

Development Strategy  
Rugby Borough Council  
Town Hall  
Evreux Way  
Rugby  
CV21 2RR

Our ref: 23-01851  
Date: 2 February 2024

Dear Sir/Madam,

**Re: Rugby Local Plan Review Regulation 18 Issues and Options: October 2023 – Representations on behalf of Moto Hospitality Limited**

## Introduction

We act on behalf of Moto Hospitality Limited (Moto) and have been instructed to submit representations to the above Local Plan consultation.

The Moto Motorway Service Area (MSA) relevant to this consultation is the Rugby MSA, located at Junction 1 of the M6. Specifically, the following representations are made in respect of land adjacent to the north of the MSA, which is approximately 12.14ha in size and is currently being earmarked as a potential site for a ground-mounted solar farm to assist in Moto's Electric Vehicle (EV) charging points roll out and additional HGV parking that is urgently needed to cater for demand.

We are aware of L&Q Estates' representations for the wider land to the north of Junction 1 to be promoted as a mixed-use strategic allocation, including employment, housing and community infrastructure. We are supportive of each other's proposals and both parties have agreed to fully consider each other's proposals in their respective future development plans. However, it should be noted that both schemes will be subject to independent and separate planning applications.

These representations should be read alongside the completed Call for Sites Proforma and Red Line boundary plan enclosed to this letter.

## Moto Sustainability Aspirations

Moto has an ambition to become a net positive business by 2050 by putting more back into the environment than they take out. Two of Moto's strategic priorities towards achieving their vision to 'brighten people's journeys through life' are to be achieved by:

- Leading the transition to clean energies; and
- Building a more sustainable future

The impact of climate change will be one of the greatest challenges to UK businesses over the coming decade. To address these challenges and to deliver sustainable business growth, Moto will reduce carbon, maximise energy and water efficiency and keep waste to a minimum within their operations and across their supply chains.

**Rapleys - York House York Street Manchester M2 3BB**

T: 0370 777 6292

E: [info@rapleys.com](mailto:info@rapleys.com)

[www.rapleys.com](http://www.rapleys.com)

[@rapleys](#)

[linkedin/twitter](#)

To achieve this, Moto has developed five key goals to tackle climate change:

- Moto will lead the national transition to EV
- Moto will reduce negative environmental impacts and improve use of natural resources
- Moto will futureproof our sites through innovation and design
- Moto will provide safe environments for colleagues and customers
- Moto will help our customers to be more sustainable through our services and facilities

Transport currently accounts for a third of UK emissions and its decarbonisation requires significant technological and behavioural innovation. The Government announced in November 2020 that the sale of new petrol and diesel cars will be banned by 2030, which is now only 6 years away.

To achieve these targets, it is imperative that suitable infrastructure is provided to support electric vehicles. The National Grid's current demand stands at 334.2 TWh. This means the UK would need to increase its electricity production by around 100TWh to meet the charging demands of electric vehicles.

The National Grid's ability to meet even current demand for power is also becoming increasingly challenging. By 2025, Moto alone will need two and a half times as much power as it currently uses in order to service the growing number of Ultra Rapid EV Charging Points required. This is why Moto is committed to finding alternative and sustainable solutions for closing the power deficit.

In that context, Moto has set out an ambitious development strategy to bring forward solar farms on land adjacent to their MSA which will generate electricity to power the electric chargers at their services. Given the Government's support for electric vehicles, it is necessary for service stations to transform so that they can continue to provide an important service for customers.

Moto is proud to be leading the EV revolution on the UK motorway network, as the company strives to encourage more sustainable driving by making it easier for EV drivers to recharge their electric cars. Moto's aim is for all drivers to feel confident enough to switch to electric vehicles, safe in the knowledge that they do not need to worry about driving range anywhere in the UK, and Moto is proud to be leading the charge.

### **Improving HGV parking facilities**

In addition to the EV charging points roll out, based on gathered evidence, there is an identified need for additional HGV parking at Rugby MSA as the site is currently over the 'critical' need based on the current utilisation levels of HGV parking at the services.

The evidence is derived from Department for Transport recent National survey of lorry parking 2022, which outlines that on site utilisation levels of parking over 85% demonstrate critical level of need for additional parking.

### **Summary**

Therefore, based on Moto's development needs and aspirations to provide solar farms to power new EV charging points additional HGV parking on land directly adjacent to the north of the Rugby MSA, it is imperative that the land in question is safeguarded for such purposes.

The below commentary will address the relevant sections of the Rugby Local Plan Review Issues and Options consultation document in light of the above.

## Potential Strategic Employment Locations and Land for Housebuilding

The table on page 16 and map on page 17 identifies potential strategic employment locations for the borough, one of which around M6 Junction 1, where the Moto Rugby MSA is located.

Similarly, Section 9 outlines the Borough's housing land supply, and housing supply targets needed for the future. The map on page 52 identifies the land around M6 Junction 1 for a potential housing location.

The land directly to the north of Rugby MSA is an area where Moto may potentially plan to expand.

Paragraph 3.41 states that at this stage these are broad locations, not sites. Therefore, we have no 'in-principle' objection to potential new employment and housing sites around M6 Junction 1, as long as the site directly to the north of the Rugby MSA is safeguarded for Moto to expand, in order to improve their offer and services.

The National Planning Policy Framework (NPPF) states in section 6 that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt and that 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.

This is particularly pertinent given the 'critical' need for additional HGV parking and considering the Government's targets for electric vehicles, where the expansion of Moto Rugby MSA will significantly improve the infrastructure for electric vehicles.

## Zero Carbon Energy Sources

On 18 July 2019 Rugby Borough Council adopted a motion to declare a climate emergency. As such, the Council need to update the Local Plan to contribute to reducing carbon emissions and encouraging sustainable development and alternative energy sources.

Paragraph 7.14 states that the biggest reduction to greenhouse gas emissions can be achieved by installing more solar and wind electricity generation. Paragraph 7.16 outlines that the main renewable energy technologies likely to be workable in the borough are solar and wind energy.

Paragraph 7.21 then goes on to state that the Council could take a more supportive stance to both solar and wind energy, including identifying areas in which they would support new wind and solar energy generation. The paragraph then identifies potential locations such as along the A5 and motorways, including highway verges and central reservations.

We are highly supportive of the Council's stance regarding solar energy and encourage policies promoting the installation of solar farms and identifying potential locations along motorways. This approach would tie into Moto's aspirations for the future development of the Rugby MSA, where plans to install a solar array to power EV charging points are in the pipeline.

Implementing policy encouraging the development of renewable energy would also tie in with the objectives of the NPPF, where paragraph 160 states *"to help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development; and b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development."*

### Question 18

In order to deliver Moto's EV charging points and contribute to Government's strategic EV charging targets, the neighbouring field to the north and west of the main MSA building is suitable for a ground mounted solar development.

Policy and designation encouraging solar energy would help support the development of a solar farm at Moto Rugby MSA, but also help the Borough meet its targets regarding renewable energy and sustainable development.

### **Conclusion**

In conclusion, Moto are committed to the Moto Rugby MSA site and have plans to develop adjacent sites to the north in the near future. The planned developments will not only bring a benefit to the local economy and improve Moto's offer at Rugby MSA, but also help the Government meet their EV targets, and help the Borough meet their renewable energy goals.

We request that these representations are taken into account in the emerging Local Plan process and that Moto Hospitality and Rapleys are engaged in the future consultation stages.

Yours faithfully,

Rapleys LLP





Copyright KMB Ltd  
If in doubt contact KMB Ltd.  
All materials specified should be used in accordance with the manufacturers  
recommendations and all relevant current codes of practice.

OVERALL SITE AREA  
121,405M2 / 12.14Ha / 30A

El Sub Sta

Trac


Drawn  
Checked

*Amendments*

# Feasibility



Construction Consultants

PROJECT  
Rugby MSA  
Additional HGV Parking

CLIENT  
Moto Hospitality Ltd

TITLE
Site Layout - As Proposed Boundary

SCALE	DATE
1:1000 @ A1	June 2023

DRAWN BY	CHECKED BY	DRAWING No.	REV
DH	.....	7691_15	F

Unit S6, Building 67, Europa Business Park, Bird Hall Lane, Stockport SK3 0XA  
t: 0161 477 7709 e: Kmb@kmb-ltd.co.uk