



TOWN AND COUNTRY PLANNING ACT 1990

**SUBMISSION IN RESPONSE TO THE RUGBY BOROUGH LOCAL PLAN
ISSUES AND OPTIONS: OCTOBER 2023**

**POTENTIAL STRATEGIC EMPLOYMENT LOCATION – SAFEGUARDED LAND
WITHIN THE SOUTH WEST RUGBY ALLOCATION SYMMETRY
PARK, RUGBY (PHASE 2)**

**ON BEHALF OF:
TRITAX SYMMETRY LTD**

JANUARY 2024

REF: PJF/LS/10598a

CONTENTS

1.0	Introduction	3
2.0	Need for B8 Uses	5
3.0	The Submissions on the Issues and Options	12

APPENDICES

1. Red Line Plan
2. Context Plan

1.0 INTRODUCTION

- 1.1 These representations to the Rugby Borough Local Plan: Issues and Options: October 2023 relate to the Tritax Symmetry site at land to the north of Symmetry Park, Rugby, known as Symmetry Park, Rugby (Phase 2) land have been produced by Framptons on behalf of Tritax Symmetry Ltd (TSL).
- 1.2 These representations relate to the land edged red as shown on the enclosed plan (Appendix 1).
- 1.3 The site is identified as one of the Potential Strategic Employment Locations in the Rugby Borough Local Plan: Issues and Options: October 2023.
- 1.4 The site is located in the centre of the South West Rugby allocation which is allocated in the adopted Rugby Local Plan (2019) under Policy DS8 for a new neighbourhood of around 5,000 dwellings and 35 ha of B8 employment land. The site is currently identified in the adopted Local Plan (2019) Policies Map as 'Safeguarded Land', with paragraph 4.61 stating:
- "The site is a long term commitment for the Council in meeting the growth needs of the Borough and will continue to be built out beyond the life of this Local Plan. Once built, it will create a new community within Rugby and it is thus important for the Borough Council and developers of the site to do this to the highest standard possible. An essential element of this is sustainability and the balance of housing to jobs, and as such there is the potential for the growth targets of housing and employment to be revisited as a result of changing demands for the Borough as it moves beyond the 2031 period. **As such an area of land is safeguarded within the South West Rugby allocation, as identified in the Policies Map to assist in meeting the Borough's development needs beyond 2031**".*
- 1.5 The Safeguarded Land/Phase 2 land is located directly to the north of the B8 employment land which is currently being built out by TSL (as allocated in Policy DS8) (outline Planning Permission ref. R16/2569). A context plan is also attached (Appendix 2).
- 1.6 The adopted South West Rugby Masterplan Supplementary Planning Document (2019) also includes a Masterplan (Figure 2) which also shows the 'SW Safeguarded Area'; i.e. safeguarded land for future development.
- 1.7 The purpose of these representations are:
- to set out the need for the allocation of additional logistics floorspace in the emerging Local Plan;
 - to provide a response to the questions raised in the Issues and Options consultation paper;

- to confirm that the site is deliverable, is available now and can be readily developed, taking into account respective constraints, within the plan period;
- to confirm that this non-Green Belt site is an entirely suitable and sustainable location to accommodate employment development.

1.8 A call for sites form is also submitted.

1.9 TSL's view is that the allocation of the site for employment will:

- form a logical and obvious extension to the adjoining successful Symmetry Park, Rugby (Phase 1) employment development where, due to ongoing occupier discussions, there is no remaining B8 logistics space of any scale remaining;
- deliver employment to help meet the Borough's employment needs benefiting from the strategic location of the site and its proximity to the M45/A45;
- deliver new open space, and enhance the biodiversity credentials of the site;
- provide comprehensive sustainable transport links that integrate with the existing networks and provide good connectivity within the development and to the surrounding area; and
- assist in contributing to the wider infrastructure costs and delivery of the South West Rugby allocation, where significant increases in the Appendix K costs are currently subject to consultation.

2.0 The Need for Logistics Floorspace

Logistics in a National Context

- 2.1 The need argument is first demonstrated by reference to recent National, Regional and Local policy (for example as demonstrated in the NPPF, NPPG, the planning reforms for lorry parking, and the evidence base of the emerging LPR).
- 2.2 There is a policy recognition of the need for logistics floorspace, with national policy in particular recognising the need for resilience of global supply chains due to the changed circumstances from Covid-19, the UK's changes in trade relationships, and the urgency of the need to promote jobs.
- 2.3 The NPPF (2023) states 85: *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential."* (Paragraph 85).
- 2.4 Paragraph 87 states *"Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations."* (Paragraph 87 of the NPPF).
- 2.5 Furthermore, the economic objectives of sustainable development (NPPF paragraph 8) states that the planning system needs to be responsive by ensuring sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improve productivity.
- 2.6 PPG (paragraph: 031 Reference ID: 2a-031-20190722 (Revision date: 22 07 2019), states that: *"The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)."*
- 2.7 According to the British Property Federation (BPF) economic productivity of £124 billion was generated by the logistics sector in 2019 ('Delivering the Goods in 2020: The Economic Impact of the UK Logistics Sector', (2020)). There is robust growth in the industrial and logistics market as

structural change is witnessed in high street retail and growth of e-commerce drives activity into the logistics sector.

- 2.8 In a recent Secretary of State Call In decision (APP/N4205/V/20/3253244), he agreed with his Inspector's analysis of need including (paragraph 227): *"Information from the British Property Foundation (BPF) confirms a widely held view that rapid growth being experienced in the logistics sector of the UK has been due to structural changes to high street retailing and a commensurate growth in e-commerce. This shift has been accelerated by the ongoing Covid19 pandemic restrictions on personal movement. The warehousing and logistics sector has proved resilient in the current pandemic. It is therefore to be expected that this sector will be instrumental in the post-pandemic recovery of the wider UK economy."*
- 2.9 More recently the British Property Federation (BPF) (Levelling Up – the Logic of Logistics' January 2022) states that in the light industrial, B2 and B8 Use Classes (i.e., the uses classes that require warehouses or factories with associated yard space) £232 billion of GVA was generated and 3.8 million jobs. The report concludes that the sector generates significant economic benefits supporting increasing numbers of high-quality jobs across the English regions.
- 2.10 Furthermore, the BPF's 'Levelling Up: The Logic of Logistics' Report 27 January 2022 states that the UK Planning system is restricting growth in the Industrial and Logistics Sector by not allocating enough land. It notes that the historic lack of supply has constrained ('suppressed') demand by 29% nationally (equating to 10 million sq ft per annum).
- 2.11 In a recent appeal (APP/V4250/V/20/3253242) the Secretary of State considered that the logistics development would deliver a substantial range of tangible economic benefits including well paid jobs for local people and that these socio-economic benefits would boost the local economy and there was *"an evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally"*. (emphasis added)
- 2.12 The British Property Federation Report 'What Warehousing Where?' (2019) states that understanding is needed of the relationship between homes and warehouses to enable positive planning. The locations which are most relevant for additional warehouse floorspace will be primarily determined by two things: the specific locational requirements of the different elements of the fulfilment response (national, regional and last mile); and the location of population as both a driver of market demand and source of labour. Therefore, it is not only the scale of housing growth which will have an impact on the logistics response, but also its location.
- 2.13 Other changes in the logistics sector is the realisation that global supply chains lack resilience in the certainty of supply and in timescales for the delivery of goods. The UK's changed trading relationships and natural and man-made disasters, for example the Houthis attacking Red Sea ships therefore impacting on shipping routes, also has consequences for reliability of supply chains. As a consequence, logistics companies supplying goods to UK manufacturers require greater levels of stock holding within the UK – so termed 'stock buffering'.

- 2.14 The Covid-19 pandemic restrictions accelerated this long-term adjustment, which is also associated with Brexit. Rapid changes are occurring to occupier requirements, in particular a trend towards larger footprint buildings which offer economies of scale and a shift for precautionary logistics in reaction to potential disruption of supply chains, larger buildings allow manufacturers to buffer stock.
- 2.15 The UK Government has responded to this in its growth policies, for example in the planning reforms for lorry parking which reflect the importance of provision of logistics, and freight to deliver a supply chain network that is secure, reliable, efficient and resilient.
- 2.16 However, the BPF Industrial Committee Freight, Logistics and the Planning System: Call for Evidence Response dated October 2023, states that (paragraphs 2.1 to 2.2): *"We consider the plan-making system has been largely ineffective at identifying needs and providing for the logistics sector. This is particularly the case for 'larger than local' or 'strategic' needs following the abolition of regional spatial planning and its replacement with 'Localism'. This is qualified by the **significant supply/demand gaps experienced in important logistics hotspots across the country**, with record take-up, rising rents and record low vacancy rates serving as key market indicators.*

The plan-led system is therefore failing to keep pace with the fast-changing nature of market demand...."(emphasis added).

- 2.17 Furthermore, paragraph 30 of Circular 01/2022 'Strategic Road Network and the delivery of sustainable development' dated 23 December 2022 states that: *"The NPPF is clear that planning policies should recognise the specific locational requirements of different economic sectors, including for storage and distribution operations at a variety of scales and in suitably accessible locations. **To operate efficiently, the freight and logistics sector requires land for distribution and consolidation centres at multiple stages within supply chains including the need for welfare facilities for the drivers of commercial vehicles.** For instance, some hubs serve regions and tend to be located out-of-town near the SRN, while others are 'last-mile' facilities that will support more sustainable freight alternatives in urban areas. The Future of Freight Plan sets out that a joined-up approach between the planning system, local authorities and industry can safeguard and prioritise the land needed for these uses, such that all parties should work together to identify the specific requirements in their area."* (emphasis added).

- 2.18 Paragraphs 3.14 to 3.10 of the Issues and Options Paper states that:

"Retailers and manufacturers have moved to 'just in time' inventory management, whereby goods are received from suppliers when they are needed rather than being stored on site. Supply chains have become increasingly complex and international. These factors increase the need for warehousing space. At the same time, online retail has rapidly grown as a percentage of all retail sales from 2.7% in January 2007 to 26.6% in January 2023. (<https://www.ons.gov.uk/businessindustryandtrade/retailindustry/timeseries/j4mc/drsi>).

These changes have driven rapid growth in the need for warehouse floorspace. Savills estimates that warehouse floorspace in the UK grew by 32% between 2015 and 2021.

Rugby Borough sits at within the so-called ‘Golden Triangle’ for distribution. This is an area of the East and West Midlands that has 35% of all UK warehouse floorspace. The Golden Triangle is favoured by transport and distribution businesses because it allows efficient access to large parts of the country via the motorway and rail network.

The Office for National Statistics ranked Rugby Borough as the local authority district in England and Wales with the highest proportion of business units used for transport and storage. Transport and storage made up 17.5% of business units in the borough in 2021. <https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/articles/heriseoftheukwarehouseandthegoldenlogisticstriangle/2022-04-11>

Nearby districts of North Northamptonshire (5), West Northamptonshire (7) and Nuneaton and Bedworth (15) also feature in the top twenty local authority districts with the highest proportion of business premises used for transport and storage.

The 2021 Census showed that 3.8% of people aged 16 years and over in employment in Rugby Borough worked in warehousing and support activities for transportation. This is the second highest proportion of any local authority district in England and Wales, after Spelthorne District which borders Heathrow Airport.”

2.19 The evidence base for the emerging local plan comprises, inter alia:

- The Coventry and Warwickshire Housing and Economic Development Needs Assessment (2022);
- The Strategic Employment Sites Study Greater Birmingham and Solihull LEP (2021).

2.20 The supporting evidence base for the emerging Local Plan includes the Coventry and Warwickshire Housing and Economic Development Needs assessment (HEDNA) 2022, this shows three components of future need for employment land. These are shown in the table below:

Type of employment land	Land needed 2021-2041 (in hectares)	Land needed 2021-2050 (in hectares)
Gross requirement for strategic warehousing land across Coventry and Warwickshire (this means land for warehouses of over 9,000m2 in floor area)	551ha	735ha
Net need for office land (Rugby Borough only)	5.2ha (4.2ha with hybrid working)	6.5ha

Gross requirement for industrial land (Rugby Borough only) (this includes smaller warehouses of up to 9,000m2 in floor area)	150.5ha	218.2ha
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- 2.21 The Issues and Options paper at paragraph 3.37 includes a table which shows the potential additional land needed to meet Rugby Borough's own need for industrial land. This excludes the Coventry and Warwickshire strategic warehousing need and Rugby Borough's need for land for offices:

	Plan period 2021-2041	Plan period 2021-2050
Requirement for industrial land (excluding strategic warehousing and offices)	150.5ha	218.2ha
Completions 2021-2023	32.65ha	32.65ha
Total supply already identified	145.26ha	145.26ha
Supply still needing to be found	No additional supply needed	40.29ha

- 2.22 Paragraph 3.31 notes that the current local plan does not distinguish between strategic and non-strategic employment land. The local plan's Rugby Borough requirement for 102ha of employment land over 20 years 2011-31, compares to an industrial land requirement in the HEDNA for 150.5ha 2021-2041. This shows that the need for Rugby Borough has grown.

- 2.23 Furthermore paragraph 3.32 starts:

"Added to this in the current local plan is 98ha of need from Coventry City Council's area. It is yet to be decided whether Coventry City Council will be able to meet its own need for industrial land and, if not, where any unmet need will be met. However, Rugby Borough Council will need to contribute to meeting some of the identified need for strategic warehousing land in Coventry and Warwickshire."

- 2.24 Logistics is an important part of Rugby's economy as a business sector in its own right and as an enabler to the success of other businesses of all sizes and sectors. This aspect of recovery will not be possible without suitable strategic employment sites, such as the Safeguarded Land, to accommodate the necessary growth.

Conclusions

- 2.25 The key criteria for a successful logistics site are motorway proximity, junction access, connectivity to road, rail, air and sea as well as the size of the site and the potential quantum of accommodation.

- 2.26 Logistics is an important part of Rugby's economy as a business sector in its own right and as an enabler to the success of other businesses of all sizes and sectors, this will not be possible without suitable strategic employment sites, such as the Safeguarded Land to accommodate the necessary growth.
- 2.27 Allocation of the site would help drive economic growth in Rugby and beyond, and provide a source of new employment opportunities, as the site has the benefits of an optimal commercially attractive location, away from large areas of sensitive residential receptors, but close to the motorway network and with a local labour supply capable of accessing the site by sustainable modes.
- 2.28 The site is well related to the local highway network with direct access onto the M45/A45, therefore, the site is well located in relation to the strategic network (M45/A45), which provide opportunities to travel further afield and to nearby centres of employment including Coventry and Northampton, underpinning the locational strengths of the site and its appeal to this expanding business sector. The allocation of the site will address the above-mentioned significant need for logistics floorspace.
- 2.29 Economic and labour market considerations are also key drivers for the suitability of a site and location as a logistics hub, in addition to the transport links and connectivity the subject site benefits from.
- 2.30 Without the site being allocated, the supply imbalance will worsen and contribute to the already high levels of unsatisfied need in Rugby and the wider region.
- 2.31 This unsatisfied need has been exacerbated by the Covid-19 pandemic and evolving consumer trends, and will continue given the limited development pipeline, which is not sufficient to satisfy the demand. Whilst the pandemic has certainly accelerated demand for more online shopping, there are many other longer-term factors driving a race for logistics floorspace from the growth of high-tech manufacturing to supply chain changes coming from our new trading relationships with the EU and the world. The allocation of the site will help address the need for high-quality logistics floorspace. Rapid changes are occurring to occupier requirements, in particular a trend towards larger footprint buildings which offer economies of scale and a shift for precautionary logistics in reaction to potential disruption of supply chains.
- 2.32 The site (which is not located in the Green Belt) is of a scale that lends itself to a mix of unit sizes, including large logistics buildings, that would be attractive to international, national and regional occupiers, building on the success of the adjoining Symmetry Park, Rugby (Phase 1) development.
- 2.33 The allocation of the site would build on existing local economic strengths in the logistics sectors, making a readily deliverable, achievable and highly significant contribution to a strong and competitive regional economy.

- 2.34 Rapid increase in the number of logistics businesses in this market has resulted in employment land being in particularly short supply. Demand evidently also extends beyond warehousing and distribution, as production returns to the UK post Brexit, and operators seek locations with good access and labour supply.
- 2.35 TSL recognise and support the Council undertaking the Local Plan review to identify additional employment land in response to the overwhelming evidence-based need for additional floorspace. It is plain, from the foregoing assessment of employment need and supply, that the allocation of the site would contribute substantially to the national policy imperative, expressed in paragraphs 85-87 of the NPPF, to promote and support a strong competitive economy, particularly with regard to the need for storage and distribution facilities, at a variety of scales, in accessible locations.

3 SUBMISSION TO THE RUGBY LOCAL PLAN REVIEW ISSUES AND OPTIONS CONSULTATION Land for Employment Policies

3.1 With regards to the following questions, the responses are as follows:

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

3.2 The NPPF states: *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴⁴, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”* (Paragraph 85) and that:

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

3.3 Furthermore, the economic objectives of sustainable development (NPPF paragraph 8) states that the planning system needs to be responsive by ensuring sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improve productivity.

3.4 The allocation of employment land is supported and it must be ensured enough employment land has been allocated. It is noted that the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 shows three components of future need for employment land. These are shown in the table below:

Type of employment land	Land needed 2021-2041 (in hectares)	Land needed 2021-2050 (in hectares)
Gross requirement for strategic warehousing land across Coventry and Warwickshire (this means land for warehouses of over 9,000m² in floor area)	551ha	735ha
Net need for office land (Rugby Borough only)	5.2ha (4.2ha with hybrid working)	6.5ha
Gross requirement for industrial land (Rugby Borough only) (this includes smaller warehouses of up to 9,000m² in floor area)	150.5ha	218.2ha

- 3.5 We acknowledge the results of the Housing and Economic Development Needs Assessment (2022) however it is considered that the Council should identify further land for employment.
- 3.6 There are benefits of allocating more sites than the total estimated need to give occupiers market choice and flexibility, and to allow a degree of leeway should particular issues delay delivery on specific sites (e.g., lead-times to undertake infrastructure works; provide power upgrades/connections).
- 3.7 We would welcome the opportunity to further engage on the identified evidence base and how this translates into the identification and allocation of additional employment sites prior to the next stage of consultation on the Local Plan, as an identified step in building up this evidence base as set out in the Planning Practice Guidance (Paragraph: 040 Reference ID: 61-040-20190315).
- 3.8 As stated above, TSL recognise and support the Council undertaking the Local Plan review to identify additional employment land in response to the overwhelming evidence-based need for additional floorspace. There are a number of areas where we would particularly welcome a detailed discussion and review of the evidence base:
- input into the new Economic Strategy which will inform the local plan;
 - the proposed West Midlands Employment Sites Study;
 - the Housing and employment land availability assessment to be updated later this year;
 - updates to the Rugby Borough Council Authority Monitoring Report including the assumed supply of developable sites position; and
 - approach to suppressed demand.
- 3.9 Paragraph 11 of the Framework requires that for plan making Local Plans strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. Paragraph 85 of the NPPG requires that *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.”* and paragraph 86 states *“That Planning policies should: a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.... d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”*
- 3.10 In order to ensure that the emerging plan contains the necessary level of flexibility that is required additional employment floorspace should be allocated and this should be expressed as a minimum figure. In doing so, this would ensure that the policy was positively prepared, be effective and consistent with national policy, and would enable the Local Plan to be flexible and respond to changing circumstances. The emerging plan should therefore should take account of market signals and set out a clear strategy for allocating sufficient land which is suitable for development in their area.

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

3.11 It is considered that all types of employment land should be planned for but there is a particular need for B8 warehousing employment land.

3.12 It is noted that the Issues and Options paper at paragraphs 3.24 to 3.26 states:

“Large warehouses over 9,000sqm tend to be occupied by large companies that serve a regional, national or international market. They are not tied to one local authority area. For this reason, it makes more sense to consider the need for large warehouses at a subregional level.

The way the requirement is calculated, using sub-regional projections of future freight traffic, means that it does not disaggregate into separate local authority projections.”

3.13 The tables set out in Section 2 above demonstrate the acute need for a B8 allocation on the Phase 2/Safeguarded land.

3.14 As stated above, logistics development needs to be adjacent the Strategic Road Network, which the site is, paragraph 30 of Circular 01/2022 ‘Strategic road network and the delivery of sustainable development’ dated 23 December 2022 states that: *“The NPPF is clear that planning policies should recognise the specific locational requirements of different economic sectors, including for storage and distribution operations at a variety of scales and in suitably accessible locations.”*

3.15 Recognising that the Issues and Options reports identifies a substantial need, we therefore request that the Phase 2/Safeguarded land is allocated for B8 development. The site can be accessed off the strategic road network and is both deliverable and developable, forming a logical extension of the adjoining Symmetry Park, Rugby (Phase 1) development, and utilising the existing infrastructure from the Park.

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

3.16 TSL entirely support the broad location ‘Safeguarded Land within the South West Rugby Allocation’; the reasons for this are set out below.

3.17 It is noted that paragraph 3.38 to 3.41 of the consultation document states:

*“Land for large-scale manufacturing and distribution uses **needs to have good access to A-roads and motorways**. This will avoid inappropriate routing of HGVs through residential areas and country lanes.”*

*Large scale employment locations should be **close to existing settlements** to allow staff access to work. Remote rural locations should therefore be avoided.*

Considering these restrictions, we have identified the following potential locations. These are shown on the map on page 16.

*At this stage these are broad locations, not sites. If land is put forward in these locations or elsewhere it will be assessed through the housing and employment land availability assessment later this year. In assessing locations **transport impact and HGV routing will be considered, as will the Warwickshire Local Transport Plan. Other important considerations will be landscape impact, the capacity of the highways network, and transport accessibility**, both for commercial traffic and for employees getting to work. We will also consider the contribution that proposals can make to reducing carbon emissions and delivering wider benefits to the borough's economy and residents."*

- 3.18 The allocation of the site for B8 uses, in addition to those already allocated, will enable much needed, high quality and modern employment floor space to be provided that is able to respond to modern market demand. The site is available for development within the Plan period. The allocation will enable the delivery of a sustainable development that is consistent with the policies and guidance that are provided within the Framework.
- 3.19 The allocation of the site as land safeguarded for future development in the adopted Local Plan demonstrates that the Council already considers the site suitable for development.
- 3.20 The site is deliverable and is a sustainable and appropriate allocation for new employment to meet the identified needs of the Borough. The allocation of the site is necessary in order to deliver employment land within the Borough.
- 3.21 The features and benefits of the site can be summarised as follows:
- the site is in a sustainable location, the site adjoining the urban area of Rugby, and is well related to the main town's existing services and infrastructure;
 - the site's location is accessible to existing infrastructure and B8 development and the proposals will enable easy access to existing and new infrastructure that is proposed;
 - the site is available and suitable for the early delivery of employment floorspace;
 - the site has been robustly assessed in terms of its planning, physical and environmental context;
 - the site is well related to the local highway network with direct access onto the M45/A45 to be facilitated as part of the development proposals.
 - the site is well located in relation to the strategic network (M45/A45), which provides opportunities to travel further afield and to nearby centres of employment including Coventry and Northampton;

- direct access to the strategic network (M45/A45) meets the requirement of modern logistics operators, underpinning the locational strengths of the site and its appeal to this expanding business sector;
- the site has opportunities to link development into existing pedestrian and cycle routes within and near to the site, including the Sustrans Cycle route along the disused railway line and the National Cycle Network Route 41;
- the site is regarded as suitable for employment development without having a detrimental visual impact on the neighbouring urban environment or wider landscape.
- there are green infrastructure assets within the site which provide an opportunity to create a network that links to assets within the wider area, contribute to conserving and enhancing the natural environment, and provide access to high quality open space;
- the only designated environmental feature near the site is Cawston Spinney to the north which will inform the design of the new development. Its long-term management can be secured as well as providing opportunities for managed public access for the benefit of the town's residents;
- the opportunity also exists to create a Green Infrastructure network for wildlife and public access at the site;
- the existing landscape features and topography of the site, alongside future surface water drainage requirements provide opportunities to influence the creation of connected open spaces;
- the site falls within Flood Zone 1, which is the lowest flood risk possible, and therefore the site is not constrained in this regard. On-site SUDS network would control surface water run-off, utilising the existing topography and watercourses;
- there will be no adverse impact on heritage assets;
- development of the site will assist in contributing to the delivery of the South West Rugby allocation and to the wider infrastructure costs and delivery of the South West Rugby allocation, where significant increases in the Appendix K costs are currently subject to consultation.
- the analysis of the site and the illustrative development framework in the adopted SPD demonstrate how a well-designed high-quality development can be achieved and integrated where appropriate with adjacent neighbourhoods;
- the site would form a logical extension of the adjoining Symmetry Park, Rugby (Phase 1) development, utilising the existing utilities and highways infrastructure from the Park.

3.22 With regards to site access, the site will link to the south to the north-south access and east west sustainable transport links that are being built as part of the employment development to the south, this provides access to the M45/A45 to the south (the employment development has also enabled considerable improvements to this roundabout). To the north, a new access road will be created namely 'The Potsford Dam Link Road'.

3.23 The Safeguarded Land can assist in contributing to the wider infrastructure costs and delivery of the South West Rugby allocation, where significant increases in the Appendix K costs are currently subject to consultation.

3.24 In summary, allocation of the site for B8 uses would contribute to sustainable development in the following ways:

Economic Objective

- Capital Investment into the economy;
- Indirect investment in local construction companies;
- Net GVA generation to Rugby's economy; and
- Generation of business rates, which can be invested in local services and infrastructure;

Social Objective

- Creation of construction jobs;
- Creation of operational jobs;
- Creation of a range of skilled and unskilled jobs;
- Open space provision;
- Improvements to cycle routes to enable/encourage staff to cycle to work to assist in maintaining good levels of health of the workforce, and
- Provision of cycle parking and showers to enable/encourage staff to cycle to work to assist in maintaining good levels of health of the workforce;

Environmental Objective

- Improved infrastructure to reduce the impact of trips generations, reduce the impact of traffic on the local highway, and reduce pollution;
- Improved cycle infrastructure: internal and provision of shared pedestrian/cycle path;
- Car and cycle parking that is consistent with Council standards, guidance, and TSL experience of logistics occupiers;
- Operating a Travel Plan that will encourage residents to make use of more sustainable modes of transport when travelling to/from the Site;
- Provision of a net gain in biodiversity;
- Boundary hedgerows and trees would be retained where possible (with buffers to the Proposed Development);
- Resilience to climate change, through for example use of SuDS and being built to high sustainability standards;
- Construction of buildings to Net Zero Carbon in construction;
- Achieving a minimum EPC rating A;
- Achievement of a rating of BREEAM 'Excellent' (as a minimum) upon completion;
- Incorporation of substantial on-site renewable energy generation through solar PV coverage on the roof, and
- Provision of Electric Vehicle charging points for staff and visitors.

3.25 In summary, the site is suitable, available and achievable for development.

- 3.26 The allocation of land for employment development, will meet a significant proportion of the District's development needs over the proposed Plan period. The site is in a sustainable location and is wholly suited to delivering the B8 uses. There are no technical or physical reasons that would prevent its development. The proposed allocation of the site:
- is necessary to provide employment land that is needed and will support economic growth and generate new jobs. The new floorspace at will provide high quality employment facilities with excellent access to the motorway network and the local workforce, whilst promoting opportunities for diversification and training;
 - will deliver new open space and will increase public access through the formation of areas of open space and public footpaths;
 - will enhance the ecology of the site including an increase in tree planting and ecological improvements;
 - will maximise accessibility for all in the widest sense, ranging from walking and cycling at a local level and will achieve development in a sustainable location;
 - will form a logical extension of the adjoining Symmetry Park, Rugby (Phase 1) development, utilising the existing utilities and highways infrastructure from the Park;
 - will assist in contributing to the wider infrastructure costs and delivery of the South West Rugby allocation, where significant increases in the Appendix K costs are currently subject to consultation.
- 3.27 As summarised above, the purpose of this representation is to ensure that the Council is clear that the site (which is already safeguarded for development) is still deliverable, is available now and can be readily delivered. TSL has vast experience in delivering such schemes, as demonstrated by the existing development at Symmetry Park Rugby. TSL is a FTSE 250 company that is the UK's leading investment company focused on logistics real estate with a portfolio value of £5.05bn (June 2023), and an unrivalled knowledge and network of logistics operators.
- 3.28 With regards to the other Potential Strategic Employment locations, it is noted that these are in Green Belt locations or have other significant environmental constraints e.g. located next to a Scheduled Ancient Monument. Therefore, the subject site is considered the most suitable site for B8 uses compared to other options available to RBC.

Climate Change Policies

- 3.29 With regards to the following questions:
- 21. Should we adopt a minimum tree canopy policy for new development?*
- 3.30 It is considered that the adoption of a minimum tree canopy policy for new development is overly prescriptive and as such is not required. It is also not clear how this objective would be compatible with the nature and requirements of the logistics sector/B8 Use generally where there is a need

for large footprint buildings/associated yards which do not allow for the incorporation of tree planting.

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

- 3.31 This approach would be supported. As above, the nature and requirements of the logistics sector/B8 Use for large footprint buildings/associated yards often makes achievement of 10% net gain on site an unrealistic proposition. Allowing floorspace to be maximised in the most suitably accessible locations that meet the needs of the sector, and maximising the efficiency of site coverage for development will make the best use of the limited sites available, and it is therefore important that there are readily-identified sites that financial obligations to off-site BNG improvements could be put towards.

23. Would you support the creation of additional country parks as part of delivering biodiversity net gain

- 3.32 In principle, this would be supported. However, the suitability of this approach would depend on matters such as the detail of the habitats to be created, and the balance of providing public accessibility/ecological management to ensure the BNG objectives were achieved.

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

- 3.33 No there should not be a requirement to prioritise the delivery of biodiversity gain within close proximity to the development. As long as the Council accept that it is not feasible to deliver the required BNG onsite, the location of the offsite biodiversity gains should not affect the determination of whether to approve a Biodiversity Gain Plan. Any insistence by a Council to have the compensation delivered in its area is not supported by legislation. It should be noted that the Statutory Biodiversity Metric already applies a negative weighting to offsite units based on distance from the development site.

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

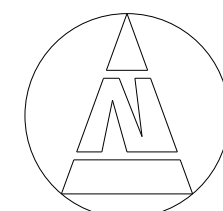
- 3.34 It is unclear what is meant by 'net zero' and this needs to be clearly defined. Building Regulations control how energy efficient/sustainable a building should be. It is therefore submitted that the Council follows National Policy as differing policies in different Councils only slow down development. The Council also needs to demonstrate that their policies are viable, as too onerous policies which will have a subsequent impact on employment land provision. In any case TSL, as a standard in all their developments, commit to achieving a rating of BREEAM 'Excellent' (as a minimum) upon completion and delivery of all buildings to 'net zero carbon in construction' to accord with the UK Green Building Council's definition.

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

- 3.35 The BREEAM (Building Research Establishment Environmental Assessment Method) requirements and Building Regulations control the water efficiency standards for non residential development. It is therefore submitted that the Council follows National Policy as differing policies in different Councils only slow down development. The Council also needs to demonstrate that their policies are viable as too onerous policies which will have a subsequent impact on employment land provision. As stated above, in any case TSL as a standard in all their developments commit to an achievement of a rating of BREEAM 'Excellent' (as a minimum) upon completion.

APPENDIX 1

Rev	Date	By	Description
A	30.01.24	HA	Drawing updated
B	31.01.24	HA	Drawing updated



APPENDIX 2

Rev	Date	By	Description
A	30.01.24	HA	Drawing updated
B	31.01.24	HA	Drawing updated

