



TOWN AND COUNTRY PLANNING ACT 1990

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

LAND TO THE WEST OF SYMMETRY PARK, RUGBY

**ON BEHALF OF:
TRITAX SYMMETRY LTD**

JANUARY 2024

REF: PJF/LS/10598 (b)

CONTENTS

1.0	Introduction	3
2.0	Need for B8 Uses	4
3.0	The Submissions to the Issues and Options	10
4.0	Merits of the Site	19

APPENDICES

1. Red Line 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 west of Symmetry Park, Rugby and 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 Phase 3 land is located to the north west of the Use Class B8 employment land which is currently being built out by TSL (as allocated in Policy DS8) (Planning Permission ref. R16|2569).
- 1.4 The purpose of these representations are:
- to set out the need for the allocation of additional logistics floorspace (and smaller/incubator units - Use Class B2/E(g)(ii)) in the emerging Local Plan;
 - to provide a response to the questions raised in the Issues and Options consultation paper; and
 - to confirm that the site is deliverable, is available now and can be readily developed, taking into account respective constraints, within the plan period.
- 1.5 A call for sites form is also submitted.
- 1.6 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; and
 - provide comprehensive sustainable transport links that integrate with the existing networks and provide good connectivity within the development and to the surrounding area.

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

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 Phase 3 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 land to the west of Symmetry Park, Rugby 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 the A4071 accessing 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 is of a scale that lends itself to a mix of unit sizes, including smaller/incubator units (Use Class B2/E(g)(ii)), as well as large logistics buildings, that would be attractive to international, national and regional occupiers.
- 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. 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.

3.0 SUBMISSIONS TO THE LOCAL PLAN ISSUES AND OPTIONS

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 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
 - the above-mentioned assessments.
 - 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.
- 3.11 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

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

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

3.13 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.”

3.14 The tables set out in Section 2 above demonstrate the acute need for a B8 allocation of the land west of Symmetry Park, Rugby.

3.15 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.”*

3.16 Recognising that the Issues and Options reports identifies a substantial need, we therefore request that the land west of Symmetry Park, Rugby is allocated for B8 development alongside an element of smaller/incubator units, Use Class B2/E(g)(ii)). The site can be accessed off the A4071 and is both deliverable and developable.

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

3.17 TSL support the broad location of the ‘A45/A4071 junction’, which they consider includes the land promoted as land to the west of Symmetry Park, Rugby. The A4071 forms a logical and defensible revised Green Belt boundary, and the site would form a natural extension of the wider Symmetry Park, Rugby employment development and the wider South West Rugby allocation.

3.18 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."*

- 3.19 The allocation of the site for B8 uses, in addition to those already developed to the south east of the site, 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.
- 3.20 As set out in Section 4 below, 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. In summary, the site is suitable, available and achievable for development.
- 3.21 The allocation of land for employment development, will meet a significant proportion of the Borough'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.
 - 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 the former railways line 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 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.
- 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.

3.22 As summarised above, the purpose of this representation is to ensure that the Council is clear that the site is deliverable, is available now and can be readily delivered. TSL has vast experience in delivering such scheme, 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.

5. We are minded to allocate sites specifically for industrial (B2) and light industrial (E(g)(iii)) uses. Do you support this and if so, where?

- 3.23 It is also noted that in paragraphs 3.10 to 3.13 of the Issues and Options paper that there is a recognition a particular need for B2 industrial and light industrial (now use class E(g)(iii)) land and these types of uses could be supported on the land west of Symmetry Park, Rugby site:

*"The HEDNA doesn't split the need for industrial and smaller warehousing land in the borough into different types of employment land. **It does, however, recommend that, because of the high demand for warehousing land, we should make specific site allocations for B2 industrial and light industrial (now use class E(g)(iii)) land.***

*Additionally, the **feedback we have received from local businesses is that there is a shortage of 'grow on space' in the borough to allow existing businesses to expand and incubator space for new start-ups.***

*Successful business clusters have developed in the borough, in particular the Manufacturing Technology Centre and associated manufacturing uses at Ansty Park. However, **there is an impetus to diversify the borough's economy and support the development of local skills to meet future business needs.***

*Alongside any review of the Local Plan, Rugby Borough Council **is producing a new economic strategy which will inform the local plan. As part of this Economic Strategy, we will consult with the Coventry and Warwickshire Chamber of Commerce, the Coventry and Warwickshire Growth Hub and Warwickshire County Council, West Midlands Combined Authority and other partners and representatives of the business community to refine our understanding of the employment land we need.*** [emphasis added]

- 3.24 It is also noted that the Issues and Options document states at paragraphs 3.20 to 3.21:

"Although Rugby and the Midlands are an attractive location for warehousing space, it is to recognise that a sizeable proportion of our existing industrial land is used for manufacturing and research and development uses. This is true, for example, of GE Power Conversion, Ansty Park and for part of Prologis Park at Ryton.

*It is the Council's expectation that the Economic Strategy **will support the expansion of manufacturing, research and development employment land. Therefore, additional site allocations are likely to be necessary to enable this need to be met and for Rugby to continue to be able to attract the next generation of these skilled businesses and jobs.*** [emphasis added]

- 3.25 TSL support the allocation of some of the site for Class B2 and Class E (g) (iii) Land.

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

- 3.26 With regards to the NPPF (2023) 'Protecting Green Belt Land' states at paragraphs 142 and 143 that:

“The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

Green Belt serves 5 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.”*

3.27 Paragraphs 145 and 146 state:

*“Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. **Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.** Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non- strategic policies, including neighbourhood plans.”*

*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority **should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.** This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

- (a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- (b) optimises the density of development in line with the policies in [chapter 11](#) of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- (c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.” [emphasis added]*

- 3.28 Paragraph 3.37 of the Issue and options Consultation report sets out the quantity of potential additional employment land the Council consider they need to find 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

- 3.29 As set out above (paragraph 2.4) the HEDNA (2022) states that the gross requirement for industrial land (Rugby Borough only) (this includes) smaller warehouses of up to 9,000 square metres) **is 218.ha** (Land needed 2021-2050).
- 3.30 Having regard to the particular facts of the scale of Council's employment land requirement (and potentially adjoining local authorities' requirements) and an inability to meet this on non-Green Belt land within the Borough it is entirely appropriate that Green Belt boundaries should be subject to a review and revision.
- 3.31 Therefore, it is considered that the need for employment land demonstrates exceptional circumstances and that the changes to the Green Belt (via the Local Plan process) in this location to help meet this need is fully evidenced and justified. The A4071 forms a logical and defensible revised Green Belt boundary, and the site would form a natural extension of the wider Symmetry Park, Rugby employment development and the wider South West Rugby allocation.

Climate Change Policies

- 3.32 With regards to the following questions:

21. Should we adopt a minimum tree canopy policy for new development?

- 3.33 It is considered that the adoption of a minimum tree canopy policy for new development is overly prescriptive and as such is not required.

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?

- 3.34 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

- 3.35 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?

- 3.36 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?

- 3.37 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?

- 3.38 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.

4.0 SECTION 4 – THE MERITS OF THE SITE

- 4.1 The section below sets out the merits of the site to demonstrate that it is suitable for development.

Site and Surrounding Area

- 4.2 The site is located on the A4701. The site is located within an area of countryside designated as Green Belt, which forms part of the wider West Midlands Green Belt.
- 4.3 The site extends to an area of 12.31 ha.
- 4.4 The site connects to the wider area via its access onto the A4071.
- 4.5 The immediate context and surroundings of the site is agricultural land to the west and south. Immediately to the east of the site is the former railway line which is a Sustrans cycle route and a local wildlife site. Beyond the railway line is the South West Rugby allocation which is allocated in the adopted Rugby Local Plan (2019) under policy DS8 for a new neighborhood of around 5,000 dwellings and 35 ha of employment land. The B8 employment element of this allocation is currently under construction by TSL under planning permission R16/2569.

The Proposal

- 4.6 The proposal is for B8 uses and some starter units Industrial (Use Class B2) and Light Industrial (Use Class E(g) iii) with a total developable area of approx. and floorspace approximately 45,000 sq.m.
- 4.7 Landscape buffers would be provided at the edges of the site, and it would form a natural extension to the South West Rugby allocation.

Suitability of the Site for Employment Development

- 4.8 The area of land proposed for allocation for employment is shown on the attached red line plan. The land is available, suitable and achievable for employment to form a sustainable development as advocated by the National Planning Policy Framework. The land is presently agricultural in agricultural use. It can be developed in a viable manner; and does not have significant development costs associated with it such as contamination or noise mitigation.
- 4.9 There are no third-party land ownership or access matters to complicate the site's delivery. It would therefore be well positioned to contribute to developer contributions if they are proven to be necessary to offset the impact of development.

Transport and Access

- 4.10 The site is located approximately on the edge of Rugby.

- 4.11 The site is accessed directly from the A4071. This will then provide access onto the A45/M45 to the south.
- 4.12 The site is accessible by bus. The nearest bus stops are located to the east of the site in Cawston (approximately 1 km away). New bus routes are also being created in the employment development to the east, which this site can link to. A public footpath runs thorough the site ref. R168 (bridleway).
- 4.13 To the east of the site the Sustrans route is a dedicated cycleway. National Route 41 is situated to the south of Bourton on Dunsmore and connects Rugby with Leamington Spa, Southam and Stratford-upon-Avon.
- 4.14 There is adequate space within the site to accommodate the proposed number of units, alongside the necessary roads, parking, landscaping and open space.
- 4.15 Site access will be from the A4071. A fully compliant site access design is achievable and deliverable. There are no highway safety or traffic capacity issues associated with the development of the site.

Landscape

- 4.16 The site lies adjacent to the west of the existing units at Symmetry Park, Rugby. The site is designated as Green Belt.
- 4.17 In terms of national landscape character, the Countryside Character of England identifies that the site lies within the Dunsmore and Feldon National Character Area (NCA 96).
- 4.18 The site is located in the Green Belt, the NPPF states (paragraphs 147-148) that:

‘When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land’.

- 4.19 When defining Green Belt boundaries, plans should:
- (a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;
- (b) not include land which it is unnecessary to keep permanently open;

(c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

(d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

(e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

(f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. “

- 4.20 It is submitted that the site does not contribute to the openness or other objectives of the Green Belt. For the following reasons the site does not contribute to the purposes on the Green Belt.

Purpose (a) - To check the unrestricted sprawl of large built-up areas - the land does not lie adjacent to a large built-up area. Therefore, the land is not considered to contribute to checking the unrestricted sprawl of large built-up areas.

Purpose (b) - To prevent neighbouring towns merging into one another - the land lies to west of the existing proposed development land at South West Rugby. The land is relatively distant from any towns and therefore plays a very limited role in preventing the merging or erosion of the visual and physical gap between Coventry and Rugby.

Purpose (c) - To assist in the safeguarding of the countryside from encroachment – to the east is allocated for development and to the disused railway which is an urbanising feature. The A4071 is an urbanising feature. The surrounding areas to the west are large open fields; however, these fields are relatively enclosed by woodland and tree belt particularly to the west and east. There is a limited relationship between the parcel and the wider countryside.

Purpose (d) – To preserve the setting and special character of historic town - there is no intervisibility with Rugby. The site relates very well in both landscape and visual terms to the existing landscape and that the site represents a logical and easily assimilated potential development.

- 4.21 In this instance, the Green Belt boundary has been made redundant by the South West Rugby allocation to the east and a logical and defensible long-term boundary of the A4071 to the west.

- 4.22 In summary, allocation of the site would be positively prepared, effective, justified and consistent with National Policy. The combination of complimentary factors such as Rugby's and surrounding authorities unmet employment land need as set out above are considered to constitute the exceptional circumstances to warrant the site being released from the Green Belt and allocated for development.

- 4.23 The core land-use planning principles require the planning system to ‘proactively’ drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local communities the country needs. Plans 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. It is clear that the Council need to undertake a full Green Belt review as the employment need identifies the need for a comprehensive review.
- 4.24 The site is sensitively located, and can be master planned to respect and reflect the constraints and setting of the site, including creating defensible Green Belt boundaries.
- 4.25 In summary the site is capable of creating a sustainable form of development, which can respond to its constraints and deliver new employment land.

Heritage

- 4.26 The site is not located within a conservation area. There are no listed buildings located on the site. The site does not include a scheduled ancient monument.

Ecology

- 4.27 There are no statutory or non-statutory designated wildlife sites sufficiently close to the site as to be at risk of development impacts or pose a constraint to the development layout. The disused railway to the east of the site is a designated Local Wildlife site.
- 4.28 The site is situated within the SSSI Impact Risk Zone for Draycote Meadows SSSI which is located 2km to the south. Draycote Water Local Wildlife Site is located 2km to the south-east.
- 4.29 The site has no statutory or non-statutory designations for nature conservation within its boundary. There are no RAMSARs, SPAs, SACs, or NNRs within 5 km of the site. There are no LNRs, WLS’ within 2 km of site.
- 4.30 The site primarily comprises agricultural land and is likely to be of limited ecological interest. Additional habitats present within and around the site include trees, hedges and a pond.
- 4.31 Therefore, the site is considered to be deliverable for employment purposes, with ecology not posing a prohibiting factor, subject to surveys during the preparation of a planning application.

Flood Risk and Surface Water Drainage and Ground Investigation

- 4.32 The site is located within Flood Zone 1 as defined by the Environment Agency’s Flood Map. Flood Zone 1 is defined as a low flood risk zone with a risk of flooding less than 1 in 1000 years or 0.1%.
- 4.33 The agricultural use of the site indicates that there are likely to be no contamination issues on the site.

Conclusions

- 4.34 It is considered that the site has the capacity to accommodate change and could support an employment development as part of an appropriate extension to Symmetry Park, Rugby, at a scale which is proportionate to the location's sustainability credentials.
- 4.35 It is acknowledged that the release of land would result in the encroachment of Green Belt and undeveloped land. However, employment need demonstrates an exceptional circumstance to amend the Green Belt boundary on the site/in this location, with the A4071 providing a logical defensible long-term boundary.
- 4.36 The allocation of the land for employment will help to meet employment needs and the site should be allocated for employment.
- 4.37 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 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, which 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 a number of 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 opportunity also exists to create a Green Infrastructure network for wildlife and public access through 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;
 - the development can provide a mix of units including smaller incubator units;

- 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.

4.38 It is considered that the site provides a great opportunity to deliver employment a sustainable location. The Local Plan Review should allocate the site.

4.39 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.

APPENDIX 1

