set within a landscape framework of new woodlands, grassland areas, public realm, new footpath and cycleways and vehicular access routes. This change will comprise a

mixture of adverse and beneficial changes to character. The adverse components of the effect will result from the increase in built development and lighting while the beneficial components of the effect will result from the improved condition of retained landscape features, additional landscape features and improved/connected habitat diversity which responds to the characteristics of the Dunsmore Parklands LCT, and Policy NE3 of the Local Plan.

22.17. It is agreed that all of the above will be significant effects at operation. It is argued that the landscape effects have been kept to a minimum and that there will be some beneficial effects of the landscape strategy. However, it is the scale, footprint and size of development which creates significant adverse effects.

Visual Effects (Operational Year 1)

22.18. Paragraph 13.8.8 of the LVIA sets out the assessment of landscape effects during operation. The significant visual effects in the early years of operation are summarised as follows:

- Moderate-Major (adverse) effect on parts of the community of Ansty as a result of mid-range views of the completed Development located behind existing and proposed structural planting (which includes advanced planting). This will result in a medium to large scale change in views for properties on the B4065 (Hinckley Road) adjacent the Rose and Castle Public House along the southern fringe of the settlement;
- Moderate (adverse) effect on recreational users of the open eastern section of the Oxford Canal and Oxford Canal Walk near Ansty Golf Course where Logistics Buildings 1, 2 and 3 and the multi storey car park to the east of the site will be visible above planted earthworks bunds, and the open western section of the Oxford Canal and Oxford Canal Walk where there will be views towards Logistics Building 1, 4 and 5 and result in a medium scale visual change;
- Major (adverse) effect on users of Public Rights of Way through the Site including R31a, R31/1, R31/2 and R31b due to proximity views of the Development and permanent diversion.
- Moderate (adverse) effect on users of Public Rights of Way to the north / north east of the Site including PRoW 104/R29/1 south of St. James' Church, and Nettle Hill (156/R73a/1) where there will be clearly perceptible views towards Logistics Buildings 1, 2 and 3.
- Moderate (adverse) effect on users of Public Right of Way 104/R31/2 which crosses the M6 footbridge due to proximity views north towards Logistics Building 1 and the upgraded, lit PRoW 104/R31/2 from the M6 to Ansty Business Park.
- Moderate (adverse) effect on users of the B4065 (Hinckley Road) as a result of seeing new built form within relatively close proximity, particularly from elevated locations such as outside Grade II* Listed Ansty Hall; and
- Moderate-Major (adverse) effect on users of the B4029 as a result of seeing new built form within relatively close proximity prior to woodland buffer planting fully maturing.

22.19. It is considered that all viewpoints will have a level of adverse visual impact at year 1. In none of the views will mitigation completely screen the proposals. The LVIA states that the

majority of significant effects occur within 200m of the site which is generally agreed with. Nevertheless, It is considered that significant major/moderate adverse effects are likely to occur at viewpoints 1, 2, 3, 4, 5, 9, 10d, 11, 12, 13c, 13d, 14, 23, 24, 25a, 25b, 26a and 26b.

Visual Effects (Operational Year 15)

22.20. By Year 15 the LVIA in paragraph 13.89 states that most of the effects will be the same, partly because the advanced planting and mitigation bunding will ensure that screening to the most sensitive receptors is provided early on. The following changes are highlighted at Year 15:

- The effect on users of the M6 will reduce to Minor (adverse) as woodland buffer planting along the perimeter of the site matures, further screening views of the logistics buildings.
- The direction of effect on users of the B4029 will form a combination of adverse change (through the loss of views of open countryside) and beneficial change (through the introduction of woodland screening planting); and
- The direction of effect on Public Right of Way users within the site will also form a combination of adverse change (through the loss of views of open countryside) and beneficial change (through improved condition, accessibility, and increased landscape diversity).

22.21. The view on the effects at year 15 is similar to that of year 1. Mitigation planting will help to reduce visual impacts but will not completely screen proposals due to height, scale and mass of the proposed development. The planting will reduce openness of long-distance views across rural countryside e.g. from B4029.

Visual Impact Conclusion

22.22. Twenty-six viewpoints have been provided and the applicant's assessment groups them in relation to key receptor groups. The independent consultant have reviewed all of the viewpoints individually on behalf of the Council. All of the views will have an adverse impact on the current baseline position. It is agreed that the location of more significant impacts are those location which are closer to the site. However, these significant effects occur up to 0.5 km from the site. It is agreed that a number of moderate/major and major adverse impacts which are significant which will result from the proposed development particularly in the following locations:

- Moderate-Major (adverse) effect on parts of the community of Ansty as a result of mid-range views of the completed Development located behind existing and proposed structural planting (which includes advanced planting). This will result in a medium to large scale change in views for properties on the B4065 (Hinckley Road) adjacent the Rose and Castle Public House along the southern fringe of the settlement.
- Moderate (adverse) effect on recreational users of the open eastern section of the Oxford Canal and Oxford Canal Walk near Ansty Golf Course where Logistics Buildings 1, 2 and 3 and the multi storey car park to the east of the site will be visible above planted earthworks bunds, and the open western section of the Oxford Canal and Oxford Canal Walk where there will be views towards Logistics Building 1, 4 and 5 and result in a medium scale visual change;

- Major (adverse) effect on users of Public Rights of Way through the Site including R31a, R31/1, R31/2 and R31b due to proximity views of the Development and permanent diversion.
- Moderate (adverse) effect on users of Public Rights of Way to the north / north east of the Site including PRoW 104/R29/1 south of St. James' Church, and Nettle Hill (156/R73a/1) where there will be clearly perceptible views towards Logistics Buildings 1, 2 and 3.
- Moderate (adverse) effect on users of Public Right of Way 104/R31/2 which crosses the M6 footbridge due to proximity views north towards Logistics Building 1 and the upgraded, lit PRoW 104/R31/2 from the M6 to Ansty Business Park.
- Moderate (adverse) effect on users of the B4065 (Hinckley Road) as a result of seeing new built form within relatively close proximity, particularly from elevated locations such as outside Grade II* Listed Ansty Hall; and
- Moderate-Major (adverse) effect on users of the B4029 as a result of seeing new built form within relatively close proximity prior to woodland buffer planting fully maturing.

Landscape and Visual Impact Conclusion

22.23. It is considered that the development will break the skyline and reduce long distance views across the landscape. The scale and mass of the logistics units are large and will change the experience of the view from one that is predominately rural to a view which is much more urban in character. Mitigation planting beneficially impact the viewpoints to a point however due to the massing there is only a limited amount of planting that will actually screen the buildings.

22.24. In general, the conclusions of the LVIA are agreed. There will be significant residual adverse impacts on both the landscape and visual effects of the proposed development as set out within the assessment. The identified harm will be weighed within the planning balance.

23. Trees, Hedgerows, Green Infrastructure & Landscape Strategy

23.1. Paragraph 136 of the NPPF states that trees make an important contribution to the character and quality of urban environments and can also help to mitigate and adapt to climate change. It goes on to state that existing trees should be retained where possible and that new streets should be tree lined.

23.2. Policy SDC2 of the Local Plan relates to landscaping of sets out that proposals should identify important site features for retention, this includes trees.

23.3. Policy NE2 of the Local Plan states that the existing green and blue infrastructure within the network as shown on the policies map should be retained, restored and enhanced. It goes on to state that appropriate multi-functional corridors between existing and potential green and blue infrastructure assets should be introduced to enhance the network.

23.4. Policy HS1 seeks to encourage healthy lifestyles and Policy HS4(B) states that new open space should be accessible and of high quality, meeting a set of criteria.

23.5. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

23.6. The following documents have been submitted in support of the application:

- Green &Blue Infrastructure Strategy (& Addendum)
- Landscape and Biodiversity Strategy (& Addendum)
- Landscape and Environmental Management Plan (& Addendum)
- Arboricultural Survey and Assessment
- Planting Plans and Specifications

23.7. The Forestry Commission have no objection to the application and refer to standing advice.

23.8. The Green Infrastructure (GI) policies map shows that the majority of the site is within the existing green and blue infrastructure network. The green and blue infrastructure on this site should therefore be maintained and/or enhanced and should not be removed in accordance with this policy. The site is also in the Princethorpe Biodiversity Opportunity Expansion area.

23.9. Princethorpe Biodiversity Opportunity Expansion Area aims to protect corridors for the movement of wildlife and protection of flora and fauna. New developments must provide suitable green and blue infrastructure corridors that link to adjacent corridors.

Landscape Strategy

23.10. Paragraph 21.42 of this report sets out the 9 landscape character areas within the proposed landscape strategy. Beyond the development parcels, the existing landscape character is proposed to be reinforced through soft landscape proposals. Woodland edges, parkland trees, woodland streamlines, mature hedgerows and roadside trees, will reinforce the character by creating a sequence of linked wooded spaces.

23.11. The landscape features and field pattern found within the Local Wildlife Site, and categorised as HLC Type Piecemeal Enclosure, will be retained and appropriately managed. The ridge and furrow and historic strip field pattern will be considered as a design language reference point within the surrounding landscape spaces.

23.12. The network of watercourses and associated wetland habitats will be protected and appropriately managed with enhancements explored with the project ecologist as biodiversity net gain opportunities.

23.13. The existing network of hedgerows and woodlands will be used to inform the layout and spatial distribution of the proposed landscape spaces.

23.14. Educational, access and recreational experiences for local urban and rural communities will be enhanced through the provision of interpretation relating to the sites natural and cultural heritage, extensive new footpaths and cycleways throughout the site and linking with the wider landscape, and informal recreational opportunities such as incidental and natural play.

23.15. The specifics of what species and landscape features are being introduced into the site are detailed within the following subsections of section 23.

23.16. Overall, it is considered that the Landscape strategy for the site has been carefully curated and will provide a framework for the planting strategy and the landscape plans. Conditions will control the implementation of these elements of the development.

Green & Blue Infrastructure

23.17. In relation to the blue infrastructure network on the site, all of the existing water courses are to be retained within the development along their existing alignments.

23.18. The green infrastructure network covers various parts of the site. In the northern part of the site sits a local wildlife site and this will be retained and enhanced. Additional planting and landscaped areas are proposed to the north of the site and therefore the green infrastructure in this corridor will be enhanced.

23.19. An additional green infrastructure corridor covers the south-east of the site. Units 2, 3 and part of unit 1 are proposed in this location. Therefore, arable land and some trees/hedgerows will be lost in this area. Planting and landscaped areas are proposed between the warehouse units in this location. Across the site there will be a loss of 78 individual trees comprised of 55 small trees, 22 medium trees and 1 large tree, along with and some hedgerows. 95 trees will be retained across the site and approximately 1,495 new standard trees will be planted. The loss of some hedgerows will be compensated by new hedgerow planting which will be species-rich native hedgerows.

23.20. The majority of the site is within the biodiversity opportunity expansion area. The design of the site has been carefully considered and landscaped corridors have been left between the units with the biggest between unit 1 & 4 to promote a north-south corridor.

23.21. There would be a continuous planted borders to the site of between 20-30 metres to provide an element of screening on the perimeter of the site.

23.22. It is recognised that there is a loss of existing green infrastructure therefore there is conflict with Policy NE2 of the Local Plan. However, given the significant level of planting proposed across the site it is deemed acceptable in this instance.

Trees and Hedgerows

23.23. In line with Policy SDC2 and the NPPF existing trees should be retained where possible.

23.24. RBC tree officer has commented on the application.

23.25. There are no tree preservation orders or conservation area designations within the application site. An arboricultural survey and assessment has been submitted in support of the application as per the recommendation of BS5837:2012. This is an important design tool which identifies key arboricultural assets which have the potential to benefit and enhance new developments. Where tree retention is proposed the objective should be to achieve a harmonious relationship between trees and structures that can be sustained in the long term.

23.26. The arboricultural assessment shows that there are 9 category A trees, 18 category B trees and 3 Category B groups of trees proposed for removal in order to facilitate the development. Category A and B are those of high and moderate quality and have the most potential to contribute positively to new development.

23.27. The 9 category A oak trees to be removed are of particular interest due to their size, stature and associated age, being long established components of the local landscape for upwards of 100 years and over. As an example T102-104 (mature oaks) are highly prominent visual amenity features being visible from existing public right of ways which run adjacent to the trees.

23.28. No justified rationale has been provided for the removal of the category A and B trees within the arboricultural assessment however due to the scale of the development and the footprint associated with certain uses on the site it is not possible to retain all trees on the site. Nevertheless, high quality mature oak trees (9 category A trees) are irreplaceable habitats and visual amenity features. Their removal would have a negative impact on the visual amenity and landscape qualities of the local area. Similarly the removal of 18 category B trees and 3 groups will have a negative impact.

23.29. 596 extra heavy standard (EHS) trees are proposed to be planted across the site and Oak is one of the 8 species specified within the species which can be planted for this size of tree. 75 EHS oak trees will therefore be planted as mitigation for the proposed removals in order to facilitate the development.

23.30. In addition to the above 899 standard trees (1.75-2m in height) and 88,681 of feathered and transplant trees (0.6 – 1.5m in height) will be planted across the site.

23.31. Due to the loss of 9 category A and 18 category B trees it is considered there is conflict with Policy SDC2 of the Local Plan. Due to the significant level of extra heavy standard trees to be planted across the site (75 of these being Oak trees) it is considered that the level of mitigation is acceptable in this instance.

24. Ecology

24.1 Policy NE1 of the Local Plan seeks to ensure that development proposals do not have an adverse impact upon protected habitats and species. It also sets out that development should retain and protect natural habitats and provide mitigation and compensation measures where this would be lost. In addition, Policy NE2 of the Local Plan requires proposals to protect, restore and enhance green infrastructure assets within the defined Strategic Green Infrastructure Network.

24.2 These policies are consistent with one of the core planning principles outlined within the NPPF which sets out the need for planning to 'contribute to conserving and enhancing the natural environment'. The NPPF further outlines a need to minimise the impact of proposed developments on biodiversity as well as contributing to and enhancing this where possible it particularly highlights the need to consider the impact on ecological networks, protected wildlife, priority species and priority habitats.

24.3 Paragraph 180 of the NPPF states that development should result in a net gain for biodiversity by including ecological enhancement measures within the proposal.

24.4 Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

24.5 WCC Ecology have reviewed the application and have no objection subject to conditions.

24.6 A Biodiversity and Ecology Assessment was submitted as part of the application within the Environmental Statement. Chapter 10 presents an assessment of the likely significant effects of the Development on Ecology and Biodiversity during construction and when the site is operational. The chapter is also supported by a number of appendices 10.1 through to 10.10. The direct and indirect effects for both the construction period and for the completed development, have been assessed.

24.7 Having established baseline conditions using best practise methodology, important ecological features (IEF) were identified through desk and field surveys and evaluated in terms of their nature conservation value using criteria set out in the CIEEM guidelines.

24.8 The IEF's have been assessed as to their likely significance following the mitigation hierarchy, which identifies impacts and incorporates measures to avoid those that could be significant, before identifying appropriate mitigation and/or compensation measures to offset. Biodiversity net benefits are then proposed over and above those measures required to avoid, mitigate or compensate identified effects.

24.9 The assessment of effect significance identifies the need for mitigation and any residual effects during construction and for the completed development. In line with the EIA Regulations (2017) the assessment includes a review of the potential for cumulative effects.

Habitats

24.10 The site is comprised predominantly of intensively managed arable land with smaller fields to the north. Hedgerows with scattered trees bound all fields, and areas of dense scrub, standing water, broadleaved and mixed plantation woodland are also present. Beyond the site, habitats within the wider landscape are largely dominated by arable and grassland field compartments, bounded by hedgerows with interspersed mature trees.

24.11 Grazed semi-improved grassland occurs in the smaller fields to the north which have non-statutory nature conservation designations but lie within a Strategic Green and Blue Infrastructure corridor. The bordering hedgerows are of varying quality and generally poor diversity with variable degrees of management.

24.12 Several minor watercourses and ditches occur alongside hedgerows, two of which form part of wider strategic blue corridors identified under Policy NE2. Five small field ponds occur within small areas of scrub.

24.13 The Borough has a number of different natural landscape characteristics as identified within the 2006 Landscape Assessment and the Landscape Sensitivity Study 2016. The Borough also contains a large number of environmental assets, including features of historic interest, geological/geomorphological significance and particular habitats of nature conservation interest. These range from Sites of Specific Scientific Interest (SSSI's), Local Nature Reserves and significant tracts of woodland deemed to be of ancient origin. There are also many other sites and features that are subject to non-statutory designations, such

as Local Wildlife Sites identified through the Habitat Biodiversity Audit, that reflect their particular contribution to biodiversity.

24.14 The Ensors poll Special Area of Conservation (SAC) lies approximately 8.5km to the northwest and outside of the application boundary. The site is physically remote and not hydrologically linked. No statutory designated sites at national level are located within a 2km zone of influence, although the site lies within the SSSI Impact Risk Zones (IRZ) for Coombe Pool, located 2.3 km to the south. Potential impacts upon this are assessed as negligible given the separation distance.

24.15 The site supports Home Farm Grasslands Local Wildlife Site (LWS) and potential LWS's (pLWS) within its northern edge; pLWS are those sites which are considered to meet LWS criteria but have not yet been notified. This comprises of a number of semi-improved grassland fields, bound by field and these are to be retained.

24.16 The application site largely falls within the Princethorpe Biodiversity Opportunity Expansion Area, with strategic blue and green corridors also passing through the Site. The 'Withybrook, headwaters and tributaries Ecosite' flows south to north through the site and the 'River Sowe headwater and tributaries Ecosite', also flows through the Site. The Oxford Canal pLWS and Ecosite adjoins a small section of the northern boundary. Key objectives of Policy NE2: Strategic Green and Blue Infrastructure include:

- Buffer green and blue corridors which form part of strategic network;
- Retain habitats of existing environmental value; and
- Manage green and blue infrastructure.

24.17 These objectives have been considered as part of the proposals and are reflected in the embedded mitigation. The majority of habitats of greater value identified on site have been retained as part of the design and master planning process. All the watercourses are to be retained and the largest areas of woodland covering 3.34 hectares.

24.18 The extensive green infrastructure of the site enables the scope to mitigate and/or compensate any necessary habitat losses through restoration of retained habitats, and the new habitat corridors within the site creating a more diverse range of new habitats. These are proposed to be woodland, wood-edge and scrub areas, different types of grassland and wetland habitat, as well as contributing to the wider ecological connectivity and biodiversity value in the local area.

Species

24.19 The Natural Environment and Rural Communities Act 2006 (the NERC Act) places a duty on local authorities and other public bodies to consider the biodiversity when carrying out all of their functions (Paragraph 40(1)). In terms of protected species, no protected or notable species records were returned from within the site boundary. A summary is provided below of the Appendix 10 reports submitted for species surveys.

24.20 **Great Crested Newts (GCN):** The survey found no positive results for GCN. WCC are aware of GCN populations present adjacent to the northern boundary of the site. However, it has been acknowledged that it is unlikely GCN are using the site in high numbers.

24.21 **Bats:** Bat surveys have been caried out across the site. A detailed schedule of bat mitigation measures will be conditioned in order to secure the relevant details for the development in relation to bats.

24.22 **Birds:** A full breeding bird survey has been undertaken at the site. The breeding and wintering bird assemblages within the site were typical of the habitats present, comprising mainly common and widespread species. The proposals are considered to result in a local adverse impact on breeding skylark and wintering populations of both skylark and merlin. Disturbance is expected to be limited to the construction phase and is anticipated to have a minor adverse impact during the breeding season.

24.23 Mitigation measures have been recommended to minimise disturbance impacts from construction operations and are included as an informative note so that these details can be considered as part of the Landscape Ecological Management Plan.

24.24 **Badgers:** Badgers are protected under the Protection of Badgers Act 1992. Work that disturbs badgers whilst occupying a sett is illegal without a licence. WCC Ecology have reviewed the report and are satisfied with the proposed mitigation for the badger setts identified on the site.

24.25 **Reptiles:** All common reptile species, including slow worm, common lizard, grass snake and adder are partially protected under Sections 9(1) and 9(5) of Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). This partial protection does not directly protect the habitat of these reptile species.

24.26 During the course of the surveys no reptiles were recorded on any occasion, with all surveys completed during suitable weather conditions. Nonetheless green infrastructure should seek to provide habitats of value to reptile species and herpetofauna generally, providing a variety of habitats of structural diversity, with grassland areas of varied length, edge habitats providing transitional habitats, with sheltered habitat niches for basking, shelter and foraging.

24.27 The Local Wildlife Site (LWS) will include habitats that could be made more suitable for the common lizard throughout their life cycle. The grassland compartments will provide general foraging for reptiles and creation of a few practical measures will increase the overall suitability.

24.28 The creation of a linear bank along the northern edge of one of the LWS fields will provide topographical variation of value, typically around 0.5-0.75 m high and 2m wide and created from logs and similar materials covered with a layer of subsoil and seeded with a suitable grassland mix in conjunction with the grassland enhancement proposed. The south facing slope will provide new basking habitat for reptiles and habitat niches for invertebrates with opportunity for sheltering/wintering within the relatively open internal structure. In addition, there will be pre-selected areas to create the occasional compost pile offering breeding habitat. The common lizard will then be introduced to the site in order to provide a location

for an endangered species. These details will be conditioned to be provided and the management will then be through the Landscape Ecological Management Plan condition.

Biodiversity Net Gain

24.29 Biodiversity net gain in England is underpinned by the mitigation hierarchy, which is set out in the National Planning Policy Framework. This outlines a sequential approach to addressing potential harm to biodiversity in determining planning applications. It states avoidance should be prioritised, before mitigation measures, and finally compensation.

24.30 At the time of the applications submission in October 2023 the requirement to provide a 10% net gain for biodiversity was not enshrined in law and therefore this application is not required to provide this gain. This is due to the transitional arrangements following the passing of the Environment Act in November 2021. The legislation was subject to parliamentary procedure and 10% BNG did not become mandatory for new Major applications until 12th February 2024 with minor applications following on 2nd April 2024.

24.31 A biodiversity net gain of 16.63% habitat units, 12.00% hedgerow units and 16.55% watercourse units, has been proposed and will be the minimum delivered by the development as set out within the Biodiversity Net Gain Assessment Addendum.

24.32 There will be a loss of 78 individual trees on the site, along with and some hedgerows. 95 trees will be retained and approximately 596 extra heavy standard trees and 899 standard trees will be planted. In addition, approximately 88,000 feathered and transplant trees will be planted. The loss of some hedgerows will be compensated by new hedgerow planting which will be species-rich native hedgerows.

24.33 3.83ha of existing woodland is to be retained and the following additional woodland planting is proposed (total 11.2ha):

- 3.32 ha Mixed Native Woodland
- 1.96 ha Riparian Native Woodland
- 3.22 ha Mixed Native Woodland (Planted as Advance Planting)
- 2.06 ha Riparian Native Woodland (Planted as Advanced Planting)
- 0.08 ha Native Woodland Edge Planting (mix comprises native shrub species such as hazel, blackthorn and hawthorn as well as tree species)
- 0.56 ha Native Riparian Woodland Edge Planting (mix comprises native riparian shrub species such as goat willow and dogwood as well as tree species)

24.34 WCC Ecology have commented on the application and acknowledge that although the loss of individual trees, hedgerows and especially woodlands is never desirable, it is recognised that efforts have been made to retain the most important ecological assets at the site. There is also an emphasis of creating new habitat, including woodland and hedgerows. Therefore, the compensation proposed is considered appropriate for the impacts projected, especially considered a biodiversity net gain (above the 10%) will be achieved as part of the proposed development.

24.35 WCC have also commented that whilst it is acknowledged that the site will be dominated by large warehouses and associated infrastructure, the development design has made

efforts to help ensure that generally habitats of greater value identified on site have been retained. The design has sought to create, enhance and retain semi-natural habitat corridors around and through the site. Corridors are loosely corresponding with the strategic green and blue corridors which cross the site and are within the Princethorpe Biodiversity Opportunity Areas, in line with local policy NE2.

24.36 Furthermore, the LEMP corresponds with the BNG calculation and assessments and is detailed enough to provide confidence that the proposed habitats (conditions and distinctiveness) can be achieved as part of the proposed development. WCC Ecology are therefore satisfied that the LEMP will prevent the loss, deterioration or harm to the LWS.

24.37 A condition will secure the provision of a Construction Environmental Management Plan (CEMP: Biodiversity). The CEMP: Biodiversity will risk assess to ensure that protected, important and priority species and their habitats are not harmed by the development and must include method statements for nesting birds, badger and GCN.

24.38 Embedded mitigation for the site includes a Landscape and Ecological Management Strategy Plan (LEMP) for all habitats retained and created for nature conservation purposes within the wider Green Infrastructure, and the LEMP will be secured by condition.

24.39 The long-term management of the Site will be carried out by or in consultation with an organisation with a proven track record of managing areas to maximise their nature conservation potential, such as through a steering group or other mechanism. Targeted creation and management prescriptions based on the criteria required to achieve a net gain in biodiversity will ensure that the condition of habitats meets those defined within the Biodiversity Net Gain Assessment (Appendix 10.9) in the short medium and long term (30 years) with monitoring and remediation mechanisms incorporated, ensuring that the biodiversity gains are achieved. The LEMP will specify the early creation and establishment of green infrastructure. The established habitats will also ensure that the Proposed Development continues to form part of both strategic and local green and blue infrastructure networks.

24.40 In the absence of the development, the Site would be reasonably assumed to be managed as agricultural land and much of it would therefore experience limited change, continuing to support an overall low biodiversity value for wildlife across the managed habitats. On-going grazing pressure may in the long-term impact grassland quality within the on-Site Home Farm Grasslands LWS and pLWS. Scrub is likely to continue to develop in the south of the Home Farm Grasslands pLWS.

24.41 The proposal results in an increase of biodiversity on site and therefore no off-site mitigation measures are required. Conditions are imposed to secure the CEMP: Biodiversity, LEMP and bat mitigation. In addition, a condition will secure a lighting design strategy for biodiversity. This will assist in ensuring the avoidance of illumination of Home Farm Grasslands LWS.

24.42 Subject to this the impact on ecology and biodiversity is considered acceptable in accordance with the NPPF, ODPM Circular 2005/06 and Policy NE1 of the Local Plan.

25. Traffic Flows, Highway Safety and Parking Provision

25.1. Local Plan Policy D1 states that sustainable transport methods should be prioritised with measures put in place to mitigate any transport issues. Whereas Appendix 5 expands on this and further sets out the need for transport assessments to be submitted with planning applications to assess the impact and acceptability of development proposals.

25.2. Local Plan Policy D2 also states that planning permission will only be granted for development which incorporates satisfactory parking facilities as set out within the Planning Obligations SPD and Appendix 5 of the Local Plan.

25.3. Policy HS5 of the Local Plan seeks for developments to promote a shift to the use of sustainable transport modes and low emission vehicles to minimise the impact on air quality, noise and vibration caused by trip generation. Proposals should be located where the use of public transport, walking and cycling can be optimised.

25.4. Paragraph 114 of the Framework states that it should be ensured that safe and suitable access to a site can be achieved for all users.

25.5. Policy 115 of the Framework states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the cumulative impacts on the road network would be severe.

25.6. Paragraph 116 of the NPPF states that applications for development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas. Policy D1 of the Local Plan also seeks a safe and convenient access for pedestrians and cyclists.

25.7. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

25.8. A Transport Assessment (TA) and framework travel plan were originally submitted with the application within the Environmental Statement (ES). A Transport Assessment Addendum (TAA) and further Supplementary TAA were submitted with various technical notes having been submitted in support of the application throughout the course of the application.

25.9. Due to the scale and location of the site, assessments of the scheme have been undertaken by various highway authorities and statutory consultees. Warwickshire County Council (WCC) are the highway authority for the application, National Highways (NH) deal with all matters relating to the strategic road network and Coventry City Council (CCC) are the neighbouring highway authority. Transport for West Midlands (TfWM) and Active Travel England (ATE) have also commented on the application. The Council appointed transport consultants to independently scrutinise, analyse and evaluate the information submitted by the applicant. The final position of all highway related consultees will be addressed within this section.

25.10. The application site lies solely within Rugby Borough Council's administrative area however the highways assessment factors in the impact upon the strategic road network (M6, M69, A46) and the neighbouring highway network (Coventry).

Trip Generation and Distribution

25.11. A trip generation assessment has been completed for each of the land uses under consideration within the Campus. A combination of Trip Rate Information Computer System (TRICS) data – database of trip rates for developments used in the UK for transport planning purposes - and first principles – a bespoke assessment, utilising information such as staff numbers, shift patterns, operating hours and mode share to generate anticipated vehicle movements - trip assessments have been undertaken to reflect the differences between the proposed land uses.

25.12. TRICS data has been utilised in support of the HQ office, hotel, group accommodation and leisure facilities.

25.13. For the retail aspect of the site, TRICS data was initially proposed. However, to further understand this element of the site, a survey of the nearby Elliot's Field retail park was completed, with Automatic Traffic Count (ATC) surveys completed at the site accesses. Following the completion of the surveys, it was noted that a small service yard area was not covered within the assessment area and TRICS trip rates were utilised to estimate the operational vehicles utilising this area, to ensure its inclusion.

25.14. Utilising the survey information and the floorspace associated with Elliot's Field, trip rates were generated. These were subsequently combined with several proxy sites within TRICS to generate an average trip rate between the sites which was used to derive the trips associated with this element of the site.

25.15. As a result of the mixed uses at Elliot's Field, the trips for the retail element of the site were also applied to the café and convenience store.

25.16. Turning to the learning and development facilities, a first principles assessment has been completed based on the anticipated day-to-day usage of the facility. The learning and development academy comprises of 10 training rooms and a wider auditorium space, with capacity for 750 delegates (further consideration of the auditorium will be touched upon as part of the modelling section below).

25.17. Based on the capacity of the training rooms and the associated staffing levels, a figure of 100 trainees and 20 staff was generated by the assessment. Vehicle trips were then generated using Census mode share and applied evenly across the AM and PM peak periods (07:00-10:00 and 16:00-19:00). For the HGV aspect of the learning and development facility, TRICS data was utilised.

25.18. Finally, with respect to the warehouses, the shift patterns for staff have been determined in conjunction with the Frasers Group (for reference, the agreed shift patterns are detailed in the TAA, dated 05/07/2024 in Table 7.8 and replicated below).

Table 7.8: Warehouse Shift Patterns

Warehouse 1		
Day Shift	0700-1500	600
Evening Shift	1500-2300	290
Night Shift	2300-0700	155
Office 9-5	0900-1700	382
Warehouse 2		
Day Shift	0600-1400	500
Evening Shift	1400-2200	242
Night Shift	2200-0600	129
Office 9-5	0900-1700	75
Warehouse 3		
Day Shift	0700-1500	300
Evening Shift	1500-2300	145
Night Shift	2300-0700	77
Office 9-5	0900-1700	40
Warehouse 4		
Day Shift	0700-1500	300
Evening Shift	1500-2300	145
Night Shift	2300-0700	77
Office 9-5	0900-1700	40
Warehouse 5		
Day Shift	0600-1400	300
Evening Shift	1400-2200	145
Night Shift	2200-0600	77
Office 9-5	0900-1700	75
Total		
Day Shift 1	0700-1500	1200
Day Shift 2	0600-1400	800
Evening Shift 1	1500-2300	581
Evening Shift 2	1400-2200	387
Night Shift 1	2200-0600	206
Night Shift 2	2300-0700	310
Office 9-5	0900-1700	612
Total		4,096

25.19. It is noted that warehouse shifts will not start or end during the network peak periods (08:00-09:00 and 17:00-18:00) with only office staff arriving and departing the site during these times in association with the ancillary offices for the warehouses.

25.20. Using the shift patterns and staffing levels, along with the Census mode share, the vehicle trip impacts of staff coming to and from the warehouses were identified.

25.21. With respect to HGV movements, ATC surveys of the existing Shirebrook site were conducted in 2021. Given the timings of the surveys with respect to COVID-19 restrictions and the accuracy of the vehicle classification, a further video survey was completed between 22/06/2024 and 28/06/2024, to verify the findings of the original surveys. When comparing the results of the surveys (as detailed in the STAA) the approach taken with respect to the original surveys was considered to offer the more robust assessment in terms of trip rates and was taken forward for assessment.

25.22. Using the above methodologies, the total trip generation for the site was established by the applicant.

25.23. Further refinements were then made to account for trip internalisation and linked trips between land uses.

25.24. The refinements to the internalisation comprise the following elements:

- Retail (including convenience store and café) – 90% factor (applied to the peak period retail trips and also office and warehouse trips to account for 10% of staff utilising the retail aspects of the site before and after work).
- Leisure – 75% internalisation (applied to the peak period trip generation to account for 25% of warehouse and office staff utilising the leisure facilities before and after work).
- Learning and Development – 70% internalisation (applied to peak period trip generation to account for 30% of attendees already being staff onsite).
- Hotel – 50% internalisation (applied to peak period trip generation to account for multiple night stays of people coming to the site).

25.25. Following the internalisation refinements, the Travel Plan reductions were applied, equating to a 30% reduction in car driver mode share for the warehouse staff (exclusive of the ancillary office staff) and 10% reduction in car driver mode share for the remainder of the site.

25.26. This blanket approach to the Travel Plan measures was subsequently refined further within the STAA following discussions with WCC, with the applicant refining the trip distribution exercise to assess corridors where trip reductions would be focused as a result of the proposed active and sustainable transport provisions.

25.27. Based on the methodology detailed above, the resulting trip generation for the site is outlined in N74 and replicated below:

Table 2: Total Campus With Travel Plan Trip Generation (Refined TP Approach)

Time Period	Total Vehicle			OGVs			Light Vehicles		
	Arrival	Departure	2-way	Arrival	Departure	2-way	Arrival	Departure	2-way
07:00-08:00	221	267	489	54	40	95	167	227	394
08:00-09:00	850	88	938	61	36	98	789	52	840
09:00-10:00	465	243	708	83	67	150	382	176	558
16:00-17:00	312	532	843	50	64	113	262	468	730
17:00-18:00	215	902	1117	33	40	73	182	862	1,044
18:00-19:00	200	383	583	28	42	70	172	341	513

25.28. The peak period trip impacts will be conditioned and monitored, with financial penalties being incurred as a result of any exceedance of these flows. This will be included as part of the Section 106 agreement and will be monitored as part of the Travel Plan.

25.29. With respect to trip distribution, the applicant has utilised information presented as part of the economic assessment, to establish the local availability of workers. Taking this, information regarding blue- and white-collar workers within surrounding wards has been established from the Census (comparing 2011 and 2021 to ensure the suitability of the 2011 dataset).

25.30. White collar workers were utilised for the head office workers with all other land uses being assigned as blue collar.

25.31. A catchment area of 30 minutes off-peak drive time was then derived and the distance travelled by white- and blue-collar workers was weighted, assuming white collar workers would travel from a further distance within this catchment area.

25.32. The routes of the employees were then assigned based on Google Maps Real Time Journey Planner.

25.33. For visitors coming to the site, the blue-collar distribution was used. This was verified against information provided by Quod within their trade draw distribution submitted as part of the Main Town Centre Use Assessment.

25.34. With respect to HGV movements, information was provided by Frasers Group with respect to their current store locations and from this, routes were assigned, with HGVs routeing via the strategic and primary road network.

25.35. Following further discussions with WCC and CCC, it was requested that the distribution assessment be reviewed. WCC requested consideration be given to the use of TRACC, a travel time analysis software, with CCC requiring consideration of their Coventry Area Strategic Model (CASM) distribution.

25.36. The results of the TRACC and CASM model distribution review were discussed in the STAA, with further information provided as part of the WCC response (N69) and the CCC response (N64).

25.37. When cross referencing the different methodologies outlined, the original methodology (as detailed in Table 2 above) was maintained for assessment purposes.

25.38. Within their response dated 30/08/2024, WCC raised a query with respect to the trip assessment for the retail element of the site, resulting in a sensitivity assessment being completed using the Elliot's Field trip rates only (N69). WCC have raised no objection to the development proposals, as detailed in their response dated 03/12/2024.

25.39. NH raised several queries regarding trip generation and distribution as part of their responses to the application. The applicant provided further information regarding these comments (within N61 and N67) which NH accepted in their responses dated 26/09/2024 and 25/10/2024. No further comments have been provided by NH regarding this element of the proposals.

25.40. CCC object to the methodology employed with respect to both trip generation and distribution. Their primary analysis is outlined within the response dated 30/08/2024. A summary of the comments made is detailed below.

Trip Generation

- Office Trip Rates – CCC raise concerns regarding the site selection methodology for the TRICS rates presented, which it is considered has resulted in too low a trip rate.

- Retail, Café / Restaurant and Convenience Store – CCC raise concerns over the methodology applied to derive these trip rates, noting the methodology detailed is less than that outlined at the pre-application stage. CCC note the survey completed at Elliot's Field but indicate that it would not be suitable to apply these rates in light of the location and accessibility of the site.

- Learning and Development Academy – CCC do not consider that the assessment encompasses the full impact of the facility, due to the presence and capacity of the auditorium. CCC do not consider the Event Management Plan to be suitable to mitigate the impacts of larger events.

- Warehouse – CCC do not agree with the survey methodology used to assess the HGV movements coming to the site, nor do CCC agree with the first principles methodology employed to assess the warehouse staff.

- Nursery – CCC raise concerns that no trip generation has been provided for the nursery proposed.

- Leisure, Hotel and Group Accommodation – CCC agree with the trip rates presented.

- Linked Trips and Travel Plan Reductions – CCC do not agree with the methodology employed with respect to trip internalisation and the Travel Plan reductions.

- Multi-Modal Trip Generation – given the concerns regarding the vehicle trip rates, CCC do not agree with the corresponding multi-modal trip assessment.

Trip Distribution

25.41. CCC do not agree with the methodology completed, raising several concerns including issues with respect to route assignment using Google Maps and the criteria selected for the preferred route which is indicated as not being clarified. Concerns are also raised regarding the figures presented in the TAA which it is indicated do not provide meaningful data, as they only indicate the number of workers available across the nearby wards.

25.42. CCC also highlight that no Google Maps assessments have been provided as part of the TAA to verify the distribution detailed.

25.43. CCC indicate that given the assumptions regarding the lesser distances travelled by blue collar workers, the 35% of blue-collar workers travelling to the site via the A4600 is considered to be low.

25.44. As will be touched on in the following section, several sensitivity assessments were completed for the development, including an assessment using the CASM model for distribution purposes. With respect to this, CCC raise concerns regarding the model zone used to validate the distribution for this test, noting that it contains larger retail uses and a number of leisure uses. As such, CCC do not consider it to offer the best comparison with the site.

25.45. CCC then summarise the results of the distribution approaches (gravity model, TRACC and CASM) noting that of the methods, TRACC assigns the greatest quantum of movements to the A4600 corridor. CCC indicate that they consider the TRACC assessment to represent the correct distribution for the site and recommend that the modelling be revised using this. CCC do indicate a possible acceptance of the CASM method also, but subject to the model being re-run with agreed trips rates and an agreed distribution input being used.

25.46. CCC do not agree with the use of the blue-collar distribution for visitors to the site. When cross referencing the Main Town Centre Use Assessment, CCC indicate a greater draw of trips from Coventry than the distribution assumes.

25.47. CCC do not agree with the HGV distribution methodology and recommend that it is revised to reflect the information provided in the Planning Statement with respect to site operations.

25.48. CCC's concerns regarding the trip generation and distribution methodology are re-iterated in their later responses (dated 09/10/2024 and 06/11/2024).

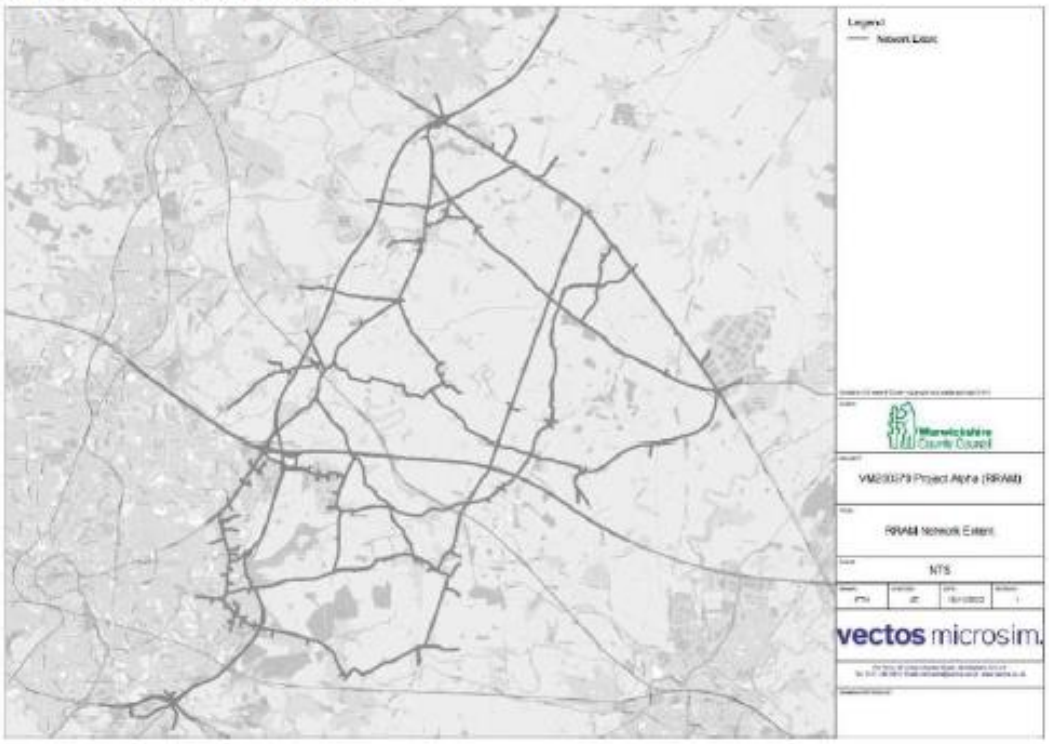
Modelling

25.49. As part of the application, several modelling iterations have been completed with respect to the local and strategic highway network. An overview of the approach taken with respect to the modelling has been provided below, detailing the evolution of the modelling assessment through the different documents provided.

Modelling Approach

25.50. Modelling for the proposals has been completed using WCC's Rugby Rural Area Model (RRAM). The RRAM study area is shown below.

Figure 10.1: RRAM Study Area



25.51. The model has been run to assess the weekday peak period impact of the proposals considering the AM (07:00-10:00) and PM (16:00-19:00) peaks. The TAA provides an explanation of the model inputs within Section 10, including information relating to the committed developments assessed and the survey data used to inform the RRAM runs.

25.52. As part of the TAA the RRAM was run for the following scenarios:

- 2031 Reference Case
- 2031 Development Case (with Travel Plan)
- 2031 Development Case (without Travel Plan)

25.53. The results of the RRAM were presented for the network under consideration, highlighting the impacts of the development on the agreed network area as a whole, using journey time analysis, percentage impact, speed, delay and junction queueing as assessment proxies.

25.54. This information was compared against the 2031 reference case for both the with and without Travel Plan scenarios to understand the net impacts of the development proposals.

25.55. In addition to the network assessment, the RRAM model has been utilised to complete individual junction capacity assessments, with the flows being taken from the RRAM model for the AM (08:00-09:00) and PM (17:00-18:00) peak periods.

25.56. The individual junction assessments were completed using junction capacity software; ARCADY and PICADY software for roundabouts and priority junctions respectively and LinSig for signalised junctions.

25.57. The junctions considered as part of the TAA were as follows:

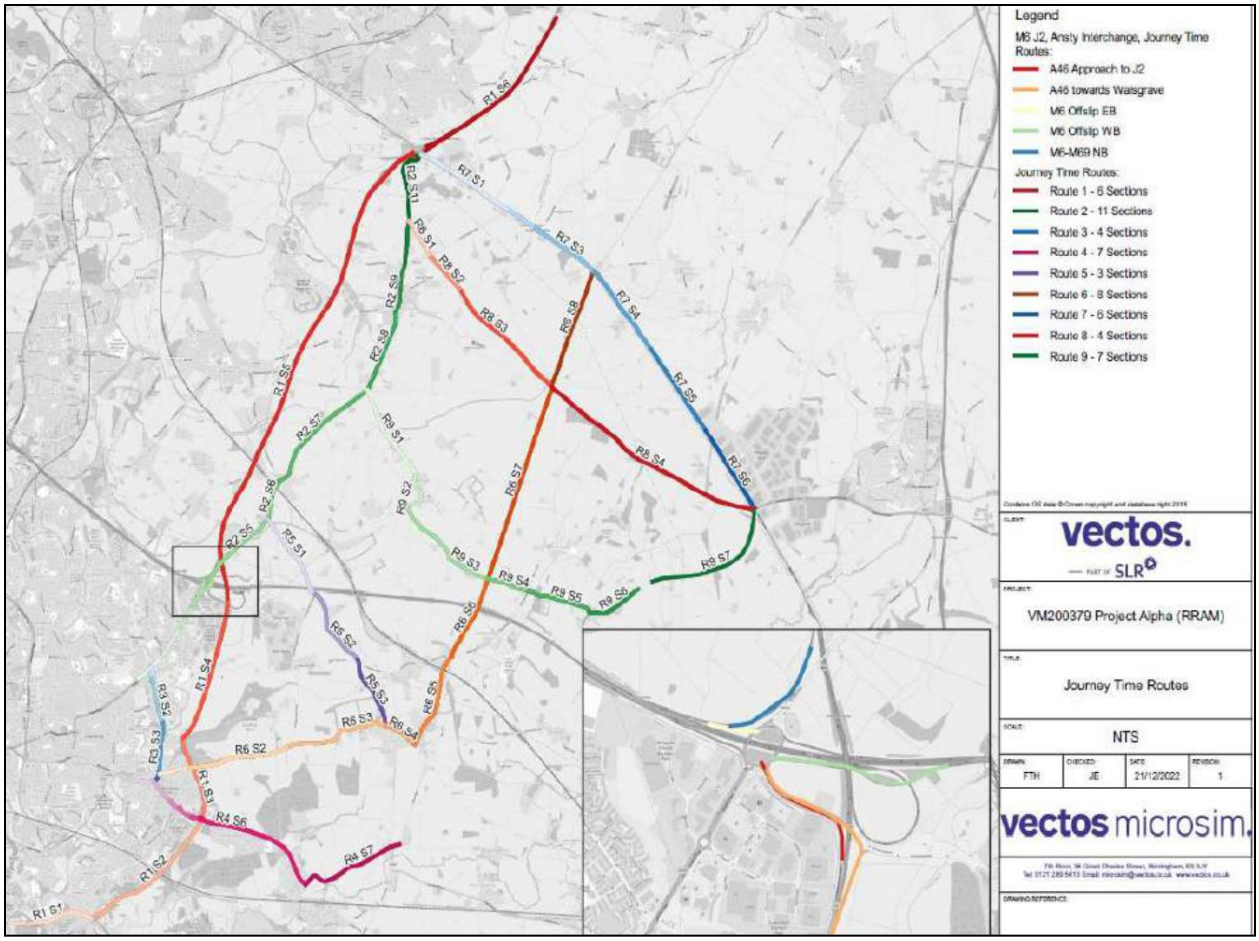
- Primary Site Access Roundabout
- Secondary Site Access Priority Junction
- B4065 Main Road / B4029 Signal Junction
- M6 Junction 2
- M69 / A46 Interchange
- A4600 / Parkway / Eden Road Roundabout

25.58. Following the submission of the TAA, an STAA was subsequently provided, which outlined several sensitivity scenarios that had been completed in addition to the scenarios detailed as part of the TAA.

25.59. These scenarios are as follows:

- Travel Plan refinements – this scenario sought to target the Travel Plan reductions with respect to the journeys where a reduction was likely to occur (based on active and sustainable transport measures). This offers a more focussed assessment than the TAA which applied the Travel Plan targets as a blanket reduction;
- Hinckley Strategic Rail Freight Interchange – this was added as a committed development following discussions with WCC;
- Learning and Development Auditorium – assessment of the 750-seat auditorium;
- Retail Trip Rates – an assessment using the survey data collected at the existing Shirebrook site;
- CASM (Coventry Area Strategic Model) Distribution Assessment – the CASM model was run to review the proposed trip distribution assessment presented as part of the TAA to understand the difference between the methodologies (as detailed above).

25.60. For all of the sensitivity scenarios, the RRAM model was run, and the network information was extracted and summarised in the STAA. A number of routes were assessed with respect to the RRAM model, and these are shown below.



25.61. The network model results summarise the impact of the development with respect to the routes shown above, with queue data presented for junctions within the modelled area (please refer to the relevant appendices of the STAA for the network modelling for the sensitivity scenarios detailed).

25.62. With respect to the individual junction modelling, these were completed assuming the Travel Plan refinement scenario.

25.63. In addition to the junctions assessed as part of the TAA (which were re-run as part of the STAA) a number of additional junctions were assessed:

- M6 Junction 3
- A4600 Hinckley Road / Wigston Road / Brade Drive Roundabout
- A4600 Ansty Road / Hall Lane / Woodway Lane Signals
- A4600 Ansty Road / B4082 Clifford Bridge Road Signals
- A4600 Ansty Road / Sewall Highway / Hipswell Highway Signals
- A444 Ricoh Arena Roundabout

25.64. The rationale for including the junctions listed within CCC's network results from using both an Area of Influence assessment provided by WSP (who develop and run the CASM model on CCC's behalf) and the traffic flow diagrams for the distributed development.

25.65. Further discussions with WCC were undertaken regarding the assessments presented, with a further scenario subsequently completed. This assumed the utilisation of the trip rates derived from the Elliot's Field survey only, as opposed to the blended trip rate as detailed above. This was assessed in conjunction with the refined Travel Plan scenario. The results of this exercise were presented to WCC as part of N69 (with the network modelling results detailed within Appendix C).

25.66. In addition, as part of N69, consideration was given to the bridge shuttle working currently in place in Ansty village, to understand the impacts of the development at this location.

25.67. During pre- and post-application discussions, CCC completed their own review of the Area of Influence with the CASM model and raised the need to consider the following additional junctions to those listed above:

- Ansty Road / Arch Road / Wyken Croft junction.
- Ansty Road / Morris Avenue T-junction.
- Ansty Road / Wyken Grange Road T-junction.
- Ansty Road / Mellowdew Road T-junction.
- Ansty Road / Wykeley Road T-junction.
- Ansty Road / Dane Road signalised junction.
- Ansty Road / Longfellow Road / Burns Road roundabout.
- Hipswell Highway / Longfellow Road T-junction.
- Wigston Road / Narberth Way T-junction.
- Wigston Road / Woodway Lane / Ringwood Highway staggered T-junctions.
- Woodway Lane / Henley Road (B4082) signalised T-junction.
- Clifford Bridge Road / UHCW Site Access signalised junction.
- Clifford Bridge Road / Belgrave Road signalised junction.
- Clifford Bridge Road / Sowe Link (B4082) roundabout.

25.68. Additional information with respect to these junctions was provided in N71a and N79.

25.69. Following discussions with WCC and NH, consideration has also been given to the M69 Junction 1, as will be detailed later in this report.

25.70. With respect to the methodology employed for the junction capacity assessments, it is noted that WCC offer no objection to the application, accepting the capacity methodology of the modelling undertaken with respect to their network.

25.71. Clarification regarding the methodology employed to assess several junctions has been requested by NH with corresponding evidence provided by the applicant. At the time of writing, NH raised several methodological queries with respect to the modelling for the M69 Junction 1 (response dated 25/11/2024) with the applicant having responded on 04/12/2024. A further response is currently awaited from NH. These comments remain the only outstanding matters with respect to NH's network.

25.72. CCC within their response dated 30/08/2024 highlighted several concerns relating to the methodology employed:

- CCC question why an opening year assessment was not provided and raise concerns about the proximity of the future year assessment to the opening year of the development (future year of 2031, opening year of 2028/2029).
- CCC remain concerned regarding the achievability of the Travel Plan targets and as such, the modelling of the development with these reductions applied.
- CCC note that the base data used for the RRAM is from 2016 to 2018, with the flows having been taken from the RRAM model for the future year with and without development assessments. Based on CCC's recent survey collections, they indicate the 2031 base figures are smaller than the data collected.
- CCC question whether the 9 routes assessed as part of the journey time analysis are the key routes, as some take limited development traffic.
- The committed developments do not include Keresley SUE or Pickards Way mixed use development, which CCC indicate will impact M6 Junction 3.
- It is indicated that the applicants did not provide a report regarding the models' stability nor have they provided the full PARAMICS results.
- It is not considered that network statistics are an acceptable measure for the RRAM model. It is stated that these are generally used as a quick 'health check' for the operation of the model before looking into journey and queue data
- The journey time information is not presented in line with WCC's protocol as the information provided represents the full length of the route. WCC's guidance indicates that the full route should be broken down into sections as opposed to being presented as the full route.
- The applicant's consultants have used slightly different modelling criteria when compared with the suggested criteria and modelling protocol.
- CCC indicate that the reassignment of traffic and traffic not being realised onto the network is usually a sign of severe or very severe congestion and delay on the network.
- With respect to the results of the network modelling, CCC indicate that not all new trips added to the network are being completed. CCC highlight that this does not indicate an increase in performance but that the trips are being held up by congestion.

- CCC highlight that development has a discernible negative impact on average speed and network mean delay, particularly in the PM peak, which equates to 21 seconds per completed trip.
- CCC highlight that on introduction of the Travel Plan, the results suggest delay is increased and mean speed is reduced which is not what would be expected.
- As a result of the journey times being presented for the full routes, this has obscured some of the development impacts. On assessment of the route sections, it is indicated that there are severe and very severe impacts for journey time on Route 1, 2 and 3.
- CCC raise concerns with the level of queueing detailed as part of the modelling presented and also raise concerns that the 2031 reference case is not accurately reflecting queuing for Junctions 10 to 17 (from Clifford Bridge Road to Combe Fields Road).
- CCC have presented several summary tables which assess the impact of the development on Routes 2 and 3. Based on the analysis presented by CCC, it is maintained that the development is having a severe impact and reassigning traffic to inappropriate roads within the model.
- CCC reviewed the network queue data provided for the junctions within their network. CCC indicate that almost every junction is experiencing a significant impact as a result of the development.
- Based on their review, CCC indicate that the network information provided shows a very severe and significant impact to congestion and safety on CCC's network.

25.73. Within CCC's response dated 09/10/2024, they maintain their concerns previously raised as detailed above.

25.74. With respect to the sensitivity scenarios assessed, CCC note that the methodology underpinning the sensitivity assessments was not agreed with the highway authorities prior to proceeding.

25.75. For the refined Travel Plan assessment, CCC do not agree that this should have been applied as the baseline assessment, as it in itself was considered to be a sensitivity. CCC do not agree with the methodology employed with respect to this sensitivity, as a result of their concerns regarding the active and sustainable transport strategy for the site. CCC do not consider that the active travel strategy will result in material impact to trip reduction. They also question the methodology applied to the trips to generate the sensitivity flows and note that the applicant has misinterpreted the results of this assessment, by comparing the incorrect scenarios.

25.76. CCC indicate that the refined Travel Plan scenario continues to show severe and very severe impacts on Routes 1, 2 and 3 and also reference concerns regarding Route 4. CCC raise concerns regarding the queueing observed and indicate that the refined Travel Plan scenario shows more impact in this regard than the previous Travel Plan scenario presented as part of the TAA.

25.77. With respect to the Hinckley Rail Freight Interchange, CCC note that the applicant has failed to provide trips relating to the Interchange. The sensitivity also includes the refined Travel Plan trips (for which comments are noted above). CCC do not accept the sensitivity.

25.78. The L&D sensitivity, CCC indicate that the applicants reduced the baseline assessment below the levels of assessment that the authorities had requested, without supporting evidence. It was requested that this aspect of the site be considered for up to 500 attendees. CCC raise concerns regarding the application of the 50% internalisation rate for this element of the site, as it reduces the vehicle impacts associated with larger events.

25.79. CCC indicate that no detail has been provided regarding the methodology for the assessment. Whilst the applicant is content for an Event Management Plan to be conditioned for events over 500 delegates, CCC highlight that the sensitivity which considers 500 delegates is not considered to be suitable.

25.80. CCC highlight that the scenario shows significant impacts on their network, in a similar nature to the other scenarios assessed.

25.81. The Shirebrook retail survey sensitivity is not agreed due to the survey methodology and as such CCC indicate that they will not consider this as part of their assessment. CCC note that the survey information included in the STAA is incorrect (which was rectified in the applicant's response N69). CCC indicate that the test removes an unrealistic number of trips from the assessment, however, based on the results presented a significant impact is still seen.

25.82. For the distribution sensitivity, CCC indicate that the CASM and TRACC assessments support their view that the distribution provided in support of the TAA is unsuitable and as such, the distribution analysis should be revised to better reflect the outcomes of these assessments, as opposed to being provided as a sensitivity. CCC recommend the use of the TRACC assessment for distribution purposes, though would also accept CASM if this was re-run with agreed trip generation and distribution parameters.

25.83. The impacts of this scenario are highlighted as being demonstrably worse with respect to average speed and mean network delay when compared against the TAA methodology. Severe impacts continue to be seen on Route 1-3 and significant queueing remains within CCC's network.

25.84. With respect to trip generation, discussions have been undertaken regarding this throughout the course of the application, with the applicant's transport consultants providing several Technical Note responses regarding trips and the associated methodology. It is noted that WCC and NH have agreed the trip generation and methodology (with the former seeking a sensitivity with respect to the retail assessment using the Elliot's Field rates). Given the discussions and evidence presented with respect to trip generation, and the peak period trip cap to be applied to the application, it is considered that the approach taken is reasonable, with several sensitivities also completed.

25.85. For distribution, WCC and NH have raised no objections to the approach taken with respect to their network. Whilst CCC maintain objections, the final distribution was considered to be reasonable, subject to clarifications regarding final junction assessments.

Local Junction Modelling

25.86. Turning from methodological considerations, each of the junctions assessed has been taken in turn below, with the comments of the relevant highway authorities also detailed.

25.87. Regarding the following section, several definitions are offered below, to aid with the modelling review:

- Passenger Car Unit (PCU) - A unit of measurement used in traffic modelling to standardise the impact of different types of vehicles on traffic flow. For example, a car is usually 1 PCU, while larger vehicles like buses may be assigned higher PCU values to reflect their greater impact on congestion.
- LinSig - A software tool used for modelling and optimising signalised junctions.
- ARCADY (Assessment of Roundabout Capacity and Delay) - A software tool used for analysing the performance of roundabouts.
- PICADY (Program for Intersection Capacity and Delay) - A software tool for modelling the operation of priority-controlled junctions (e.g., T-junctions and crossroads).
- Degree of Saturation (DoS) - The ratio of traffic demand to the available capacity at a road or junction, expressed as a percentage. A DoS of 100% means the demand matches the capacity. If DoS exceeds 85%, it typically indicates that the junction or road is nearing its capacity limit and may experience delays. A DoS above 100% suggests significant congestion and operational problems.
- Mean Maximum Queue (MMQ) - The average of the longest queues observed during multiple traffic cycles, typically used to understand the worst-case queuing scenario at a junction. A high MMQ value may indicate that the junction is struggling to cope with traffic demand.
- Practical Reserve Capacity (PRC) - A measure of how much additional traffic a junction or road can handle before reaching its maximum capacity. A positive PRC indicates spare capacity, meaning the road or junction can handle additional traffic. A negative PRC means the capacity has been exceeded, leading to potential delays and congestion.
- Ratio Flow Capacity (RFC) - The proportion of traffic flow relative to the capacity of a road or junction. An RFC of 1.0 (or 100%) means the traffic demand matches the available capacity. If RFC exceeds 0.85 (85%), it suggests that the junction is approaching capacity, and delays may occur. An RFC over 1.0 indicates congestion and significant queuing.

25.88. With respect to the site access arrangements, the design and associated capacity modelling results are detailed in a separate section below.

B4065 Main Road / B4029 Signal Junction

25.89. This junction lies within the control of WCC and has recently been upgraded to a signal-controlled arrangement. The junction was modelled using LinSig software.

25.90. Modelling for this junction is included in the STAA and N69, with the latter detailing the modelling results using the Elliot's Field trip rates.

25.91. The STAA details the 2031 reference case for the junction (without development flows); N69 details the 'with development' flows.

25.92. The reference case and associated 'with development' case are shown below. Please note that with respect to the 'with development' flows, the first column labelling is incorrect and should reflect the same labels are shown for the reference case.

2031 Without Development (Reference Case)

Table 14.5: Main Road B4065/B4029 Signalised Junction

B4029 / B4065 - 2031			PM	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
B4065 (NE)	65.6	6.8	51.6	3.9
B4029	54.6	2.6	54.9	3.8
B4065 (SW)	64.6	3.2	48.7	4.8
Overall Junction PRC (%)	37.2		63.9	

Table 2.3: Main Road B4065/B4029 Signalised Junction

M69 / A46 Ansty Park Existing Layout	AM DS (with TP) ST		PM DS (with TP) ST		AM DS (no TP) ST		PM DS (no TP) ST	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A46(W) Lane 1	72.8	7.8	54.9	4.0	74.3	8.3	55.9	4.1
A46(W) Lane 2	59.3	2.9	55.7	4.1	62.6	3.1	56.5	4.2
Central Bvd WB Res. Lane 1	66.4	3.6	53.5	5.4	73.5	4.0	54.0	5.5
Overall Junction PRC (%)	23.7		61.6		21.2		59.3	

25.93. N69 indicates that the junction continues to operate within capacity during the AM and PM peak periods and as such no mitigation is required.

25.94. Within WCC's response to N69, they note that *"the outputs show that the junction operates with sufficient reserve capacity and with minimal queuing even without introduction of travel plan measures".* WCC have raised no objection to the application, as confirmed in their response dated 03/12/2024.

25.95. NH and CCC had no comments in relation to this junction.

M6 Junction 2

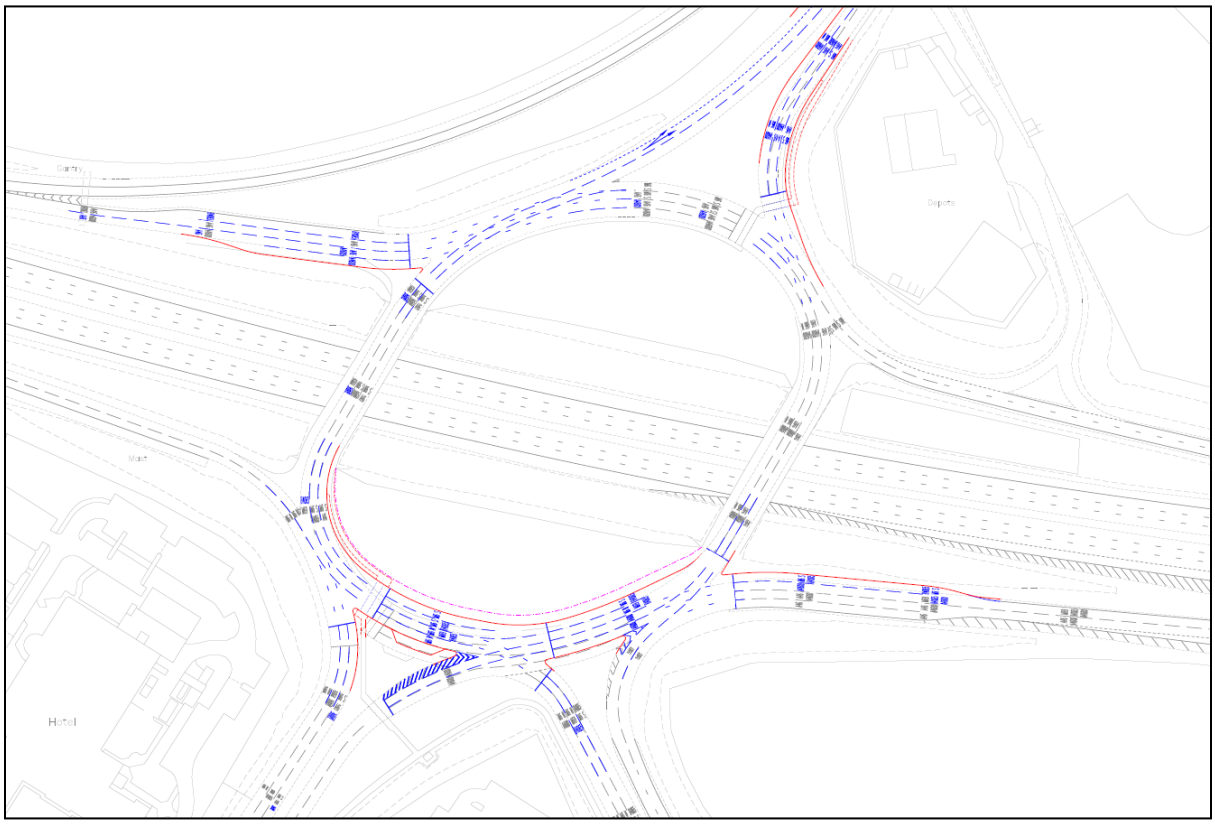
25.96. All of the highway authorities have an interest in this junction, as it connects to the M6 (NH) and both WCC and CCC's networks. The junction has been modelled using LinSig software.

25.97. The baseline 2031 reference case modelling can be found in the TAA. The reference case includes the now implemented junction improvement as part of the Prospero Park

application. The reference case indicates that the junction currently operates over capacity in the AM peak (PRC -2.5%) and within capacity during the PM peak (PRC 3.6%).

25.98. On addition of the development trips, assuming both the with and without Travel Plan scenario, the operation of the junction worsened, with the development trips placing the junction over capacity in both the AM and PM peaks (as shown in the TAA). Several arms of the junction were also seen to exceed 100% DoS, with notable increases in queueing observed.

25.99. In light of the impacts of the development at this location, a mitigation scheme is proposed and can be found at Drawing Number 195061/PD41 (Appendix O of TAA). The improvement works comprise of additional approach lanes on the M6 westbound off slip and the M6 eastbound off slip, resulting in 4 lanes provided on entry to the roundabout. On the B4065 Hinckley Road arm of the junction, 3 lanes are proposed on entry to the roundabout. Associated lane marking changes are also proposed to facilitate the increases in lanes on the arms of the junction. An extract of the proposed improvements is shown below for reference:



25.100. A corresponding Stage 1 Road Safety Audit is also included at Appendix O of the TAA with respect to this junction improvement, with both recommendations raised being accepted, with further details to be provided at the next design stage.

25.101. The latest modelling, which assumed the refined Travel Plan assessment and Elliot's Field trip rates (as detailed in N69) indicates that as a result of the proposed mitigation measures, the junction will operate within capacity during the AM peak assuming both the with (PRC 0.7%) and without (PRC 0.2%) Travel Plan scenario. During the PM peak,

the junction will operate slightly over capacity in both the with (PRC -0.8%) and without (PRC -3.8%) Travel Plan scenario.

25.102. Within their response dated 01/11/2024, WCC noted the following with respect to Junction 2: "*It is noted that National Highways have not raised any issues with the junction modelling with regards to traffic impacts on the SRN. WCC comments were made for information only and the response from SLR is noted."* WCC's final response to the application (dated 03/12/2024) raises no objection to the proposals.

25.103. NH raised queries with respect to this junction and the associated journey time analysis of the M6 (response dated 22/08/2024). The applicant subsequently responded to these matters (please see N61 and N67) with NH accepting these matters in their response dated 23/09/2024 and 25/10/2024. As such, NH have no objection to the junction modelling and associated mitigation measures proposed.

25.104. CCC within their response dated 30/08/2024 provided a comparison of the LinSig reports produced by the applicant and by IPAD (the consultants for Prospero Park), comparing the flows outlined. CCC highlight several discrepancies with the 2031 reference case flows between the two models. CCC go onto compare the flows on the A4600 and B4065 with the ARCADY models provided for the Eden Road roundabout and site access roundabout respectively, indicating further flow discrepancies.

25.105. CCC indicate that the improvement scheme at M6 Junction 2, to be provided as a result of Ansty Business Park, has already been implemented and as such, should be included within the 2031 reference case and development cases. On review of the TAA, it is indicated that the improvement has been included within the reference case on assessment of the modelling presented in Table 14.8, which references the associated improvement.

25.106. Within their response dated 09/10/2024, CCC acknowledged that Junction 2 is a NH asset. However, they raise concerns regarding the impact of the proposals on the A4600, noting that if the junction operates overcapacity it could result in area wide issues for CCC's network. CCC also note that if the junction does not operate efficiently, then vehicle divert via the A444 / M6 Junction 3 or A428 / A46 routes. CCC maintain concerns about the effectiveness of the proposed mitigation scheme.

25.107. In their response dated 06/11/2024 CCC note *"We have no further comments to make on M6 Junction 2, and the M69/A46 Interchange, our previous objections stand as the errors highlighted are still included in the modelling."*

M69 / A46 Interchange

25.108. This junction has been modelled using LinSig software. The 2031 reference case is detailed in the TAA and replicated below for ease.

2031 Without Development (Reference Case)

Policy 14.13: M69/A46 Interchange – Reference Case

M69 / A46 Ansty Park	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A46(W) Lane 1	66.8	7.5	53	6.3
A46(W) Lane 2	51.7	6.5	50.7	6.4
Central Bvd WB Res. Lane 1	0	0	41.6	3.1
Central Bvd WB Res. Lane 2	8.4	1.0	52.2	4.2
A46 NB Off-slip Left	59.1	7.9	60.4	6.2
A46 NB Off-slip Right	61.2	4.4	8.1	0.7
Central Bvd EB Res. Lane 1	44.5	3.2	10.9	0.1
Central Bvd EB Res. Lane 2	29.6	0.8	3.5	0.2
Central Bvd EB Res. R/T Ln 1	37.1	0.3	56.6	1.1
Central Bvd EB Res. R/T Ln 2	50.4	0.5	54.2	1.0
Central Boulevard Lanes 1 & 2	21.3	0.9	59.2	5.8
Central Boulevard Lane 3	15.3	0.9	27.2	2.7
Overall Junction PRC (%)	34.1		49.0	

25.109. This highlights that the junction currently operates within capacity in both the AM and PM peaks.

25.110. The 'with development' modelling is outlined in N69 and is summarised below.

Table 2.5: M69/A46 Interchange

M69 / A46 Ansty Park Existing Layout	AM DS (no TP) ST		PM DS (no TP) ST		AM DS (no TP) ST		PM DS (with TP) ST	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A46(W) Lane 1	54.5	6.1	57.4	7.3	55.5	6.1	56.0	6.9
A46(W) Lane 2	45.9	5.4	57.7	7.8	47.3	5.7	56.5	7.6
Central Bvd WB Res. Lane 1	0.4	0.0	39.3	2.9	0.4	0.0	40.3	3.0
Central Bvd WB Res. Lane 2	16.8	0.9	53.4	4.3	19.3	1.0	52.9	4.3
A46 NB Off-slip Left	63.1	5.6	64.6	6.9	63.9	5.7	62.0	6.4
A46 NB Off-slip Right	53.6	3.3	8.4	0.7	53.3	3.3	8.6	0.7
Central Bvd EB Res. Lane 1	35.9	2.2	5.7	0.1	37.3	2.3	5.5	0.1
Central Bvd EB Res. Lane 2	16.1	0.4	3.2	0.2	14.5	0.3	3.3	0.2
Central Bvd EB Res. R/T Ln 1	44.3	0.4	61.2	1.3	45.8	0.4	59.8	1.2
Central Bvd EB Res. R/T Ln 2	44.8	0.4	61.6	1.3	46.2	0.4	60.2	1.3
Central Boulevard Lanes 1 & 2	15.8	0.7	63.4	6.3	18.6	0.8	61.4	5.9
Central Boulevard Lane 3	12.2	0.7	29.1	2.8	14.0	0.8	28.8	2.8
Overall Junction PRC (%)	42.5		39.3		40.9		45.0	

25.111. Based on the above capacity modelling exercise, the junction will continue to operate within capacity both with and without the Travel Plan measures.

25.112. Within their response to N69 WCC note that *"The Linsig outputs demonstrate that the junction operates with considerable residual capacity and limited queuing in the development scenario, with and without the travel plan."*

25.113. NH raised queries regarding the junction within their original response to the application (dated 11/12/2023). On submission of the TAA and STAA, no further comments regarding this junction were provided.

25.114. CCC (within their response dated 30/08/2024) indicate concerns regarding the consistency of flows used to assess the junction. In their response dated 06/11/2024 CCC note *"We have no further comments to make on M6 Junction 2, and the M69/A46 Interchange, our previous objections stand as the errors highlighted are still included in the modelling."*

A4600 / Parkway / Eden Road Roundabout

25.115. This junction is controlled by CCC. The junction was modelled using ARCADY software. The reference case assessment was presented in the STAA and is summarised below.

Table 4.6: A4600/Parkway/Eden Road Roundabout – 2031 Reference Case

Hinckley Rd / Parkway / Eden Rd Rbt - 2031	AM Reference		PM Reference	
	RFC	Queue (pcu)	RFC	Queue (pcu)
Hinckley Road North	0.95	15.3	0.59	1.5
Parkway	0.34	0.6	0.47	0.9
Hinckley Road South	0.63	1.7	0.48	0.9
Eden Road	0.32	0.5	0.7	2.2
Maximum RFC	0.95		0.7	

25.116. As shown above, this indicated generally limited queuing beyond the Hinckley Road (N) arm in the AM peak. On cross referencing the results of the RRAM network modelling (presented in the TAA, STAA and N69) with the outputs of the individual junction modelling, it is noted that greater levels of queueing were indicated within the RRAM model.

25.117. Further consideration of this junction and the associated modelling outputs was subsequently provided in N79. This provided a comparison of the queue data from the RRAM and the ARCADY model and is shown below.

Table 3.1: A4600 / Parkway / Eden Road Reference Case Forecast Queues

A4600 / Parkway Roundabout Junction Entry	AM 2031 Ref Case		PM 2031 Ref Case	
	RRAM Q (pcu)	ARCADY Q (pcu)	RRAM Q (pcu)	ARCADY Q (pcu)
A4600 Hinckley Rd S/B	22	0	6	0
Parkway	12	2	25	1
A4600 Hinckley Road N/B	27	1	27	1
Eden Road	4	1	9	4

Table 3.2: A4600 / Parkway / Eden Road Development Case Forecast Queues

A4600 / Parkway Roundabout Junction Entry	AM 2031 DS (ST with TP)		PM 2031 DS (ST with TP)	
	RRAM Q (pcu)	ARCADY Q (pcu)	RRAM Q (pcu)	ARCADY Q (pcu)
A4600 Hinckley Rd S/B	24	13	13	3
Parkway	12	1	26	1
A4600 Hinckley Road N/B	53	3	5	1
Eden Road	3	1	4	3

25.118. Refinements were made to the ARCADY modelling to better reflect the queueing noted as part of the RRAM model, with the resulting modelling presented below. The modelling was completed using the Elliot's Field trip rates and associated refined Travel Plan figures.

Table 3.3 – A4600 / Parkway / Eden Road Development Case – Adjusted ARCADY results

A4600 / Parkway Roundabout Junction Entry	AM 2031 DS (ST with TP)		PM 2031 DS (ST with TP)	
	Adjusted Intercept RFC	Adjusted Intercept ARCADY Q (pcu)	Adjusted Intercept RFC	Adjusted Intercept ARCADY Q (pcu)
A4600 Hinckley Rd S/B	0.95	16	0.73	3
Parkway	0.71	3	0.93	9
A4600 Hinckley Road N/B	0.97	20	0.71	2
Eden Road	0.36	1	0.75	3

25.119. The applicant indicates that based on the above modelling, increased queueing is shown on the Hickley Road approach, which equates to 20 vehicles spread across two approach lanes with all arms below 1.0 RFC. The applicant does not consider this level of impact to warrant mitigation.

25.120. WCC had no comments in relation to this junction.

25.121. NH raised queries regarding the junction within their original response to the application (dated 11/12/2023). On submission of the TAA and STAA, no further comments regarding this junction were provided.

25.122. CCC (response dated 30/08/2024) reiterated their comments raised with respect to this junction in their original response to the TA (dated 23/12/2023). These comments were:

- The modelling presented was of a poor standard. CCC indicate that the flows used in the junction modelling did not relate to actual traffic figures at the junction, with

CCC comparing survey data collected at this location in November 2023, which they indicate highlights material differences between the conditions surveyed and the outputs of the RRAM.

- CCC also raise issues with the methodology of the modelling, indicating that the use of the one-hour profile in ARCADY (which uses a 15-minute warm and up cool down period for the peak and synthetises the information provided) has not been applied correctly and that the geometry of the roundabout is incorrect.
- CCC also noted a significant difference between the queues presented by the RRAM model and the ARCADY modelling, with no explanation provided as to why.

25.123. Following on from the above, CCC note that the TAA does include a geometric diagram of the junction, however, it is indicated that this remains unchanged from the geometry previously provided. CCC also maintained that the use of the one-hour profile is incorrect and further highlight inconsistencies with respect to continuity of flow between this junction and surrounding junctions.

25.124. Within their response dated 09/10/2024, CCC maintain that the local junction modelling has not been completed to a suitable standard, maintaining concerns regarding geometry and the one-hour profile. Within N69, it is noted that the applicants sought to amend the flare length concerns with respect to geometry, however, CCC indicate that the true junction geometry should have been presented.

25.125. In their response dated 06/11/2024 CCC note state: *"A4600/Parkway/Eden Road Roundabout the applicants have failed to consider CCC's previous objections relating to geometry and flows used in the modelling."*

25.126. Finally, with respect to the revised modelling presented as part of N79, CCC note within their final response dated 06/12/2024 the following: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

M6 Junction 3

25.127. The junction is maintained by both NH and WCC, however, the junction lies near CCC's network. As such, all of the highway authorities have an interest in this junction.

25.128. The junction has been assessed using WCC's PARAMICS model. This is a separate model to the RRAM outlined above. At the time of writing the TAA, WCC were in the process of refining their model to reflect updated traffic survey information. The modelling for this junction was subsequently presented as part of the STAA and further refined in N69 in response to WCC, to reflect the use of the Elliot's Field trip rates.

25.129. The resulting capacity assessments were presented in N69 within the spreadsheet '425-001000-Sp013__M6_J3_Retail_Sensitivity_Results'.

25.130. Based on the results of the modelling, WCC indicated the following: *"At M6 Junction 3, results suggest that both the delivery of the already identified interim scheme and implementation of mode shift measures are required to mitigate the impacts of the development. Even so, there are some residual impacts with increased queuing and journey times on the A444. A contribution towards delivery of the interim scheme and a*

further contribution towards future improvements at the junction would help deliver suitable mitigation."

25.131. The applicant confirmed both within N69 and N72 that they were willing to provide a contribution to the improvement of this junction.

25.132. WCC (response dated 03/12/2024) subsequently confirmed no objection to the proposals, subject to an agreed sum, to be secured via the Section 106 for mitigation measures at M6 Junction 3.

25.133. NH have also confirmed that a contribution would be required to M6 Junction 3.

25.134. CCC (within their response dated 30/08/2024) noted that as part of the modelling presented within the STAA, that with the development in place, it was considered that the proposals resulted in a severe impact at this junction with respect to journey times and queueing.

25.135. CCC go onto note the need for a financial contribution for this junction, as detailed in their response dated 09/10/2024.

25.136. A financial contribution has been sought and will be included in the Section 106 for this junction to offer the necessary mitigation, as confirmed in WCC's response detailed above.

M69 Junction 1

25.137. This junction is maintained by both WCC and NH.

25.138. Modelling of this junction was presented in N67 in response to comments raised by NH and has been modelled using LinSig software with consideration having also been given to the RRAM model.

25.139. The results of the modelling exercise completed in N67 indicated that on addition of the development proposals, an increase in queueing was observed on the M69 (SW) off slip, increasing from 42.7 PCUs in the reference case to 73.7 PCUs with the development added. This increase was seen to align with the results of the RRAM modelling outputs also.

25.140. In light of the impacts of the development at this junction, the applicant proposed to optimise the traffic signals and adjust the junction's timings to better accommodate the development flows, indicating a cost of in the region of £20,000 for this change. The modelling presented in N67 indicates that with optimisation the queueing on the M69 (SW) off slip would be 24.1 PCUs, improving queueing beyond the reference case.

25.141. Further clarification was sought by NH (email dated 25/10/2024) with respect to the modelling presented in N67, which the applicant responded to (email dated 06/11/2024).

25.142. A further email response was provided by NH (dated 25/11/2024) raising queries with respect the methodology employed to model the junction. The applicant responded to these comments on 04/12/2024 providing revised modelling which indicated lesser queueing at this location because of the refinements made to the model following NH

comments. The updated modelling is shown below, where it is seen that that queueing on the M69 (SW) arm has reduced in the PM peak:

M69 J1 Entries	AM 2023 Observed		AM 2031 Ref Case		AM 2031 Dev Case	
	DoS (%)	MMQ(pcu)	DoS (%)	MMQ(pcu)	DoS (%)	MMQ(pcu)
M69(SW)	89.6	10.1	94.7	12.6	95.3	12.9
A5(NW)	90.1	13.9	96.9	20.6	97.1	20.9
B4109(N)	86.0	17.9	92.6	22.5	94.5	24.5
M69(NE)	74.8	6.4	80.6	7.4	80.6	7.4
A5(SE)	84.6	7.3	90.5	10.2	90.8	10.1

M69 J1 Entries	PM 2023 Observed		PM 2031 Ref Case		PM 2031 Dev Case		PM 2031 Dev Case MOVA Revalidation Test	
	DoS (%)	MMQ(pcu)	DoS (%)	MMQ(pcu)	DoS (%)	MMQ(pcu)	DoS (%)	MMQ(pcu)
M69(SW)	95.8	17.0	103.4	27.7	106.6	36.3	97.8	21.2
A5(NW)	85.0	11.6	91.7	14.8	91.8	14.9	91.8	14.9
B4109(N)	90.0	12.7	97.3	17.6	98.1	18.5	88.8	13.0
M69(NE)	70.4	7.1	75.8	8.0	75.8	8.0	85.9	9.4
A5(SE)	79.7	9.5	86.3	11.3	84.7	10.8	84.7	10.8

25.143. Throughout, the applicant has indicated an acceptance of providing the signal timing changes at the junction to mitigate the impacts of the development.

25.144. At the time of writing, NH have not responded to the most recent evidence presented with respect to this junction.

25.145. WCC provided comments on the modelling presented as part of N69 (which replicate the information provided in N67) noting: *"The outputs show that the development has an impact at the junction but that the impacts on WCC network are limited, with marginal increases in queuing and reduction in capacity. A mitigation scheme has been proposed which offers an overall betterment to the operation of the junction in the PM and operation the B4019 Hinckley Road in the AM."* WCC have raised no objection to the application following this, within their response dated 03/12/2024.

25.146. CCC do not offer any material comments with respect to this junction.

A4600 Hinckley Road / Wigston Road / Brade Drive Roundabout

25.147. This junction is maintained by CCC. The junction was modelled using ARCADY software. The junction was first considered in the STAA. The modelling presented as part of this indicated that the development would result in increased queueing in the PM peak on the Hinckley Road (N) and Brade Drive arms of the junction. Reference was made to the potential for mitigation at this location, however, no proposals were presented as part of the STAA.

25.148. The junction was further investigated as part of N64, which provided a drawing for a proposed signal junction arrangement, with modelling of this proposed mitigation being provided in N71a.

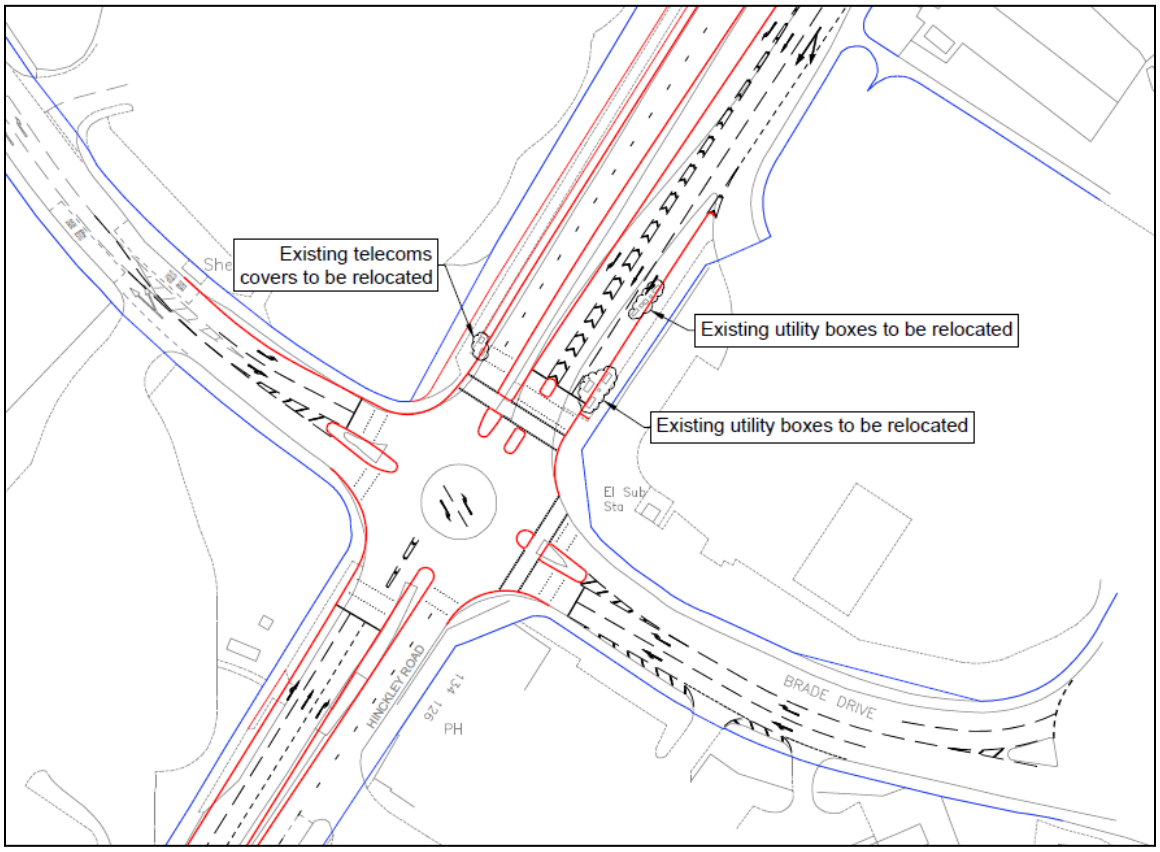
25.149. The latest modelling evidence is presented in N79. The 2031 reference case and with development scenario (assuming Elliot's Field and the refined Travel Plan impacts) is shown below.

Table 3.14 – A4600 / Brade Drive Existing Layout – ARCADY Analysis of Ref Case vs Dev Case (Retail Sensitivity & TP effects)

A4600 / Brade Drive / Wigston Road	AM 2031 Ref Case		PM 2031 Ref Case		AM DS Retail ST (with TP)		PM DS Retail ST (with TP)	
	RFC	Queue (pcu)	RFC	Queue (pcu)	RFC	Queue (pcu)	RFC	Queue (pcu)
A4600 S/B	0.91	9	0.85	5.5	0.9	8.5	1.03	49.4
Brade Drive	0.6	1.5	0.82	4.2	0.61	1.5	1.15	39.5
A4600 N/B	0.65	1.9	0.78	3.5	0.79	3.7	0.84	5
Wigston Rd	0.8	4	0.59	1.4	0.96	12.1	0.66	1.9
Maximum RFC	0.91		0.85		0.96		1.15	

25.150. This highlights the increased queue lengths during the PM Peak on the Hinckley Road (N) and Brade Drive arms of the junction.

25.151. The proposed signal mitigation measures are shown in Drawing Number 195061/PD61, with an extract of this drawing shown below.



25.152. The results of the signal modelling are provided below.

Table 3.15 – A4600 / Brade Drive Improved Layout – LinSig Analysis Results (Sensitivity & TP effects)

A4600 / Brade Drive	AM 2031 Dev ST (with TP)		PM 2031 Dev ST (with TP)	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 (N) Ln1	88.0	22.4	100.9	39.5
A4600 (N) Ln1 & R/T	78.9	21.0	97.1	41.0
Brade Dr S/O & L/T	85.5	18.6	99.4	29.1
Brade Dr R/T	88.0	20.7	100.6	35.3
A4600(S) Ln1	60.0	6.6	101.0	23.0
A4600(S) Ln1 & R/T	89.1	6.9	69.0	5.5
Wigston Rd	75.8	11.3	100.6	20.2
Pract. Res. Capacity (%)	1.1		-12.2	

25.153. The signal junction modelling highlights that queueing will remain at the junction within the PM peak. The applicant indicates that the improvement will not fully mitigate the impact of the development. However, they note that the signal arrangement will allow for formal crossings for pedestrians on all arms of the junction.

25.154. The applicant has indicated that if the scheme is not considered to be appropriate, there is a possibility of a financial contribution being made to the same cost to allow for an alternative scheme to be implemented.

25.155. WCC and NH have not provided comment with respect to this junction.

25.156. CCC noted within their response (dated 30/08/2024) that they had concerns regarding how the turning flows had been derived for the junction, with concerns also raised regarding the geometry of the junction used for the roundabout modelling. CCC also highlighted discrepancies with respect to the consistency of flows at the junction based on surrounding junction flows.

25.157. Within their response dated 06/11/2024, CCC state: *"A4600 Hinckley Road/Wigston Road/Brade Drive Roundabout the applicants have modelled their mitigation proposals. The modelling shows that the mitigation suggested is detrimental to highway safety and capacity."*

25.158. CCC's final response (dated 04/12/2024) references the need for a traffic management contribution for CCC's network. CCC acknowledged the mitigation proposed for this junction but indicated further work is required to develop and refine the mitigation package.

A4600 Ansty Road / Hall Lane / Woodway Lane Signals

25.159. This junction is maintained by CCC and has been modelled using LinSig software. The junction was reviewed as part of the STAA, with further modelling presented as part of N64 in response to CCC. The modelling presented in N64 sought to respond to the comments of CCC.

25.160. The modelling presented in N64 is based on the controller information provided by CCC, with its operation having been observed to determine several model inputs.

25.161. The results of the modelling, for the 2031 reference case and with development flows are summarised below.

Table 8.1: 2031 Reference Case

Hinckley Road / Woodway Lane	AM 2031 Reference		PM 2031 Reference	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 Hinckley Road	100.0	40.5	97.8	26.7
Hall Lane	98.8	15.4	99.3	13.1
A4600 Antsy Road	77	16.8	89.6	17.9
Woodway Lane	100.6	28.4	100.2	20.8
Overall Junction PRC (%)	-11.8		-11.3	

Table 8.2: 2031 wth Development

Hinckley Road / Woodway Lane	AM 2031 Dev (with TP)		PM 2031 Dev (with TP)		AM 2031 Dev (no TP)		PM 2031 Dev (no TP)	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 Hinckley Road	99.8	39.9	109.9	65	101.1	43.7	108.2	60.3
Hall Lane	95.6	14.1	101.5	14.7	100.5	16.7	105.7	17.1
A4600 Antsy Road	89.8	26.4	88.2	17.9	91.1	27.9	85.1	16.6
Woodway Lane	100.1	26.8	108.6	35.2	99.1	25.7	108.7	35.4
Overall Junction PRC (%)	-11.2		-22.2		-12.3		-20.7	

25.162. Based on the modelling presented, notable increases in queueing are seen on the A4600 Hinckley Road in the PM peak, with an increase in queues also observed on Woodway Lane during the same time period.

25.163. In response to this increase, the applicant proposed that the cycle time for the junction be increased to 120 seconds during the PM peak period. The results of this change are shown below.

Table 8.3: 2031 with Development – Increase in PM Peak Cycle Time

Hinckley Road / Woodway Lane (120s CT)	PM 2031 Reference ST		PM 2031 Dev (with TP) ST		PM 2031 Dev (no TP) ST	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 Hinckley Road	93.2	26.3	101	42.6	102.2	46.8
Hall Lane	92.2	11.4	100.4	15.5	95.9	12.7
A4600 Antsy Road	92.7	23.9	89.7	23.5	88.7	22.9
Woodway Lane	91.8	16.7	100.2	23.9	100.4	24.2
Overall Junction PRC (%)	-3.6		-12.2		-13.6	

25.164. On increasing the cycle times during the PM peak period, the queues on the A4600 Hinckle Road and Woodway Lane arms of the junction are reduced.

25.165. Within N64, the applicant has indicated that the configuration of the junction has the capacity to accommodate the cycle time currently. As such, the applicant concludes that the impacts at this location are not 'severe' in line with paragraph 115 of the NPPF.

25.166. WCC and NH have not provided comment with respect to this junction.

25.167. Within their response dated 30/08/2024, CCC state: "*This junction has not been modelled to an acceptable standard:*

- *Traffic Flows are derived from strategic model.*
- *No turning counts.*
- *Signal timings are not realistic or based on actual signal timings.*
- *Pedestrian phases are unrealistically short, skewing the results of the modelling."*

25.168. *Despite these issues the modelling results still show a discernible impact of the development on the junction. Despite the results presenting a negative impact on the practical reserve capacity the applicant states the junction is still operating within capacity. Despite showing a severe impact no mitigation has been suggested*."

25.169. The modelling in N64 sought to address these comments, with associated mitigation being outlined.

25.170. Within their response dated 09/10/2024, CCC indicate that as the methodology with respect to CCC's network is unagreed, other impacts may be likely which are unidentified and may require mitigation. Within this, they note that this junction operates over capacity currently and any development associated with the development will likely exacerbate this.

25.171. CCC also state generally with respect to the signal modelling completed with respect to the site that *"Despite being given the controller data, traffic flows, signal timings, phases and intergreen phases for the signals being modelled in Coventry, the applicants' transport consultant insists on continuing with their unrealistic timings based on surveys they are not willing to provide evidence of."*

25.172. CCC's final response (dated 04/12/2024) references the need for a traffic management contribution for CCC's network. CCC acknowledged the mitigation proposed for this junction but indicated further work is required to develop and refine the mitigation package.

A4600 Ansty Road* / B4082 *Clifford Bridge Road Signals

25.173. This junction is maintained by CCC and has been modelled using LinSig software. The junction was reviewed as part of the STAA, with further modelling presented as part of N64 in response to CCC. The modelling presented in N64 sought to respond to the comments of CCC.

25.174. The modelling presented in N64 is based on the controller information provided by CCC, with its operation having been observed to determine several model inputs. Separate TomTom analysis was provided with respect to journey time data for this junction, as on-site observations indicated exit blocking towards this junction from the UHCW access.

This blocking was indicated as being limited to the A4600 south-bound lane 1 and the downstream lanes to UHCW.

25.175. The results of the modelling, for the 2031 reference case and with development flows are summarised below.

Table 8.4: 2031 Reference Case

Antsy Road / Clifford Bridge Road - 2031	AM Reference		PM Reference	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 Antsy Road East	89.5	14.7	79.6	8.6
A4600 Antsy Road West	45.0	3.6	43.5	2.4
Clifford Bridge Road	77.9	5.1	87.9	11.8
South Circulatory	88.4	15.9	40.0	4.7
West Circulatory	71.0	3.2	62.0	3.7
A4600 E/B R/T	78.1	9.9	29.8	8.3
Overall Junction PRC (%)	0.6		2.4	

Table 8.5: 2031 With Development

Antsy Road / Clifford Bridge Road - 2031	AM Dev (with TP)		PM Dev (with TP)		AM Dev (no TP)		PM Dev (no TP)	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 Antsy Road East	88.0	13.8	88.3	14.1	87.7	13.6	88.4	14.3
A4600 Antsy Road West	55.6	4.0	47.6	5.0	57.3	4.3	48.0	5.0
Clifford Bridge Road	76.3	4.8	87.4	11.6	77.5	5.1	88.6	12.3
South Circulatory	87.8	15.6	41.1	4.9	87.8	15.6	38.8	4.6
West Circulatory	71.0	3.2	51.7	3.7	70.1	2.9	62.5	3.7
A4600 E/B R/T	79.1	10.0	31.3	8.3	77.6	9.8	29.6	8.3
Overall Junction PRC (%)	2.3		1.9		2.4		1.6	

25.176. The results of the modelling indicate that the impact of the development at this location is negligible.

25.177. WCC, within their response to N69, raise comments regarding the TomTom analysis presented, highlighting that the RRAM demonstrates a good level of validation along these routes and as such, it was unclear as to what the TomTom analysis was intended to show, noting also the time differences between the RRAM and the TomTom date (2018 compared with 2024). WCC noted with respect to the evidence presented that the peak period analysis was likely to be robust and have raised no objection to the application within their final response (dated 03/12/2024).

25.178. NH have not provided comment with respect to this junction.

25.179. Within their response dated 30/08/2024, CCC state: *"The applicant has failed to provide the modelling for this junction in Appendix K, making it impossible to do any form of assessment.*

25.180. *Looking at the title of the chapter and the modelling results, it appears that the applicant has modelled this junction in isolation. It forms, with the University Hospital Coventry and Warwickshire entrance, a single gyratory. It is simply not possible to model them independently."*

25.181. The modelling in N64 sought to address these comments, with associated mitigation being outlined.

25.182. Within their response dated 09/10/2024, CCC do not discuss the updated modelling for this junction directly. CCC do, however, generally note that with respect to the signal modelling completed with respect to the site that *"Despite being given the controller data, traffic flows, signal timings, phases and intergreen phases for the signals being modelled in Coventry, the applicants' transport consultant insists on continuing with their unrealistic timings based on surveys they are not willing to provide evidence of."*

25.183. CCC's final response (dated 04/12/2024) references the need for a traffic management contribution for CCC's network.

A4600 Ansty Road / Sewall Highway / Hipswell Highway Signal Junction

25.184. This junction is maintained by CCC and has been modelled using LinSig software. The junction was reviewed as part of the STAA, with further modelling presented as part of N64 in response to CCC. The latest modelling for the junction is detailed in N79.

25.185. This junction does not form part of the RRAM model area and as such survey data was collected for the junction. Growth factors were applied to the junction to provide a 2031 reference case.

25.186. The development flows interacting with this junction were based on the flows presented within the RRAM for the junctions north of this junction. CASM distribution was then used to assess the flows at the junction itself.

25.187. A site visit was conducted on 19th September to assess the junction's operation. The resulting LinSig assessment is detailed below.

Table 3.4 – LinSig Analysis of A4600 / Hipswell Highway / Sewall Highway – Reference Case

A4600 / Hipswell Highway / Sewell Highway	AM Reference		PM Reference	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 (NE)	84.8%	15	81.7%	20
Hipswell Highway	74.5%	7	75.6%	15
A4600 (SW)	87.9%	18	78.5%	14
Sewall Highway	87.6%	16	80.6%	16
Overall Junction PRC (%)	2.4%		10.1%	

Table 3.5 – LinSig Analysis of A4600 / Hipswell Highway / Sewall Highway – Development Case

A4600 / Hipswell Highway / Sewell Highway	AM DS (No TP)		PM DS (No TP)		AM DS (with TP)		PM DS (with TP)	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 (NE)	90.0%	17	82.2%	20	88.6%	16	85.5%	21.2
Hipswell Highway	74.5%	7	81.2%	16	74.5%	7	79.2%	15.5
A4600 (SW)	92.3%	20	85.5%	15	90.2%	19	86.2%	14.3
Sewall Highway	87.6%	16	87.4%	18	87.6%	16	85.0%	17.4
Overall Junction PRC (%)	-2.5%		3.0%		-0.2%		4.4%	

Table 3.6 – LinSig Analysis of A4600 / Hipswell Highway / Sewall Highway – Retail Sensitivity Test

A4600 / Hipswell Highway / Sewell Highway	AM DS Sens (no TP)		PM DS Sens (no TP)		AM DS Sens (with TP)		AM DS Sens (with TP)	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 (NE)	89.9%	17	85.6%	23	89.1%	14	85.6%	23
Hipswell Highway	74.5%	7	77.4%	15	74.5%	7	77.4%	15
A4600 (SW)	91.7%	20	88.2%	16	90.5%	19	87.7%	16
Sewall Highway	87.6%	16	82.5%	17	87.6%	16	82.5%	17
Overall Junction PRC (%)	-1.8%		2.1%		-0.5%		2.6%	

25.188. As a result of the development proposals, it is noted that the overall junction PRC will be impacted (most notably during the AM peak), taking the junction over capacity.

25.189. A review of the cycle time was completed, assessing the impacts of a 104 second cycle time. The results of this are shown below.

Table 3.7 – LinSig Analysis of A4600 / Hipswell Highway / Sewall Highway – AM 104s Cycle Time

A4600 / Hipswell Highway / Sewell Highway	AM DS Sens (no TP)		PM DS Sens (no TP)		AM DS Sens (with TP)		PM DS Sens (with TP)	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 (NE)	88.4%	17	86.9%	17	88.2%	14	87.1%	14
Hipswell Highway	80.7%	8	80.7%	8	80.7%	8	80.7%	7.6
A4600 (SW)	89.6%	20	87.6%	19	89.0%	20	87.9%	20
Sewall Highway	87.4%	17	87.4%	17	87.4%	17	87.4%	17
Overall Junction PRC (%)	0.4%		2.8%		1.1%		2.4%	

25.190. The change in cycle time would bring the junction within capacity during the AM peak and the applicant indicates that this change could be facilitated within the current junction set up.

25.191. The applicant concludes that as a result of the changes to the cycle timings, the development will have no material impact at this location.

25.192. WCC and NH have not provided comment with respect to this junction.

25.193. Within their response dated 30/08/2024, CCC state in respect of the STAA: "*This junction has not been modelled to an acceptable standard:*

- *Traffic Flows are derived from strategic model.*
- *No turning counts.*
- *Signal timings are not realistic or based on actual signal timings.*
- *Pedestrian phases are unrealistically short, skewing the results of the modelling.*

25.194. *The inputs to the modelling are of such a poor standard it is not worth considering the results that have been included in the STAA."*

25.195. The modelling in N64 sought to address these comments, with further modelling provided in N79.

25.196. Within their response dated 09/10/2024, CCC do not discuss the updated modelling for this junction directly. CCC do, however, generally note that with respect to the signal modelling completed with respect to the site that *"Despite being given the controller data, traffic flows, signal timings, phases and intergreen phases for the signals being modelled in Coventry, the applicants' transport consultant insists on continuing with their unrealistic timings based on surveys they are not willing to provide evidence of."* Their concerns regarding the methodology applied to the trip generation, distribution and modelling approach (as detailed above) remain highlighted.

25.197. CCC's final response (dated 04/12/2024) references the need for a traffic management contribution for CCC's network. CCC indicate they are willing to work with the applicant, post approval, to address the concerns raised with respect to CCC's network.

A444 Ricoh Arena Roundabout

25.198. This junction is maintained by CCC. Within CCC's response dated 30/08/2024, it was noted that whilst the modelling of the junction was welcomed, the junction had not formed part of the area of influence which CCC had identified as requiring consideration.

25.199. As such, whilst modelling for this junction was presented as part of the STAA, this junction has not been considered further as part of the application, as it falls outside of the junctions detailed by CCC as requiring consideration.

25.200. No comments were provided by WCC or NH with respect to this junction.

Ansty Road / Arch Road / Wyken Croft junction

25.201. This junction is maintained by CCC. This junction has been considered within N79. No formal junction capacity assessment has been completed with respect to this junction.

25.202. Onsite observations were completed on Tuesday 19th November and Wednesday 20th November during the peak periods.

25.203. During the AM peak, limited queueing was observed on the Arch Road arm of the junction, with Wyken Croft queueing observed to be up to 6 vehicles. It was noted that a pedestrian crossing is provided on the A4600 which when red allows vehicles to filter from the junction.

25.204. During the PM peak, traffic levels were indicated as being greater during this period. Queueing on Arch Road remained limited with queues of up to 10 vehicles noted on Wyken Croft.

25.205. On assessment of Google Maps typical traffic conditions for this junction, slow moving conditions are observed on Wyken Croft during the AM peak. Traffic associated with vehicles turning right from the side arms is slow moving, though it does not appear to impact vehicles on the A4600.

25.206. During the PM peak, slow moving traffic is noted on Arch Road, with slow moving vehicles queueing back to the junction from the Hocking Road or Hipswell Highway / Sewall Highway junction.

25.207. As a result of the development proposals a total of 294 trips are anticipated to interact with the junction in the AM peak (assuming the Elliot's Field trip rates and refined Travel Plan impacts); during the PM peak this figure is 479. Up to 149 vehicles are indicated as leaving Wyken Croft during the AM peak in association with the development.

25.208. During the latest 5-year period, 7 incidents were recorded at this location. On assessment of these incidents, no pattern appears to be present with respect to causation.

25.209. Based on the assessment presented, the applicant indicates no 'severe' impact at this location.

25.210. WCC and NH have not provided comment with respect to this junction.

25.211. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.212. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Ansty Road / Morris Avenue T-junction

25.213. This junction is maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to this junction.

25.214. Observations were completed on Tuesday 19th and Wednesday 20th November. This indicated limited queueing on Morris Avenue, with a maximum of 2 vehicles found to be queueing.

25.215. Google traffic conditions were reviewed, and no traffic visualisation was provided for Morris Avenue indicating low traffic volumes.

25.216. No trips associated with the development impact Morris Avenue, with all development trips routeing through the junction on the A4600.

25.217. No incidents were recorded at this location during the latest 5-year period.

25.218. The applicant indicates no 'severe' impact at this location.

25.219. WCC and NH have not provided comment with respect to this junction.

25.220. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.221. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Ansty Road / Wyken Grange Road T-junction

25.222. This junction is maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to this junction.

25.223. Observations were completed on Tuesday 19th and Wednesday 20th November. This indicated limited queueing on Wyken Grange Road, with a maximum of 2 vehicles found to be queueing.

25.224. Google traffic conditions were reviewed which indicated slow moving vehicles during the 08:30 period on Wyken Grange Road. Queueing was also observed on the A4600 in the 17:30 period potentially as a result of queueing from the Hipswell Highway junction. It was, however, indicated that this did not result in queueing on Wyken Grange Road itself.

25.225. No trips associated with the development impact Wyken Grange Road, with all development trips routeing through the junction on the A4600.

25.226. No incidents were recorded at this location during the latest 5-year period.

25.227. The applicant indicates no 'severe' impact at this location.

25.228. WCC and NH have not provided comment with respect to this junction.

25.229. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.230. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Ansty Road / Mellowdew Road T-junction

25.231. This junction is maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to this junction.

25.232. Observations were completed on Tuesday 19th and Wednesday 20th November. This indicated limited queueing on Mellowdew Road, with a maximum of 2 vehicles found to be queueing.

25.233. Google traffic conditions were reviewed, and no traffic visualisation was provided for Mellowdew Road indicating low traffic volumes.

25.234. No trips associated with the development impact Mellowdew Road, with all development trips routeing through the junction on the A4600.

25.235. One incident was recorded at this location during the latest 5-year period.

25.236. The applicant indicates no 'severe' impact at this location.

25.237. WCC and NH have not provided comment with respect to this junction.

25.238. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.239. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Ansty Road / Wykeley Road T-junction

25.240. This junction is maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to this junction.

25.241. Observations were completed on Tuesday 19th and Wednesday 20th November. This indicated limited queueing on Wykeley Road, with a maximum of 2 vehicles found to be queueing.

25.242. Google traffic conditions were reviewed which indicated slow moving vehicles during the 08:30 period on Wykeley Road.

25.243. No trips associated with the development impact Wykeley Road, with all development trips routeing through the junction on the A4600.

25.244. No incidents were recorded at this location during the latest 5-year period.

25.245. The applicant indicates no 'severe' impact at this location.

25.246. WCC and NH have not provided comment with respect to this junction.

25.247. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.248. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Ansty Road / Dane Road Signal Junction

25.249. This junction is maintained by CCC and its operation is considered in N79. Junction capacity assessments have been completed for the junction, using traffic data collected. The junction has been modelled using LinSig software.

25.250. Observations were completed at the junction on 20th November, to understand the operation of the junction on the ground and to determine several model inputs. The controller specification for the junction was provided by CCC.

25.251. Growth factors were applied to the survey data to establish a 2031 reference case, with development flows then added (comprising both with and without Travel Plan scenarios and with and without Elliot's Field trip rates). The results of the modelling are shown below.

Table 3.8 – A4600 / Dane Road LinSig Analysis – Reference Case

A4600 Ansty Rd / Dane Rd	AM Reference		PM Reference	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 O/B	70.2%	10	71.8%	10
R/T ro Dane Rd	57.1%	4	41.0%	3
Dane Road	70.8%	5	68.5%	6
Overall Junction PRC (%)	27.1%		25.3%	

Table 3.9 – A4600 / Dane Road LinSig Analysis – Development Case

A4600 Ansty Rd / Dane Rd	AM DS (no TP)		PM DS (no TP)		AM DS (with TP)		AM DS (with TP)	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 O/B	79.2%	13	75.8%	12	77.2%	13	74.9%	11
R/T ro Dane Rd	63.7%	4	54.5%	4	63.7%	4	53.3%	4
Dane Road	78.7%	5	73.3%	6	78.7%	5	73.3%	6
Overall Junction PRC (%)	13.6%		18.8%		14.4%		20.2%	

Table 3.10 – A4600 / Dane Road LinSig Analysis – Dev Case (Retail Sensitivity)

A4600 Ansty Rd / Dane Rd	AM DS Sens (no TP) (Retail Sens)		PM DS Sens (no TP) (Retail Sens)		AM DS Sens (with TP) (Retail Sens)		AM DS Sens (with TP) (Retail Sens)	
	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)	DoS (%)	MMQ (pcu)
A4600 O/B	78.9%	13	73.9%	11	77.4%	13	77.3%	12
R/T ro Dane Rd	63.7%	4	43.1%	3	63.7%	4	54.5%	4
Dane Road	78.7%	5	70.5%	6	78.7%	5	73.3%	6
Overall Junction PRC (%)	14.1%		21.8%		14.4%		16.5%	

25.252. Based on the modelling presented, it is indicated that the junction operates within capacity in all scenarios.

25.253. A total of 5 incidents were recorded at the junction in the latest 5-year period. The incidents recorded did not show any clustering as to indicate any safety concerns at the junction.

25.254. WCC and NH have not provided comment with respect to this junction.

25.255. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.256. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Ansty Road / Longfellow Road / Burns Road Roundabout

25.257. This junction is maintained by CCC and its operation is considered in N79. Junction capacity assessments have been completed for the junction, using traffic data collected in November 2024. The junction has been modelled using ARCADY software.

25.258. Observations were completed at the junction on 20th November, to understand the operation of the junction on the ground. It was indicated in N79 that in general, queues cleared and the operation of the junction was acceptable.

25.259. Growth factors were applied to the survey data to establish a 2031 reference case, with development flows then added (comprising both with and without Travel Plan scenarios and with and without Elliot's Field trip rates). The results of the modelling are shown below.

Table 3.11 – A4600 / Burns Road / Longfellow Road – Reference Case

Antsy Road / Burns Road Roundabout	AM Reference		PM Reference	
	RFC	Queue (pcu)	RFC	Queue (pcu)
1 - Ansty Rd N	0.49	1	0.53	1
2 - Longfellow Rd	0.52	1	0.36	1
3 - Burns Rd	0.48	1	0.5	1
4 - Ansty Rd W	0.54	1	0.57	2
Maximum RFC	0.54		0.57	

Table 3.12 – A4600 / Burns Road / Longfellow Road – Development Case

Antsy Road / Burns Road Roundabout	AM DS (no TP)		PM DS (no TP)		AM DS (with TP)		AM DS (with TP)	
	RFC	Queue (pcu)	RFC	Queue (pcu)	RFC	Queue (pcu)	RFC	Queue (pcu)
1 - Ansty Rd N	0.5	1	0.63	1.7	0.5	1	0.62	1.6
2 - Longfellow Rd	0.53	1.1	0.4	0.7	0.53	1.1	0.4	0.7
3 - Burns Rd	0.49	0.9	0.54	1.2	0.49	0.9	0.54	1.1
4 - Ansty Rd W	0.63	1.7	0.62	1.6	0.61	1.6	0.61	1.6
Maximum RFC	0.63		0.63		0.61		0.62	

Table 3.13 – A4600 / Burns Road / Longfellow Road – Dev Case (Retail Sensitivity)

Antsy Road / Burns Road Roundabout	AM DS Sens (no TP)		PM DS Sens (no TP)		AM DS Sens (with TP)		AM DS Sens (with TP)	
	RFC	Queue (pcu)	RFC	Queue (pcu)	RFC	Queue (pcu)	RFC	Queue (pcu)
1 - Ansty Rd N	0.5	1	0.63	1.8	0.5	1	0.63	1.7
2 - Longfellow Rd	0.53	1.1	0.41	0.7	0.53	1.1	0.4	0.7
3 - Burns Rd	0.49	0.9	0.55	1.2	0.49	0.9	0.54	1.2
4 - Ansty Rd W	0.63	1.7	0.63	1.7	0.61	1.6	0.63	1.7
Maximum RFC	0.63		0.63		0.61		0.63	

25.260. Based on the modelling presented, it is indicated that all arms of the junction operate within capacity in all scenarios.

25.261. A total of 6 incidents were recorded at or near to the junction. A single fatal incident was recorded on Burns Road. On review of the incident causation, it was concluded that the incidents were the result of human error, with no safety issues raised with respect to the junction itself.

25.262. WCC and NH have not provided comment with respect to this junction.

25.263. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.264. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Wigston Road / Narberth Way Priority Junction

25.265. This junction is maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to this junction.

25.266. Observations were completed on Tuesday 19th and Wednesday 20th November. This indicated limited queueing on Narberth Way of 5 vehicles with no blocking from the nearby Wigston Road roundabout junction on the A4600.

25.267. Google traffic conditions were reviewed which indicated queueing on Wigston Road leading from the roundabout junction in both the AM and PM peaks. This resulted in an element of queueing on Narberth Way.

25.268. N79 indicates that the junction lies outside of the RRAM model; therefore, the CASM model has been used to distribute trips at this location to offer a 'worst case' assessment.

25.269. This indicates a total of 188 movements through this junction in the AM peak (assuming the with Travel Plan scenario and the Elliot's Field trip rates) and 251 movements through this junction in the PM peak. These figures have been sourced from the information provided in Appendix B of N79.

25.270. No incidents were recorded at this location during the latest 5-year period.

25.271. The applicant indicates no 'severe' impact at this location.

25.272. WCC and NH have not provided comment with respect to this junction.

25.273. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.274. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Wigston Road / Woodway Lane / Ringwood Highway Staggered Junction

25.275. This junction is maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to this junction.

25.276. Observations were completed on Tuesday 19th and Wednesday 20th November. This indicated high traffic volumes during the AM peak with queues of up to 20 vehicles noted on Wigston Road. Queueing was also observed on the Ringwood Highway. It is noted that the junction lies near to a secondary school, with N79 indicating that at 08:30 traffic conditions were seen to lessen. During the PM peak lesser traffic conditions were observed, but queueing remained at times on the Wigston Road arm of up to 15 vehicles.

25.277. Google traffic conditions were reviewed which indicated queueing on Wigston Road and Ringwood Highway during the morning peak. During the afternoon peak, limited queueing was indicated.

25.278. N79 indicates that the junction lies outside of the RRAM model; therefore, the CASM model has been used to distribute trips at this location to offer a 'worst case' assessment.

25.279. This indicates a total of 115 movements through this junction in the AM peak (assuming the with Travel Plan scenario and the Elliot's Field trip rates) and 154 movements through this junction in the PM peak. These figures have been sourced from the information provided in Appendix B of N79.

25.280. Three incidents were recorded at this location during the latest 5-year period, which does not indicate a collision trend.

25.281. The applicant indicates no 'severe' impact at this location.

25.282. WCC and NH have not provided comment with respect to this junction.

25.283. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.284. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Woodway Lane / B4082 Henley Road Signal Junction

25.285. This junction is maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to this junction.

25.286. Google traffic conditions were reviewed which indicated high levels of very flow moving traffic on all arms of the junction during the morning peak. This situation was lessened during the PM peak.

25.287. N79 indicates that the junction lies outside of the RRAM model; therefore, the CASM model has been used to distribute trips at this location to offer a 'worst case' assessment.

25.288. This indicates a total of 1 movement through this junction in the AM peak (assuming the with Travel Plan scenario and the Elliot's Field trip rates) and 125 movements through this junction in the PM peak. These figures have been sourced from the information provided in Appendix B of N79.

25.289. Three incidents were recorded at this location during the latest 5-year period, which does not indicate a collision trend.

25.290. The applicant indicates no 'severe' impact at this location.

25.291. WCC and NH have not provided comment with respect to this junction.

25.292. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.293. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Clifford Bridge Road / UHCW Access Signal Junction

25.294. This junction is maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to this junction.

25.295. Observations indicate congestion associated with the hospital movements during the morning peak period. With respect to ahead movements at the junction, it was indicated that these remain unimpacted. No congestion was observed during the afternoon peak.

25.296. Google traffic conditions were reviewed which show slow moving traffic travelling towards the A4600 during the AM peak with slow moving traffic travelling towards the junction from the A4600. In the PM peak, slow moving vehicles are seen to the south of the junction of Clifford Bridge Road.

25.297. The development impacts at this junction equate to a total of 100 movements through this junction in the AM peak (assuming the with Travel Plan scenario and the Elliot's Field trip rates) and 100 movements through this junction in the PM peak. These figures have been sourced from the information provided in Appendix B of N79.

25.298. Five incidents were recorded at this location during the latest 5-year period, which does not indicate a collision trend.

25.299. The applicant indicates no 'severe' impact at this location.

25.300. WCC and NH have not provided comment with respect to this junction.

25.301. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.302. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Clifford Bridge Road / Belgrave Road Signal Junction

25.303. This junction is maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to this junction.

25.304. Observations indicate that the junction is approaching capacity.

25.305. Google traffic conditions were reviewed which show slow moving traffic on Belgrave Road during the AM peak, with slow moving vehicles also indicated on Clifford Bridge Road (S). During the PM peak, slow moving vehicles are seen at times on all arms of the junction.

25.306. The development impacts at this junction equate to a total of 100 movements through this junction in the AM peak (assuming the with Travel Plan scenario and the Elliot's Field trip rates) and 100 movements through this junction in the PM peak. These figures have been sourced from the information provided in Appendix B of N79.

25.307. One incident was recorded at this location during the latest 5-year period, which does not indicate a collision trend.

25.308. The applicant indicates no 'severe' impact at this location.

25.309. WCC and NH have not provided comment with respect to this junction.

25.310. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.311. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Clifford Bridge Road / B4082 Sowe Link Roundabout

25.312. This junction is maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to this junction.

25.313. Google traffic conditions were reviewed which indicate minimal amounts of slow-moving vehicles during the AM peak, with the junction generally operating with flowing conditions. In the PM peak, queues are observed interacting with the junction from the A46 / B4082 roundabout.

25.314. The development impacts at this junction equate to a total of 100 movements through this junction in the AM peak (assuming the with Travel Plan scenario and the Elliot's Field trip rates) and 100 movements through this junction in the PM peak. These figures have been sourced from the information provided in Appendix B of N79.

25.315. Three incidents were recorded at this location during the latest 5-year period, which does not indicate a collision trend.

25.316. The applicant indicates no 'severe' impact at this location.

25.317. WCC and NH have not provided comment with respect to this junction.

25.318. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.319. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

Hipswell Highway / Longfellow Road Priority Junction, Clifford Bridge Road / B4027 Brinklow Road and Brinklow Road / A428 Binley Road Signal Junctions

25.320. These junctions are maintained by CCC and has been considered in N79. No formal junction capacity assessment has been completed with respect to these junctions.

25.321. Based on the distribution, no development trips movements are anticipated to interact with these junctions. As such, the applicant has indicated that no 'severe' impact is foreseen at these junctions as a result of the development proposals.

25.322. WCC and NH have not provided comment with respect to this junction.

25.323. CCC within their response dated 30/08/2024 and 06/11/2024 noted the need for this junction to be considered. Within the latter response, CCC indicated that individual junction modelling would be needed to the required standard and if necessary, mitigation provided, supporting by modelling and a stage 1 road safety audit.

25.324. Within their final response (dated 04/12/2024), CCC note: *"Nothing in the most recent Technical Notes N79, dated 22nd November, or N77, dated 29th November submitted by the applicant leads the Council to amend or lift any of these objections."*

25.325. Following discussions with the applicant, clarification is being provided with respect to the following junctions:

- A4600 / Parkway / Eden Road Roundabout
- Ansty Road / Arch Road / Wyken Croft junction
- Clifford Bridge Road / UHCW Access Signal Junction
- Clifford Bridge Road / Belgrave Road Signal Junction
- Wigston Road / Narberth Way T-junction
- Wigston Road / Woodway Lane / Ringwood Highway staggered T-junctions
- Woodway Lane / Henley Road (B4082) signalised T-junction

25.326. The clarifications provided with respect to these junctions will be reported as a late item prior to committee.

Ansty Shuttle Signals

25.327. During discussions with WCC, the need to consider the shuttle signals in place at Ansty village was noted. The applicant sourced information from WCC regarding the signals and associated timings for these. The junction was modelled using LinSig software using the Elliot's Field sensitivity flows both with and without the Travel Plan reductions.

25.328. The results of the modelling are presented in N69 dated 11/10/2024, in response to WCC.

25.329. The modelling presented indicates that with the development proposals and the Travel Plan in place, a maximum queue of 23.7 Passenger Car Units (PCUs) would occur in the AM peak with a maximum queue of 25.1 PCUs in the PM peak. Both of these values are for the B4065 Main Road (W/B), with lesser queueing observed on the B4065 Main Road (E/B).

25.330. The length of the queueing equates to a maximum queue length of 138m. In light of this, it was concluded that the operation of the signals (with the development in place) would not have a material impact on the operation of the wider highway network.

25.331. Within their comments dated 01/11/2024, WCC noted that "*While the signals cause additional delay, they will continue to operate at the limit of practical capacity and with PM peak queues of up to 25 PCUs in a Travel Plan scenario."* WCC have subsequently raised no objection to the proposals (dated 03/12/2024).

25.332. NH and CCC had no comments in relation to this junction.

Saturday/Interpeak Assessment

25.333. Traffic impact analysis has focused on the traditional weekday network peak hours, between 07.00-10.00 and 16.00-17.00, on the basis that the impact during these hours is greater than at other times of the day or days of the week, when background traffic flows would be lower.

25.334. During the application process, the highway authorities requested the Applicant to demonstrate that this was the case. This was therefore primarily addressed within the Transport Assessment Addendum. The Applicant therefore undertook traffic surveys for the B4065 north of the site and sourced secondary traffic information from the National Highways Webtris website for other parts of the Strategic Road Network in order to establish background interpeak and Saturday traffic flows, sourcing 2022 traffic flows.

25.335. The Applicant then quantified the weekday interpeak development traffic, which was for the hour 14.00-15.00 and summated this to the observed background traffic. This assessment demonstrated that the total interpeak traffic was less than that occurring during the network AM peak and on that basis the assessment was considered to be acceptable.

25.336. In terms of the Saturday peak, the Applicant stated within the Transport Assessment Addendum that the background traffic peak was 12.00-13.00 and adopted this assessment period on the basis that Saturday development flows during this time were also high. Whilst development traffic flows were in fact higher during latter hours, the Applicant stated that background flows during these periods were lower and therefore maintained 12.00-13.00 as the assessment period, again demonstrating that cumulative traffic flows during this hour were less than the AM peak.

25.337. In response to this approach, no further objections were raised by either National Highways or WCC.

25.338. CCC raised concerns within their consultation response (30th August 2024) that across their road network was experiencing higher traffic flows during the interpeak than the AM peak and that the data collection was not representative given more recent time periods could have been relied upon. CCC presented data that demonstrated that the cumulative impact between 14.00-16.00 was higher than the AM peak. The data did however also demonstrate that the PM peak had cumulative traffic levels higher than the interpeak (Table 39) and it is noted that these PM flows were higher than the same Saturday analysis (Table 41). This was acknowledged by the Applicant in N64. In response to this, CCC prepared a response (9th October 2024), noting that Saturday traffic generation was

higher than weekday traffic generation, though no further requests for Saturday modelling were stated and nor has any such request been stated in any subsequent response.

25.339. On the basis of the information presented in the Transport Assessment Addendum and traffic flows presented in CCC's response 30th August, traffic flow analysis based on the AM and PM weekday peaks is reasonable, with no objections having been raised by National Highways or WCC in this regard.

Site Accesses

25.340. Two vehicle accesses are proposed for the site. The primary vehicle access (Drawing Number 195061/PD01 Rev J) will take the form of a three-arm roundabout junction on the B4065 Hickley Road. The 30mph speed restriction on Hinkley Road will be extended further west to accommodate the proposed roundabout. Each arm of the roundabout has been designed with flared approaches to offer two lanes, accommodating the necessary movements at the junction.

25.341. CCTV will be installed at the primary access to ensure HGVs entering and exiting the site are routeing via the M6 Junction 2. Any non-compliance will be monitored and enforced against accordingly by Frasers Group.

25.342. A secondary access (Drawing Number 195061_PD39 Rev A) is to be provided from the B4029. This access will take the form of a priority junction and is aimed at accommodating employee movements from the north-east. This junction will also be installed with CCTV to monitor vehicles using this access and to ensure no HGV movements are using this junction. As with the primary access, any vehicles failing to comply with the access arrangements will be enforced against accordingly.

25.343. Visibility splays of 2.4m and 160m have been indicated for the secondary access arrangement, with the plan showing the splays can be achieved within highway land and land controlled by the applicant.

25.344. Swept path analysis has been provided for both accesses with both accesses also having been the subject of a Stage 1 Road Safety Audit, with all recommendations having been accepted as part of the Designers Response.

25.345. Both junctions have been the subject of capacity modelling exercises. With respect to the primary roundabout access, revised modelling was presented as part of Technical Note 72 (dated 21/10/2024) in response to comments raised by WCC. This presented three modelling scenarios to highlight the assessments undertaken to account for potential unequal lane usage at the roundabout.

25.346. Following the submission of this revised modelling, WCC acknowledged that whilst the site access arm of the roundabout experiences an element of queueing and associated detail, it will continue to operate with residual capacity. With respect to the wider public highway, WCC indicated that the impacts are shown to be minimal (WCC response dated 01/11/2024).

25.347. With respect to the secondary access, capacity modelling is presented as part of the STAA which indicates that the junction will operate within capacity, with no queueing or delay observed.

25.348. WCC have raised no objection to development proposals, as noted in their response dated 03/12/2024. NH had no comments in relation to this topic.

25.349. CCC raised several matters with respect to the site access junctions (response dated 30/08/2024), though it must be acknowledged that the accesses fall solely within the control of WCC.

25.350. CCC indicate concerns relating to cyclists entering the carriageway from the shared footway / cycleway provision on the site access arm indicating potential for conflict between other vehicles at this location. CCC also indicate that this arrangement is not LTN 1/20 complaint.

25.351. CCC raise concerns regarding the suitability of the pedestrian refuge island on the site access arm for pedestrian crossing movements, in light of the vehicle traffic to be generated by the development. CCC indicate that it is considered that a signal controlled or grade separated facility may be required.

25.352. CCC highlight concerns with the swept path analysis provided for the roundabout, noting that two large vehicles would not be able to negotiate the roundabout at the same time, with a vehicle leaving the site access heading northbound having to cross the left-turn lane to manoeuvre.

25.353. CCC raised concerns regarding the link capacity of the Hinckley Road corridor to the south of the site, in light of the increased traffic movements generated by the site.

25.354. For the secondary access, CCC raised concerns regarding its design, noting it has been designed with a width of 7.3m and radii of 10m. CCC indicate this could result in higher vehicle usage than indicated, also noting the proximity of land uses to the access.

25.355. CCC indicate an achievable visibility of 2.4m by 111m to the left and 59m to the right. CCC do not detail within their response how they have determined these visibility splays.

25.356. It is considered that both of the proposed accesses are acceptable in relation to safety and capacity of resultant traffic flows of the development.

Car Parking, Cycle Parking, Mobility Hub and Management

25.357. The parking proposed for the scheme has also been assessed in accordance with Local Plan Policy D2.

25.358. The table below provides a breakdown of the use classes proposed within the application site, along with the total requirements for vehicle parking provision for the use classes, as set out within the Planning Obligations SPD and Appendix 5 of the Local Plan. These tables provided below can be found in N59, dated 06/09/2024. Please note that the Learning and Development land use, whilst provided with an area, has been assessed on the basis of 750 seats, in line with the RBC criteria.

Land Use	Masterplan Brief	Area (sqm)	RBC Standards Land Use	RBC Car Parking Standards	RBC Required Provision	Proposed Provision	Difference
Office	Headquarters office and supplier hub	18,860	B1(a) Office	1 space/30sqm	629	851	-1,815
Concept Retail R&D	Concept Retail Research & Development	21,954	A1 Non-Food Retail and General Retail	1 space/20sqm	1,098		
Learning and Development	Learning / Training	3,234	Cinemas, Conference Facilities, Theatres, Concert Halls, Bingo Halls and other similar spectator facilities	1 space/5 seats	150		
Hotel	Hotel	100 rooms	Hotels/Motels/Guest Houses and Boarding Houses	1 space/bedroom	100		
Food and Drink	Café/Restaurant	607	A3 Food & Drink – Restaurants and Cafés and A5 Hot Food Takeaways	1 space/5sqm	121		
Convenience	Convenience Store	383	A1 Food Retail	1 space/14sqm	27		
Concept Leisure R&D	Concept Leisure R&D	5145	Swimming Pools, Health Clubs and Gymnasia	1 space/3staff & 1 space/10sqm	541		
Nursery	Nursery	663	D1 Day Nursery	1 space/full-time staff member	16		
Halls of Residence	Group Accommodation	80 rooms	Residential Schools, Colleges or Training Centres	1 space/4 residents	20	5 (Additional can park in Central MSCP)	-15
National distribution centre	Warehouses + Warehouse Offices	Unit 1 = 113,456	B8 Storage and Distribution	1 space/60sqm	1891	780	-1111
		Unit 2 = 58,603			977	710	-693
		Unit 3 = 25,566			426		
		Unit 4 = 25,622			427	557	-779
		Unit 5 = 54,533			909		
		Total = 277,780			4630	2047	-2583
Total:					7332	2903	-4413

25.359. Based on the above 7,332 parking spaces could be provided based on RBC policy guidance.

25.360. The development proposals seek to provide 2,903 parking spaces across the site. Based on the parking standards detailed, this would equate to a shortfall of 4,413 spaces.

25.361. As part of the application documentation, a parking accumulation assessment has been provided. This assessment was initially detailed within the TAA, with additional information provided within several Technical Note responses and associated spreadsheets.

25.362. Using the information outlined in S76 Master Spreadsheet 240905, the accumulation assessment was reviewed for both the with and without Travel Plan scenario, with comments issued to the applicant and responded to in N74, dated 28/10/2024.

25.363. Based on the assessment completed, it was indicated that without the Travel Plan interventions, the parking accumulation assessment would result in a parking shortfall of in the region of 613 spaces across the site.

25.364. On implementation of the Travel Plan measures and associated modal shift assumptions, the onsite parking is seen to accommodate the anticipated weekday parking demand based on the trip methodology outlined. However, an element of flexibility remains between the retail and office car parking facilities to ensure the efficiency of these car parks across the day.

25.365. It is considered that the onsite parking, whist noticeably below the policy provision, is acceptable in the context of the accumulation assessment presented and the Travel Plan measures outlined (which will be secured through the Section 106 agreement as detailed above).

25.366. Additionally, for the warehouse parking accumulation, this has been assessed on the basis of the warehouse shift patterns and the trip generation methodology detailed. The shift patterns per warehouse unit are detailed above for completeness.

25.367. A Saturday parking assessment was also completed by the applicant (S78-AD-Master Spreadsheet Saturday Trip Gen ISSUED). It is noted that at the weekend, the office HQ will not be operational. As a result of this, the hotel and learning and development suite

will also be closed as these are for staff. Therefore, the accumulation associated with these elements will be zero. Based on the information provided, for the with Travel Plan scenario, the onsite parking provision will be suitable to accommodate the anticipated demand for the site.

25.368. Whilst the office HQ will be closed, it is, however, noted that to ensure that the increased retail demand is accommodated, the office car park should be retained for use across the weekend period. This should be detailed as part of any final Car Park Management Plan, to allow for the flexible use of the car parking facilities during the weekend period.

25.369. Across the site, a total of 146 disabled parking spaces will be provided, with 519 'active' Electric Vehicle (EVs) parking spaces. This equates to 5% of spaces being for disabled users and 18% of spaces for EVs. All remaining spaces will be provided with 'passive' EV provisions to allow for future conversion.

25.370. This is seen to align with the Local Plan, which details a requirement for electric vehicle charging provision, at a rate of 1 charging point per 10 spaces, including 1 charging point for every 10 disabled parking spaces.

25.371. With respect to cycle parking, the policy requirements are outlined below (and can be found in Technical Note 59, dated 06/09/2024).

Land Use	Masterplan Brief	Area (sqm)	RBC Cycle Parking Standards			Requirement Based on RBC Standards			Number of Proposed Spaces			Difference	Showers & Changing Facility
			Land Use	Long-stay	Short-stay	Long-stay	Short-stay	Total	Long-stay	Short-stay	Total		
Office	Headquarters office and supplier hub	18,860	B1(a) Office	1 stand per 150sqm	1 stand per 500sqm	251	75	327	124	12	136	-315	2 Changing Facilities (18 showers)
Halls of Residence	Group Accommodation	80 rooms	Residential Schools, Colleges or Training Centres	Each case considered on its own merits	Each case considered on its own merits	n/a	n/a	n/a	24	2	26	n/a	n/a
Concept Retail R&D	Concept Retail Research & Development	21,954	A1 Non-Food Retail andGeneral Retail	Greater of 1 space per 6 staff or 1 per 300sqm	1 space per 200sqm	180	110	290	68	12	80	-1,013	0
Learning and Development	Learning / Training	3,234	Cinemas, Conference Facilities, Theatres, Concert Halls, Bingo Halls and other similar spectator facilities	Greater of 1 space per 6 staff or 1 per 40sqm	1 stand per 20sqm	81	162	243					n/a
Concept Leisure R&D	Concept Leisure R&D	5,145	Swimming Pools, Health Clubs and Gymnasia	Greater of 1 space per 6 staff or 1 space/40sqm	1 stand per 20sqm	129	257	386					5 Changing Facilities (22 showers)
Hotel	Hotel	100 rooms	Hotels/Motels/Guest Houses and Boarding Houses	1 stand/6 full-time staff	1 stand/10 beds	3	20	23					1 Changing Facility (4 showers)
Food and Drink	Café/Restaurant	607	A3 Food & Drink – Restaurants and Cafés and A5 Hot Food Takeaways	Greater of 1 space per 6 staff or 1 per 40sqm	1 stand per 20sqm	15	61	76					n/a
Convenience	Convenience Store	383	A1 Food Retail	Greater of 1 space per 6 staff or 1 per 300sqm	1 space per 200sqm	3	2	5					n/a
Nursery	Nursery	663	D1 Day Nursery	1 space/ 6 full-time staff member. Min of 2 stands.		3		3					
National distribution centre	Warehouses + Warehouse Offices	Unit 1 = 113,456	B8 Storage and Distribution	1 stand per 500sqm	1 stand per 1,000sqm	454	227	681	64	6	70	-675	9
		Unit 2 = 58,603				234	117	352	42	4	46	-348	6
		Unit 3 = 25,566				102	51	153	24	2	26	-151	4
		Unit 4 = 25,622				102	51	154	24	2	26	-152	6
		Unit 5 = 54,533				218	109	327	26	4	30	-323	6
		Total = 277,780				1111	556	1667	180	18	198	-1649	31
Mobility Hub			n/a				n/a		60	2	62	n/a	0
Total			n/a			1,773	1,242	3,018	456	46	502	-2,976	31

25.372. Based on the assessment presented by the applicant, a total of 3,018 spaces could be provided, of which 1,773 would be long stay and 1,242 would be short stay.

25.373. The applicant proposes the development of 502 spaces across the site, of which 456 would be long stay and 46 would be short stay.

25.374. In addition to the above, there will be 24 long stay spaces for E-bikes and 36 long stay cycle parking spaces for Brompton bicycles. These spaces will be provided within the mobility hub. This brings the total long stay provided to 516 spaces.

25.375. It is acknowledged that this provision is below the standards outlined above. On review of the cycle trips anticipated for the site (as detailed in S76-AD-Master Spreadsheet 240905 ISSUED), it is considered that the quantum provided will accommodate anticipated demand at the site.

25.376. The cycle parking will, however, need to be monitored through the Travel Plan to ensure long term suitability and as required, additional cycle parking should be provided based on the outcome of the onsite monitoring.

25.377. Based on the information provided, WCC have raised no objection to the proposals (WCC response, dated 03/12/2024).

25.378. NH had no comments in relation to this topic.

25.379. Within their response dated 30/08/2024, CCC raised concerns regarding the assessment of parking against policy requirements presented as part of the TAA. The applicant subsequently addressed this in N59, as detailed above.

25.380. CCC indicated that the ancillary office element of the warehouses should have been assessed as part of the office standard. However, RBC's standards do not explicitly reference this as a requirement.

25.381. CCC consider that additional cycle parking should be offered to encourage greater levels of cycling to the site, with greater provisions for E-bikes.

25.382. As a result of CCC's concerns relating to trip generation and the Travel Plan measures, the accumulation (for both cars and bicycles) was not considered to be suitable. CCC also raise several methodological queries, including overnight parking.

25.383. CCC also indicate that the provision of free car parking does not encourage the use of sustainable transport modes, which is also noted by TfWM.

25.384. Further review of parking was provided as part of N59, which CCC have not provided comments on. This note includes additional car parking information.

25.385. This and the corresponding spreadsheet has been reviewed, refining this to account for overnight parking associated with the warehouse proposals. Based on this assessment, as detailed above, without the Travel Plan measures, a parking shortfall will take place.

25.386. It is therefore imperative that the Travel Plan and modal split targets be secured, implemented and continually supported by the Applicant in order for the proposed level of car parking to be acceptable and avoid parking displacement occurring throughout the Campus or off-site.

25.387. The Application notes that the proposed learning and development suite could be used for a number of events during the year. Whilst these are typically managed so that associated trip generation would occur outside of network peaks or warehouse shift changeover, the cumulative parking demand associated with the day to day operation and an event would not likely be accommodated on-site without some form of event management plan in place. On that basis it is considered necessary for the Applicant's to provide further details within an Event Management Plan prior to use of the Learning and Development Suite for a capacity event, secured via condition or obligation.

25.388. Based on the assessment undertaken, the car parking and cycle parking proposed for the scheme, without the Travel Plan measures, a parking shortfall will take place. It is therefore assessed that the quantum provided will accommodate the anticipated demand at the site.

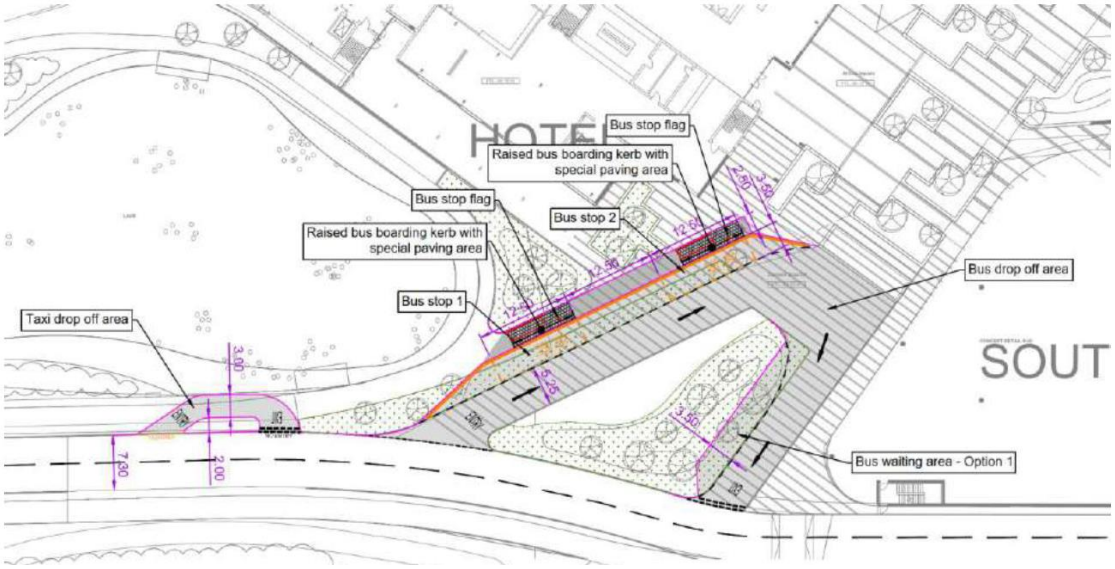
Mobility Hub

25.389. The mobility hub will be located within the vicinity of the hotel, auditorium and leisure complex. It will comprise of the following elements:

- Lockers
- Shower facilities
- Brompton bicycle lockers
- Bicycle maintenance equipment
- E-bicycles, for use by staff to travel across the campus
- E-scooters, for use by staff to travel across the campus

25.390. Within the vicinity of this facility will lie the central bus stop and associated taxi drop off area. The design of this central interchange is shown below and can be found in Appendix M of the TAA:

Figure 4.8 Bus and Taxi Interchange



25.391. The interchange has been designed to accommodate two bus stops and a bus waiting area. A separate taxi drop off have been proposed, to reduce interaction between buses and taxis.

25.392. The bus stops will be developed with the following provisions:

- Provision of a raised bus boarding / hard-standing area with specialised paving;
- Provision of bus stop clearway box markings on the carriageway;
- Provision of a bus stop pole (including a bus flag and timetable case attached);
- Provision of a large bus shelter, i.e. a 4-bay Cantilever specification; and
- Provision of Real Time Information.

25.393. Based on the information provided, WCC have raised no objection to the proposals (WCC response, dated 03/12/2024). The obligations associated with this are within the planning obligations section of this report. NH had no comments in relation to this topic.

25.394. TfWM do not offer material comment on the mobility hub, beyond noting that is it welcomed within their original application response (dated 22/12/2023).

25.395. CCC questioned why the full design of the mobility hub had not been provided with only an indicative arrangement shown in the TAA, given the detailed nature of the site. It was also considered by CCC that the hub was remote from a number of uses, namely the warehouse facilities.

25.396. It is considered that the mobility hub and bus and taxi interchange will promote sustainable travel and transport within the development and is a welcome addition to the site.

Sustainable Transport

Public Transport

25.397. The extension of bus routes 78/78A with an hourly service and diversion of route X6 into the campus on an hourly frequency are proposed. A new route (72) will be provided linking Rugby and Nuneaton via Bulkington and the campus on an hourly frequency. Bus routes 9, X30 and 60 to also be extended into the campus. WCC and TfWM have accepted this increased level of public bus service and the associated monetary obligations are set out within the Planning Obligations section of this report.

Shuttle Buses

25.398. In addition to the active travel strategy described above and interventions to improve public transport, to further reduce the reliance on vehicular trip generation, ensure the off-site traffic impact is acceptable and to support the proposed car parking strategy, the Sustainable Transport Strategy is also to be supported by the introduction of a Shuttle Bus Service.

25.399. WCC have no specific comments on the shuttle bus strategy.

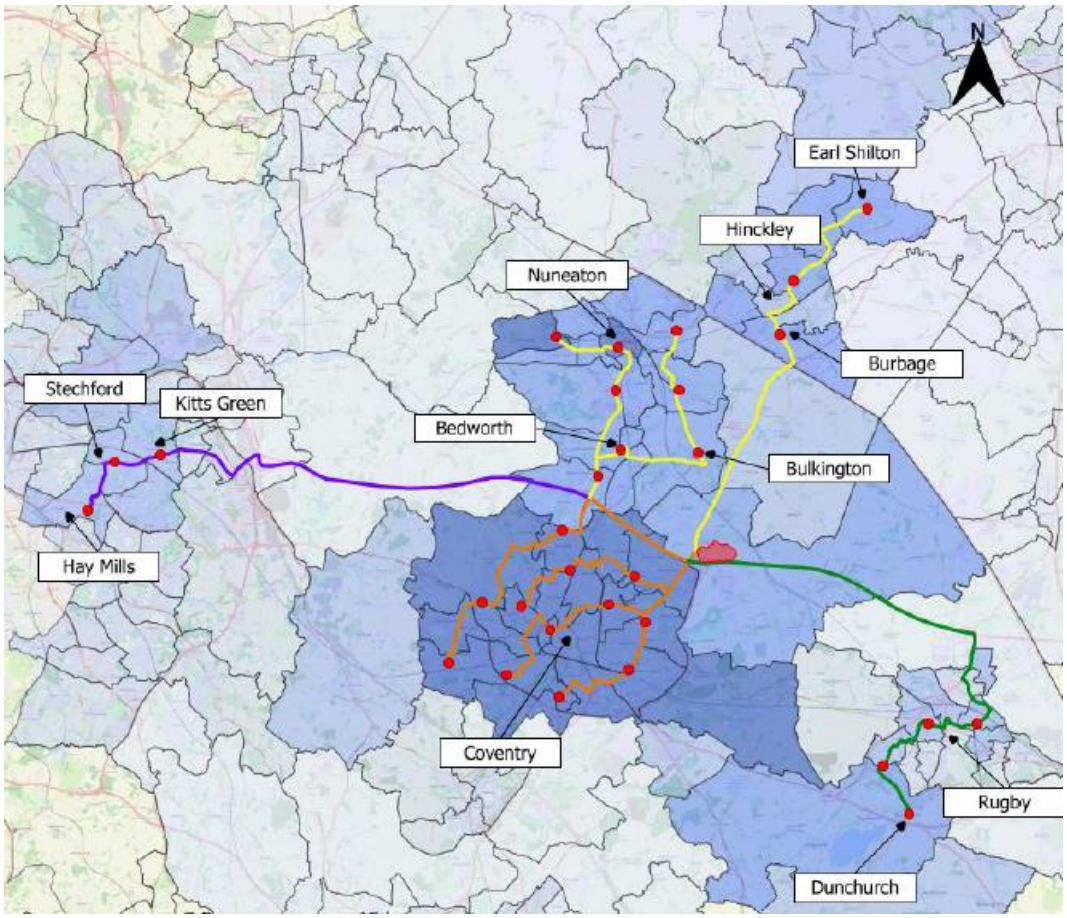
25.400. National Highways have requested that any shuttle bus intervention be maintained indefinitely.

25.401. Transport for West Midlands state that these services should be supported by adequate infrastructure and integrated with conventional bus services and rail services.

25.402. Coventry City Council raised concerns that there is too much flexibility at this stage requested with regards to the shuttle buses and associated factors such as shift patterns, which planning conditions will attempt to address and insufficient detail on routes and number of buses. CCC have themselves quantified that at least 6 x 44 seater shuttle buses would be needed to address demand originating from the city alone. CCC have also questioned that there have been no details provided with regards to location and design of stops.

25.403. The Shuttle Bus Service will be a private service, procured fully and managed by the Applicant's themselves, made available to warehouse workers and therefore adopting a service pattern that will complement shift patterns. Operating costs will be part funded by the Applicant, with a potential small charge applied for users.

25.404. The exact routing will be confirmed prior to occupation when the Applicant has confirmation on the origin of their workforce, but for the purpose of the planning application an extent to encompass the adjacent settlements of Coventry, Rugby, Nuneaton and as far afield as Birmingham and Leicester was envisaged, with illustrative routes indicated below.



25.405. Upon entering the site via the main site access from Ansty Road, the shuttle buses will access dedicated stops associated with each of the warehouse buildings.

25.406. A mode split of warehouse workers using buses of any form, encompassing either public or shuttle, is 33% (up from a 2% baseline), which equates to approximately 1000 employees using this mode of travel, and therefore the Applicants will need to procure a quantum of services that will achieve this target. At the application stage, a minimum of 10 shuttle buses was envisaged to achieve the targeted modal split, however this will need to be revisited by the Applicant prior to the commencement of operation, with additional shuttle buses provided where necessary to ensure the targeted modal split is achieved.

25.407. As the Applicants will be obligated to achieve their envisaged modal split targets, shuttle buses will play an important role in achieving this aim and as part of Travel Plan strategies/updates, the proposed routes, frequencies will need to be confirmed. Travel Plan Monitoring will confirm if the targeted mode splits are achieved. Additional shuttle buses will be an intervention that the Applicant may need to implement to achieve the

targeted mode splits. It is noted that shuttle buses operating within Coventry will need to be electric buses due to the timeframes of the development. It is considered that this is all achievable through a Section 106 obligation.

Demand Responsive Travel

25.408. The Sustainable Travel Strategy is also supported by the introduction of Demand Responsible Travel (DRT), which will essentially be a mini-bus service that will complement the Shuttle Bus Service, by providing access to surrounding villages and towns where the employee density is not sufficient to justify a Shuttle Bus Route itself.

25.409. WCC have no specific comments on the DRT strategy. NH have no comments.

25.410. Transport for West Midlands raise concerns that there is a heavy reliance on DRT and question whether it will be feasible for DRT to fully cover the wider catchment area, raising further concerns that the DRT reliance may be cost prohibitive.

25.411. Coventry City Council raised concerns that the modelled use of the DRT is so small that it will unlikely come to fruition and that the suggested service pattern will preclude some staff, suggesting that funding for the DRT could be better spent elsewhere.

25.412. The DRT is intended for use by members of staff only and will follow semi-fixed routes, responding to the specific needs of the workforce at that time, with bookings made via an App. An anticipated service pattern between 07.30-18.00 means the DRT will be used by office staff.

25.413. As per the Shuttle Bus Service, the DRT will be a private service, procured fully and managed by the Applicant's themselves. Operating costs will be part funded by the Applicant, with a potential small charge applied for users.

25.414. Outside of peak hours, the DRT minibuses are envisaged to provide a direct service between the Campus and the centre of Coventry for visitors.

25.415. The DRT service is not envisaged to have a material influence on the modal split of employees, with an 11% mode split targeted for all bus types for non-warehouse workers (up from a 2% baseline), which is more likely to be achieved via the public bus interventions. It is considered that this is all achievable through a Section 106 obligation.

Supplementary Highways Matters

25.416. Various framework draft documents have been submitted to accompany the application. These set out the principles that will have to be included within the various documents which will be submitted under various conditions. The purpose of these documents and associated conditions are provided below:

- Travel Plan (TP) – to reduce journeys by car drivers and encourage walking, cycling and public transport use. The TP includes the appointment of a Travel Plan Co-ordinator to management the implementation of the measures within the Travel Pan and the monitoring and review of the TP to ensure it is successful. This will be secured through the Section 106 agreement.
- Operational Management Plan – to control traffic during weekday peak periods.

- Delivery and Servicing Plan – to manage servicing traffic, especially vehicle routing to/from the site which will be via M6 J2.
- Car Park Management Plan – to manage the onsite car parks to ensure that they meet demand.
- Events Management Plan – to set out the transport measures that support the operation of the Learning and Development Suite.
- Construction Logistics Plan – to manage traffic during construction including HGV routing to be via M6 J2.

25.417. In addition to the above a condition will be imposed relating to freight management to ensure HGV's are not using the secondary access and routing through villages. No temporary construction access is proposed however the construction logistics will be managed through the CEMP condition.

Traffic Flows, Highway Safety and Parking Provision Summary

25.418. Based on the assessment undertaken, the car parking and cycle parking proposed for the scheme, without the Travel Plan measures, a parking shortfall will take place. It is therefore assessed that the quantum provided will accommodate the anticipated demand at the site. Based on the assessment undertaken, if the Travel Plan measures were not implemented there would be a parking shortfall on the site when taking into account the number of car parking and cycle parking spaces proposed. However, as the Travel Plan measures would be secured within the s106, it is considered that the proposed car parking and cycle parking spaces would be sufficient to accommodate the anticipated demand at the site.

25.419. The site accesses are acceptable for the proposed development.

25.420. In relation to modelling the impacts upon Warwickshire network is acceptable and adequate mitigation is provided. In relation to the strategic road network there is an outstanding element in relation to M69 Junction 1 which will be reported in the late items before committee. In relation to Coventry's network there is also outstanding clarifications in relation to the junction modelling which will also be reported in the late items.

25.421. At this time, it has not adequately been demonstrated that any impacts upon Coventry's network or M69 Junction 1 have been adequately mitigated. In turn, it has not adequately been demonstrated that the proposals would not cause a safety impact or a severe impact upon the highway network. Therefore, the proposal does not comply with policies D1 and D2 of the Local Plan or the wider policies of the NPPF. This will therefore be weighed in the planning balance.

26. Public Rights of Way

26.1. Policy HS1 seeks to protect and enhance physical access including public rights of way. This is consistent with Paragraph 100 of the NPPF which confirms that planning decisions "should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks".

26.2. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

26.3. The Council appointed transport consultants to independently scrutinise, analyse and evaluate the information submitted by the applicant.

26.4. WCC and NH have no objections to the active travel proposals for the site. The Canal and River Trust have requested a contribution in relation to the towpath which links the application site to Grove Road in Ansty.

26.5. Ramblers (Warwickshire Area) considered objecting to the application on footpath grounds, but stated that '*the current woefully neglected condition of public footpaths through the site oblige us to admit that the proposals made for the diversion/retention of these three public footpaths would probably be in the best interests of path users, particularly in aiding connectivity with the footpath network beyond the site*.'

26.6. CCC object to the proposed active travel routes in Coventry as it is has not been shown that they are LTN1/20 compliant. Their response however states that conditions and obligations requested could secure satisfactory active travel routes to the site. Transport for West Midlands object to the proposed active travel routes in relation to the details provided for the route which is proposed to connect to the Binley Cycleway, their being no cycle link to Ansty, no suitable provision for pedestrians and cyclists at the main site access, active travel mode share targets are unlikely to be achieved and there is no restraint on the use of the private car at the development.

26.7. Active Travel England objects and recommends refusal of the application. They state that the delivery of the cycle route from Ansty Park (where the site will join to at the South) to Coventry is uncertain, road safety audits have not been undertaken and elements of the route (e.g. Ansty Road) have been omitted. Overall, it is the absence of certainty on offsite infrastructure, its quality and delivery which results in this objection.

Existing PRoW

26.8. The current Public Rights of Way (PRoW) are in poor condition as described in the Design and Access Statement and as a result they are poorly utilised as confirmed through the usage surveys of the routes undertaken in February, June and July 2023 (Transport Assessment).

26.9. The Public Right of Way from the M6 footbridge (R31) to the east of the site is proposed to be moved slightly north of its existing alignment onto the proposed tarmac footpath adjacent to the proposed road. From a landscape perspective this is a significant change (i.e. rural PRoW to urbanised tarmac PRoW within the development) which would be classified as a significant harm however elements of this area of the site is within flood zone 2/3 and therefore a footpath in this location especially sandwiched between the site hedgerow boundary and the development is unlikely to the used all year round especially given flood zones in this area. Therefore, it is deemed that the re-alignment of the PRoW would make the route more useable and still link into the existing PRoW to the east of the site.

26.10. The existing ProW which runs north to south (R31a) would also not be retained on its existing alignment. It would be diverted around the campus heart so that it is retained

within the landscaped areas of the site. The impact in relation to landscape has been assessed within the landscape and visual impact section. The PRoW is proposed to be upgraded as it is currently a very rural agricultural route. The upgrades will make the route accessible all year road and will be the main accessible cycle route to the site.

26.11. Improvements to the canal towpath for active travel are proposed (370 metres from the north of site to Grove Road in Ansty). This will improve accessibility of the canal from the site and Ansty. The access to the site from the canal will be conditioned to make it accessible for all (redesigned as part of the landscaping scheme). The improvements to the canal towpath itself will be secured through the section 106.

26.12. It is acknowledged there is some historic significance to the current alignment of the PRoWs, given poor quality and low usage, the impacts are outweighed by the considerable benefits arising from the routes being significantly upgraded in terms of surfacing, lighting, accessibility and wayfinding.

Proposed PRoW

26.13. Internally to the site the formal PRoW have been discussed above however additional primary, secondary and tertiary routes are proposed throughout the site to create an overall network. Primary routes within the landscape will be a bound surface 3m wide shared footpath/cycleway. Routes will have either a self-binding gravel or resin bound gravel surface in order to maintain the rural experience for users.

26.14. Primary routes will also be located alongside the road network throughout the site. Secondary routes which are pedestrian only and provide links between the primary routes to landscaped open spaces and include part of the north-south PRoW. Tertiary routes will provide further informal connections throughout the Site. Tertiary routes will be unbound surfaces which are consistent with the majority of existing PRoW that cross the site.

26.15. The following improvements are proposed:

- Canal towpath upgrade as set out above
- Upgrade of the existing footway on the southern side of the B4065 Hinckley Road between the primary site access and Ansty as shown on plan PD65.
- Upgrade of the footway on the southern side of the B4065 Hinckley Road between the primary site access and M6 Junction 2.
- Upgrade of the existing pedestrian facilities around M6 Junction 2 including allowing make provision for pedestrians to also cross the eastern motorway overbridge as well as the western motorway overbridge as shown on plan PD62.
- Upgrade of the PRoW that runs south of the site over the motorway accommodate bridge and through to the existing crossing on Central Boulevard which leads to Ansty Park as shown on plan PD57.
- Upgrade of the existing crossing of Central Boulevard to provide a Toucan crossing as shown on plan PD63.
- Provision of a connection to Binley Cycleway from Central Boulevard as shown on plan PD67.

26.16. WCC and NH have no objections to the scheme on active travel grounds. CCC agree that the provision of a connection to Binley Cycleway is required on their network and have stated that it should be to LTN 1/20 standards.

26.17. CCC have also commented that the following should be provided on NH and WCC networks:

- Upgrade shared footway/cycleway along A46, through Ansty Interchange
- Upgrade or provision of new pedestrian crossing facilities at M6 Junction 2 and footway along Hinckley Road (B4065)

26.18. Having assessed what it proposed on all three networks it is considered that adequate active travel provision will be secured through conditions and delivered before the occupation of the site to ensure that there is satisfactory active travel access to the site in accordance with Local Plan Policy HS1 and Paragraph 100 of the NPPF.

27. Flood Risk and Drainage

27.1. Paragraphs 165-175 of the Framework and policies SDC5 and SDC6 of the Local Plan set out the need to consider the potential impact of flooding on new development whilst ensuring that flood risk is not increased elsewhere as a result of it. Sustainable drainage systems (SuDS) should also be incorporated into major developments where feasible.

Sequential Test (Flood Risk)

27.2. Policy SDC5 of the Local Plan and paragraphs 165-175 of the Framework require a sequential approach to the location of new development. The aim of this is to steer development to areas with the lowest risk of flooding from any/all sources. Paragraph 168 of the NPPF sets out that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.

27.3. The applicant has submitted a Flood Risk Assessment Site Sequential Assessment (FRASSA) in response to these requirements. It draws on the Alternative Sites Assessment (ASA) and Alternative Sites Assessment Addendum (ASAA) which are considered in detail in the “Alternative Sites” section above. In brief, they included a search for alternative sites within and adjoining the “golden triangle” of a size which could accommodate the proposed development. A total of 102 alternative sites were identified. They were then assessed in four defined stages to ensure only genuine and credible alternative sites were considered and reviewed. The stage 2 identified that there were 44 available alternative sites (i.e. that they are on the market and undeveloped). The FRASSA has consequently considered flood risks from all sources for each of these 44 available alternative sites in accordance with the PPG (paragraph 024 Reference ID: 7-024-20220825).

27.4. The FRASSA identifies that 18 of the 44 available alternative sites would have a greater level of flood risk than the application site. These sites had: a considerable area in Flood Zone 2 and 3 and required flood compensation; or a considerable area of surface water

flooding with flood mitigation required; or a considerable area of reservoirs flooding; or Flood Zones falling in the middle of the site.

27.5. The remaining 26 available alternative sites were found to be comparably sequentially preferable in terms of flood risk compared to the planning application site. This means that there are sequentially preferable sites available to accommodate the proposed development with less risk from flooding. It is therefore acknowledged by the applicant that the sequential test for flood risk has not been passed. Policy SDC5 is consequently not complied with in relation to the sequential test.

Flood Risk and Drainage

27.6. Policy SDC5 of the Local Plan states that following the sequential test, and if required the Exception test (not required in this instance), development will only be permitted where the following criteria are met:

- That the development does not increase flood risk elsewhere;
- Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; and
- Development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.

27.7. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

27.8. A water resources and flood risk chapter has been included as part of the Environmental Statement. The Flood Risk and Drainage Strategy Assessment (FRDSA) submitted with the application confirms that the majority of the application site falls within flood zone 1 (low risk). A small portion of the site in the southeast is located within flood zone 2 and is therefore at 'low to medium' risk of fluvial flooding.

27.9. All of the proposed buildings would be located inside flood zone 1 (low risk). A small part of one of the access roads serving the development would be located within flood zone 2. The proposed earthworks across the site have been designed so there are specific areas where onsite fluvial flooding would be contained. In particular, the area of flood zone 2 to the southeast site boundary would be managed through an earthworks strategy compromising landscaped attenuation basins positioned to contain the extents of flood water. The FRDSA concludes that the proposed development would be at a very low risk of fluvial flooding.

27.10. Pluvial flood risk mapping shows that parts of the site are at low-high risk of surface water flooding. This is associated with the drainage ditches which run through the site. Groundwater flood mapping also shows that the majority of the site would be susceptible to groundwater flooding. The proposed drainage strategy includes an earthworks strategy which seeks to deal with this. In particular, landscaped areas would be shaped to allow flooding to be maintained within these areas and away from proposed buildings and associated infrastructure. The FRDSA concludes that the risk of pluvial flooding to the post-development would be low.

27.11. Due to underlying geological conditions, infiltration drainage methods into the ground are a very low viability option for the discharge of surface water runoff from this development. It is therefore proposed that the rate of surface water runoff from the proposed development would be restricted to the greenfield runoff rate of 449.44l/s discharging from the site currently. The necessary attenuation would be provided in multiple SuDS components (including swales, detention ponds and rainwater gardens) across the site to ensure sufficient storage capacity. This surface water would be stored in a network of lined attenuation ponds and attenuation crates (with capacity to handle water from extreme storms up to a 1 in 100 year + 40% climate change) before discharging into existing watercourses which pass through the proposed development site.

27.12. The FRDSA sets out that the proposed development does not significantly impact the existing extent of the 1:100-year flooding event. Culvert blockage scenarios were also modelled and it was found that post development blockage scenarios do not significantly impact the existing flooding extent. It concludes that the proposed development would not increase flood risk elsewhere.

27.13. Notwithstanding the conclusion of the FRDSA, objections have been received expressing concerns regarding the cause of existing flooding at Brookside Cottage (in Ansty) and a small field adjoining it. Reference is made to a High Court decision in 2020 concerning this issue and a claim that two culverts under and near Main Road, Ansty are causing the land to flood. The Court judgment concluded that these culverts were not causing flooding and were not the cause of any existing flood risk to Brookside Cottage. The objections received in response to this application dispute this conclusion. They also claim that the flood risk modelling undertaken contradicts the High Court judgment. These objections were sent to WCC Flood Risk Management to consider.

27.14. WCC Flood Risk Management has carried out an independent assessment of the FRDSA. They are satisfied that the findings of the FRDSA are acceptable and form a robust basis for considering the flood risk and drainage impacts arising from the proposed development. They have therefore raised no objection to this subject to a condition requiring the submission of a detailed surface water drainage scheme, a verification report for the installed flood risk mitigation measures and surface water drainage system, and site specific maintenance plan. It is further noted that there is no objection relating to flood risk at Brookside Cottage (in Ansty) and a small field adjoining it.

27.15. The Environmental Agency has currently raised an objection to the proposed development. This is on the basis that some of the hydraulic model files needed to complete a model review were unavailable at the time of their assessment. Associated project reporting and need to address some areas within the FRDSA were also noted. Additional information to address these points has subsequently been provided to the Environmental Agency and a response is due imminently and will be reported as part of the Late Material.

27.16. It is concluded that at this time, and as required by policy SDC5, it has not adequately been demonstrated that:

- The development does not increase flood risk elsewhere;
- Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; and
- Development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.

Foul Drainage

27.17. The FRDSA confirms that foul sewage would discharge via gravity to a new foul sewer located within the recently constructed spine road. In turn this would discharge to a new foul water pumping station via the existing rising main. This rising main takes the pumped discharge to the head of a public gravity foul water sewerage system to the south-west at a point to the west of Walsgrave Farm.

27.18. The FRDSA confirms that foul flows generated by the proposed site would be discharged into Severn Trent Water's public foul water sewer located to the west of the site, along the B4065 (Hinckley Road). There is currently not enough capacity in the public foul infrastructure to accommodate the flow produced from the proposed development. Severn Trent Water would consequently need to upgrade the existing public infrastructure to accommodate the additional foul flow produced by the development before a connection can be made into the public sewer.

27.19. Severn Trent Water have commented on the proposed development. They particularly highlight concerns with the capacity of the existing network to which the drainage would be directed. Owing to the potential risk of flooding and operational issues they acknowledge the need to assess the situation and provide whatever improvement may be required. They consequently request a condition requiring drainage plans for the disposal of surface water and foul sewage. They note the need for any necessary off-site improvements to be completed prior to the development being occupied. This would be controlled by condition.

Flood Risk and Drainage Summary

27.20. At this time it has not adequately been demonstrated that: (i) the proposed development does not increase flood risk elsewhere; (ii) the most vulnerable development is located in areas of lowest flood risk; and (iii) development is appropriately flood resilient and resistant. In turn, it has not adequately been demonstrated that the proposal complies with policies SDC5 and SDC6 of the Local Plan. This will therefore be weighed in the planning balance.

28. Water Resources

28.1. Section 15 of the NPPF seeks to conserve and enhance the natural environment, including water management and quality. Policy SDC4 of the Local Plan requires that all non-residential development should aim to achieve a minimum BREEAM standard of 'very good'. Water is an element of the BREEAM assessment. The Climate Change & Sustainable Design and Construction SPD (2023) supports this policy. A sustainability and energy statement has been submitted in support of the application.

28.2. No existing attenuation or Sustainable Urban Drainage Systems have been identified within the site. Currently the majority of surface water from the site is conveyed through the three unnamed ditches that run from north to south along the Site. These ditches eventually outfall to the River Sowe located 2.6km southwest of the Site. On the south-eastern site boundary is Withy Brook which flows northeast to southwest and which is defined as a main watercourse by the Environment Agency. To the north of the Site is located Oxford Canal which flows northwest to southeast.

28.3. There are no specific water requirements for non-domestic developments in Rugby Borough Council's Local Plan however BREEAM have water targets included. BREEAM seeks a minimum of 50% improvement of building water consumption over the baseline building water consumption. The applicant sets out that they are seeking an outstanding BREEAM rating (highest possible rating) which will be conditioned.

28.4. A water management strategy is required through the BREEAM accreditation. The application documentation states that the aim of this strategy is to replicate natural water flows and balance. A number of measures have been designed into the site in order to achieve this; rain gardens, rainwater attenuation ponds, stormwater sewers, grey and rainwater harvesting, wetlands and swales.

28.5. Considering the measures to be put in place and the targets set to be achieved through BREEAM it is concluded that adequate measures to conserve and enhance water resources have been considered.

29. Archaeology

29.1. Section 16 of the NPPF states that Local Planning Authorities should consider the impacts which cause any harm to; or loss of; the significant of a designated heritage asset. Paragraph 198 of the NPPF states that Local Planning Authorities should maintain or have access to a historic environment record which should be used to predict the likelihood that current unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Paragraph 200 of the NPPF states that 'Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'

29.2. Furthermore, Local Plan Policy SDC3 states that applications with the potential to affect the significance of a heritage asset will be required to provide sufficient information and assessment on the impacts the proposal has on the heritage asset.

29.3. An archaeological assessment has been submitted as part of the Environmental Statement (appendix 8.2) in support of the application. This includes both a desk-based assessment and geophysical surveys (appendix 8.3). Pre-determinative trail trenching has been undertaken on the site, the results of which are given in appendix 8.4 of the ES.

29.4. WCC Archaeology have reviewed the application and have objected to the proposal. The objection relates to the amount of trial trenching undertaken. WCC deem that a 1% trenching sample of the site is insufficient and that large parts of the site have not been adequately assessed. They request a minimum sample of 4% be trial trenched prior to determination of the application to be able to satisfactorily understand the archaeological

potential of the site. If this level of trial trenching is not undertaken pre-decision then WCC Archaeology have recommended refusal of the application. The percentage requested by WCC is not enshrined in local or national policy.

29.5. The archaeological assessment submitted sets out an adequate summary of the known archaeological resource of the application site and surrounding area. The document assesses the potential for the site to contain within it archaeological remains dating to the Mesolithic, Neolithic, Bronze Age and Saxon periods as low to moderate. This conclusion has been reached on the basis of information held by the Warwickshire Historic Environment Record (WHER). The archaeological assessment also considered there to be a moderate to high potential for the site to contain archaeological remains dating from the Iron Age and Roman periods.

29.6. The results of the geophysical surveys concluded that no magnetic responses were recorded which could be interpreted as being of definite archaeological interest. There were some magnetic anomalies which were identified and assigned to the category of uncertain. The applicant note that these are likely to be due to a combination of natural and agricultural processes.

29.7. Trail trenching followed the results of the geophysical surveys and the results of the fieldwork are included in appendix 8.4 of the ES. The submission sets out that the trial trenching has been focused on the areas of the site which will be developed (47%) and where the geophysical surveys picked up anomalies. The fieldwork comprised the excavation of 98 trenches each measuring 50m x 1.8m across a total site area of 112.9ha and identified three distinct areas of potential settlement activity dating to the later prehistoric and early/middle Roman periods including potential Roman farmstead.

29.8. The trial trenching approach is considered to be a sound approach based on 53ha (47%) of the 112.9ha site being proposed to be developed. The trial trenching which has been undertaken largely corroborates the results of the geophysical surveys which identified possible archaeology in two main areas (Unit 3 and north of units 1 and 4). WCC have commented that the information submitted provides a satisfactory account of the fieldwork undertaken to date.

29.9. The applicant has taken the approach on combining the geophysics outputs with targeted trail trenching and gridded trenching to identify key impacts and any archaeological significance. The applicant will undertake additional required trial trenching prior to development commencing on site. Based on the evidence presented in its entirety, through the combination of the WHER, geophysical surveys and targeted trial trenching (appendices 8.2-8.4) it is considered that an appropriate desk-based assessment and field evaluation has been undertaken for the application to date and a condition will be imposed requiring the remaining trail trenching and associated archaeological works to be undertaken prior to commencement of development. Therefore, it is considered that the proposals accord with Policy SDC3 and the NPPF.

30. Heritage

30.1. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

30.2. Section 16 of the National Planning Policy Framework (NPPF) provides the national policy on conserving and enhancing the historic environment. Paragraph 197 states that in determining planning applications, local planning authorities should take account of:

a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
c) The desirability of new development making a positive contribution to local character and distinctiveness.

30.3. Paragraphs 199-202 of the NPPF require great weight to be given to the conservation of designated heritage assets when considering the impact of a proposed development on its significance, for any harm to the significance of a designated heritage asset to have clear and convincing justification, and for that harm to be weighed against the public benefits of a proposal.

30.4. Paragraph 203 states that “the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

30.5. Paragraph 206 of the NPPF states that local planning authorities should look for opportunities for new development within conservation areas, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

30.6. Policy SDC3 states that development will be supported that sustains and enhances the significance of the Borough’s heritage assets including listed buildings, conservation areas, historic parks and gardens, archaeology, historic landscapes and townscapes. Development affecting the significance of a designated or non-designated heritage assets and its setting will be expected to preserve or enhance its significance.

30.7. The Council appointed heritage consultants to independently scrutinise, analyse and evaluate the information submitted by the applicant.

30.8. The application includes a Heritage Impact Assessment (HIA) and a Cultural Heritage Chapter (Chapter 8) within the Environmental Statement (ES), both prepared by RPS. The HIA examines the built heritage considerations related to the proposed development of the site, particularly the effects on the setting and significance of relevant heritage assets. The assessment concludes that the development will alter the setting of these assets, with the primary impact identified on Ansty Hall. This impact is assessed as less than

substantial harm, with proposed mitigation measures expected to address the harm. Additionally, the report finds no impact on the significance of the Church of St. James, the Church of St. John the Baptist, or Coombe Abbey, including the listed buildings within the registered park and garden.

30.9. The Cultural Heritage Chapter of the ES evaluates the potential significant effects of the development on cultural heritage during both the construction and operational phases. Where applicable, it proposes mitigation and offsetting measures to avoid, reduce, or offset any identified adverse effects, as well as to enhance any beneficial effects. The report details the nature and significance of the residual effects. Regarding Ansty Hall, it is determined that the construction and development phases will cause a minor adverse impact, leading to a moderate adverse significance due to the visual impact from Ansty Hall. For the Deserted Village of Hopsford, the assessment concludes that, with mitigation, the development's impact will be negligible, with the significance of the effect being slightly adverse but falling at the lower end of the spectrum for less than substantial harm. The development is also expected to have a slight or negligible adverse effect on the visual setting of Brinklow Castle, the Scheduled Monument, and the Church of St. John the Baptist. This is partly due to the site's distance of over 4 km from Brinklow Castle, its location outside the same historic parish, and the lack of direct historical association with the castle, aside from being a minor part of the broader landscape.

30.10. Historic England responded that they had no comment on the application and delegated any comments to the local conservation officer. Heritage specialists have reviewed the application and their assessment closely aligns with the applicants findings as set out as above. Where the findings differ in respect of the harm to certain assets this will therefore be addressed below.

30.11. The proposed development is located in proximity to several designated heritage assets, including Ansty Hall (Grade II* listed), the Deserted Village of Hopsford, Brinklow Castle (Scheduled Monument), and the Church of St John the Baptist (Grade II* listed). These assets require consideration as the assessment of harm differs from the findings of the submission documents.

30.12. Ansty Hall is a Grade II* listed building located approximately 605 meters northeast of the development site. It is obvious across the wider landscape and has commanding views back across the landscape, clearly "designed to be seen." The Adams family, who developed the Hall in its current form, were an important but emerging family in Coventry and Warwickshire, and the house reflects their desire for status. There is a potential for a harmful effect on the significance of this asset identified arising from the proposed development. The Council’s independent consultant deem that the mitigation measures do not negate the harm identified. The proposed development brings new construction closer to Ansty Hall, resulting in an impact on its setting. The setting of Ansty Hall is integral to its significance, and the introduction of new industrial-scale buildings detracts from its historic landscape, thereby conflicting with Policy SDC3 of the Local Plan and Paragraph 202 of the NPPF. Development within the wider setting, most likely on land historically connected to the Hall, would be harmful, and the scheme will clearly exacerbate the existing impact of urbanising features such as Ansty. While the applicant’s Heritage Impact

Assessment (HIA) suggests minimal impact, the Council's assessment is that the development results in "less-than-substantial" harm, categorised at the "low end" of this spectrum. This aligns with a "Moderate Adverse" impact in Environmental Impact Assessment (EIA) terms.

30.13. The Deserted Village of Hopsford (Scheduled Monument) is located within 2 km of the proposed development site. The eastern end of the scheme would appear to bring industrialised development at scale closer to the village, forming more of a backdrop to the development. This introduces a more noticeable industrial presence into the landscape, which detracts from the remote and rural character that contributes to the significance of the Deserted Village of Hopsford. This impact is assessed as "Moderate/Slight Adverse," raising concerns under Policy SDC3 and Paragraph 202 of the NPPF.

30.14. Brinklow Castle and the Church of St John the Baptist in Brinklow are important heritage assets that are indirectly affected by the development. The Church and Castle at Brinklow are clearly sensitive, not only because of their designations but because of the integrity of their immediate setting and the legibility this provides them; it is immediately obvious that Brinklow was historically significant and strategically important. The Castle, in particular, commands 360-degree views across a wide swathe of Warwickshire and beyond to Northamptonshire and Leicestershire. It has a wider setting that combines significant urbanising features with an open landscape that it was designed to defend. There are views from the main entrance to the Outer Bailey which take in the Church, High Street (including Grade II listed buildings), and the landscape beyond into which the development would intrude. The initial assessment by the applicant rated the potential harm as negligible; however, further analysis suggests a "Slight/Moderate Adverse" impact, particularly on strategic views from the castle. This reassessment indicates a potential conflict with Policy SDC3, which mandates the preservation of the significance and setting of heritage assets. Moreover, the visual intrusion of the development into the wider landscape undermines the historical narrative of Brinklow Castle, challenging the principles outlined in Paragraph 194 of the NPPF. There would be an appreciable change here.

Heritage Summary

30.15. The assessment identifies four heritage assets where a low level of less than substantial harm results from the proposed development. In accordance with Policy SDC3 of the Rugby Borough Council Local Plan and Section 16 of the NPPF (paragraph 208), these adverse impacts must be weighed against the public benefits of the proposal. This weighing exercise must be undertaken being mindful of the statutory duty to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

30.16. The benefits of the proposal are identified throughout this report and are summarised from paragraph 46.19 onwards. It is concluded that in particular, the overarching economic benefits, community use of the site, significant accessible public open space and improvements to public transport as public benefits of the scheme would outweigh the less than substantial harm to heritage assets. Accordingly, the test within paragraph 208 of the

NPPF is passed. Therefore, the proposal accords with national and local planning policy. Nevertheless, the identified harm to heritage assets identified will be factored into the planning balance.

31. Air Quality

31.1. Paragraph 192 of the Framework, policy HS5 of the Local Plan and the Air Quality SPD set out the need to consider the impact of the proposed development on air quality.

31.2. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

31.3. Air Quality Chapters (AQCs) have been included within the Environmental Statement and Environmental Statement Addendum. They identify that the site is located outside the Rugby Air Quality Management Area (AQMA) but is in close proximity to the Coventry City-Wide AQMA. Both AQMAs have been declared for exceedances of the annual mean NO2 objective. They further set out that modelled baseline concentrations are below the UK objectives for air quality at all existing sensitive receptors.

Air Quality During Construction

31.4. The AQCs consider the potential effects of the development during construction. They acknowledge that construction works have the potential to create dust. There would be a medium risk during earthworks and construction with a low risk for demolition and for dust trackout. A package of mitigation measures would therefore be put in place during construction to avoid or minimise dust emissions. These mitigation measures would be implemented as part a Construction Environmental Management Plan (CEMP) as required via a condition. The AQCs conclude that any residual effects would not be significant.

Air Quality Post-Occupation

31.5. The AQCs consider the potential effects of the completed development. They conclude that air quality conditions for future users of the development would be acceptable. Concentrations would be well below air quality objectives throughout the site. Furthermore, they demonstrate that pollutant concentrations would be well below objectives at all existing receptors in 2030 with or without the development. Emissions from the additional traffic generated by the development would have a negligible (not significant) impact on air quality conditions at all existing receptors along the local road network. This relies on mitigation such as active and sustainable transport options being provided and utilised to achieve a modal shift.

Air Quality Neutral

31.6. In accordance with local policies, an Air Quality Neutral Assessment has been submitted. This is used to estimate the additional NOx and PM2.5 emissions from the development and provide a calculation of the resultant damage cost. It refers to a range of measures that would be utilised to help mitigate air quality impacts. This includes the provision of electric vehicle charging points for 20% of parking spaces. Such provision would be double the 10% required by local policies. The cost of this extra provision alone would be well in

excess of the air quality damage cost. It concludes that the development would consequently meet air quality neutral requirements.

Environmental Health Comments on Air Quality

31.7. Environmental Health are satisfied with the conclusions reached within the AQCs, i.e. that the proposed development would not have significant effects on air quality. This is subject to a condition. They are also satisfied with the air quality neutral measures subject to a condition. However, they do raise concerns with the predicted increase in average daily traffic movements in Brinklow and Bretford. They nonetheless acknowledge that the number of movements in Brinklow would be below screening thresholds. In regard to Bretford the number of movements would exceed screening thresholds. Despite this they acknowledge that a diffusion tube monitor in Bretford shows existing concentrations in the area are well below the objective. Together with other factors it is concluded that the case for a detailed assessment of road traffic impacts is not justified. Environmental Health consequently accept the assessment for both villages that the development is unlikely to have a significant impact on local roadside air quality.

Air Quality Summary

31.8. The proposed development would not have a significant impact on air quality. The potential effects of the development during construction, particularly from dust, would not be significant subject to mitigation secured by condition. The potential effects of the completed development, particularly in relation to impacts arising from increased traffic, would not be significant subject to conditions. Air quality neutral requirements would be achieved by providing mitigation including double the number of electric vehicle charging points than required. As a result, the proposal complies with the Framework and policy HS5.

32. Noise and Vibration

32.1. Paragraph 191 of the Framework and policies HS5 and SDC1 of the Local Plan set out the need to ensure that noise arising from the proposed development would not adversely impact on the amenity of nearby noise-sensitive receptors.

32.2. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

32.3. Noise and Vibration Chapters (NVCs) have been included within the Environmental Statement and Environmental Statement Addendum. As a starting point they refer to the outcome of a baseline noise monitoring survey which established the prevailing noise climate at the site and in the vicinity of the nearest noise sensitive receptors. This was used to create a computer generated model of the site to predict effects for the construction and operational effects. They particularly highlight that the prevailing noise climate at the site and nearest noise sensitive receptors is dominated by road traffic noise from the M6 and M69 motorways, as well as the adjacent B-roads. The NVCs consider the potential effects of the development during on-site and off-site construction over the anticipated 6 year construction programme.

Noise and Vibration During On-Site Construction

32.4. In regard to on-site construction, the NVCs classify the different types of construction activity into three groups and zone the site into thirteen areas to model what the impacts would be. This modelling is informed by indicative plant and equipment with respective source sound power levels. They conclude that during on-site construction works, including the main and secondary site access junction works, noise effects would be negligible (not significant). Vibration effects would be negligible to minor adverse (not significant).

32.5. These conclusions rely on mitigation measures which would be secured as part of a Construction Environmental Management Plan (CEMP) as required by a condition. This includes a requirement for the days and hours of construction activity to be agreed with the Council. Furthermore, site hoarding would be erected close to sensitive receptors to provide activity and vehicle noise screening. This would then be supplemented by the early construction of proposed bunds around the northwest perimeter of the site. These would be secured by conditions.

Noise and Vibration During Off-Site Construction

32.6. In regard to off-site construction, the NVCs consider the impact of different highway improvement works required as a result of the development. They identify likely significant adverse noise effects (moderate to major adverse) at the Double Tree by Hilton Hotel at Junction 2 of the M6 motorway. These effects would only occur if the works are likely to exceed a defined criteria (i.e. 10 days or nights of adverse effect in any consecutive 15 days or nights, or more than 40 nights in six consecutive months). In addition to employing reasonably practicable noise mitigation measures, the CEMP (required by a condition) also specifies a need for the hotel management to be informed of the likely start and duration of the works to enable them to inform their guests.

Noise and Vibration Post-Occupation

32.7. The NVCs consider the potential effects of the completed development. This is informed by an Operational Sound Assessment (OSA). The OSA specifically considers sources of sound arising from: building services and building envelope breakout sound; on-site vehicle movements; amplified music/event noise; sports and recreation facilities; and off-site road traffic noise.

32.8. Predicted noise levels from on-site vehicle movements during operation of the development have been modelled onto plans. Landscaped noise bunds have been developed as embedded mitigation around the northwest of the site to screen noise from on-site vehicle movements. This includes bunds around the closest residential property of Ashville which is situated adjacent to the main site access. These bunds would be secured by condition. Assessments of predicted noise levels against existing background sound levels and ambient sound levels have demonstrated that there would be negligible to minor adverse noise effects (not significant).

32.9. The OSA identifies that tonal reversing alarms are likely to be audible in the higher frequency (2 kHz and 4 kHz) octave bands. It recommends that these should be avoided during the night-time. This would be secured by condition.

32.10. The OSA sets environmental sound criteria for building services and building envelope breakout sound. These are used as design criteria which would be achieved through the specification of plant and associated mitigation, and building envelope design. This would be secured by condition.

32.11. The OSA considers the effects of amplified music and events. Particular consideration is given to the need to not exceed the background noise level (in the absence of music noise) in the 63 Hz and 125 Hz octave bands. This has resulted in the formation of Amplified Music/Event Noise Criteria which the building envelope must achieve. Hours of use would also be limited to prevent the use of the auditorium for amplified music and events between 23:00hrs and 09:00hrs. This would be secured by condition. A noise management plan would also be prepared by the operators of the auditorium event space. This would include measures to keep noise to a minimum and specify how any complaints would be managed. A condition would secure this. Subject to this, the NVCs set out that the noise effects from amplified music and events would be negligible (not significant).

32.12. The OSA concludes that noise from the outdoor sports and recreation facilities would result in negligible effects (not significant). Equally, an assessment of off-site road traffic noise concluded that there are negligible to minor adverse noise effects (not significant) at receptors within the associated study area.

Helicopter Noise

32.13. A Helicopter Noise Assessment (HNA) has been submitted which provides a detailed assessment of helicopter noise from the use of the proposed helipad. It sets out that a worst-case scenario was modelled. This was based on 8 movements (4 landings and 4 take offs) in a single day within a period between 07:00 and 23:00. However, it advises that in reality it is expected that there would likely be a maximum usage of 10 take offs and landings (20 movements) per calendar month.

32.14. The assessment of helicopter noise along the 3.5km arrival/departure track indicates that the addition of the proposed helipad operations would have a negligible impact on the ambient level for the residential dwellings underneath the flight path. However, it is noted that helicopter noise would be audible at noise sensitive receptors for a few minutes during each movement.

32.15. Given the parameters used to inform the modelling it is considered that it would be necessary to impose a condition limiting the number of movements to/from the helipad together with the hours it could be used. A condition would further be necessary to ensure that the noise from the helicopters using the helipad would not be any greater than the name and model used in the assessment.

Environmental Health Comments on Noise and Vibration

32.16. Environmental Health note that the proposed development would alter the aural environment and soundscape. However, they are nonetheless satisfied with the conclusions reached within the NVCs, i.e. that the proposed development would not have significant effects on noise subject to conditions.

Noise and Vibration Summary

32.17. The proposed development would not have a significant impact on noise. The potential effects of the development during construction, particularly from on-site and off-site activities, would not be significant subject to mitigation secured by condition. The potential effects of the completed development, particularly in relation to noise from on-site vehicles, amplified music and concerts, and helicopter movements, would not be significant subject to conditions. As a result, the proposal complies with the Framework and HS5 and SDC1.

33. Contamination

33.1. Paragraphs 189 and 190 of the Framework sets out the need to ensure a site is suitable for its proposed use taking account of risks arising from contamination.

33.2. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

33.3. A Geo-Environmental Assessment has been submitted with the application. It notes that the site comprises of a large area of undeveloped agricultural fields with two farmyards and associated residential dwellings. It advises that potential sources of contamination are limited to the agricultural use of the site and potential made ground in the developed central and north western areas. Historical tanks were also recorded in the north western farmyard together with buildings potentially containing asbestos. Limited sources of ground gas associated with potential made ground in developed areas and infilled ponds were identified.

33.4. Investigations were carried out across the site to establish whether there were any contamination issues. It was found that the quality of the soil and groundwater beneath the site, and ground gas regime, is acceptable for a commercial end use. However, further investigations are recommended should permission be granted.

33.5. Environmental Health has considered this and raised no objection to the proposed development subject to a condition. This would require the submission of an investigation and risk assessment including a remediation scheme and measures to report unexpected contamination found on the site. It is therefore considered that this would ensure that contaminated land does not affect the health of the future occupiers of the proposed development. As a result, the proposal complies with the Framework.

34. Lighting

34.1. Paragraph 191 of the Framework sets out the need to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. National Planning Practice Guidance also expands on this. It indicates that getting the design and setting right is important as artificial lighting can be a source of annoyance to people, harmful to wildlife, undermine enjoyment of the countryside or detract from enjoyment of the night sky.

34.2. A Light Pollution Chapter has been included within the Environmental Statement (ES). This is supported by a Baseline Lighting Survey, Illumination Impact Profile and Lighting Impact Assessment. They characterise existing lighting conditions at the site and surrounding area. The proposed lighting design scheme was then modelled to allow for a before and after comparison of lighting conditions to be made.

34.3. The Council appointed Lighting consultants to independently scrutinise, analyse and evaluate the information submitted by the applicant, including the proposed lighting designs, assessment methodology and assessment conclusions. This was undertaken having regard to concerns raised regarding lighting installations on employment buildings at nearby Ansty Business Park and Prospero Ansty. A baseline survey of existing lighting conditions on the site and surrounding area (including Ansty Business Park and Prospero Ansty) was consequently carried out as part of the review.

34.4. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

Construction Lighting

34.5. The proposed development would be constructed over six years. During this time there would be periods of work that would occur during hours of reduced light. Task lighting and a degree of temporary lighting would be needed for operational purposes (particularly during winter) and security purposes. The ES sets out that the potential effects from this temporary lighting could result in light spill, light intrusion, glare and sky glow. As a result, good practice mitigation would be needed to avoid significant adverse lighting effects. This would form part of a Construction Environmental Management Plan (CEMP) as required by condition. In turn, the ES advises that there would be no negligible effects on all receptors with regards to lighting at night during construction.

34.6. The Council's consultants are satisfied that the construction lighting assessment is acceptable. A range of measures would need to employed through the CEMP to prevent light pollution. It is concluded that the risk of light intrusion on the vertical plane (to residential properties) is considered low. There is a risk that light pollution and skyglow could arise if measures are not followed. That would be subject to enforcement action with the ES setting out that "the contractor should act responsibly to adjust any temporary lighting reported as causing nuisance."

Operational Lighting

34.7. The ES acknowledges that the operational lighting of the proposed development has potential effects that could result in light spill, light intrusion, glare and sky glow. This has been factored into the layout and orientation of buildings which have been designed to help reduce these effects. Furthermore, the proposed ground levels, landscape bunds and retention of boundary vegetation would help to shield the site from views and minimise potential light spill and nuisance. Embedded mitigation, that is the appropriate light fittings, at the correct height and with the right light distribution, is also proposed. The ES consequently advises that there would be no negligible effects on all receptors from lighting at the site post-occupation.

34.8. The Council's consultants advise that the assessment addresses the key criteria for obtrusive light (i.e. artificial lighting that is harmful to health or noticeable and prominent in an intrusive way). Environmental Lighting Zones are used to classify the lighting environment of the site and surrounding area. The application site would change from being a dark natural environment to one of a suburban medium district brightness environment. Other dark natural environments within a reasonable distance of the site would also be likely to experience change to a rural low district brightness environment.

34.9. The consultants advise that the development is unlikely to significantly increase lighting levels at residential properties, with minimal risk of disruption to residents, particularly those in Ansty. The property of Ashville, located near the site boundary, might experience a small increase in light levels (up to 0.4 lux) but this is expected to be within acceptable limits. There could be an exceedance of nighttime thresholds here but this is considered minor and could be mitigated.

34.10. In terms of glare, most residential receptors, being at higher elevations, would not have direct views of bright light sources, and the impact of glare would be minimal. However, receptors at Ashville may experience around 30% more glare than the target, which could be addressed with design adjustments.

34.11. Regarding skyglow and upward light, the development would not produce significant upward light, which could affect the sky, as most lighting is designed with full cut-off optics. However, reflective light from building surfaces and ground materials could still contribute to skyglow, and this potential impact warrants further mitigation.

34.12. The issue of over-lit building façades and signs is not directly addressed in the application. The design avoids excessive illumination of façades, but some building-mounted lights could create hotspots of brightness. The current assessment does not consider the potential impact of illuminated signs or internal lighting which would be subject to separate advertisement consent applications. The consultants therefore recommended that any future additions, such as signage, should adhere to the existing lighting limits to prevent incremental increases in light levels.

34.13. The effects of the development's lighting on transport systems have been assessed with regard to glare risk for drivers on nearby roads (including the M6 and B4029). National Highways has advised that lighting should not pose a safety risk to drivers by being visible from the road. While glare assessments have been carried out according to industry standards, National Highways has suggested further assessment once the lighting installation is complete. The risk from most luminaires is considered low, but further study may be necessary for certain lighting types, particularly those with tilted optics.

34.14. The consultants conclude by proposing conditions which focus on ensuring that lighting design, control, and operational practices align with the commitments made in the application. It would include requirements for lighting submissions to address luminaires, mounting, and lighting performance, ensuring that overlighting is avoided and that the cumulative effects are considered. Operational controls would limit lighting to functional needs, reducing intensity in unoccupied spaces, with curfew conditions for certain features

like sports pitches and signage. The use of warm white light sources (below 3000K) is emphasized to reduce blue light and minimize ecological impacts, while ensuring that no lighting emits direct upward light. These would be secured by condition. Subject to this, the proposed lighting impacts would be acceptable.

Lighting Summary

34.15. It is considered that the proposal complies with paragraph 191 of the Framework and National Planning Practice Guidance. The proposed lighting scheme emphasises the importance of minimising light pollution. The ES includes assessments of existing lighting conditions and proposed designs. This has been scrutinised by an independent review. During construction, temporary lighting would be managed through a Construction Environmental Management Plan (CEMP) to mitigate potential adverse effects, while operational lighting designs aim to reduce spill and glare. Conditions would ensure compliance with commitments to control lighting intensity, timing constraints of lighting, limit upward light, and use warm white sources to minimise ecological impacts, making the proposed lighting impacts acceptable.

35. Residential Amenity (Light, Aspect and Privacy)

35.1. Policy SDC1 of the Local Plan sets out that proposals for new development should ensure the living conditions of existing and future neighbouring occupiers are safeguarded. Further standards and details are set out within the Residential Design Guide that is included within the Climate Change and Sustainable Design and Construction SPD.

35.2. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

35.3. The closest residential property to the application site is Ashville on Hinckley Road. It takes the form of a 1.5 storey building with windows to habitable rooms in the side and rear elevations overlooking the application site. The closest proposed buildings to this dwelling would be the two-storey group accommodation to the southwest at a distance of approximately 100 metres. There would also be a separation distance of approximately 125 metres from this dwelling and logistics building 5. These distances are significantly beyond the minimum distance standards specified in the Residential Design Guide. There would consequently be no detrimental impact on light, aspect and privacy to Ashville.

35.4. Furthermore, landscaped bunds up to 4 metres in height would be positioned around the southeast and southwest curtilage boundaries of Ashville. This would be at a distance of approximately 60 metres from the rear elevation and 20 metres to the side elevation of Ashville. These landscaped bunds would consequently prevent direct views of the proposed group accommodation. Equally, they would be positioned far enough away from habitable windows so as not to have a detrimental impact on light or aspect.

35.5. Aside from Ashville, there are a number of residential dwellings located to the north of the application site in Ansty. The proposed group accommodation would be 150 metres away from the closest dwelling here. This is significantly beyond minimum distance standards

and there would consequently be no detrimental impact on light, aspect and privacy to residential dwellings located here.

35.6. In summary, the impact on residential amenity in relation to light, aspect and privacy would be acceptable. As a result, the proposal complies with policy SDC1.

36. Climate Change, Carbon Emissions, Energy, Sustainable Design and Construction

36.1. Policies SDC1 and SDC4 of the Local Plan sets out support for the enhanced energy efficiency of buildings and need to achieve a BREEAM very good sustainability rating. Further detail is set out within the Climate Change and Sustainable Design and Construction SPD 2023. These policies are consistent with section 14 of the Framework which indicates a need for the planning system to support the transition to a low carbon future to help tackle climate change.

36.2. Rugby Borough Council also declared a climate emergency in July 2019 and produced a Climate Change Strategy and Action Plan pursuant to this. At the heart of this is a net zero vision which states “Rugby is an environmentally sustainable place where we work together to reduce and mitigate the effects of climate change, transitioning Rugby to a low carbon and nature positive place which is net zero.”

36.3. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report.

Sustainability and Energy Statement

36.4. A Sustainability and Energy Statement (SES) and Sustainability Checklist has been submitted with the application. It sets out that the development would deliver Net Zero Carbon (NZC) for embodied carbon (the carbon emitted during from producing, procuring, and installing the materials and components that make up a building). NZC would also be achieved for operational carbon for buildings only (i.e. the carbon emitted during the building's use). Targets are set in-line with UK Green Building Council (UKGBC) guidance and industry standards and are in-line with the Paris agreement and UK’s net zero pathway to net zero carbon. Third party verification would be utilised to demonstrate this has been achieved.

Embodied Carbon

36.5. In respect of NZC for embodied carbon, an early stage Life-cycle embodied Carbon Assessment (LCA) was undertaken to estimate the total embodied carbon emissions of a building over its lifetime - from ‘cradle to grave’. These were used throughout the design process to inform the selection of the facade and structural materials proposed. Some of the strategies adopted include structural systems with reduced and optimised spans for minimal use, timber structures where appropriate for carbon sequestration, omission of finishes, maximising recycled content, cement replacements for concrete, low carbon asphalt and low carbon (electric arc furnace) steel.

36.6. Further strategies would continue to be refined and optimised at later RIBA design stages and through the considered procurement of suppliers and contractors. This would enable a pre-commencement LCA to be developed based on as-designed data and target procurement. A post-development LCA would then be produced to confirm actual

performance. In the event of any shortfall being identified, the applicant has committed to making carbon offset payments to achieve NZC.

Operational Carbon for Buildings

36.7. In respect of NZC for operational carbon for buildings, the SES sets out that this would be achieved through energy efficiency, passive design and active building systems, and on-site renewable energy, with the remainder offset by a commitment to procure energy through high-quality green tariffs.

Tier 1 - Reducing Energy Demand

36.8. In accordance with the Climate Change and Sustainable Design and Construction SPD, the applicant has followed the energy hierarchy approach. This means that the focus has firstly been on reducing energy demand. As a starting point, consideration was given to the location, grouping, orientation and massing of buildings. An emphasis has then been placed on a fabric first approach which would result in excellent levels of insulation and airtightness for the buildings. Several passive and active design strategies would also be utilised. This includes external solar shading to provide protection, good daylighting within buildings, narrow floor plates on regularly occupied spaces and activated exposed thermal mass using natural ventilation.

Tier 2 – Supplying Energy Through Efficient Means

36.9. In line with the energy hierarchy, consideration has been given to ensuring that energy is utilised in the most efficient manner possible. This is firstly based around an all-electric strategy (i.e. no gas supply). Heating, cooling and domestic hot water for the campus would then be provided via efficient Air Source Heat Pumps (ASHPs) (a renewable energy technology) used in combination with Water Source Heat Pumps (WSHPs) (which can upgrade hot and chilled water from ASHPs) and energy storage.

36.10. Multiple local energy centres would then serve clusters (groups) of buildings where synergies between heating and cooling can be created to achieve improved seasonal efficiencies and reduce peak demands for and annual electricity usage. This would be used in conjunction with efficient HVAC (heating, ventilation, air conditioning) systems. In addition, efficient lighting and demand-led controls are proposed featuring LED luminaires, photoelectric dimming, and occupancy sensing. This would all be supported by extensive metering, sub-metering, and monitoring via a central Building Management System (BMS) to support demand control and post-occupancy monitoring.

36.11. Part L of the national Building Regulations relate to the energy efficiency of buildings. Calculations undertaken in accordance with this demonstrate that the building groups achieve c.12% reduction in (regulated) carbon emissions and c.11% in primary energy use through energy efficiency alone. This is well over the minimum standard required by Building Regulations to comply with Part L. More importantly, this has been achieved through energy efficient design (i.e. without accounting for energy production from on-site renewables).

Tier 3 – Utilising Renewable Energy

36.12. The final tier of the energy hierarchy requires consideration of how renewable energy generation could be utilised. To that end, it is proposed that a large commercial solar photovoltaic (PV) array would be installed on the roofs of logistic units 1 and 4. This would have a capacity of approximately 15MWp. The SES notes that this would be one of the

biggest roof PV array installations in the UK. By way of comparison, the Churchover solar farm near Rugby (ref: R13/1401) on a 30ha site has a capacity of 12MWp (the equivalent annual electricity needs of about 3,600 homes each year).

36.13. A campus-wide electricity network would share PV power to all buildings and other facilities on-site (e.g. EV charging and street lighting). There would be no export of PV power out to the grid due to current local network constraints including a lack of 'reverse power' capacity and grid stability issues. All electricity generated would therefore be absorbed on-site with limited battery storage.

36.14. The SES calculates that annual electricity consumption from the buildings is expected to be c.40,000MWh per annum. PV generation (of c.15,000MWh) would provide c.40% of this electricity need. However, at this stage there are a number of uncertainties. This includes the patterns of the site electrical loads if the site is built out and then full operation begins, the degree of automation and robotics in the logistics buildings and future demand for electric vehicles from logistics operations, suppliers, staff and visitors.

36.15. In light of the above, the SES notes that the proposed PV provision is based on the initial estimate of site electrical loads which "needs to be further refined post-planning, with the potential for the PV to be extended in the future." In response to this, all warehouse roofs and site power infrastructure would be designed to allow for the expansion of PV arrays to cover all warehouse roofs. This provides the potential for the development to reach net zero energy status in the future. Therefore, prior to occupation the solar provision required to sustain the development and testing of the grid capacity for external exportation will be conditioned to be done.

36.16. Consideration has been given to covering all the warehouse roofs with PV thus generating more electricity which could be exported for use off-site. In that regard, appendix B of the SES examines on-site renewable energy generation in detail. It identifies that there are various constraints that would make it unfeasible to export electricity to the grid. Key issues include a lack of 'reverse power' capacity in the local grid for exporting large amounts of electricity. This lack of capacity/inability to export to the grid is a problem nationally, even for schemes attempting to export relatively small quantities of electricity.

36.17. Overall, operational energy targets are aligned with UKGBC's Net Zero carbon targets. The SES sets out that approximately 40% of total energy demand can be met from the proposed roof PV array. It further states that "the remaining power will be procured from offsite renewable sources in line UKGBC guidance." Such procurement is typically secured through Corporate Power Purchase Agreements. These are long-term contracts under which a business agrees to buy some or all of its electricity directly from a renewable energy generator, such as a solar or wind farm (which is connected to the grid). Other businesses who have signed such contracts include BT, Nationwide, McDonalds, Tesco, Sainsbury's and HSBC.

Operational Carbon for Buildings Summary

36.18. Overall, the building groups would achieve a c.12% reduction in (regulated) carbon emissions and c.11% in primary energy use through energy efficiency alone. When production from on-site PV is considered, (regulated) carbon emissions and primary energy use would be c.70% and c.74% respectively lower than the minimum standard required by Part L of the national Building Regulations. This means that a 70% reduction in annual regulated operational carbon emissions is achieved.

Assessment

36.19. The Council appointed sustainability consultants to independently scrutinise, analyse and evaluate the information submitted by the applicant. They have confirmed that sustainability has been considered extensively throughout the development. Requirements set out within the Council's policies have been addresses and exceeded. Where submitted information has been unclear this has been raised with the applicant who has provided a full response.

36.20. Matters pertaining to climate change and net zero carbon emissions is understandably a rapidly evolving field. Building Regulations set out national minimum standards which any new building must comply with. However, these standards do not achieve the net zero carbon status which this development is setting out to achieve. In that respect, there is currently no one single or common approach to measuring this. There are rather a multitude of different standards and assessments which can be utilised to calculate the impact of a proposed development. This includes a range of best practice design targets, benchmarks, additional accreditation and certificates that can be sought. Even within each of these there are often different versions which are being rapidly released seeking to better past targets and push for more stringent measures.

36.21. It is within the context of the above that there has been healthy and constructive dialogue between the Council's sustainability consultants and the applicant. This has typically centred around what versions of a chosen methodology should be used and what targets would be appropriate for the development to be reach "exemplar" status. This is particularly challenging when the goal posts keep moving as new standards are continually being updated and published. As such, the SCS and approach taken within it is considered suitable and robust for demonstrating the impact on carbon emissions at the point in time it was prepared and submitted. Considering what is required by planning policies it is also clear that this proposed development would push the boundaries whilst simultaneously being realistic and deliverable.

36.22. Policy SDC4 of the Local Plan requires all new non-residential developments to achieve a BREEAM rating of "Very Good". For context, BREEAM is a leading sustainability assessment method that evaluates and certifies the environmental performance of buildings, focusing on energy efficiency, resource conservation, and occupant wellbeing. BREEAM ratings range from Pass, Good, Very Good, Excellent, to Outstanding, reflecting the building's level of sustainability, with higher ratings awarded for greater environmental performance and innovation in areas like energy use, resource management, and occupant health.

36.23. The SCS sets out that all buildings within the proposed campus would be BREEAM certified and achieve an "Outstanding" rating against. It notes that BREEAM "Outstanding" buildings make up less than 1% of the new building stock in the UK. It is contented that this significantly exceeds local planning policies and exhibits exemplar performance level both in UK and globally. BREEAM preassessments have been submitted demonstrating that the proposed development stands to achieve a score which would qualify for

BREEAM “Outstanding”. A condition would ensure that this rating is achieved post-development and post-occupation.

36.24. Beyond this, the applicant has committed to undertaking a Whole Life Carbon Assessment prior to the commencement of development. This would demonstrate that net zero carbon for embodied carbon and operational (buildings only) carbon can be achieved. Net zero carbon verification of the buildings would meet independent third-party quality assessment under UKGBC (Net Zero Carbon Buildings: A Framework Definition, April 2019; and related documentation) or other equivalent worldwide Net Zero Carbon standard being pursued. It would also include a requirement for additional off-site power to be sourced via green (renewable) power supply contracts (via condition).

Environmental Impact - Climate Change and Greenhouse Gases

36.25. The Environmental Statement contains a chapter on Climate Change and Greenhouse Gases (chapter 17). A risk-based assessment determined that the development's resilience to climate change would be robust, considering hazards like extreme temperatures, heavy rainfall, drought, storms, and ground movement. With embedded mitigation measures such as flood and drainage systems, no significant climate resilience risks were identified. Consequently, the development is deemed to have no significant cumulative effects regarding future climate change impacts.

36.26. A greenhouse gas assessment estimates that the development would generate 39,096 tonnes CO2e in 2030 and 283,032 tonnes CO2e over its lifetime, representing a minor increase relative to local and national emission totals. Key emissions stem from energy and transport, which are expected to decarbonise by 2050, and the development aligns with policies to reduce these emissions. With design measures and best practices implemented, the residual greenhouse gas effects are deemed minor adverse and not significant.

Climate Change, Carbon Emissions, Energy, Sustainable Design and Construction Summary

36.27. It is considered that the proposed complies with policies SDC1 and SDC4 of the Local Plan and the Climate Change and Sustainable Design and Construction SPD. The applicant is committed to achieving net zero carbon for both embodied carbon and operational carbon for buildings

36.28. A number of strategies have been utilised to achieve this. Of particular note it how the energy hierarchy has been followed to reduce energy demand, supply energy through efficient means and then utilise renewable energy. It is anticipated that this would result in a 70% reduction in annual regulated operational carbon emissions. The remainder would be offset by a commitment to procure energy through high-quality green tariffs. Furthermore, all of the buildings within the proposed campus would be BREEAM certified and achieve an “Outstanding” rating against.

36.29. Overall, there would be a significant betterment over and above building regulations and planning requirements. The impact of this development in respect of carbon emissions would therefore be substantially less than if it was built out to the bare minimum standards.

However, the weight which can be attributed to this is tempered by the fact that it only seeks to neutralise the harm that it would otherwise give rise to. Notably, it would not give rise to a net gain in reducing carbon emissions. On the other hand, it is recognised that the journey to net zero is one of many steps. In that regard, this proposed development and the approach taken would be at the forefront of that journey. It would show what is possible to achieve and provide a blueprint for other employment developments to follow. In turn it is considered that the net zero status of the development is a benefit which carries significant weight in favour of the proposal.

37. Health

37.1. Paragraph 96 states that decisions should aim to achieve healthy, inclusive and safe places which promote social interaction and enable and support healthy lifestyles.

37.2. Policy HS2 of the Local Plan sets out that developments of a certain scale would need to demonstrate that it would not generate adverse impacts on health and wellbeing. The proposed development is of a scale needing to demonstrate this.

37.3. A Health Impact Assessment Screening Report has been submitted to support the application in accordance with Policy HS2 of the Local Plan.

37.4. Objections have been received in relation to this topic and are summarised in paragraph 6.5 and section 7 of this report – particularly relating to the harmful impact on Ansty village, community spirit and health of local residents.

37.5. The submitted screening report concludes that while the development has the potential to influence health outcomes, it is not expected that these will be negative or significant in nature.

37.6. WCC produced a place based needs assessment for Rugby rural north in March 2020. It considers a range of different demographic, health and economic factors and benchmarks against national averages. The baseline data within this report identified that there were no significant health sensitivities specific to this location of the Borough that development could have a disproportionate effect on.

37.7. The screening report considers health related behaviours, social environment, economic environment, bio-physical environment and institutional and built environment. It is considered that the development has been designed to respond to all of these topics adequately. Overall, it is therefore considered that the application complies with Policy HS2 of the Local Plan.

38. Fire Safety

38.1. Paragraph 101 of the NPPF states that planning decisions should promote public safety. Paragraph 96 states that decisions should aim to achieve safe and accessible places.

38.2. WCC Fire and Rescue service have reviewed the application and they have no objection subject to the implementation of a condition.

38.3. The proposed development has been designed with fire safety in mind. Fire accesses separate to the proposed accesses are shown on the proposed site plan. In addition, fire access has been provided around the perimeters of all the warehousing. It is therefore considered that the application complies with policy.

39. Mineral Safeguarding, Waste and Materials

39.1. Paragraph 215 of the NPPF states that it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Paragraph 217 states that when determining planning applications great weight should be given to the benefits of mineral extraction, including to the economy. Paragraph 218 sets out that Local Planning Authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.

39.2. The Waste & Materials Chapter of the Environmental Statement sets out the likely significant effects of the development alongside mitigation measures to reduce or offset any significant effects. The development will require significant amounts of construction materials including construction aggregates. In relation to materials the receptors all have low sensitivity and in relation to waste there are three high/very high receptors. Table 12.37 within the ES summarises the effects from the development and their significance.

39.3. WCC Minerals have no objections to the application having reviewed the accompanying ES in particular Chapter 12 on Waste and Materials and appendices 12.1, 12.2, and 12.3.

Mineral Safeguarding

39.4. The majority of the site lies within a Mineral Safeguarding Area (MSA) for sand and gravel. The development is not exempt development for the purposes of Appendix 3 of the adopted Minerals Local Plan (2022) so a Minerals Assessment is required to be submitted.

39.5. The proposal therefore falls to be determined in accordance with policies MCS5 and DM10 in the adopted minerals local plan. This was received in support of the application.

39.6. Appendix 12.3 is an adequate assessment for the purposes of policies MCS5 and DM10 and that shows there are potential resources outside the known resource mapping but within the boundaries of the MSA mapped in the local plan (see paragraph 9.174 in the minerals local plan). However, it also confirms the absence of resources across the site. The borehole information indicates that the resources appear to be of poor quality and isolated. Coupled with the levels of overburden indicated by the information it is very unlikely that the resource would be economically viable to extract in full. The incidental removal of isolated lenses of sand and gravel would be very beneficial and could be accommodated as part of the excavation operations covered by the proposed Draft Materials Management Plan.

39.7. Therefore, subject to the imposition of a planning condition requiring the submission, approval and implementation of a Materials Management Plan which includes for the incidental removal of sand and gravel during excavations there are no objections on mineral safeguarding grounds.

39.8. There are no existing mineral sites or mineral allocations within influencing distance of the site and similarly no minerals infrastructure which need to be safeguarded.

Waste Safeguarding

39.9. The County Councils adopted Waste Core Strategy includes a policy safeguarding waste management sites from non-waste development. Policy CS8 says that the authority will object to proposals for non-waste development within or adjacent to such sites where they prevent or unreasonably restrict the use of that site for waste management purposes. According to WCC records there are no waste sites in influencing distance so the authority would have no objections to the proposed development on waste safeguarding grounds.

Waste Planning Implications

39.10. The County Council as Waste Planning Authority has had regard to the waste implications of this major development in terms of its impact on existing waste management capacity and operations and the waste hierarchy. The county council welcomes the emphasis on maximising the reuse, recycling, and recovery of excavated materials on site and the submission of Appendix 12.2 (OSWMP) in outline form. A planning condition will be imposed requiring the submission, approval, and implementation of a Site Waste Management Plan in order to enforce the delivery of the targets.

39.11. It is important in environmental terms to minimise/avoid the export of materials from the site to landfill. Where materials are classified as waste and cannot be accommodated in the proposals then the emphasis should be on reuse, recycling, or recovery at a suitable permitted off-site facility. In this respect the information set out in Appendix 1 to Appendix 12.2 is very important.

39.12. In terms of design the County Council welcomes the focus on balancing cut and fill across the site in response to the need to change existing levels. To avoid problems elsewhere in the county the authority supports the on-site storage and stockpiling of materials and the use of mobile plant to recycle construction, demolition, and excavation wastes.

39.13. To deal with the commercial and industrial wastes likely to be produced as part of the future operation of the development an operational site waste management plan (see paragraph 12.7.6 in the ES) needs to be submitted, approved, and implemented before the development commences.

Imports of Construction Materials

39.14. To ensure that the development as proposed is built a considerable amount of construction material needs to be imported including construction aggregates. Chapter 12 in the ES suggests that over 200,000 tonnes of aggregates will be needed over the life of the 6-year construction period. The chapter considers the future supply options in the adopted minerals local plan and considers the implications locally and within the regions.

39.15. The County Council's current adopted local plan covers the period up to 2032 and the period of construction. While the current published Warwickshire Local Aggregates Assessment is based on the 2017 version it is possible to use data in the West Midlands Aggregates Working Party – Authority Monitoring Report (AMR) 2022 report to give an up-to-date picture on current production. The adopted local plan does have an annual requirement rate of 0.500m tonnes based on a specific 10-year period which allows for future levels of growth. At present the AMR report indicates that sales in Warwickshire are well below the local plan rate. Based on 200,000 tonnes per annum over the 6-year construction period the average annual supplies would be 33,000 for this development which is about 10% of the current county production. The development is therefore unlikely

at the present time to have a significant effect on future supplies of aggregates in the county.

39.16. Notwithstanding this WCC feels it is important that major developments such as this should have a target for the use of recycled and secondary aggregates imposed preferably by condition. A minimum target of 28% should be imposed for the life of the construction period.

39.17. Subject to the mitigation referred to in Chapter 12 and its three appendices concerning Waste and Materials, the imposition of the target mentioned above there are no objections to the level of imports proposed based on the currently submitted information.

39.18. Therefore, subject to conditions it is considered that the assessment of Mineral Safeguarding, Waste and Materials is satisfactory.

40. Broadband

40.1. Policy SDC9 of the Local Plan sets out the need for new developments to facilitate and contribute towards the provision of broadband infrastructure. Paragraph 118 of the framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

40.2. The site is located close to local telephone exchanges at Walsgrave and Wolvey. To meet the communication needs of the development and its future occupants, the existing local telecommunications infrastructure would be extended into the site to facilitate the seamless provision of telecommunication services, including voice, data, and broadband connectivity.

40.3. The Utility Planning Statement submitted with the application indicates that an application for new connection has been raised with BT. It is anticipated that a point of connection would be established from the local buried infrastructure in Hinckley Road. The future occupant would ultimately be responsible for ordering a telecoms service to meet their needs.

40.4. In summary, there is existing broadband infrastructure adjacent to the site. This would be extended into the site to provide telecommunication services for the proposed development. As a result, the proposal complies with policy SDC9.

41. Utilities

41.1. A Utility Planning Statement has been submitted with the application and considers whether existing nearby utility infrastructure could support the proposed development. It then identifies any needs for new connections and establishes underlying requirements for diversionary works. It collectively provides a utility infrastructure strategy to ensure the site can be accommodated within local utility networks.

41.2. In regard to energy, the proposed development would comprise an all-electric energy strategy. No gas supply to the site is therefore required. The new demand for electricity arising from the proposed development would in part be met from solar PV panels on the

warehouse roofs. Additional electricity needs are capable of being met via a new connection with Coventry North Primary Substation. This would require off-site works which would be delivered by the statutory undertaker.

41.3. To allow for the construction of the proposed development, a number of existing utility services would need to be diverted. The Statement does not identify any obstacles that would prevent this from being achieved. No objections have been received from statutory undertakers in relation to this. An informative has been requested by Cadent Gas owing to the proximity of the proposed development to medium and low pressure assets.

41.4. The most significant proposed diversion relates to the existing 132kV overhead lines and associated pylons which span across the site. The applicant has approached National Grid in regard to this. It is proposed that the diversion would take place within the site boundaries. It would require the provision of new grounding pylons to the perimeter of the site with the cables then being run underground across the site. A condition is proposed to secure this.

41.5. In summary, there is sufficient capacity within the electricity network to meet the energy needs of the proposed development. Existing utility services can also be diverted to accommodate the proposed development.

42. Other matters

42.1. Coventry City Council have requested a formal agreement between the City and Borough Councils that any resultant employment land supply from this application will meet the strategic needs of the City for the purposes of Local Plan preparation. This planning application cannot consider the making of new local plans and the distribution of employment needs in the context requested therefore this request is considered ultra vires.

42.2. Objections covered within the ‘other comments’ topic within section 7 of this report are not considered to be material planning considerations.

42.3. Objections have been received in relation to the development not according with elements of the Brinklow Neighbourhood Plan. The application site is not within the designated area for this neighbourhood plan.

42.4. The effect interactions as set out in Chapter 19 of the Environmental statement are accepted.

43. Community Infrastructure Levy

43.1. Rugby Borough Council is a CIL Charging Authority. This application is liable for CIL. The floorspace CIL can be applied to is 274,757m2 therefore the chargeable amount is £1,408,840 based on 2024 values. CIL is payable on commencement of development and index linked therefore value will increase annually until commencement.

43.2. Ansty Parish, where the development is located, has no neighbourhood plan therefore the 15% threshold would apply. This percentage is however capped at £170.09 per dwelling

(2024 amount which is also index linked therefore value will increase) within the parish. Ansty Parish currently has 143 dwellings therefore this would equate to £24,322.87 of the CIL receipt being paid to the Parish Council (based on 2024 rates).

43.3. Although this report provides information on future CIL receipts, the Planning Practice Guidance advises that such receipts will only be a material consideration if they help make the development acceptable in planning terms. Moreover, the PPG states "it would not be appropriate to make a decision based on the potential for the development to raise money for a local authority or other government body". The current application does not propose the use of future CIL receipts to mitigate its impacts or otherwise make the development acceptable in planning terms. Therefore, those future receipts are not a material consideration to which weight should be given.

44. Planning Obligations

44.1. Paragraphs 55, 57 and 58 of the Framework, policies D3 and D4 of the Local Plan and the Planning Obligations SPD set out the need to consider whether financial contributions and planning obligations could be sought to mitigate against the impacts of a development and make otherwise unacceptable development acceptable.

44.2. Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) makes it clear that these obligations should only be sought where they are:
(a) necessary to make the development acceptable in planning terms;
(b) directly related to the development; and
(c) fairly and reasonably related in scale and kind to the development.

44.3. If a requested planning obligation does not comply with all of these tests, then it is not possible for the Council to take this into account when determining the application. It is within this context that the Council has made and received a number of requests for planning obligations as detailed below. It is considered that all of these requests meet the necessary tests and are therefore CIL compliant.

Detailed s106 Requirements

Retail

44.4. Due to the assessment undertaken in relation to retail (section 14 of this report) it is considered that the existing floorspace within Nuneaton Town Centre and Coventry City Centre is required to be retained within these centres for 5 years following the opening of the R&D retail. This obligation is therefore considered to be CIL compliant in accordance with the tests test out in paragraph 44.2 of this report.

Highways and Sustainable Transport

44.5. Warwickshire County Council, National Highways and Coventry City Council have made obligation requests in relation to the development.

44.6. **Warwickshire County Council** have requested the following obligations:

- Monetary mitigation towards M6 Junction 3. This sum is to be agreed. The contribution will be based on a standard formula used across Coventry and Warwickshire for development schemes.
- An agreement to submit Travel Plan monitoring data and implement measures considered necessary to mitigate accordingly.

- £10,000 per annum, index linked, for a period of 10 years from the date of first occupation towards Travel Plan Monitoring.
- Bus stop infrastructure – Real Time Information (RTI) provision (£40,000), cleaning an maintenance of bus shelter (£5,000 for a 5 year period), maintenance of RTI display over a 5 year period (£4,000).
- Extension of bus routes 78/78A with an hourly service and diversion of route X6 into the campus on at an hourly frequency. New route 72 will be provided linking Rugby and Nuneaton via Bulkington and the campus on an hourly frequency. This provision equates to a contribution of £4,779,297 for bus services over a period of 5 years.

44.7. In addition to the above it is considered that a monetary obligation related to a potential need for a traffic relation order in Ansty if the car parking surveying condition shows there to be an issue with car parking in Ansty due to this development.

44.8. Due to the assessments undertaken within section 25 and 26 of this report the obligations above are considered to be CIL compliant in accordance with the tests test out in paragraph 44.2 of this report.

44.9. **National Highways** have requested the following obligations:
- Monetary mitigation towards M6 Junction 3 in accordance with WCC response.

44.10. Due to the assessments undertaken within section 25 and 26 of this report the obligations above are considered to be CIL compliant in accordance with the tests test out in paragraph 44.2 of this report.

44.11. **Coventry City Council** have requested the following obligations:
- Cycleway, designed to LTN 1/20 standards, linking the site to connect with the Binley Cycleway at the A4600/B4082 junction.
- A traffic management contribution towards the mitigation measures necessary on the local road network within Noth-West Coventry, and specifically the area bounded by and including the A4600 and B4082 routes (with the eastern boundary being the A46).
- Transport for West Midlands - Bus routes 9, X30 and 60 to be extended into the campus from Coventry. This provision equates to a contribution of £4,250,000 for bus services over a period of 5 years.

44.12. £9million has been requested in relation to the first CCC bullet point. This figure is arbitrary and the information surrounding this is not considered to justify the figure. To obligate this would therefore not be justified. This will therefore be secured via condition and delivered by the developer due to the details surrounding the scheme.

44.13. In relation to the second bullet point it is considered that the request is not specific enough and therefore it is not CIL compliant.

44.14. Due to the assessments undertaken within section 25 and 26 of this report the obligation in the third bullet point is considered to be CIL compliant in accordance with the tests test out in paragraph 44.2 of this report.

44.15. CCC also consider the following obligations are required on WCC and NH networks to make the development acceptable:

- Public Transport Strategy to be agreed with Transport for West Midlands and Warwickshire County Council, including enhancements to existing bus services and provision of new services as appropriate, and providing direct and frequent services linking the site to the centre of Coventry.
- Public Transport Strategy to be supplemented by the provision of a Demand Responsive service, or a contribution towards the extension of the existing WM On Demand service that would link the site to the full extent of the Coventry City Council area through flexible shared transport services, to be agreed with TfWM.
- A full travel plan will be required including a range of travel incentives for staff such as Mobility Credits, to promote sustainable and active travel, in accordance with Warwickshire's guidance on Travel Plans as WCC will be the lead authority for this aspect of the transport package. The travel plan will also need to provide targets, a method for review and a mechanism of what will happen should the targets not be met, i.e. further active travel and sustainable transport support Other methods worthy of discussion would be assessing the possibility of extending the West Midlands Cycle Hire scheme to the site.
- A contribution towards proposed improvements to M6 Junction 3, in scale and size with the impact development traffic will have on the junction's future performance, as agreed with Warwickshire County Council and National Highways as the highway authorities with joint responsibility for the operation of the junction. Whilst not within Coventry, this junction is a key gateway to the city, and the Council believes that the evidence presented by the applicant illustrates that the development will have a significant impact upon the operation of the junction, thereby justifying a contribution towards the improvement of the junction.

44.16. This four bullet points have been assessed under WCC and NH requests.

Canal and River Trust

44.17. The C&RT have requested a monetary obligation of £222,000 in order to upgrade the towpath between the application site and Grove Road, Ansty (approx. 370 metres). An assessment on the necessity of this link in the overall active travel strategy of the site has been made within section 26 o this report. This obligation is considered to be CIL compliant in accordance with the tests test out in paragraph 44.2 of this report.

Employment and skills

44.18. The scale of this development will provide a significant amount of construction and operational jobs as set out within this report. The skills training therefore associated with this development is substantial. It is therefore considered that Employment and Skills plans are required for both the construction phase (6 years) and for the first 10 years of the operational phase. These plans will need to adhere to the Employment and Skills Framework appended to the section 106.

44.19. The Framework to be appended also sets out the provision of an Employment, skills and training hub to be provided in the Rugby urban area. This site will be provided to promote training and innovation in Rugby and ensure that the local population is work ready. This is in addition to the training programmes that Frasers Group will provide on site for their employees. The key objectives of the hub are:

- To deliver work-readiness training for those furthest from the labour market (in a sustainable location that is accessible from where they live within the Borough).

- initiatives to support and assist local small businesses access construction and ongoing supply chain activities.
- ongoing funding for outreach work to target those hard-to-reach groups and or locations in the Borough.
- creation of new or improvement of existing physical space to deliver training and innovation activities, with the potential for use for wider community activities.

44.20. All of the initiatives secured through the Employment and Skills Framework will be delivered for a period of 10 years from occupation of the development. It is considered that these obligations are required in order to realise the economic benefits of the scheme as there will be a considerable number of the workforce for this development drawn from a local pool.

44.21. The obligations above are considered to be CIL compliant in accordance with the tests test out in paragraph 44.2 of this report.

Open Space

44.22. There is a significant amount of open space provided through this development. In order for the proposed benefit to be realised the section 106 will need to obligate that this open space remains open for public use in perpetuity. This obligation is considered to be CIL compliant in accordance with the tests test out in paragraph 44.2 of this report.

Community Use

44.23. The leisure facilities provided through this proposal will serve an element of public need and has been claimed by the applicant as a benefit. Due to the nature of the development and the private ownership of the site, in order to realise this benefit a community use agreement is required in order to set the minimum number of hours in which the facilities will be used by community groups. This obligation is considered to be CIL compliant in accordance with the tests test out in paragraph 44.2 of this report.

Heads of Terms

44.24. In summary the contributions required for this proposal have been highlighted as per the table below:

Obligations	**Requirement**	**Trigger**
Retail floorspace retention	Retention of 3,809sqm retail floorspace in Coventry and 743sqm floorspace in Nuneaton for a minimum period of 5 years from first occupation of the development.	To be confirmed
Canal and River Trust	£222,000 – Improvement of towpath for 370 metres between site and Grove Road.	To be confirmed
Sustainable Transport	WCC - £4,779,297 for bus services over a period of 5 years.	To be confirmed

	TfWM - £4,250,000 for bus services over a period of 5 years. Bus stop infrastructure – Real Time Information (RTI) provision (£40,000), cleaning an maintenance of bus shelter (£5,000 for a 5 year period), maintenance of RTI display over a 5 year period (£4,000). Provision of Shuttle buses and Demand Responsive Transport (DRT) by the developer.	
Employment and Skills Plans	Plans to be submitted for both construction and operational phases to adhere with the Framework. Plans per phase of development for construction and annually for the operational development for 10 years. Rugby Employment, Skills & Training Hub to be provided in Rugby's urban area (10 years upon occupation).	To be confirmed
Open Space Provision	Retention of identified public space for public use in perpetuity. (a) Natural and Semi-Natural Green Space – Local Wildlife Site – 11.76ha (b) Natural and Semi-Natural Green Space – 19.43ha (c) Amenity Green Space – 24.46ha (d) Campus Heart Formal Open Space – 2.62ha (e) Formal External Sports Provision – 0.32ha Management scheme for open space.	To be confirmed

	Provision for land to remain publicly accessible in perpetuity.	
Highways	<u>Travel Plan</u> Submission of Travel Plan prior to occupation. Travel Plan to consider provision of DRT. Monitor the travel plan every 3 months for 2 years and then every 6 months up to 10 years from occupation. £5,000 (Index Linked) per additional vehicle movement in the AM and PM peaks. <u>Obligations</u> Monetary obligation towards M6 Junction 3 peak period trip impact cap - £5,000 per day penalty if exceeded.	To be confirmed
Community Use Agreement	Provide document to ensure community access to auditorium and classrooms and all leisure facilities on site (gym, swimming pool, 3G sports pitches)	To be confirmed
Rugby Borough Council – Monitoring contribution	To contribute towards the cost to the Council of monitoring the implementation and compliance with the legal agreement	Upon first occupation of the development (except for Travel Plan and Community Use Agreement)
WCC Monitoring contribution	To contribute towards the cost to the Council of monitoring the implementation and compliance with the legal agreement	Upon first occupation of the development (except for Travel Plan)

44.25. Local planning authorities should ensure that the combined total impact of planning conditions, highway agreements and obligations does not threaten the viability of the sites and scale of development identified in the development plan. A viability assessment has not been submitted as part of this application.

44.26. If the Committee resolves to approve the proposal, this will be subject to the completion of an agreement by way of a section 106 covering the aforementioned heads of terms.

44.27. In relation to any financial contributions or commuted sums sought through a s.106 agreement, the financial contributions or commuted sums set out in this report will be adjusted for inflation for the period from resolution to grant to completion of the s.106 agreement. In addition, any financial contributions or commuted sums sought through a s.106 agreement will be subject to indexation from the completion of the s.106 agreement until the date that financial contribution or commuted sum falls due. Interest will be payable on all overdue financial contributions and commuted sums.

44.28. Subject to the completion of a section 106 agreement the development would be in accordance with Policy D3 of the Local Plan.

45. Equality implications

45.1. Section 149 of the Equality Act 2010 created the public sector equality duty. Section 149 states:-

(1) A public authority must, in the exercise of its functions, have due regard to the need to:

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

45.2. Officers have taken this into account and given due regard to this statutory duty, and the matters specified in Section 149 of the Equality Act 2010 in the determination of this application.

45.3. Given that the flood risk sequential test has not been passed the development is not being located within the most sequentially preferable site for flood risk. The assessment has shown that there would be no adverse impact elsewhere in relation to flood risk therefore it is not considered that there would be any adverse impacts on those protected by the Equality Act.

45.4. The decision has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including General Data Protection Regulations (2018) and The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

46. Planning Balance and Conclusion

46.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and S70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

46.2. The proposal is considered to be in conflict with the development plan read as a whole, for the reasons detailed above and summarised below. In accordance with Section 38 (6) of the Planning and Compulsory Planning Act however the Council also needs to considered whether there are material considerations that indicate in favour of approval.

46.3. The NPPF is an important consideration. Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development.

46.4. Paragraph 11(c) of the NPPF seeks to approve development proposals that accord with an up-to-date development plan without delay. The proposal does not accord with the development plan.

46.5. Paragraph 11(d) of the NPPF (2023) states that where there are no relevant development plan policies or the policies most important for determining the planning permission are out of date planning permission should be granted unless the requirements of para 11(d)(i) or (ii) are met. If either is met, the presumption in favour of sustainable development ceases to apply if it is triggered by para 11(d). Based on the content of this report there are relevant development plan policies and the policies most important for determining the application are not considered to be out of date therefore paragraph 11(d) is not engaged.

46.6. Nonetheless, it is important to consider the proposals against other policies of the NPPF. Paragraph 152 of the Framework sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 144 goes on to state that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

46.7. This test of very special circumstances requires all harms and benefits to be weighed in the balance. However, it is not an ordinary balance, the benefits of the proposal must amount to very special circumstances and must clearly outweigh harms including harm to the Green Belt.

46.8. Objections have been received relating to Very Special Circumstances not being demonstrated sufficiently to outweigh the harm to the Green Belt. Objections have also been received relating to the applicant not sufficiently considering and mitigating other harm resulting from the proposals (summarised in paragraph 6.5 and section 7). The following paragraphs summarise the harms and benefits of the proposal to be considered within the very special circumstances test. For clarity, the harms and benefits below are given weights of substantial (highest), significant, moderate or limited (lowest).

Harms/Conflicts

46.9. The government attaches great importance to the Green Belt as set out in the Framework. It has been established that the proposal would give rise to harm to the Green Belt by reason of inappropriateness, impact on openness, impact on permanence, and impact on four purposes of including land in the Green Belt (with the principal harm being to purposes A and C). This harm is given substantial weight in accordance with the NPPF.

46.10. The application is considered to be within a sustainable location (para 9.8 of this report) in relation to sustainable transport links and proximity to Coventry. The site is not an allocated site and the employment need identified within Policy DS1 of the Local Plan is

on track to be met (Section 13). The HEDNA and the WMSESS are evidence bases which set out the significant need for employment development in Rugby however it is considered that this need is to be addressed through local plan-making. There is conflict identified with Local Plan Policy ED3. There is also some conflict with Policy GP2 which identifies Rugby as the main focus for all development in the Borough. However, policy GP2 allows development where in accordance with national Green Belt policy, which includes where very special circumstances are demonstrated.

46.11. Paragraph 95 of the NPPF relates to main town centre uses and states that where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 94, it should be refused. "Should be refused" does not mean "must be refused" and this could be overcome by considerations favouring the proposal. Nonetheless, significant adverse impact in relation to retail has been identified to Coventry City Centre despite the mitigation proposed (Section 14). This therefore holds significant weight in the planning balance.

46.12. A loss of 90.7ha of average quality (3b) agricultural land and farm buildings has been identified. Moderate weight is attached to this harm. There would also be a loss of 13.6ha of grade 3a land (BMV)(section 19). Moderate weight is also attached to this loss.

46.13. There will be significant residual adverse impacts on both the landscape and visual effects of the proposed development (section 22). This harm is attributed substantial weight.

46.14. Due to the loss of 9 category A and 18 category B trees it is considered there is conflict with Policy SDC2 of the Local Plan (section 23). Due to the significant level of Extra heavy standard trees to be planted across the site (75 of these being Oak trees) it is considered that the level of mitigation is acceptable. This harm is therefore attributed moderate weight.

46.15. It is recognised that there is a loss of existing green infrastructure therefore there is conflict with Policy NE2 of the Local Plan (section 23). However, given the significant level of planting proposed across the site it is deemed acceptable in this instance. This harm is attributed limited weight.

46.16. The development would also cause less than substantial harm to four heritage assets (section 30). Paragraph 208 of the NPPF states that this harm should be weighed against the public benefits of the proposal. The benefits identified from paragraph 46.17 of this report onwards identify the benefits of the scheme. It is concluded that in particular, the overarching economic benefits, community use of the site, significant accessible public open space and improvements to public transport as public benefits of the scheme would outweigh the less than substantial harm to heritage assets. Nevertheless, this harm is attributed significant weight.

46.17. The Flood Risk Sequential Test concluded that there were alternative sites which were found to be comparably sequentially preferable in terms of flood risk compared to the planning application site. This means that there are sequentially preferable sites available to accommodate the proposed development with less risk from flooding. The sequential test for flood risk has therefore not been passed. Paragraph 168 of the NPPF sets out that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. This harm is therefore attributed significant weight.

46.18. At this time, it has not adequately been demonstrated that any impacts upon Coventry's network or M69 Junction 1 have been adequately mitigated. In turn, it has not adequately been demonstrated that the proposals would not cause a safety impact or a severe impact upon the highway network. Therefore, the proposal does not comply with policies D1 and D2 of the Local Plan or the wider policies of the NPPF. This harm carries substantial weight in the planning balance.

Benefits

46.19. The specific need for the development in broad terms has been assessed within section 18 of this report and the proposal has been accepted as an integrated campus (section 11). Overall, when considering the range of locational requirements, it is not considered that there is any other alternative site for the proposal which has an overall higher performance for the specific form of development proposed (section 12).

46.20. Paragraph 85 states that 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.

46.21. There are various capacity and productivity gains through the proposed headquarters as Shirebrook was not designed for the growth and capacity now required. The Group estimates that the new facility will increase processing capacity by up to 50% compared to the current estate. Overall, this would increase units per worker productivity by up to 90%. The value of this to the UK economy could equate to around £50m of additional contribution to Gross Domestic Product (GDP) each year. This would therefore enable the new campus to boost the UK economy by approx. £69 million per year and could potential support up to 750 additional shops with 11,000 new jobs in towns and cities across the country. This aligns with the Group's priority of being a bricks and mortar retail company. These national economic benefits hold substantial weight in the balance.

46.22. At a local level it is estimated that the campus will deliver approximately 480 FTE construction jobs over the course of the construction period. In relation to the operational development there would be approximately 5,800 FTE jobs. The scale of job creation represents a significant uplift in employment for Rugby Borough and therefore holds significant weight.

46.23. The new employees at the development site are expected to generate economic benefits for the local economy through spending. An estimate of £24.4 million per year has been put forward by the applicant. Due to the draw of workforce across geographical areas the magnitude of impact is considered to be low as the spending would also be spread across the wider geographical area. This would therefore have a minor beneficial effect at Borough level however the effect would still be felt in a wider geographical area. This benefit therefore holds moderate weight in the balance.

46.24. It is estimated that the employment supported by the proposed development would contribute approximately £235-339 million in Gross Value Added (GVA) per year. This is equivalent to growing the Rugby economy by 10%. This holds substantial weight in the planning balance.

46.25. In relation to procurement and skills training, local people will be prioritised through the provision of an employment and skills framework which will be secured through the section

106 agreement. The delivery of this framework, and the on-site training and development provision within the development, will help to support access to opportunities created for local and borough residents. In addition, the provision of the Employment, Skills and Training Hub in Rugby urban area will upskill local residents who are not yet employed by Frasers in order to support residents in the most sustainable location. This benefit holds significant weight in the planning balance.

46.26. A community use agreement will be an obligation of the section 106 agreement. This will secure community and local use of the auditorium, training rooms and leisure facilities (gym, swimming pool, sports hall and ancillary uses). This benefit holds moderate weight in the planning balance.

46.27. Three five aside 3G sports pitches are proposed and community use would be provided through the community use agreement. Due to the pitches not being full sized and therefore majorly only meeting the applicants need rather than the identified need within the Playing Pitch Strategy this benefit is given limited weight (section 15).

46.28. 48 hectares of new accessible public open space is proposed through the development. The 12ha Local Wildlife site is also proposed to be enhanced. This would therefore increase the amenity greenspace in the parish by 24.46ha (Ansty Parish currently has 0.94ha) and natural and semi-natural greenspace in the parish by 19.43ha (Ansty Parish currently has 0ha of accessible natural and semi-natural provision). This greenspace will be accessible for all and provide a social benefit for the community. The proposals deliver significant enhancements in relation to green space accessibility in the surrounding area. The north of the site comprises enhanced green infrastructure, woodland planting, improvements to biodiversity and extensive new walking and cycling routes across the site. This benefit therefore carries significant weight in the balance.

46.29. At the time of the applications submission in October 2023 the requirement to provide a 10% net gain for biodiversity was not enshrined in law and therefore this application is not required to provide a 10% gain just a net gain. The proposal provides an on-site gain of 16.63% habitat gain, 12.00% hedgerow gain and 16.55% watercourse net gain (section 24). In addition, a common lizard (protected species) will be introduced onto the site within the local wildlife site. Significant weight is attributed to this benefit.

46.30. Public Transport will be increased in the local area. Extension of bus routes 78/78A with an hourly service and diversion of route X6 into the campus on at an hourly frequency. New route 72 will be provided linking Rugby and Nuneaton via Bulkington and the campus on an hourly frequency. Bus routes 9, X30 and 60 to also be extended into the campus (section 20). This is a benefit for the local community which holds moderate weight.

46.31. The applicant is committed to achieving net zero carbon for both embodied carbon and operational carbon for buildings. A number of strategies have been utilised to achieve this (section 36). Overall, in relation to climate change, carbon emissions, energy, sustainable design and construction, there would be a significant betterment over and above building regulations and planning requirements. Due to the conditions imposed in relation to the developments net zero status this benefit carries significant weight.

46.32. It is acknowledged there is some historic significance to the current alignment of the PRoWs (section 26), however given poor quality and low usage, the impacts are

outweighed by the considerable benefits arising from the routes being significantly upgraded in terms of surfacing, lighting, accessibility and wayfinding. This benefit for the local community is given moderate weight.

Conclusion

46.33. The determination of whether very special circumstances exist is a matter of planning judgement based on a consideration of all relevant matters. However, very special circumstances cannot exist unless the harm to the Green Belt, and any other harm, is clearly outweighed by other considerations. Therefore, in this case, it is whether the identified benefits above taken together would decisively outweigh the harm identified above.

46.34. Overall, the totality of the economic, environmental and social benefits have been considered and the totality of the benefits clearly outweigh the combined weight of the harm to the Green Belt and any other harm, including the retail and landscape harm, heritage harm and harm in respect to the failure to satisfy the sequential test. Consequently, the very special circumstances necessary to justify the development do exist and the application should be approved.

47. <u>Recommendation:</u>

1. Planning application R23/1027 be approved subject to:

   a. Referral to the Planning Casework Unit;

   b. the conditions and informatives set out in the draft decision notice appended to this report; and

   c. the completion of a legal agreement to secure the necessary financial contributions and/or planning obligations.

2. The Chief Officer for Growth and Investment be given delegated authority to make minor amendments to the conditions and informatives outlined in the draft decision notice.

3. The Chief Officer for Growth and Investment (in consultation with the Planning Committee Chair) be given delegated authority to add, vary or remove any of the financial contributions and/or planning obligations outlined in the heads of terms within this report.

4. In the event that the National Planning Policy Framework (NPPF) (2023) is updated between the resolution to grant and the issuing of the decision notice, the Chief Officer for Growth and Investment be given delegated authority to:
   a) consider whether those changes to the NPPF are sufficiently significant that it would change the recommendation within the report; and/or
   b) make any minor amendment to the conditions, informatives and/or planning obligations (including financial contributions) that they deem are necessary to reflect the updated NPPF or whether the application requires reporting back to Planning Committee.

DRAFT DECISION

REFERENCE NO:
R23/1027

DATE APPLICATION VALID:
10-Nov-2023

APPLICANT:
SDI Propco (100) Ltd SDI Propco (100) Ltd, C/O Agent

AGENT:
Mr Philip Murphy, Quod, 21 Soho Square, London, W1F 3QP

ADDRESS OF DEVELOPMENT:
Crowner Fields Farm and Home Farm, Hinckley Road (B4065), Ansty, Warwickshire, CV7 9JA

APPLICATION DESCRIPTION:
Creation of an employment-led headquarters campus development, composed of head office and distribution/warehouse facilities, concept research and development retail and leisure (including gym, swimming pool, fitness studio/sports hall, sport pitches and associated facilities), ancillary food and beverage and convenience retail, onsite accommodation including a hotel and group accommodation, learning and development academy (including auditorium and training rooms), supplier offices, nursery, helipad, landscaping and ecological enhancements, site contouring, earth bunds, drainage, surface and multi-storey car parking, cycle parking, access roads, cycleways and footways, permanent ingress/egress points, utility diversions, ancillary buildings and structures, temporary construction ingress/egress, associated infrastructure and works, and demolition of existing buildings/structures.

CONDITIONS, REASONS AND INFORMATIVES:

CONDITON 1:
The development hereby permitted shall be begun before the expiration of 12 months from the date of this permission.

REASON: To comply with the requirements of Section 51 of the Planning and Compulsory Purchase Act 2004.

CONDITION 2:
Development hereby permitted shall be carried out in complete accordance with the details shown on the following submitted plans and documents received by the local planning authority:
To follow within late items.

REASON: To ensure that the details of the development are acceptable to the Local Planning Authority in accordance with policies GP1 and SDC1 of the Local Plan (2019).

CONDITION 3:
Prior to the commencement of development, a plan identifying the structures to be demolished as part of Phase 0 (in accordance with the approved demolition plans) shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved plan.

REASON: To ensure that the details of the development are acceptable to the Local Planning Authority in accordance with policies GP1 and SDC1 of the Local Plan (2019).

CONDITION 4:
Prior to the commencement of development, a Phase 0 Demolition Environmental Plan shall by submitted to and approved in writing by the Local Planning Authority. It shall include:

a) the control of noise and vibration emissions from demolition activities;
b) Ecology mitigation and management works;
c) Any grading and re-profiling of site;
d) the control of dust including arrangements to monitor dust emissions from the development site during the demolition;
e) Hours of operation;
f) Any temporary site compound, including buildings/structures, lighting, fencing/hoarding and storage provision;
g) The parking of vehicles of site operatives and visitors during the demolition;
h) Management of materials, soil resource and waste
i) Measures to prevent deleterious material being carried onto the highway network;
j) Manner in which materials are to be recycled on site if suitable;
k) Routing of related vehicles consistent with the Framework Construction Logistics Plan at Appendix H; and
l) Strategy, sequence and timing for demolition and all other works specified within the plan

The development shall not be carried out other than in accordance with the approved plan.

REASON: In the interests of residential amenity and protected species, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policies SDC1 and NE1 of the Local Plan (2019).

CONDITION 5:
The development hereby permitted shall not commence in that phase until a detailed schedule of bat mitigation measures (to include timing of works, ecologist supervision of destructive works, toolbox talk, procedure if bats are found, including provision of a bat box during works, replacement roost details, including feature/box type, location and timetable for installation, monitoring and further survey if necessary) has been submitted to and approved by the Local Planning Authority for that phase. Such approved mitigation measures shall thereafter be implemented in full and maintained in perpetuity.

REASON: To ensure protected, important and priority species and their habitats are not harmed by the development.

CONDITION 6:
Prior to commencement of development in any phase (excluding in Phase 0), a Development Implementation and Phasing Plan (DIPP) shall be submitted to and approved in writing by the Local Planning Authority. The DIPP shall provide details of the strategy, sequence and timing of development across the entire site (as defined by phases and plots with Phase 0 compromising the demolition works as identified in the documents approved under condition 3) and broad locations of key infrastructure and land uses in the remaining phases, including:
a. Earthworks, grading, re-profiling of site and enabling works;
b. Infrastructure including new accesses, roads, footways and cycleways;
c. Balancing ponds and surface water drainage systems;

d. Woodland and structural planting;
e. On Plot and site wide landscaping;
f. Ecology mitigation and management works; and
g. Development of buildings within plots.
The development shall not be carried out other than in accordance with the approved DIPP.

REASON: To ensure that the details of the development are acceptable to the Local Planning Authority in accordance with policies GP1 and SDC1 of the Local Plan (2019).

Design

CONDITION 7:
No development above foundation level in each phase (excluding Phase 0) shall commence on any building until representative samples and full details of the types, finish, texture and colours of materials to be used on all external surfaces of buildings within that phase shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved materials.

REASON: To ensure that the development has a satisfactory external appearance and in the interests of visual amenity to accord with Policy SDC1 of the Local Plan (2019).

CONDITION 8:
No development above foundation level in each phase (excluding Phase 0) shall commence unless and until full details of finished floor levels of all buildings in that phase [and ground levels of all access roads, parking areas and footways] have been submitted to and approved in writing by the Local Planning Authority. Development shall not be carried out other than in accordance with the approved details.

REASON: To ensure that the development has a satisfactory appearance and in the interests of visual amenity in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 9:
Prior to the commencement of any above ground works in any phase (excluding Phase 0), notwithstanding any indication given on the approved drawings, full details of the design, materials and finishes of all windows, including the reveal depths, as well as the type and size of the proposed rooflights, and external doors in that phase shall be submitted to and approved in writing by the Local Planning Authority. Development shall not be carried out other than in accordance with the approved details and the approved design, materials and finishes shall thereafter be maintained or replaced with identical materials and finishes.

REASON: To ensure that the development has a satisfactory appearance and in the interests of visual amenity in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 10:
Prior to installation in a phase (excluding Phase 0), full details of the siting, design, colour and materials of the proposed bin and cycle stores in that phase shall be submitted to and approved in writing by the Local Planning Authority. The bin and cycle stores shall be provided, in accordance with the approved details before the first occupation of the building hereby permitted to which they relate and thereafter shall be retained in perpetuity.

REASON: To ensure that the development has a satisfactory appearance and in the interests of visual amenity in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 11:
Prior to the commencement of any phase (excluding Phase 0) full details of earthworks (including cut and fill, and the removal and/or redistribution of existing stock piles of earth and rubble on the site), the grading and re-profiling of that phase, and the finished plateaux levels for the development plot in that phase shall have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall further include levels of adjoining buildings, land and roads and full details of any retaining walls. Measures for the reuse of existing topsoil and subsoil, to include details of the movement, storage and re-distribution of the topsoil and subsoil shall also be provided in line with the mitigation measures set out within the Environmental Statement. Development shall not be carried out other than in accordance with the approved details.

REASON: To ensure that the development has a satisfactory appearance and in the interests of visual amenity in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 12:
No part of the application site, other than within specified storage areas within approved buildings, shall be used for storage purposes.

REASON: To ensure that the development has a satisfactory appearance and in the interests of visual amenity in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 13:
No above ground development shall commence in a phase (excluding Phase 0) unless and until details, including elevations, of all proposed walls, fences, railings, gates or other boundary treatment in that phase, have been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved details and thereafter shall be maintained in perpetuity.

REASON: In the interest of visual amenity in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 14:
No above ground development shall commence until a Shop Front and Advertisement Design Code for the development hereby approved has been submitted to and approved in writing by the Local Planning Authority. The Code shall set out parameters for: an appropriate design approach including general principles; palette of appropriate materials and colours; signage type, lettering, form, style and location; lighting; blinds and canopies; and security measures. The Code shall be accompanied by illustrations of what is and isn't acceptable and shall set out how it will achieve a consistent, harmonious and high quality streetscene. No work or development on the shopfronts within the Concept Retail R&D floorspace shall commence until full details of the shopfront, setting out how they comply with the Shop Front and Advertisement Design Code, have been submitted to and approved in writing by the Local Planning Authority. No work or development on the shopfront within the Concept Retail R&D floorspace shall be carried out other than in accordance with the approved details.

REASON: In the interest of the visual amenities of the area in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 15:
No above ground development shall commence on the Concept Retail R&D buildings until full details, including illustrative visualisations, plans and cross-section plans at a close scale, showing: the reveal depths of all windows, shopfront glazing, doors, panels, cladding, brickwork panels, shopfront signage zones; the pattern, bond and projection depth of any brickwork patterns, recessed brickwork detailing, soldier courses, string courses; parapet cladding; any permanent or retractable canopies or awnings; and metal railings; have been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved details.

REASON: In the interest of the visual amenities of the area in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 16:
No above ground development shall commence on the South Concept Retail R&D building, Concept retail R&D MSCP and HQ MSCP (as shown on Proposed Site Plan drg no: 21227 – GRM – XX – RF – DR – A – 99 006 REV: P-03) until a Southern Elevation Enhancement Scheme has been submitted to and approved in writing by the Local Planning Authority. The South Concept Retail R&D building shall not be occupied until the Southern Elevation Enhancement Scheme has been provided in accordance with the approved details.

REASON: In the interest of the visual amenities of the area in accordance with Policy SDC1 of the Local Plan (2019).

Remediation

CONDITION 17:
No development (other than that in Phase 0) that is required to be carried out as part of an approved scheme of remediation shall commence until points (A) to (D) below have been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until condition (d) has been complied with in relation to that contamination.

(A) An investigation and risk assessment must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:

(i) a survey of the extent, scale and nature of contamination;

(ii) an assessment of the potential risks to: human health, property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes, adjoining land, groundwaters and surface waters, ecological systems, archaeological sites and ancient monuments;

(iii) an appraisal of remedial options, and proposal of the preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency's Model Procedures for the Management of Land Contamination, CLR 11.

(B) A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

(C) The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works. Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

(D) In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition (A), and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition (B), which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition (C).

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised.

Archaeology

CONDITION 18:
No development shall commence (excluding Phase 0) unless and until:
a) A Written Scheme of Investigation (WSI) for a programme of archaeological evaluative work has been submitted to and approved in writing by the Local Planning Authority.

b) The programme of archaeological evaluative work and associated post-excavation analysis, report production and archive deposition detailed within the approved WSI has been undertaken. A report detailing the results of this fieldwork shall be submitted to the Local Planning Authority.c) An Archaeological Mitigation Strategy document (including a Written Scheme of Investigation for any archaeological fieldwork proposed including trial trenching) shall be submitted to and approved in writing by the Local Planning Authority. This should detail a strategy to mitigate the archaeological impact of the proposed development and should be informed by the results of the archaeological evaluation.

The development, and any archaeological fieldwork post-excavation analysis, publication of results and archive deposition detailed in the Mitigation Strategy document, shall be undertaken in accordance with the approved Archaeological Mitigation Strategy document.

REASON: To ensure satisfactory archaeological investigation, recording, dissemination and archiving

Construction

CONDITION 19:
No development shall commence in any phase (excluding Phase 0) unless and until a Construction Environmental Management Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. It shall include details relating to:

a) The control of noise and vibration emissions from demolition and construction activities including groundwork's and the formation of infrastructure including arrangements to monitor noise emissions from the development site during the demolition and construction phase;
b) The control of dust including arrangements to monitor dust emissions from the development site during the demolition and construction phase;
c) The location, layout and design of temporary site compounds (including areas for loading/unloading and storing plant, materials and deliveries used in constructing the development), temporary lighting and signage;
d) Construction site access location, control and construction haul routes;
e) The parking of vehicles of site operatives and visitors;
f) Hours of work and deliveries;
g) Temporary perimeter screen and protective fencing;
h) Piling works;
i) Details concerning pre-commencement ecology checks (including badgers, bats, breeding birds, great crested newts, otter and water vole) and appropriate working practices and safeguards for wildlife and habitats that are to be employed whilst works are taking place on site;
j) A method statement and confirmed tree protection details during the construction phase;
k) Hours of construction (excluding highway works which will be subject to a separate agreement), demolition and deliveries;
l) Heavy goods vehicle and construction traffic routing plan (including details of any temporary signage);
m) Timing of heavy goods vehicle movements during the construction phase;
n) Any temporary site compound, including buildings/structures, lighting, fencing and storage provision;
o) The parking of vehicles of site operatives and visitors during the demolition/construction phase;
p) Measures to prevent deleterious material (including mud deposition, debris and obstacles) being carried onto the highway network from vehicles leaving the site during the construction phase;
q) A named point of contact for overseeing construction works and their contact details; and
r) Notification to Holiday Inn Coventry M6 Junction 2 of construction timelines for works taking place around M6 Junction 6.

Development shall be carried out in compliance with the approved Construction Environmental Management Plan.

REASON:
In the interests of residential amenity and protected species, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policies SDC1 and NE1 of the Local Plan (2019).

CONDITION 20:
No development shall take place (including demolition, ground works and vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity) for each phase has been submitted to and approved in writing by the Local Planning Authority. The CEMP (Biodiversity) shall include the following:
a) Risk assessment of potentially damaging construction activities.
b) Identification of “biodiversity protection zones”.
c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
d) The location and timing of sensitive works to avoid harm to biodiversity features.
e) The times during construction when specialist ecologists need to be on site to oversee works.
f) Responsible persons and lines of communication.
g) The role and responsibilities of an ecological clerk of works (ECoW)/similarly competent person.
h) Use of protective fences, exclusion barriers and warning signs.
The approved CEMP (Biodiversity) shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that protected, important and priority species and their habitats are not harmed by the development and to safeguard biodiversity in accordance with national and local policies.

CONDITION 21:
No development shall commence in any phase (excluding Phase 0) unless and until a Construction Logistics Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. Consistent with the Framework Construction Logistics Plan at Appendix H, the plan will be prepared with the following objectives:
• To ensure that construction traffic does not have a detrimental effect on the surrounding public highway and local community including protecting the safety for all road users (including vulnerable road users) during the construction period;
• To reduce the impact of construction traffic on the conventional network peak traffic hours and afternoon peak; and
• To identify measures to ensure safe and efficient movement of construction traffic.
Development shall not be carried out other than in accordance with the approved plan.

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 22:
No development shall commence in any phase (excluding Phase 0) unless and until a Materials Management Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. This plan will set out the approach and principles for minimising and managing excavated materials associated with the development hereby approved (save Phase 0) and is to reflect the principes in the Draft Materials Management Plan at Appendix 12.1 of the Environmental Statement. Development shall not be carried out other than in accordance with the approved plan.

REASON: To ensure materials waste management

CONDITION 23:
No development shall commence in any phase (excluding Phase 0) unless and until a Soil Resource Management Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. The plan will confirm the different soil types (based on the soil surveys already undertaken); the most appropriate re-use for the different types of soils; and the proposed methods for handling, storing and replacing soils on-site. Development shall not be carried out other than in accordance with the approved plan.

REASON: To ensure materials waste management.

CONDITION 24:
No development shall commence in any phase (excluding Phase 0) unless and until a Site Waste Management Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. The plan will set out the principles and procedures for managing materials and waste generated during the construction of the development hereby permitted and reflect the principles within the Outline Site Waste Management Plan at Appendix 12.2 of the Environmental Statement. Development shall not be carried out other than in accordance with the approved plan.

REASON: To ensure materials waste management.

CONDITION 25:
A minimum of 28% of the development aggregates throughout the construction period of the development shall be recycled and secondary aggregates. Prior to occupation evidence that the development has met this percentage shall be submitted and approved by the Local Planning Authority in writing.

REASON: To limit to depletion of aggregate reserves.

Trees and Landscape

CONDITION 26:
The landscaping scheme and planting details in any phase (excluding Phase 0), as detailed on the approved plans, shall be implemented no later than the first planting season following that phase being first brought into use. If within a period of 10 years from the date of planting, any tree/shrub/hedgerow is removed, uprooted, destroyed or dies, (or becomes in the opinion of the Local Planning Authority seriously damaged or defective), another tree/shrub/hedgerow of the same species and size originally planted shall be planted at the same place.

REASON: In the interests of biodiversity and visual amenity in accordance with paragraph 180 of the National Planning Policy Framework (2023) and Policy SDC1 of the Local Plan (2019).

CONDTION 27:
Notwithstanding the submitted landscaping plans, prior to commencement of development (excluding Phase 0) in the phase containing the Local Wildlife Site, plans and specification of the habitat to be introduced to the northern edge of the Local Wildlife Site in order to introduce the Common Lizard shall be submitted to and approved in writing by the Local Planning Authority. The approved plans shall then be implemented no later than the first planting season following that phase being first brought into use and the Common Lizard shall be introduced within 3 months of the end of the first planting season. If within a period of 10 years from the date of planting, any tree/shrub/hedgerow in this phase is removed, uprooted, destroyed or dies, (or becomes in the opinion of the Local Planning Authority seriously damaged or defective), another tree/shrub/hedgerow of the same species and size originally planted shall be planted at the same place.

REASON: In the interests of biodiversity and visual amenity in accordance with paragraph 180 of the National Planning Policy Framework (2023) and Policy SDC1 of the Local Plan (2019).

CONDITION 28:
Prior to the commencement of any phase (excluding Phase 0) a Tree Protection Plan/Method Statement for that phase shall be submitted to and approved in writing by the Local Planning Authority. Development shall not be carried out other than in accordance with the approved plan/statement. No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be pruned in any manner, be it branches, stems or roots, other than in accordance with the approved plans and particulars. All tree works relating to a phase shall be carried out in accordance with BS3998:2010 (Recommendations for Tree Work) and shall be carried out before the commencement of any development in that phase.

REASON: To ensure that the trees on site are to be retained and adequately protected during and after construction in the interests of the visual amenities of the area and biodiversity.

CONDITION 29:
Prior to the commencement of development of any phase (excluding Phase 0) a landscape and ecological management plan (LEMP) for that phase shall be submitted to, and be approved in writing by the Local Authority. The content of the LEMP shall have regard to the submitted details and include the following:

a) Description and evaluation of features to be managed.
b) Ecological trends and constraints on site that might influence management.
c) Aims and objectives of management.
d) Appropriate management options for achieving aims and objectives.
e) Prescriptions for management actions.
f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a ten-year period).
g) Details of the body or organisation responsible for implementation of the plan.
h) Ongoing monitoring and the process for implementing remedial measures should the LEMP objectives not be met.

i) Revised Biodiversity Impact Assessment calculation in accordance with the Warwickshire County Council metric version 19.1 metrics applied to the application site to demonstrate that 17% habitat gain, 12% hedgerows and 17% watercourses net gains will be achieved.
j) Details of the habitat to be created within the Local Wildlife Site for the common lizard protected species and how the common lizard is to be introduced to the site along with management options and actions.
k) Details of the legal and funding mechanism(s) by which long-term implementation of the plan (30 years) will be secured by the developer with the management body(ies) responsible for its delivery.

No phase of the development (excluding Phase 0) hereby permitted shall be occupied, until the works required by the approved LEMP for that phase have been carried out in accordance with the approved details. The site shall be managed and maintained in accordance with the approved LEMP for no less than 30 years after implementation of the development hereby approved.

REASON: To ensure a net biodiversity gain in accordance with the National Planning Policy Framework (2023).

Helicopter

CONDITION 30:
The Helipad hereby permitted shall only be used by a helicopter which does not produce more noise than the Agusta A109 (the noise levels for which are stated in table 1 of Appendix 15.6 of the Environmental Statement). If alternative helicopters to the Agusta A109 are used the noise data for the helicopter (to accord with the assessment undertaken within the Environmental Statement) shall be submitted to the Local Planning Authority within 10 working days of the request being made in writing.

REASON: to limit the incidence of noise produced from the aircraft movements in the interests of preserving residential amenity.

CONDITION 31:
No more than 8 helicopter movements (one movement being either an arrival or a departure) shall be made in any one calendar day. A flight log shall be kept (including date, flight times for each individual movement and helicopter model and helicopter type) and shall be made available for inspection within 5 working days of any request in writing from the Local Planning Authority.

REASON: to limit the incidence of noise produced from the aircraft movements in the interests of preserving residential amenity.

CONDITION 32:
Flights to or from the helipad shall only take place between 07:30 - 21:30 Monday – Saturday and 08:30 – 20:30 Sunday and Bank Holidays.

REASON: to limit the periods of exposure to noise produced in the interests of preserving residential amenity.

CONDITION 33:

The arrival and departure flight paths from or to the joining point (as defined on page 7 of appendix 15.6 of the Environmental Statement) shall generally accord with the route outlined within Figure 1 of appendix 15.6 of the Environmental Statement.

REASON: To limit the exposure produced in the interests of preserving residential amenity.

Amenity

CONDITION 34:
Prior to the first occupation of a phase (excluding Phase 0), a litter management scheme for that phase shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be complied with thereafter. Such details shall include the regularity of litter picking, existing and proposed bin provision, schedule of emptying of bin provision and associated signage.

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 35:
Prior to installation, full details of any refrigeration or airhandling plant, flues, air source heat pumps, air conditioning units or other equipment to be located externally to the buildings hereby approved, to include proposed measures for acoustically treating such equipment, shall be submitted to and approved in writing by the Local Planning Authority. Equipment shall then be installed in accordance with the approved details and retained in perpetuity.

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 36:
The required noise mitigation measures for the group accommodation (R17) and hotel (R16) shall be implemented to the buildings first being brought into use and maintained in perpetuity. The Noise levels relating to construction shall not exceed the predicted noise levels as set out in Table 15.34 of Chapter 15 of the Environmental Statement. The noise levels at R16 and R17 for the operational development shall not exceed 45dB.

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 37:
No above ground development on the group accommodation shall commence until a Noise Attenuation Scheme and Overheating Assessment has been submitted to and approved in writing by the Local Planning Authority. The scheme and assessment shall have regard to the Sustainability and Energy Statement (5594-P01, 03-10-23) and Operational Sound Assessment (13525A-20-R05-02, received 08/07/24). The Noise Attenuation Scheme shall include full details and specifications of the façade, windows, glazing, ventilation, internal floors and internal walls. The Overheating Assessment shall include full details and calculations demonstrating what measures will be incorporated into the design of the group accommodation buildings to ensure overheating caused by variations in the climate, particularly in the summer with allowances for

climate change, will not occur. Any proposed mitigation measures must ensure that the internal noise climate for each unit within the group accommodation achieves acceptable internal noise levels to be confirmed in the Noise Attenuation Scheme. The group accommodation shall not be occupied until the approved noise attenuation scheme, and mitigation measures for noise attenuation and overheating, have been implemented in full. The approved noise attenuation scheme, and mitigation measures for noise attenuation, ventilation and overheating, shall subsequently be maintained in perpetuity.

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 38:
No development shall commence, including any groundworks, site clearance and construction work until the earth bunds as shown within Figure 15.10 (landscaped Noise Bund Apex locations form Noise Model) within Chapter 15 (Noise and Vibration) of the Environmental Statement Addendum have been provided in accordance with the Proposed Bunds plan (ALPHA-PIN-XX-XX-DR-C-02110-P01, received 20-10-23) and the 2.4m site hoardings as shown on Figure 15.11 within Chapter 15 (Noise and Vibration) of the Environmental Statement Addendum are implemented in full.

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 39:
No sound from building services and building envelope breakout from structures erected on the site shall exceed the noise levels set out within table 3 of the Operational Sound Assessment (13525A-20-R05-02, received 08/07/24) at any noise sensitive residential receptor (or other proxy location, with associated calculations, as agreed in writing by the Local Planning Authority).

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 40:
No sound from building services and building envelope breakout from structures erected on the site shall exceed the Environmental Sound Criteria as calculated for the noise sensitive receptors (or other proxy location, with associated calculations, as agreed in writing by the Local Planning Authority) identified within table 5 of the Operational Sound Assessment (13525A-20-R05-02, received 08/07/24).

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 41:
No sound from on-site vehicle movements shall exceed the Environmental Soung Criteria as calculated for noise sensitive receptors (or other proxy location, with associated calculations, as agreed in writing by the Local Planning Authority) identified within table 12 of the Operational Sound Assessment (13525A-20-R05-02, received 08/07/24).

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 42:
No sound from on-site vehicle movements shall exceed the Significant Observed Adverse Effect Level (SOAEL) at any noise sensitive receptor (or other proxy location, with associated calculations, as agreed in writing by the Local Planning Authority) as identified within table 16 of the Operational Sound Assessment (13525A-20-R05-02, received 08/07/24).

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 43:
No amplified music and/or event noise shall exceed the noise levels set out within table 19 of the Operational Sound Assessment (13525A-20-R05-02, received 08/07/24) at any noise sensitive residential receptor (or other proxy location, with associated calculations, as agreed in writing by the Local Planning Authority).

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

Sports Pitches

CONDITION 44:
No development shall commence in the phase containing the 3G Sports Pitches, until details of the specification of the 3G Sports Pitches have been submitted to and agreed in writing by the Local Planning Authority. The development shall then be implemented in accordance with the approved details.

REASON: To ensure that the development has a satisfactory appearance and in the interests of visual amenity and to ensure a high specification is achieved for the Sports Pitch in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 45:
The 3G Sports Pitch shall only be used between 07:00 and 21:30 and the lighting for the 3G Sports Pitch shall be turned off 30 minutes afterwards.

REASON: To protect the amenity of nearby properties in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 46:
The 3G Sports Pitch shall be laid out and available for use before the occupation of the gym within the Concept Leisure R&D floorspace.

REASON: To ensure the sports facility is made available for use in the interests of the community in accordance with Policy HS3 of the Local Plan (2019).

CONDITON 47:
Prior to the first use of the 3G Sports Pitches, a detailed maintenance plan for that 3G pitches shall be submitted to and approved in writing by the Local Planning Authority. Such maintenance plan must:

a. Description and evaluation of features to be maintained.
b. Aims and objectives of management
c. Provide the name of the party responsible, including contact name, address, email address and phone number
d. Provide details on how the 3G pitches and any associated features shall be maintained and managed for the life time of the development – this must include an annual work plan capable of being rolled forward on an annual basis and a lifetime schedule to account for one off tasks e.g. recarpeting.
e. Details of the body or organisation responsible for implementation of the plan.
f. Ongoing monitoring and the process for implementing remedial measures should the 3G pitch maintenance plan objectives not be met.
g. Details of the funding mechanism(s) by which long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery.

The 3G pitches and any associated features shall be managed and maintained in accordance with the approved 3G Pitch maintenance plan from the first use of the 3G Sports Pitches and shall be maintained in perpetuity.

REASON: To ensure the 3G pitches are maintained in available for use in perpetuity.

Water and Drainage

CONDITION 48:
Prior to the commencement of development (excluding Phase 0) a detailed surface water drainage scheme for the site, based on sustainable drainage principles has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is occupied. The scheme to be submitted shall:

1. Limit the discharge rate generated by all rainfall events up to and including the 1 in 100 year (plus an allowance for climate change) critical rain storm to the QBar Greenfield runoff rate of 4.0l/s/ha for the site in line with the approved greenfield runoff rate calculations (ref: 200912-PIN-XX-XX-RP-C-0001 (Appendix G), revision P07, dated 25th June 2024).
2. Provide drawings / plans illustrating the proposed sustainable surface water drainage scheme.
3. Provide detail drawings including cross sections, of proposed features such as overflows (to pass forward the regular flows up to the 1 in 1yr event to above-ground SuDS), attenuation features, and outfall structures.
4. Provide detailed, network level calculations demonstrating the performance of the proposed system.
5. Provide plans such as external levels plans, supporting the exceedance and overland flow routeing provided to date.

REASON: To prevent the increased risk of flooding; to improve and protect water quality; and to improve habitat and amenity.

CONDITION 49:
Prior to occupation of a phase (excluding Phase 0), a Verification Report, for the installed flood risk mitigation measures (the bunds) and surface water drainage system, for that phase based on the approved Flood Risk Assessment (ref: 200912-PIN-XX-XX-RP-C-0001, revision P07, dated 25th June 2024) shall be provided by a suitably qualified independent drainage engineer and approved in writing by the Local Planning Authority. The details shall include:
1.Demonstration that any departure from the agreed design is in keeping with the approved principles;
2.As-Built Drawings and accompanying photos;
3.Results of any performance testing undertaken as a part of the application process (if required/necessary);
4.Copies of any Statutory Approvals, such as Land Drainage Consent for Discharges etc.; and
5.Confirmation that the system is free from defects, damage and foreign objects

REASON: To secure the satisfactory drainage of the site in accordance with the agreed strategy, the NPPF and Local Planning Policy.

CONDITION 50:
Prior to occupation of any phase (excluding Phase 0), a detailed, site specific maintenance plan for that phase shall be submitted to and approved in writing by the Local Planning Authority. Such maintenance plan must:
1.Provide the name of the party responsible, including contact name, address, email address and phone number;
2.Include plans showing the locations of features requiring maintenance and how these should be accessed;
3.Provide details on how surface water each relevant feature shall be maintained and managed for the life time of the development; and
4.Be of a nature to allow an operator, who has no prior knowledge of the scheme, to conduct the required routine maintenance.
The approved details shall be implemented in full and maintained in perpetuity.

REASON: To ensure the future maintenance of the sustainable drainage structures.

CONDITION 51:
Prior to the commencement of any phase (excluding Phase 0) drainage plans for the disposal foul sewage for that phase shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details before the development is first brought into use.

REASON: To ensure that the development is provided with a satisfactory means of drainage as well as reduce the risk of creating or exacerbating a flooding problem and to minimise the risk of pollution in accordance with Policy SDC5 of the Local Plan (2019).

CONDITION 52:
The development hereby permitted shall not be commenced in any phase (excluding Phase 0) until a scheme for the provision of adequate water supplies and fire hydrants for that phase, necessary for firefighting purposes at the site, has been submitted to and approved in writing by the Local Planning Authority. The development shall not then be occupied until the approved scheme has been implemented to the satisfaction of the Local Planning Authority.

REASON: In the interest of public safety from fire, to safeguard the living conditions of future occupiers and the protection of Emergency Fire Fighters in accordance with Policy SDC1 of the Local Plan (2019).

Warehouse

CONDITION 53:
The development hereby permitted shall be operated by the "**Campus Company**".

For the purposes of this condition and any other condition or informative within this decision notice the following terms shall be construed as:

"**Campus Company**" means a single Company, any other body corporate which is:

- its holding company;
- its subsidiary;
- any other body corporate which is a subsidiary of that holding company;
- its parent undertaking;
- its subsidiary undertaking; or
- any other body corporate which is a subsidiary undertaking of that parent undertaking,

with such terms having the same definition as in the Companies Act 2006 (as may be amended from time to time).

"**Brand Partners**" means a company or organisation which the Campus Company has a collaboration arrangement in place with to promote products from time to time.

"**Suppliers**" means a company that supplies goods, materials or services to the Campus Company from time to time.

REASON: For the avoidance of doubt and to ensure that the development remains an integrated campus.

CONDITION 54:
The warehouse units hereby approved shall not be occupied other than by a Campus Company, Brand Partners, Suppliers or a body corporate which the Campus Company or a Group Company has a shareholding in.

REASON: To ensure that the development remains an integrated campus.

CONDITION 55:
The warehouse units hereby approved shall not be occupied until the HQ Office has been occupied.

REASON: To ensure that the development remains an integrated campus.

CONDITION 56:

Prior to the installation of any fixed plant machinery and ventilation equipment in any phase (excluding Phase 0) details of fixed plant machinery and ventilation equipment for that phase (which shall include maintenance and management) shall be submitted to and agreed in writing

with the Local Planning Authority. The approved scheme shall be implemented in accordance with the agreed details before the premises within that phase are first brought into use and maintained in use thereafter.

REASON: To ensure the development does not have an adverse impact on the amenities of surrounding properties to accord with Policy SDC1 of the Local Plan (2019).

CONDITION 57:
Where audible reversing alarms are fitted to any vehicle operated on site, these shall only be of the broadband (white noise) alarm type. This shall include any delivery vehicles and warehouse vehicles operated on site

REASON: In the interests of residential amenity and to ensure the details are acceptable to the Local Planning Authority in accordance with Policy SDC1 of the Local Plan (2019).

Main Town Centre Uses

CONDITION 58:
The range of goods to be sold in the concept retail R&D floorspace (save for the food and beverage and / or convenience goods) shall be limited to products sold through the nationwide retail stores or online by the Campus Company.

REASON: To ensure that the campus remains integrated and that the main town centre use impact remains as assessed.

CONDITION 59:
The concept retail R&D retail floorspace (including the sale of food and beverage and / or convenience goods) hereby approved shall not be opened for trade until the Unit 1 warehouse and the HQ office floorspace is occupied and operational.

REASON: To ensure the development remains an integrated campus.

CONDITION 60:
No more than 988 square metres (gross external area) and 790 square metres (net internal area) shall be used for convenience goods purposes together with the sale of ancillary comparison goods sales linked to the convenience-led offer and /or food and beverage use.

REASON: To ensure no adverse impact to other centres in relation to convenience retail.

CONDITION 61:
The concept R&D retail floorspace hereby approved shall be controlled as follows:
No more than 18,094 square metres (net internal area) concept R&D retail floorspace shall be used for comparison goods retailing of which up to 10,856 square metres (net internal area) can be used for fashion-led retailing.

REASON: To ensure the impact to other centres is as assessed in relation to retail.

CONDITION 62:
Prior to first occupation of the HQ Office, a plan identifying the “Supplier Hub” within the HQ Office shall be submitted to and approved in writing by the Local Planning Authority. The HQ Office

(excluding the Supplier Hub) shall only be occupied by the Campus Company. The Supplier Hub shall only be occupied by the Campus Company, Brand Partners or Suppliers.

Details of the relationship between the Campus Company and Brand Partners or Suppliers (related to confirming their status) shall be made available for inspection within 5 working days of any request in writing from the Local Planning Authority.

REASON: To ensure that the development remains an integrated campus.

CONDITION 63:
The nursery, Food & Beverage floorspace and convenience retail shall be occupied and operational within three months of the occupation of the HQ Office.

REASON: In the interests of sustainability of the site.

CONDITION 64:
The group accommodation (Use Class sui generis) floorspace shall only be occupied by the Campus Company.

REASON: To ensure the campus remains integrated.

Auditorium

CONDITION 65:
The use of the auditorium hereby permitted within the Learning & Development Academy shall only be used by the Campus Company, Brand Partners, Suppliers or the local community (as per the terms of the Community Use Agreement which forms part of the s.106 agreement associated with this permission).

REASON: To ensure the campus remains integrated.

CONDITION 66:
The use of the auditorium hereby permitted within the Learning & Development Academy for events that seat in excess of 500 people shall be limited to a maximum of twelve times in any calendar year.

REASON: To ensure that there is limited adverse impact on the highway network in relation to events.

CONDITION 67:
Prior to the occupation of the auditorium hereby permitted within the Learning & Development Academy, an Event Management Plan, which sets out mitigation measures for attendees travelling to an event within peak traffic periods (consistent with the Framework at Appendix G of the Transport Assessment Addendum), shall be submitted to approved by the Local Planning Authority. The approved Event Management Plan shall be implemented in full.

REASON: In the interests of highway capacity and safety.

CONDITION 68:
There shall be no amplified music or events in the auditorium other than between 09:00-23:00 hours.

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

Sustainability

CONDITION 69:
Within 6 months of practical completion of the individual buildings and/or groups of buildings being certified, evidence of BREEAM PCS (post-construction stage) certification shall be submitted to the Local Planning Authority demonstrating that BREEAM 'Outstanding' (against BREEAM V6.1) has been achieved.

REASON: To ensure energy efficiency is achieved through sustainable design and construction and to reduce carbon emissions in accordance with Policies SDC1 and SDC4 of the Local Plan (2019).

CONDITION 70:
Where gas is used for any space or water heating, the boilers shall be ultra-low NOx emission devices.

REASON: In the interests of air quality in accordance with Policy HS5 of the Local Plan (2019).

CONDITION 71:
Prior to the commencement of the development (other than Phase 0), so that it can be demonstrated that the development can achieve Net Zero Carbon for embodied and operational carbon (buildings only) an updated Whole Life Carbon Assessment shall be submitted to and approved in writing by the Local Planning Authority.

Net Zero Carbon verification of the buildings shall meet independent third-party quality assessment under UKGBC (Net Zero Carbon Buildings: A Framework Definition, April 2019; and related documentation) or other equivalent worldwide Net Zero Carbon standard being pursued.

Industry Approved carbon off-sets will subsequently be purchased within 6 months of the verification assessment being submitted to the Local Planning Authority that meet independent third-party quality assessment as part of Net Zero Carbon verification of the buildings under UKGBC or UK NZCBS or other similar worldwide Net Zero Carbon standard being pursued. Confirmation of purchased carbon off-sets shall be submitted to the Local Planning Authority.

REASON: To ensure energy efficiency is achieved through sustainable design and construction and to reduce carbon emissions in accordance with Policies SDC1 and SDC4 of the Local Plan (2019).

CONDITION 72:
Within six months of practical completion of the development, an as-built Whole Life Carbon Assessment for the embodied elements shall be submitted to the Local Planning Authority for approval to demonstrate that the levels set out in the updated Whole Life Carbon Assessment submitted under Condition 64 have been achieved.

REASON: To ensure energy efficiency is achieved through sustainable design and construction and to reduce carbon emissions in accordance with Policies SDC1 and SDC4 of the Local Plan (2019).

CONDITION 73:
In achieving Net Zero Carbon for operational carbon (buildings only), additional off-site power shall be sourced via green (renewable) power supply contracts, (aligned with the renewable energy procurement requirements of the Net Zero Carbon standard being pursued as per Condition 64), the details of which shall be submitted to and approved in writing to the Local Planning Authority once the buildings are first brought into use. details of which shall be submitted to and approved by the Local Planning Authority.

REASON: To reduce carbon emissions in accordance with Policies SDC1 and SDC4 of the Local Plan (2019).

CONDITION 74:
Prior to any development following the erection of the external frame of any warehouse within any phase, an assessment of the on-site solar panel provision shall be undertaken and submitted to and approved in writing by the Local Planning Authority. The assessment shall include:

1. Confirmation that the solar provision approved can adequately serve the development in its entirety
2. A review of the grid capacity to show if the national grid can take additional capacity from this development and the associated solar infrastructure required to facilitate this.
3. Floor plans and elevations to show additional solar provision on the warehousing roofs if additional provision is required relating to points 1 or 2 above.

The development shall be carried out in accordance with the approved solar provision assessment and the provision shall be maintained in perpetuity.

REASON: to ensure that the on-site provision will adequately serve the development in its entirety and to ensure that the maximum renewable capacity is achieved from the site in accordance with the sustainability aims of the development.

CONDITION 75:
Prior to the commencement of development within any phase (excluding Phase 0) full details for the provision of electronic communications infrastructure to serve the development in that phase, including full fibre broadband connections, shall be submitted to and approved in writing by the local planning authority. The development shall be implemented in accordance with the approved details and the infrastructure fully available prior to the occupation of each unit in that phase.

REASON: To ensure the provision of a high quality and reliable communications infrastructure network to serve the development to accord with paragraph 118 of the National Planning Policy Framework (2023) and Policy SDC9 of the Local Plan (2019).

CONDITION 76:
Prior to the commencement of development within any phase (excluding Phase 0) full details of the electric vehicle charging point locations for that phase (showing a minimum of 20% of spaces) shall be submitted to and approved in writing by the Local Planning Authority. The approved electric vehicle charging points associated with any building within that phase shall be provided prior to the buildings first being brought into use.

REASON: To encourage the use of electric vehicles in the interest of sustainability.

CONDITION 77:
Prior to the commencement of development within any phase (excluding Phase 0) full details of the cabling to enable 100% electric vehicle charging provision across the site shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

REASON: To encourage the use of electric vehicles in the interest of sustainability.

Lighting

CONDITION 78:
Prior to commencement of any phase (excluding Phase 0) notwithstanding the submitted details, a lighting assessment for that phase shall be submitted to and approved in writing by the Local Planning Authority. This information shall include a layout plan with beam orientation and a schedule of equipment proposed in the design (luminaire type, mounting height, aiming angles and luminaire profiles). Any lighting assessment must include:

1. Calculation of both functional and obstructive light must consider the contributions and impacts of previous phases to provide for the cumulative effects.
2. The requirement for 'light levels' shall consist of illuminance calculations for each area, based upon the performance requirements identified within Drawing 16-17216-HLEA-XX-ZZ-SP-LD-708001 within ES18_V2_A18-2_Lighting_Design_Parametres_&_Exterior_Lighting_Design_Layout_Drawings. Justification for performance requirements at each should be provided. Calculations must demonstrate that areas are not overlit.
3. Identification of areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory;
4. Clearly demonstrate that the proposed lighting will not disturb or prevent bats using their territory or having access to their breeding sites and resting places.
5. Obstrusive light calculations based on day one conditions (maintenance factors applied for function).
6. If the phase includes floodlighting then the submitted lighting assessment must include; hours of operation, light levels, tilt/angle, off site light spillage, column heights, equipment design, layout plan with beam orientations and details of any mitigation measures.
7. Mitigation measures must be considered including but not limited to lighting control systems for external spaces and buildings to reduce light spill (e.g. motion detection lighting for car parks).

The lighting shall be installed, maintained and operated in accordance with the approved lighting assessment.

REASON: In the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 79:

Lighting for the following features should not be externally illuminated after 22:00:

- Helipad
- Sports Pitches
- Retail Display Lighting and Signage
- HQ Office

Any lighting around these features which are proposed to be illuminated after 22:00, a plan, specification and justification statement shall be submitted to and approved in writing by the Local Planning Authority. The lighting shall be installed, maintained and operated in accordance with the approved details.

REASON: To reduce light spill from the development in the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 80:

The maximum Correlated Colour Temperature (CCT) for external lighting shall be 3000K in accordance with paragraph 18.5.11 of Appendix 18.3 of the Environmental Statement.

REASON: To reduce light spill from the development in the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

CONDITION 81:

All externally mounted luminaires shall not emit direct upward light when mounted in their final orientation.

REASON: To reduce light spill from the development in the interests of residential amenity, to ensure the details are acceptable to the Local Planning Authority and to avoid significant adverse impacts in accordance with Policy SDC1 of the Local Plan (2019).

Permitted Development Removal

CONDITION 82:
Notwithstanding the provisions of The Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification) there shall be no change of use permitted from the approved use classes to a different use class of The Town and Country Planning (Use Classes) Order 1987 (as amended)).

REASON: In the interests of sustainable development, economic growth, protection of employment land, traffic movements and highway safety in accordance with Policies SDC1, SDC4, ED1, ED3 and D2 of the Local Plan (2019).

CONDITION 83:
Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no plant, equipment or development/extension shall be installed/undertaken that would increase the overall height of the buildings hereby permitted.

REASON: In the interests of visual amenity and landscape impact in accordance with Policies SDC2 and NE3 of the Local Plan (2019).

Highways

CONDITION 84:
No part of the development shall be occupied or brought into use until the roads, footways and cycleways serving that part of the development have been laid out and completed in accordance with approved details.

REASON: To ensure the details of the development are acceptable to the Local Planning Authority in the interests of providing a safe means of access to the development.

CONDITION 85:
Prior to occupation of the development in any phase (except for Phase 0) hereby permitted, an Operational Management Plan (OMP) for that phase shall be submitted to and approved in writing by the Local Planning Authority. The OMP shall be consistent with the Framework Operational Management Plan at Appendix D of the Transport Assessment Addendum and include measures for monitoring traffic associated with the proposed development at peak periods, to show that the development is being managed as proposed. The development shall not be carried out other than in accordance with the approved Operational Management Plan.

REASON: In the interests of highway safety and traffic flows.

CONDITION 86:
No part of the development hereby approved shall be occupied until a Freight Management Plan has been submitted to and approved in writing by the Local Planning Authority. The details and measures contained in the Freight Management Plan shall include the establishment of a Transport Steering Group which shall monitor and manage the Freight Management Plan in perpetuity. It shall further stipulate a routing agreement for freight traffic and the use of ANPR Counters (or similar technology) and that no HGV traffic generated by development within the application site shall use vehicular access point onto B4029. The development hereby approved shall not be occupied until the approved measures have been implemented in full. The approved and implemented measures shall then be retained in perpetuity.

REASON: In the interests of residential amenity, air quality, highway safety and traffic flows.

CONDITION 87:
Prior to occupation of the development in any phase (expect for Phase 0) hereby permitted a Delivery and Servicing Plan for that phase shall be submitted to and approved in writing by the Local Planning Authority. The plan shall be consistent with the Framework Delivery and Servicing Plan at Appendix E of the Transport Assessment Addendum. The development shall not be carried out other than in accordance with the approved Delivery and Servicing Plan.

REASON: In the interests of residential amenity, air quality, highway safety and traffic flows.

CONDITION 88:
Prior to occupation of the development in any phase (expect for Phase 0) hereby permitted a Car Park Management Plan for that phase shall be submitted to and approved in writing by the Local Planning Authority. The plan shall be consistent with the Framework Car Park Management Plan at Appendix F of the Transport Assessment Addendum. The development shall not be carried out other than in accordance with the approved Car Park Management Plan.

REASON: To ensure there is sufficient parking provision on the site and that there is not an adverse impact on Ansty in the interests of residential amenity, highway safety and traffic flows.

CONDITION 89:
No building within any phase shall be occupied until an On-Street Parking Assessment (OSPA) has been submitted to and approved in writing by the Local Planning Authority. The OSPA shall define a geographical area for assessment which shall include Ansty village. It shall further detail an appropriate methodology for an on-street parking survey which must be carried out prior to the occupation of any building hereby approved. It shall then set out timescales for carrying out and submitting further parking surveys and Post-Occupation On-Street Parking Assessments (POOSPAs) to the Local Planning Authority for approval in writing. The POOSPAs shall compare the results of the pre-occupation and post-occupation car parking surveys. They shall further set out appropriate mitigation measures in the event that any issues caused by on-street parking are identified post-occupation of the development.

REASON: To ensure there is sufficient parking provision on the site and that there is not an adverse impact on Ansty in the interests of residential amenity, highway safety and traffic flows.

CONDITION 90:
No development shall commence until evidence demonstrating that a valid application to enter into a Section 278 Highway Works Agreement for the eastern site access (onto Hinckley Road B4065) and western site access (onto B4029) has been received and accepted by Warwickshire County Council has been submitted to and approved in writing by the Local Planning Authority. No part of the development hereby approved shall be occupied until the eastern site access (onto Hinckley Road B4065) and western site access (onto B4029) have been provided in accordance with the plans listed in condition 2.

REASON: In the interests of highway safety and traffic flows.

CONDITION 91:
No development shall commence until an Active Travel Scheme (ATS) has been submitted to and approved in writing by the Local Planning Authority. The ATS shall set out details of all of off-site walking and cycling infrastructure including the exact route and alignment (including plans to a suitable scale), dimensions, levels, ramps, drainage, construction specification (including cross-section plans), materials, highway crossings, signage, lighting, any boundary treatments (including any bridge parapets) and CCTV provision (where feasible and deliverable). Where ATS works are required on the highway network, evidence demonstrating that a valid application to enter into a Section 278 Highway Works Agreement has been received and accepted by the relevant Highway Authority for that area (in accordance with timescales to first be agreed in writing by the Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority. No part of the development hereby approved shall be occupied until the ATS has been provided in accordance with the approved details, is fully operational and (where relevant) a Section 278 Certificate of Substantial Completion has been issued (evidence of which shall be submitted to the Local Planning Authority upon receipt).

REASON: In the interests of sustainability, highway safety, traffic flows and air quality and reducing carbon emissions.

CONDITION 92:
No part of the development hereby approved shall be occupied until full details of the Mobility Hub Operations (MHO) have been submitted to and approved in writing by the Local Planning

Authority. The MHO shall provide full details of what will be provided within the Mobility Hub, who will operate and manage the Mobility Hub, opening hours for the Mobility Hub and timescales for the delivery of the Mobility Hub. The Mobility Hub shall be provided and made available for use in accordance with the approved timescales and details. It shall thereafter be retained and operated as a Mobility Hub in accordance with the approved details in perpetuity.

REASON: In the interests of promoting sustainable transport measures, traffic flows, air quality and reducing carbon emissions.

CONDITION 93:
No development shall commence until full details of an A4600/Brade Avenue/Wigston Road mitigation scheme and A4600/Hall Lane/Woodway Lane mitigation scheme have been submitted to and approved in writing by the Local Planning Authority. No development shall commence until evidence demonstrating that a valid application to enter into Section 278 Highway Works Agreements for these mitigation schemes has been received and accepted by the relevant Highway Authority for that area (in accordance with timescales to first be agreed in writing by the Local Planning Authority) has been submitted to and approved in writing by the Local Planning Authority. No part of the development hereby approved shall be occupied until the A4600/Brade Avenue/Wigston Road mitigation scheme and A4600/Hall Lane/Woodway Lane mitigation scheme have been provided in accordance with the approved details and a Section 278 Certificate of Substantial Completion has been issued (evidence of which shall be submitted to the Local Planning Authority upon receipt).

REASON: In the interests of highway safety and traffic flows.

CONDITION 94:
No part of the development hereby approved shall be occupied until the National Highways A46 Walsgrave Junction (B4082 / Coventry Eastern Bypass (A46) roundabout) improvement works (detailed at https://nationalhighways.co.uk/our-roads/west-midlands/a46-coventry-junctions-upgrade/) are completed and fully operational.

REASON: In the interests of highway safety and traffic flows.

CONDITION 95:
No building hereby approved shall be occupied until a sustainable travel pack has first been provided to each employee prior to the occupation of that building.

REASON: In the interests of promoting sustainable transport measures, traffic flows, air quality and reducing carbon emissions.

CONDITION 96:
No development shall commence until a Highway Surface Condition Assessment (HSCA) has been submitted to and approved in writing by the Local Planning Authority. The HSCA shall define a geographical area for assessment which shall include Ansty village. It shall further detail an appropriate methodology for surveying the condition of the highway surface carriageway. It shall then set out timescales for carrying out and submitting a Post-Occupation Highway Surface Condition Assessment (POHSCA) to the Local Planning Authority for approval in writing. The POHSCA shall compare the results of the pre-occupation and post-occupation highway surface carriageway. It shall further set out appropriate mitigation measures to repair any damage identified to the highway surface carriageway that is reasonably attributable to construction of the proposed development.

REASON: In the interests of highway safety.

CONDITION 97:
No occupation in any phase (excluding Phase 0), unless a public rights of way improvements scheme, for improvements to the Public Right of Way from within the application site over the M6 overbridge to the public highway on Central Boulevard, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include, but is not limited to, alignment, construction details, lighting, drainage, levels, layout and materials. The approved scheme shall be implemented in full prior to occupation of the permitted development and retained in perpetuity.
REASON: To ensure sustainable access to the development.

INFORMATIVES

INFORMATIVE 1:
In relation to Condition 29 (LEMP) any vegetation clearance should be undertaken outside the bird nesting season (March – August, inclusive). If this is not possible, an ecologist will make a check of any suitable breeding habitat prior to its clearance, with suitable stand-offs (as determined by the ecologist) retained around any active nests until dependant young have fledged. This therefore needs to be considered in any submitted plan.

INFORMATIVE 2:
In relation to all landscaping conditions, the proposed tree planting specification shall include details of the quantity, size, species, position and the proposed time of planting of all trees to be planted, together with an indication of how they integrate with the proposal in the long term with regard to their mature size and anticipated routine maintenance. In addition, all shrubs and hedges to be planted that are intended to achieve a significant size and presence in the landscape should be similarly specified.

INFORMATIVE 3:
This planning permission is subject to pre-commencement conditions which require details/drawings to be submitted to and approved in writing by the Local Planning Authority before ANY development may lawfully commence. Any development commenced in breach of these pre-commencement conditions will be unauthorised, a breach of planning control, and liable to immediate Enforcement and Stop Notice action.

INFORMATIVE 4:
The applicant/developer is advised that the development will need to comply with Approved Document B, Volume 2, Section B5 - Access and Facilities for the Fire Service. Full details including the positioning of access roads relative to buildings, the arrangement of turning circles and hammer heads etc regarding this can be found at: www.warwickshire.gov.uk/fireguidancecommercialdomesticplanning
Where compliance cannot be met, the applicant/developer will need to provide details of alternative measures intended to be put in place. Please also note The Warwickshire County Council Guide 2001, Transport and Roads for Developments, Section 5.18, Access for Emergency Vehicles. In addition, Warwickshire Fire and Rescue Authority fully endorse and support the fitting of sprinkler installations, in accordance with the relevant clauses of BS EN

12845 : 2004, associated Technical Bulletins, and or to the relevant clauses of British Standard 9251: 2014, for residential premises.

INFORMATIVE 5:
Pursuant to Section 149 and 151 of the Highways Act 1980, the applicant/developer must take all necessary action to ensure that mud or other extraneous material is not carried out of the site and deposited on the public highway. Should such deposits occur, it is the applicant's/developer's responsibility to ensure that all reasonable steps (e.g. street sweeping) are taken to maintain the roads in the vicinity of the site to a satisfactory level of cleanliness.

INFORMATIVE 6:
Public rights of way should remain open and available for public use at all times unless closed by legal order and should not be obstructed by parked vehicles or by materials during any works. Any damage to the surface of any public right of way caused during the works should be made good. If it is proposed to temporarily close any public right of way during the works then an application for a Traffic Regulation Order must be made to Warwickshire County Council's (WCC) Rights of Way Team well in advance. Any disturbance or alteration to the surface of any public right of way requires the prior authorisation of WCC Right's of Way Team, as does the installation of any new gate or other structure on the public right of way.

INFORMATIVE 7:
This development is subject to a s106 legal agreement.

INFORMATIVE 8:
In relation to the drainage conditions, the strategy should be treated as a minimum at this stage of the design. Further consideration should be given during the next stage of the design to incorporate additional, localised source control SuDS such as green roofs, rain-gardens and tree pits as part of a 'SuDS management train' approach to provide water quality, amenity and bio-diversity benefits and increase the resilience within the design. Reference is also made to our Flood Risk Guidance for Development (updated June 2023) with more details and examples of SuDS which can be incorporated at later stages of design.

At the 'discharge of condition' stage proposals for surface water drainage should be approaching a level of detail suitable for tender or construction. Documentation should show the drainage scheme including SuDS features, specific details (e.g. standard details or cross sections) and demonstrate the performance and of the system through calculations and exceedance management respectively. Such scheme should be in line with the original planning application/permission and where significant changes are made, justification should be provided.

INFORMATIVE 9:
Ordinary Watercourse Land Drainage Consent (Advisory)
The developer they will need to apply for ordinary watercourse consent to move the alignment of the watercourse, for any culverts crossing watercourses within the site and any outfalls. Please note that land drainage consent must be granted upfront as it cannot be grated retrospectively and to this end, we have provided some pre-emptive comments from a land drainage consent perspective:
<u>Culverts</u>

• It is understood the ten culverts are proposed as 1.5m dia. Supporting evidence (such as from the hydraulic modelling) will be required demonstrating that they are all sized appropriately to convey the full channel capacity of the various watercourses.
• Plan and cross sections drawings of the culverts. All culverts should be sunk 150mm below bed level to ensure a natural bed is present throughout the length of the culverts.
• Confirmation over the detail being utilised for the headwall structures at the inlet and outlet of the culverts.
• Culverts should not be excessively long and would only ideally be accepted if circa 4 to 5 meters longer than the width of the road they will be facilitating. If there is a reason as to why they should be longer this should be provided for consideration
• Method statement outlining how the culverts will be installed such as how will flows be managed during the installation works.

Diversion
• A plan showing the existing line of the watercourse pre-diversion.
• Engineering plans and cross sections of the new watercourse channel profile; the LLFA wouldn't expect side slopes to be any greater than 1 in 3.
• Its see the diverted central watercourse and the eastern watercourse will be very close together in the area from culverts 7 and 8 and further downstream. Will there be sufficient space around both watercourses to carry out maintenance activities on both the watercourses and culverts.
• Method statement outlining how the diversion works will take place and what will happen with existing flows during the works.

Outfall structures
• Will require details of the headwalls including cross sections of how they will fit into the watercourse; any outfalls should be positioned at 45 degrees to the direction of flow to minimise scour undermining the structure over time.
• Method statement outlining how the outfalls will be installed.

INFORMATIVE 10:

In relation to condition 50 the following should be considered. The numbering below matches the specific numbered points within the condition. The scheme to be submitted shall:

2a. The strategy agreed to date may be treated as a minimum and further source control SuDS should be considered during the detailed design stages as part of a 'SuDS management train' approach to provide additional benefits and resilience within the design.

2b.The strategy agreed to date shows the conceptual representation of attenuation features. These should be drawn and modelled in detail as the strategy progress through to scheme design.

3.These should be feature-specific demonstrating that such the surface water drainage system(s) are designed in accordance with 'The SuDS Manual', CIRIA Report C753.

4. This should include:

a.Suitable representation of the proposed drainage scheme, details of design criteria used (incl. consideration of a surcharged outfall), and justification of such criteria where relevant.

b.Simulation of the network for a range of durations and return periods including the 1 in 2 year, 1 in 30 year and 1 in 100 year plus 40% climate change events

c.Results should demonstrate the performance of the drainage scheme including attenuation storage, flows in line with agreed discharge rates, potential flood volumes and network status. Results should be provided as a summary for each return period.

d.Evidence should be supported by a suitably labelled plan/schematic (including contributing areas) to allow suitable cross checking of calculations and the proposals.

5.Such overland flow routing should:

a.Demonstrate how runoff will be directed through the development without exposing properties to flood risk.

b.Consider property finished floor levels and thresholds in relation to exceedance flows. The LLFA recommend FFLs are set to a minimum of 150mm above surrounding ground levels.

c.Recognise that exceedance can occur during any storm event due to a number of factors therefore exceedance management should not rely on calculations demonstrating no flooding.

INFORMATIVE 11:
Table referred to in Condition 39:

Table 3: Building Services and Building Envelope Breakout Sound Criteria

Period	LOAEL	SOAEL
Daytime (0700-2300hrs)	Background sound level, $L_{A90,T}$ - 10 dB (with consideration of context)	Background sound level, $L_{A90,T}$ + 10 dB (with consideration of context)
Night-time (2300-0700hrs)		

INFORMATIVE 12:
Table referred to in Condition 40:

Table 5: Environmental Sound Criteria for Building Services and Building Envelope Breakout Sound

Receptor	ESC Daytime $L_{Ar,Tr}$ (dB)	ESC Night-time $L_{Ar,Tr}$ (dB)
R1	45	41
R2	41	36
R3	41	36
R4	41	36
R5	41	36
R6	41	36
R7	41	36
R8	41	36

INFORMATIVE 13:
Table referred to in Condition 41:

Table 12: Environmental Sound Criteria for Noise from On-site Vehicle Movements

Receptor	Representative Measurement Location	ESC Daytime $L_{Ar,Tr}$ (dB)	ESC Night-time $L_{Ar,Tr}$ (dB)
R1	LT2	55	51
R2	LT3	51	46

INFORMATIVE 14:
Table referred to in Condition 42:

Table 16: L_{AFmax} Thresholds of Potential Effect

Period	LOAEL	SOAEL	UAEL
Night-time (2300-0700hrs)	60 dB L_{AFmax} not normally more than 10 times a night, outside of a bedroom	70 dB L_{AFmax} not normally more than 10 times a night, outside of a bedroom	80 dB L_{AFmax} not normally more than 20 times a night, outside of a bedroom

INFORMATIVE 15:
Table referred to in Condition 43:

Table 19: Amplified Music/Event Noise Criteria

Period	LOAEL
Daytime (0700-2300hrs)	MNL not exceeding Background Sound Level ($L_{A90,15mins}$) by more than 5 dB(A) over a 15-minute period AND MNL in the 63 Hz and 125 Hz not exceeding 50 dB L_{eq} over a 15-minute period
Night-time (2300-0700hrs)	MNL inaudible within NSRs with windows open at any octave band frequency

INFORMATIVE 16:
Warwickshire County Council Highways has advised that the developer must enter into Highway Works Agreements made under the provisions of Section 278 of the Highways Act 1980 for the purposes of completing the works.

In terms of design guidance this is carried out in conjunction with the County Road Construction Strategy 2022 on our website as referred to on the opening page. Please see below link: https://api.warwickshire.gov.uk/documents/WCCC-770-261

The developer should note that feasibility drawings of works to be carried out within the limits of the public highway which may be approved by the grant of this planning permission should not be construed as drawings approved by the Highway Authority, but they should be considered as drawings indicating the principles of the works on which more detailed drawings shall be based for the purposes of completing an agreement under Section 278.

An application to enter into a Section 278 Highway Works Agreement should be made to the Planning & Development Group, Communities Group, Warwickshire County Council, Shire Hall Post Room, Warwick, CV34 4SX or by email to: s38admin@warwickshire.gov.uk

In accordance with Traffic Management Act 2004 it is necessary for all works in the Highway to be noticed and carried out in accordance with the requirements of the New Roads and Streetworks Act 1991 and all relevant Codes of Practice. Before commencing any Highway works the developer must familiarise themselves with the notice requirements, failure to do so could lead to prosecution.

Applications should be made to the Street Works Manager, Budbrooke Depot, Old Budbrooke Road, Warwick, CV35 7DP or by email to: streetworks@warwickshire.gov.uk

For works lasting ten days or less, ten days notice will be required. For works lasting longer than 10 days, three months notice will be required.

The developer will be required to defray all the County Council's administration, legal, design, technical approval, safety audit, inspection of works costs etc., whenever applicable in respect of any applications to enter into Highway Works Agreements, or for the issue of licences or similar actions.

The County Council will not be held liable for any delays in the execution of any works carried out under the provisions of any Highway Works Agreement, or issue of any licence or similar action, which may be incurred as a result of the developers failure to make an application for such an agreement/ licence sufficiently in advance of the works requiring to be executed, or for any delays which may be incurred as a result of service or plant alterations required by the public utility companies.

Prior to commencement of development, the applicant is required enter into an agreement with the Highway Authority under Section 59 of the Highways Act 1980. Prior to works taking place on site and following completion of the development, a joint survey shall be undertaken with the County's Locality Officer to agree the condition of the public highway. Should the public highway be damaged or affected as a consequence of the works being undertaken during the development of the site, the developer will be required to undertake work to remediate this damage as agreed with the Locality Officer.

STATEMENT OF POSITIVE ENGAGEMENT:

In dealing with this application Rugby Borough Council has actively sought to work with the applicant in a positive and proactive manner, in accordance with paragraph 38 of the NPPF.