

Representations on Rugby Borough Council's Local Plan Review Preferred Options Consultation (Regulation 18) – Site 325

1. Executive Summary

- 1.1 These representations are submitted to Rugby Borough Council in response to the Local Plan Review Preferred Options Consultation, which was approved for consultation from 24th March to 19th May 2025. The representations specifically relate to land west of Magna Park Lutterworth, with the representations submitted jointly on behalf of [REDACTED]
- 1.2 The site promoted is comprised of four land parcels, identified in the Council's Stage 2 Site Assessment Report (March 2025) as follows:
- Site 106: Land opposite MP Lutterworth
 - Site 57: North of Coal Pit Lane
 - Site 36: Cross-in-Hand Farm, Willey
 - Site 35: Cross in Hand Farm, Monks Kirby
- 1.3 The landholdings are located to the west of the A5, opposite Magna Park Lutterworth, which at present falls entirely within Harborough District Council and is Europe's largest dedicated distribution park. The land is entirely outside Green Belt and is available, suitable, achievable and deliverable for employment development within the plan period.
- 1.4 As currently prepared, we do not consider the proposed approach in the draft Local Plan is sound for several reasons set out in these representations. These include:
- The original omission of land west of Magna Park as a 'broad location' for growth.
 - The underlying employment land figures underestimate the residual strategic employment land need.
 - The approach to identifying sequentially preferable sites is unsound due to the prioritisation of sites within the Green Belt, which does not accord with national planning policy.
- 1.5 The site is promoted as a sustainable western expansion to Magna Park Lutterworth capable of delivering significant benefits for Rugby Borough and the wider region, which have largely been overlooked in the preparation of the draft Local Plan. The benefits include:
- A proposed expansion to a highly successful employment ecosystem at Magna Park in a very sustainable location, with the extension able to leverage the existing physical and community infrastructure already in place;
 - The ability for an expansion to be able to cater for B2 and B8 use class occupiers to attract blue-chip businesses and provide a diverse range of job opportunities and associated economic benefits;

- The provision of a landscape-led scheme to provide habitat creation and biodiversity enhancements and opportunities for a new country park with links to the existing 200 acre country park at MPL;
- Opportunities for on-site training and education and synergies with training and research and innovation facilities already established at MPL;
- A large labour catchment with the existing park already served by a number of bus routes, with opportunities for network expansion; and
- Expansion of an existing employment park that acts as a satellite location to DIRFT, with further opportunities for businesses to be able to utilise the open rail terminal c. 7miles south.

1.6 The site promoters welcome the opportunity to work with Rugby Borough Council and the local community in order to realise the opportunity.

2. Introduction

- 2.1 These representations are submitted to Rugby Borough Council in response to the Local Plan Review Preferred Options Consultation, which was approved for consultation from 24th March to 19th May 2025.
- 2.2 These representations specifically relate to land west of Magna Park Lutterworth (MPL), with the representations submitted jointly on behalf of GLP Europe, [REDACTED] and [REDACTED].
- 2.3 The site promoted is comprised of four land parcels, identified in the Council's Stage 2 Site Assessment Report (March 2025) as follows:
- Site 106: Land opposite MP Lutterworth
 - Site 57: North of Coal Pit Lane
 - Site 36: Cross-in-Hand Farm, Willey
 - Site 35: Cross in Hand Farm, Monks Kirby
- 2.4 The combined landholdings are also included in the Council's Stage 2 Site Assessment Report as 'Strategic Site 325: Land adjacent Magna Park'.
- 2.5 The land is located to the west of the A5, opposite MPL, which at present falls entirely within Harborough District Council and is Europe's largest dedicated distribution park. Given the location of the boundary line between Rugby Borough and Harborough District Council's, which is located c. 10m west of the A5, whilst the majority of the site is within Rugby, a small proportion does fall within Harborough. This is detailed below and also on the Site Location Plan included in Appendix 1.

Site no.	Total site area (ha)	Area within Rugby (ha)	Area within Harborough (ha)
106	22.92	18.96	3.96
57	40.57	36.64	3.94
36	89.12	89.12	0
35	14.01	11.54	2.47
325	166.62	156.26	10.36

Table 1. Site area

- 2.6 MPL which was first established in 1987, is situated within the "Golden Triangle", at the intersection of the A5 and A4303, between Rugby, Coventry and Leicester. Its proximity to these three major employment centres, the M1 and the M6 allow for unparalleled access to the north, south, east and west of the country, enabling approximately 90% of the UK population to be reached within four hours by truck. This makes it one of the most sought after locations for strategic warehousing and logistics development in the country.

- 2.7 The site, promoted as a sustainable western expansion to MPL, is capable of delivering significant employment and economic opportunities for Rugby Borough and the wider region, and the site promoters welcome the opportunity to work with Rugby Borough Council and the local community in order to realise the opportunity.
- 2.8 The remainder of these representations are structured as follows:
- **Section 3** sets out the context for strategic employment development within the national, regional and local levels. It also comments on the Council's Development Needs Topic Paper and the conclusions it reaches.
 - **Section 4** provides commentary on Rugby Council's approach to identifying strategic employment growth locations within the draft Local Plan, with a specific focus on the Sustainability Appraisal.
 - **Section 5** describes the opportunity presented by the expansion of MPL to the west of the A5 to support the economic, social and environmental objectives of the borough. It also summarises the site's suitability and deliverability to demonstrate that the site should be allocated for employment development in the emerging Local Plan.
 - **Section 6** draws conclusions and recommends the next iteration of the draft Local Plan should allocate Strategic Site no. 325 for employment development as it will meet the identified needs for employment land for Rugby in the most sustainable manner and in conformity with national planning policy.

3. The Context for Strategic Employment Development

National Context

- 3.1 There is 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 and boost economic growth.
- 3.2 Paragraph 85 of the NPPF (2024) 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 innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential”*.
- 3.3 Moreover, Paragraph 87 of the NPPF states: *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for: b) storage and distribution operations at a variety of scales and suitably accessible locations that allow for the efficient and reliable handling of goods, especially where there is needed to support the supply chain, transport innovation and decarbonisation”*.
- 3.4 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.
- 3.5 In addition, 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)”*.
- 3.6 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.
- 3.7 In a recent Secretary of State Call In decision (APP/N4205/V/20/3253244), he agreed with the 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.”*
- 3.8 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.

- 3.9 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).
- 3.10 In a recent appeal decision (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*".
- 3.11 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.
- 3.12 Other changes in the logistics sector are 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 have consequences for reliability of supply chains. As a result, logistics companies supplying goods to UK manufacturers require greater levels of stock holding within the UK – so termed 'stock buffering'.
- 3.13 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.
- 3.14 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.
- 3.15 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...*".
- 3.16 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”.

Regional and Local Context

3.17 In September 2024, the 3rd iteration of the West Midlands Strategic Employment Sites Study (WMSESS) was published. This study was produced by Icenl in August 2024. It covers the whole of the West Midlands.

3.18 The WMSESS identifies three Opportunity Areas for road based strategic scale sites in the sub-region of Coventry and Warwickshire. These are:

- Area 5: M42 North Warwickshire
- Area 7: M6/A45/A46/M45 Coventry & Rugby
- Area 8: A46/M40 Warwick.

3.19 These areas are presented by Figure 14.1 of the study. The relevant part to this figure is provide below.

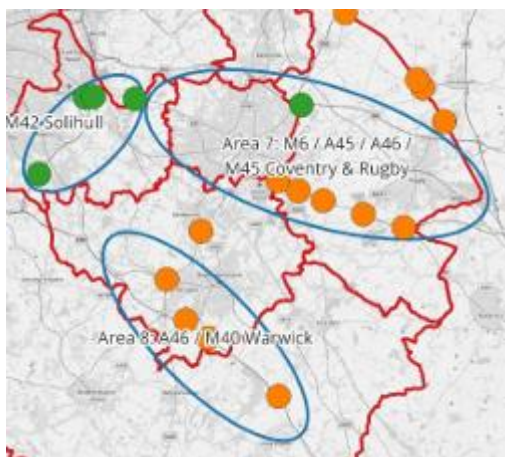


Figure 1. Opportunity Areas as identified in Figure 14.1 of the WMSESS (2024)

3.20 It is noted that the study emphasises that the boundaries of each opportunity area are not precisely defined or delineated (para 14.21).

3.21 Table 14.1 of the study provides an indicative site distribution by opportunity area. An extract of this table is provided below.

Opportunity Area	Notional supply – years (hatching=current committed supply)				Market rank	Indicative phasing	Indicative additional strategic site requirement at B8/mixed E(g)/B2 c.25ha	Narrative – market rank / performance, scale (no. LPA), site supply, SRFIs, Green Belt
	Type	0-5	5-10	10-15				

Area 7: M6 / A45 / A46 / M45 Coventry & Rugby	B8/ Mixed						C/D	1-2	Large OA. Highest existing supply. High demand location. Part GB constrained OA. Supply requirement later in study period.
	E(g)/B2					A	C/D	1-2	Highest existing supply although Coventry Airport is a single occupier site that may shorten supply period. Further supply at Ansty Park. Potential to attract further investment.

Figure 2. Extract from Table 14.1 of the WMSESS (2024)

- 3.22 For OA7 (which concerns Coventry & Rugby), one or two additional sites for B8 (50 ha +) and one or two additional sites for B2 (25ha +) are recommended for the study period (2022-2045). In both cases, the recommendation is caveated that new sites should be brought forward towards the latter part of the study period because of high existing supply. Committed supply for B8 in Area 7 is measured as lasting 20 years. The corresponding figure for B2 is 23 years.
- 3.23 In September 2024, the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (the Alignment Paper) was also published. It was subsequently amended and re-published in November 2024. This paper was produced also by IcenI, as was the original HEDNA (see below).
- 3.24 The HEDNA was published in November 2022. It also projected a wider separate need for strategic B8 for the sub-region as a whole. These projections covered the periods 2021-2041 and 2021-2050 and were presented in the Alignment Paper at Tables 2.1 and 2.2. Extracts are provided below for ease of reference.

Table 2.1 C&W Employment Land Needs 2021-41 ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	5.3	56.1	61.4	
N. and Bedworth	2.2	45.5	47.7	
Rugby	5.2	150.5	155.7	
Stratford-on-Avon	5.2	166.1	171.3	
Warwick	11.4	56.2	67.6	
Coventry	8.5	147.6	156.1	
Total	37.7	621.9	659.6	551

Source: IcenI Projects, C&W HEDNA 2022

Table 2.2 C&W Employment Land Needs 2021-50 ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	7.0	81.4	88.4	
N. and Bedworth	3.0	66.0	69.0	
Rugby	6.5	218.2	224.7	
Stratford-on-Avon	7.2	240.9	248.1	
Warwick	15.8	81.4	97.2	
Coventry	10.0	214.0	224.0	
Total	49.4	901.8	951.3	735

Source: IcenI Projects, C&W HEDNA 2022

Figure 3. Extracts from Tables 2.1 & 2.2 of the HEDNA & WMSESS Alignment Paper (2024)

3.25 The 2024 Alignment Paper reviewed these needs (i.e. industrial and non-strategic warehousing) and sought to align the findings of the HEDNA and WMSESS in respect of the need for strategic scale sites. The resulting findings are summarised by Table 3.9 of the Alignment Paper. This is extracted and provided below.

Table 3.9 Total Industrial Need

	2021-41	2021-45	2021-50
Industrial Need Non-Strategic Sites			
Rugby	58.4	68.0	79.5
North Warwickshire	60.3	70.2	82.1
Nuneaton & Bedworth	41.2	47.8	56.1
Coventry	104.9	121.8	142.8
Stratford	144.2	167.3	196.2
Warwick	83.3	96.6	113.3
Total	492.0	572.0	670.0
Strategic Sites Need 2021-45	835 – 1,017		
Total C&W Industrial Employment Land Need	1,327-1,509	1,407-1,589	1,505-1,687

Source: Icen Projects analysis of Local authority Monitoring Data

NB: figures may not sum due to rounding

Figure 4. Extract from Table 3.9 of the HEDNA & WMSESS Alignment Paper (2024)

3.26 These figures are gross and do not take into account existing committed supply. This exercise is undertaken for strategic scale sites in paragraph 4.7 to 4.11 of the Alignment Paper. In essence, the Alignment Paper carries forward the assumptions made by WMSESS in respect of committed supply and adds a further site – Padge Hall Farm (adjacent to Hinckley but in Rugby Borough), which has been granted planning permission since April 2022 (the cut-off for committed supply for the WMSESS). The resulting need for strategic sites is presented in paragraph 4.11 of the Alignment Paper, as below:

4.11 The residual strategic sites need is as follows:

- Area 5: North Warwickshire – 50-100ha
- Area 7: M6 / A45 / A46 / M45 Coventry & Rugby – 9-84ha
- Area 8: A46 / M40 Warwick – 75-125
- **Total: 136 – 311ha**

Figure 5. Extract from paragraph 4.11 of the HEDNA & WMSESS Alignment Paper (2024)

- 3.27 Overall, it is considered by the representations that the WMSESS which underpins the Alignment Paper is a well-intentioned piece of work as it seeks to boost the allocation of strategic sites across the West Midlands. In addition, its scope is ambitious, seeking to quality and quantify the amount of land required for each sub-region. It's assessment of gross need is multi-layered and includes sensitivity testing.
- 3.28 However, we are of the view that the study's assessment of existing supply of sites has been wholly uncritical, taking information provided by Local Planning authorities at face value. NDL, who have prepared a Technical Paper on Employment Land Need to support these representations, contend that the information is out of date (based on data prior to 2022) and untested in terms of its capacity or capability to deliver built floor space. This has led to a gross over-estimation of supply and, as a consequence, an under-estimation of residual need. This is particularly prevalent in the assessment of Coventry and Warwickshire and especially so for OA7, which takes in Coventry, its economic hinterland, Nuneaton and Bedworth and Rugby. NDL's analysis of current deliverable committed supply is that it amounts to only 92 ha. This is a fraction of that assessed by WMSESS and the Alignment Paper (560 ha).
- 3.29 The resulting analysis – with a projected need of just 136-311 ha to serve the whole of Coventry and Warwickshire – makes no sense in either economic or market terms. Instead, it serves to fundamentally undermine the principal purpose of the study i.e. the allocation of sufficient number of sites to serve the sub-regional economy for the next 20 years.
- 3.30 NDL considers this to be a lost opportunity and is very concerned about the potential consequences on the sub-regional economy. For these reasons, NDL has sought to engage with both responsible Council officers and Iceni Projects prior to the publication of the draft Local Plan, to present its full analysis of committed supply and request that the study, and the associated Alignment Paper, is reviewed and updated as soon as practically possible.
- 3.31 As noted, a Technical Paper on Employment Land Need has been prepared by NDL to support these representations which sets out our criticism of the underlying evidence base in full. In summary NDL contend that the requirement for strategic scale sites in Rugby over the plan period should be 1,456,711 sqm.
- 3.32 We understand that for the purpose of calculating Rugby's employment land requirement, RBC has assumed it will need to accommodate all the need for Opportunity Area 7 as identified in the WMSESS-HEDNA Alignment Paper. This is on the basis that:
- Coventry does not have land to allocate further large employment sites.
 - Only a small part of Warwick is within OA7 and this is already allocated for development.
 - Nuneaton & Bedworth emerging Local Plan is at an advanced stage and it is therefore unlikely any additional allocations can be accommodated.
- 3.33 We consider this is the correct approach, particularly given Rugby's locational advantage of having sites located on or near the SRN and outside the Green Belt. However, as above, we consider the underlying figures for which the employment need for OA7 has been calculated is fundamentally flawed.
- 3.34 In addition to the above, Rugby is also looking to allocate employment land to meet Coventry's unmet need. This has been calculated as 180,000sqm on 45ha.
- 3.35 NDL has reviewed the draft Coventry Local Plan and its associated evidence base and made representations on related employment land issues. In summary, NDL contends that there is actually a minimum shortfall of 348,000 sqm in Coventry

for the period 2024 to 2045, which should be considered for the purpose of assessing unmet need from Coventry over the Rugby Local Plan period.

- 3.36 In addition, another aspect of the wider regional need not considered by Rugby, is unmet need from Harborough. Rugby Borough shares a long boundary with Harborough District, with settlements such as Lutterworth well related both geographically and economically to Rugby. Rugby Borough and Harborough District are located in the epicentre of the “Golden Triangle” and MPL is a highly successful logistics park located on this boundary.
- 3.37 The draft Harborough Local Plan (Regulation 19) was consulted upon from 10th March – 6th May 2025. This looks to allocate two additional sites at MPL, totalling 137.8 ha to meet the identified requirement of 340,000 sqm for large-scale warehousing within Harborough District.
- 3.38 NDL contends that the project need for large-scale warehousing in Harborough should be a minimum of 623,000 sqm for the reasons set out in **Appendix 2**. As such, Rugby Borough should consider opportunities to assist in meeting this unmet need from Harborough, particularly given the unique opportunity on the border to expand the existing MPL.
- 3.39 Taking the above into account, these representations make the case that the employment need for Rugby Borough has been underestimated, and should comprise the following:

Element	Requirement (sqm)
Strategic scale sites	1,456,711
Smaller sites	251,284
Unmet need from Coventry	348,000
Unmet need for strategic scale sites from Harborough	283,000
Total	2,338,995

Table 2. NDL assessment of employment need for Rugby Borough

- 3.40 Qualitatively, a large majority of the committed and proposed supply of sites (c. 60%) is located within the Green Belt and on the eastern edge of Coventry. This seems to be out of proportion relative to other well served locations in Rugby Borough. Land west of MPL is an obvious such example.
- 3.41 Further detail is provided within the Technical Note on Employment Land Need in **Appendix 2**.

4. Rugby's Preferred Approach & Proposed Site Selection

4.1 This section provides comments on the Rugby Local Plan Preferred Options Document and supporting evidence base.

Spatial Strategy & Site Selection Methodology

4.2 Rugby Borough Council's (RBC) approach to the spatial strategy set out in the draft Local Plan 2024-2045 comprises three stages:

Stage 1: Housing and Economic Land Availability Assessment (HELAA)

4.3 This is a desk-based assessment of 261 sites formed of sites submitted during the call for sites process, lapsed planning permissions, allocations, planning permissions and identified by Officers. The assessment concluded whether sites were to either be (1) discounted; (2) suitable, achievable and available; or (3) not currently developable – changes to policy would be required.

Stage 2: Detailed Sites Assessments

4.4 This stage comprised a more detailed technical analysis of site constraints and opportunities of the sites identified in the HELAA as (3) not currently developable – changes to policy would be required, with the aim of narrowing the list to reasonable site options for inclusion in the sustainability appraisal.

4.5 A total of 112 sites were considered, with the site assessment identifying (1) potential site options; and (2) sites not to be progressed to the next stage.

4.6 Within the Detailed Site Assessments, the four land parcels subject of this representation were assessed independently: sites nos. 35, 36, 57 and 106; and also cumulatively as part of strategic site no. 325.

4.7 It is worth noting that whilst all the individual site assessments conclude that all land is outside the Green Belt, the analysis for strategic site no. 325 notes that 2% of the land area is within the Green Belt. To clarify, this 2% relates to a small area of land within the site boundary of site no. 36 which comprises a disused railway line. Removal of this land from the site area does not impact the developable area of the site, or its deliverability, and therefore we would like to take this opportunity to amend the site area for site no. 36, and site no. 325 accordingly. As such, all of the land subject of this representation falls outside the Green Belt boundary. This is shown on the Green Belt overlay plan in **Appendix 1**.

Stage 3: Sustainability Appraisal (SA)

4.8 This final stage combined the site analysis work of stages 1 and 2 with 'top down' strategic considerations, including development needs, to generate options for growth scenarios. The growth scenarios are then appraised in terms of their sustainability and potential for significant environmental effects.

4.9 The analysis was undertaken by Aecom, with the preferred growth option scenarios then selected by the Council. This then forms the Preferred Option subject of the Local Plan consultation.

4.10 The following section of these representations provides further commentary on the Sustainability Appraisal, which we consider to be flawed for the following reasons:

- How the ‘broad locations’ for growth were originally identified.
- The underlying employment need figures underestimate the residual strategic employment need.
- The approach to identifying sequentially preferable sites is unsound and does not accord with the national planning policy.

4.11 Taking each of these points in turn:

‘Broad locations’ for growth

- 4.12 The potential locations for strategic employment development is discussed in paragraphs 2.3.7 – 2.3.8 of the SA. This states that the starting place for identifying broad locations for new employment land allocations is the figure taken from the Issues & Options (I&O) consultation document (2023), included at Figure 2.3 of the SA.
- 4.13 Paragraph 2.3.7 states that these areas/options “*unsurprisingly correlate closely with the existing strategic employment areas*”.
- 4.14 Whilst this is true of the areas identified, there is a clear omission of the land to the west of MPL as a potential location, despite it being within the A5 corridor and adjacent to an existing major employment site of regional significance which accommodates strategic warehousing uses. It cannot be said that this land was excluded on the basis that MPL is situated within the neighbouring borough of Harborough, as both the areas ‘North of Houlton’ and ‘South of Hinckley’ are identified in Figure 2.3 despite also being located in proximity to existing employment areas in neighbouring authorities. Indeed, MPL is the only existing large employment area which does not have a potential location for growth identified adjacent to it.
- 4.15 GLP and NDL raised concerns with this approach at the previous Regulation 18 stage, specifically given that it was unclear of how these broad locations for growth had been identified or the methodology used, particularly given the inconsistency of omitting the land west of MPL.
- 4.16 It is acknowledged that the area to the west of MPL has been included in the list of potential locations for strategic employment growth in paragraph 2.3.8 despite not featuring in Figure 2.3, however the accompanying text does make reference to this location “*[not being] flagged as a foremost option at the Issues & Options stage*”. This should not be a factor weighing negatively against this potential location for strategic employment growth given there was a clear omission in Figure 2.3 as presented during the previous consultation.
- 4.17 We therefore question the validity of the initial process for identifying the broad locations for strategic employment growth and thus the impact this may have had on the subsequent analysis of these locations within the SA.

Employment Need Figures

- 4.18 Paragraphs 5.2.16 – 5.2.25 of the SA summarise how the strategic employment need has been calculated, which is largely based on the West Midlands Strategic Employment Sites Study (WMSESS) (2024) and subsequent Alignment Paper (2024). Using these figures, paragraph 5.2.39 of the SA states:

“Building upon the discussion of ‘growth quanta’ above, the first point to make here is that a key priority is to explore options suited to industrial uses other than large-scale logistics (use class B8), which primarily means ‘general industrial’ (Use Class B2)”.

- 4.19 The SA sets out that this is based on two factors:
- a. The residual need figure for B8 is not high after having taken into account a very extensive pipeline of supply of B8 sites with planning permission.
 - b. There are two site options at Rugby that are clearly well-suited for allocation in order to deliver the residual need figure for B8, because they are *to some extent* already committed.
- 4.20 Firstly, we do not agree with the residual need figure for B8 (or the employment need figures in general). This is discussed above and in detail in the Technical Statement on Employment Land Need prepared by NDL which accompanies these representations. In summary, we consider that the pipeline of B8 sites has been overestimated, which has led to the residual B8 need being reported lower than it should be. The employment need also underestimates the unmet need from Coventry and does not consider any unmet need from Leicestershire.
- 4.21 As this is informing the SA, this leads to the unsound conclusion that the strategy should be to explore options suited to industrial uses other than large-scale logistics as a priority.
- 4.22 Secondly, we do not agree with the claim that there are two site options in Rugby which are ‘to some extent already committed’. This statement relates to two sites:
- Site 17: South West Rugby Phase 2
 - Site 64: Coton Park East
- 4.23 Whilst we appreciate these sites have status as allocations in the adopted Local Plan, we do not consider it correct that these sites are to some extent already committed specifically for employment purposes. Taking each of the sites in turn:
- Site 17: South West Rugby Phase 2
- 4.24 The land comprising South West Rugby Phase 2 was identified as ‘safeguarded land’ within the adopted Rugby Local Plan (2011-2031), to be safeguarded for future allocation in a Local Plan either for residential or employment development. Specifically, paragraph 4.61 of the adopted Local Plan states:
- “The site [South West Rugby] 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”.*
- 4.25 There is further explanation regarding the safeguarding of the land in a letter from RBC to the Inspector (in the Examination Library under reference RBC/02) which sets out that safeguarding a portion of the allocation site beyond the plan period “would allow time to ensure that development within the South West takes place in managed phases”. Additionally, the letter states: “As detailed in the Housing Trajectory, housing within the South West Rugby allocation is already expected to be built out beyond the plan period. It is therefore proposed that the wording of the safeguarded land in modification LP54.191

is amended to reflect this so that the land is reserved for potential employment growth, if necessary, beyond the plan period”.

- 4.26 Therefore, it is clear that the rationale behind safeguarding this parcel of land was to ensure that development would come forward in phases, and also provide flexibility in case the growth targets for housing and employment changed beyond 2031.
- 4.27 Within the adopted Local Plan, South West Rugby as a whole is allocated for around 5,000 dwellings and 35ha of B8 employment land.
- 4.28 The 35ha of employment land has already been satisfied by development granted under planning consent ref R16/2569. As the South West Rugby SPD (December 2024) explains, the total permitted site area under R16/2569 is 46.2ha, which exceeds the 35ha in the allocation, but this has been considered acceptable and accords with the site boundary identified for the employment area on plans in the previous iterations of the SPD.
- 4.29 A design code for the South West Rugby allocation has also been prepared and was consulted on in March 2025. Within this, two scenarios for the safeguarded land are presented: one for residential development and one for employment development. Section 6 ‘Built Form’ includes guidance on residential density. For the safeguarded land, this sets out densities of between 30dph and 40dph. Using the site area of 40.7ha for the safeguarded land, and a density of 30dph, would equate to this land being able to accommodate c. 1,221 dwellings.
- 4.30 Therefore, given the safeguarded land would be able to accommodate in excess of 1,000 homes, it is not clear why it has been automatically assumed that this land should be designated for employment purposes when, and as explained further below, not allocating this land for housing puts additional pressure on the Council to find alternative residential allocations, including land within the Green Belt, and there are alternative (non-Green Belt) sites capable of being able to accommodate employment land to meet the identified need (e.g. land west of MPL).

Site 64: Coton Park East

- 4.31 The Coton Park East land forms part of allocation DS7 in the adopted Rugby Local Plan for 800 new homes and 7.5ha of employment development. The land is subject to the following extant planning consents:
- Full planning permission ref R22/0551 for storage and distribution floorspace (Class B8) (single unit of 26,421 sqm) granted 17th February 2023. This permission satisfies the employment requirement of allocation DS7 and forms part of the committed supply for employment land.
 - Outline planning permission ref R20/0336 for 225 residential dwellings granted 24th February 2021. This development has been delivered.
 - Outline planning consent ref R20/0787 for up to 475 dwellings, with land for either a primary school, secondary school or additional 100 residential dwellings, granted 26th April 2023.
- 4.32 Planning permission R20/0787 has not yet been implemented but remains extant. A reserved matters application ref R25/0210 was submitted in February 2025 for infrastructure works (installation of new link road, footways / cycleways, 4no. bus stops and temporary drainage) pursuant to outline planning permission R20/0787 for up to 475 dwellings. Therefore, whilst the SA states that the landowner of this site has expressed a desire to deliver employment development,

it should be noted that there is an extant planning consent for residential development in this location, and the land promoter is also pursuing reserved matters associated with this consent at the current time.

- 4.33 As such, we do not consider the Coton Park East site can be considered 'to some extent committed' for employment development on the basis that the land promoter is continuing to pursue residential development on the site, via the recent submission of a reserved matters application.
- 4.34 Moreover, if this land were to be allocated for employment, rather than residential, this would lead to a shortfall of 575 dwellings against the previous DS7 allocation. This then puts pressure on elsewhere in the borough as RBC have to find alternative housing sites to satisfy this requirement. This is acknowledged in the assessment of site no. 64 in the HELAA, which states "*will need to make up for shortfall in housing numbers if site taken forward for employment instead of housing*".
- 4.35 The draft Local Plan sets out the need to deliver 12,978 new homes over the plan period to 2045. This includes allocating land for 3,338 new homes, of which the following comprise proposed allocation in the Green Belt:

Site Ref	Site name	Dwellings
75	Lea Crescent, Newbold on Avon	20
316	Land at Long Lawford	400
6	Fosse Way, Stretton-on-Dunsmore	3
81	Land west of Fosse Way, Stretton-on-Dunsmore	40
134	Land north of Plott Lane, Stretton-on-Dunsmore	125
39	Dyers Lane, Wolston	15
337	West Farm and Home Farm, Brinklow	75
315	Land south of Rugby Road, Brinklow	340
84	Land south of Leicester Road, Wolvey	60
96	Land at Coventry Road, Wolvey	500
309	Land north of B4109, Wolvey	150

Table 3. Proposed allocations for housing on Green Belt sites in the Rugby draft Local Plan

- 4.36 The emerging Local Plan therefore proposes to allocate land within the Green Belt to provide 1,728 new dwellings.
- 4.37 If both the SW Rugby Phase 2 site and Coton Park East were to remain allocated for residential development to provide c. 1,221 and 575 dwellings respectively, this would significantly reduce the pressure on the need to find sites for housing development within the Green Belt as the 1,728 dwellings currently planned on Green Belt sites could continue to be accommodated at SW Rugby Phase 2 and Coton Park East as originally intended.
- 4.38 Removing the requirement for South West Rugby Phase 2 and Coton Park East to deliver residential development and allocating them instead for employment development is therefore not in accordance with paragraph 147 of the NPPF which requires local authorities to consider all reasonable alternatives before looking to allocate Green Belt land for development.
- 4.39 For these reasons, we do not consider these sites can automatically be assumed to be 'already committed' for employment development, given the significant impact this has on the Council's overall housing strategy. In doing so, this leads to the Council adopting an unsound approach to identifying other employment allocations given the flawed assumption that the B8 demand can be met elsewhere.

Sequential approach to identifying preferred sites

- 4.40 The Council's approach to identifying preferred sites for employment growth is set out in paragraphs 5.4.84 – 5.4.95 of the SA.
- 4.41 In the first instance, we consider the approach within the SA as a whole is fundamentally flawed on the basis it assesses Green Belt sites ahead of locations outside the Green Belt.
- 4.42 Paragraph 147 of the NPPF states:
- “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” [Emphasis added].*
- 4.43 We do not consider that the Council can demonstrate that it has complied with NPPF Paragraph 147 as it has not examined fully all other reasonable options for meeting its identified need for development *before* concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, given that non-Green Belt sites have not been assessed as potential options ahead of identifying Green Belt sites.
- 4.44 From the potential locations for growth identified in the SA, it is clear that employment needs can be met by sites wholly outside the Green Belt, including the land west of MPL, negating the need to release Green Belt land for development.
- 4.45 We also question how the Council can come to a decision on a preferred approach for development which includes allocating Green Belt sites, in the absence of a Green Belt Review. We understand that this is still being prepared which raises questions about the robustness of the SA, and the Green Belt Review being undertaken potentially to support the preferred approach, rather than being used to inform it.
- 4.46 We also understand that the Green Belt Review work being undertaken by Rugby will also include identification of Grey Belt land. Should any of the sites currently in Green Belt be considered as Grey Belt, in accordance with the NPPF, these are still to be considered less sequentially preferable than sites wholly outside the Green Belt and Grey Belt.
- 4.47 The SA as a whole is therefore fundamentally flawed. Our conclusions on this issue are supported by legal advice from Paul Tucker KC and Freddie Humphreys of Kings Chambers. The advice is included within **Appendix 3** and sets out that the approach in the draft Rugby Local Plan regarding the allocation of employment land is fundamentally flawed and unlawful. This is on the basis that the evidence base to support the draft Plan provides retrospective justification for the proposed allocations, as opposed to being an evidence-led process as required by both policy and law. An evidence-led process would include full assessment of 'reasonable alternatives', which, in the case of a plan proposing to allocate land in the Green Belt, should comprise assessment of meeting the identified need on land not in the Green Belt.
- 4.48 Notwithstanding the comments above about the SA being fundamentally unsound given the preferential assessment of Green Belt sites, the following paragraphs of these representations provide commentary on the sequential approach taken within the SA, particularly how the SA assesses alternative sites ahead of land west of MPL.
- 4.49 The Council first identify the residual figure is now lower than reported following a large site gaining planning permission post 1 April 2024 for 274,388 sqm, namely Crouner Fields Farm, Ansty (site no. 95). To note, this planning application (ref R23/1027) received resolution to grant at committee on 18th December 2024, but a decision notice is yet to be issued. Planning permission has therefore not yet been granted.

- 4.50 Secondly, it is questionable whether it is correct to assume that this development does contribute towards meeting the need for strategic employment floorspace given that the application was clearly designed to meet the requirements of a specific occupier (i.e. Frasers Group) and the draft decision notice includes conditions requiring the development to be occupied and operated by a single campus company. Rather than meeting a wider employment need, it could be argued that this this development is therefore catering for a specific occupier requirement. Notwithstanding this, this scheme does illustrate demand for new strategic employment sites in this location.
- 4.51 The SA identifies the 'first port of call' is to allocate the two site options at Rugby that are presented to be to some extent already committed. As set out above, we dispute the contention that the South West Rugby Phase 2 and Coton Park East sites are to some extent already committed for employment development, and do not agree allocating these sites should take priority above all other potential locations for employment growth, particularly given the consequences this has for housing delivery and the Council's overall housing strategy which requires significant Green Belt loss.
- 4.52 The next two sites considered sequentially preferable by the Council are both within Green Belt. These are site no. 14 (Ansty Park) and site no. 328 (west of Prologis Park Ryton). As above, we do not consider assessing these sites ahead of non-Green Belt options is sound as it does not accord with NPPF paragraph 147.
- 4.53 Of these two Green Belt sites considered, site no. 14 (Ansty Park North) is taken to be a constant in all growth scenarios tested on the basis that it is relatively well-contained in landscape / Green Belt terms (despite a Green Belt Review not having been published) and there is a need to support Ansty Park as a highly successful hub for a variety of high-value industrial and wider business activities (para 5.4.86 of the SA).
- 4.54 Taking site nos. 95, 17, 64 and 14 as constants, the SA then claims there is a residual need figure that could be met via the allocation of just one further strategic site, or the possibility of meeting it via allocation of several smaller sites (para 5.4.88). The options for this that are examined by the SA are:
- Site no. 328 (west of Prologis Park Ryton)
 - Site no. 130 (Land north of Houlton); or
 - Site nos. 18 (Barnwell Farm, Thurlaston) and 133 (Land North of M45).
- 4.55 Paragraph 5.4.90 states that an extension to Magna Park (site no. 325) is considered less sequentially preferable to the above options and is therefore ruled out as a potential allocation at this stage.
- 4.56 We strongly object to this approach for a number of reasons.
- 4.57 Firstly, and as set out above, all potential allocations on non-Green Belt land should be given first consideration in the site selection process in accordance with Paragraph 147 of the NPPF. Land west of MPL lies solely outside the Green Belt and therefore should be fully examined as a reasonable alternative by the Council, before any conclusions about releasing Green Belt are made.
- 4.58 In addition to the commentary made above on site nos. 95, 17, 64 and 14 and why these should not be considered sequentially preferable to other options, we also consider there are a number of issues with the other sites included as reasonable alternatives, notably:

Site 328: West of Prologis Park, Ryton

- 4.59 Site no. 328 is comprised of two sites and also assessed individually: site no. 50 Prologis Park Ryton West and site no. 61 Mountpark Ryton. The Stage 2 site assessment for site no. 328 identifies that there are high ecological constraints, specifically stating that “*given the location of Ryton Wood SSSI within 500m of the site, there are significant constraints to the development at this site and other alternative sites for development should be considered in the first instance*”.
- 4.60 This conclusion in relation to site no. 328 is taken from the Rugby Ecological Constraints Assessment (March 2025) which was prepared to support the emerging Local Plan and comprises an assessment of ecological constraints at 53 ecologically sensitive HELAA sites, identifying potential impacts of development and outlining recommendations for mitigating impacts. The report recommended that sensitive design and site layout avoid and ensure the protection of ecological sensitive features associated with Ryton Wood SSSI, River Avon and Tributaries LWS, Featherstone Farm Fields LWS and Siskin Drive Bird Sanctuary LWS, but only where alternative site locations are not feasible (paragraph 57.3.10).
- 4.61 Notwithstanding this, the Council commissioned a further assessment of ecological constraints at site no. 50 (i.e. the part of site no. 328 that is the most ecologically sensitive) to complement the Ecological Constraints Assessment. It is important to note in this respect that this appears to predate the Ecological Constraints Assessment, with the main report dated March 2025 and the additional information for site no. 50 being dated 15th January 2025.
- 4.62 The additional information for site no. 50 reiterates (with emphasis added), that sensitive design and site layout to avoid ecologically sensitive features should only be considered where alternative site locations are not feasible (paragraph 10). The report does go on to set out potential mitigation for the site, but this can only be considered in the context of this site being the only potential location to accommodate employment development to satisfy need.
- 4.63 This is not the case, and it is notable that other less-ecologically sensitive sites have been discounted. This includes site no. 325 for which the Stage 2 site assessment concludes the following in relation to ecology: “*An initial ecological assessment indicated that the site was not within an Impact Risk Zone [or] a Site of Special Scientific Interest, nor a Local Wildlife Site, not was it comprised of more than 20% medium to high distinctiveness habitat*”. The site was not further assessed for ecological constraints given none were identified.

Site 130: Land north of Houlton

- 4.64 The land north of Houlton is not located immediately adjacent to any existing employment development. It is located to the north of the Rugby Radio Station development but detached from any employment floorspace to be delivered as part of this development. The land is not well related to DIRFT, which is situated to the south east of the site with housing (i.e. the new settlement at Houlton) intervening.
- 4.65 As such, this location would not be able to benefit from utilising any of the existing or planned infrastructure as part of either of these developments and would effectively act as a standalone employment park. This would limit any benefits that could be released from expanding already existing employment parks through the creation of critical mass and clustering benefits.
- 4.66 The ability to benefit from a strategic extension to DIRFT is also limited on the basis that this site is promoted by a different developer (Stoford) compared to the developer of DIRFT (Prologis). This therefore represents a piecemeal approach to development, rather than a cohesive extension which would be able to leverage existing infrastructure such as roads and community liaison groups.

- 4.67 It is also noted in the Stage 2 Site Assessment that National Highways have expressed high levels of concerns regarding development in this location.
- 4.68 We also understand this site may also be subject to significant heritage constraints due to the proximity to, and association with, Grade II Listed Dunsmore House.

Site 18: Barnwell Farm, Thurlaston and Site 133: Land North of M45

- 4.69 The third option considered by the Council is seeking to meet the remaining need via two smaller site allocations (i.e. site nos. 18 and 133). There are a significant number of benefits associated with favouring larger logistics parks and the benefits associated with clustering of their uses including cost, management and environmental efficiencies from shared infrastructure and resources between businesses:

Management:

- 4.70 Logistics operations that form part of a cluster are much easier to co-ordinate and are therefore much more likely to be realised under a single ownership and management. Most UK based logistics developers predominately seek to maintain ownership of all their assets and associated infrastructure which enables better coordination and efficiencies between business which maximise the associated benefits.
- 4.71 A larger site provides an opportunity to deliver large scale facilities that are increasingly required by major warehouse and industrial units, which has seen the average sized unit increase from 217,000 sqft in 2015 to 340,000 sqft in 2020. Examples include the sharing of local bus routes and car club services.

Investment:

- 4.72 A piecemeal approach to logistics development results in individual developments each without the critical mass to generate the level of investment required to facilitate the infrastructure needed to support this level of development and deliver sustainable economic development.
- 4.73 The allocation of larger sites for Class B2 and B8 uses also has the ability to attract major occupiers in a range of sectors, including those seeking to serve regional and national markets. It is critical to provide space for a mix of sectors and employment uses that deliver a diversity of employment as a cohesive and connected business ecosystem is essential for the creation, growth and retention of innovative and economically prosperous businesses in the region.

Efficiency and Sustainability:

- 4.74 The co – location of different business functions (e.g. offices, research and development or training facilities) alongside warehousing and manufacturing space is a means of improving operational efficiency, reducing estate costs and fostering stronger collaboration between different business units. The close proximity of different uses will also result in a higher proportion of full HGV loads which reduces both transportation costs and CO2 emissions.
- 4.75 Therefore, all potential options for allocating larger employment sites (i.e. land west of MPL) should be considered first ahead of looking at splitting the employment need across two smaller land parcels. This is also supported by the WMSESS within which the criteria for strategic employment sites states these should be sufficiently large and flexible, ideally a minimum of 25ha and readily over 50ha. Site nos. 18 and 133 are 26ha and 12ha respectively, thus performing poorly against this criterion in the WMSESS for strategic employment sites.

4.76 For these reasons, we do not consider that site nos. 328, 130, 18 and 133 should be considered preferential to the land west of MPL. We also dispute the rationale for dismissing site no. 325 as set out below.

Site 325: Land west of Magna Park

4.77 The SA does not provide clear justification for the omission of site no. 325 as a reasonable alternative to be examined. Rather, the assessment of site no. 325 in the Stage 2 Site Assessment Report states that the site is relatively unconstrained in highways, landscape and ecological terms – in contrast to some of the other alternative sites that have been included as reasonable alternatives, as outlined above.

4.78 In ruling out an extension to MPL as a potential site allocation, the SA makes reference to concerns raised in section 5.2. The table below responds to the concerns raised:

Commentary in paragraph 5.2.42 of the SA concerning Magna Park	Response
<p>“The park is already very large, continues to expand and is set to expand further through the new Harborough Local Plan”</p>	<p>Harborough District Council (HDC) are preparing a new Local Plan, the regulation 19 version of which was consulted on between March – May 2025. Within this, two locations within and adjoining MPL are subject of draft employment allocations: a north-eastern extension (Land at Mere Lane SHELAA Ref 24/12227) and an infill site between Magna Park Central and Magna Park South (Land South of George House SHELAA Ref 24/10595).</p> <p>The emerging HDC Local Plan is accompanied by a Strategic B8 Needs Sensitivity Report (December 2024) prepared by Icen Projects Limited. This sets out that there is a need for 137ha of strategic B8 floorspace as part of the emerging Local Plan. This need can therefore be fully accommodated by the two emerging site allocations at MPL.</p> <p>Any further expansion of MPL to the west of the A5 would be catering to meet additional need over and above that identified by HDC in the 2024 assessment. The authorities in Leicestershire have commissioned a new study to consider the overall need for strategic B8 development and then take forward, on this basis, consideration of how this is apportioned across Leicestershire.</p> <p>Whilst there is no indication of potential need, we consider this is likely to show a large requirement, particularly following the Hinckley SRFI decision. Need to be apportioned with west of Leicestershire needing to accommodate the majority given the good connectivity on the SRN compared to other areas of Leicestershire (Blaby etc.). As such, there may be a position where Leicestershire is unable to meet its identified need, and needs to look elsewhere (e.g. in Rugby/Warwickshire).</p> <p>There is also no evidence to suggest that the size of the park is “too large”. Rather, to the contrary, there are a number of benefits associated with creating a critical mass and clustering uses, as set out above.</p>
<p>“Whilst further expansion through the Rugby Local Plan is an option to consider, including given land located outside of the Green Belt and other land in the Green Belt that may comprise Grey Belt”</p>	<p>As referenced in Section 3 of these representations, all the land to the west of MPL subject to these representations (and comprising strategic site no. 325) is wholly outside the Green Belt. As such, this location should be considered before consideration of any site allocation utilising Green Belt land in accordance with NPPF paragraph 147.</p>
<p>“A key concern is that this is a rural location distant from major centres of population/labour, with implications for transport and wider objectives”</p>	<p>These representations are accompanied by a Labour Study prepared by CBRE which is included in Appendix 4. This demonstrates that MPL has good labour availability and attracts workers from a number of neighbouring authorities. The greatest proportion of workers (24%) at MPL are coming from Leicester, with 13% travelling from Rugby and Harborough respectively. Workers also travel from Coventry, Birmingham, Lutterworth, Hinckley and Nuneaton. There is also</p>

	<p>planned housing growth within the MPL catchment, which could provide an additional c. 17,000 workers over the next 20 years.</p> <p>The travel patterns of existing employees aligns with the already established public transport infrastructure that is in place. A number of bus routes serve MPL, bringing workers from Lutterworth, Leicester, Rugby and Hinckley. An expansion to MPL is therefore inherently sustainable as a public transport network is already established and there may be opportunities for future enhancement to the services.</p> <p>It is also noted that the Strategic B8 Needs Sensitivity Report (December 2024) which Icenip prepared to support the Harborough DC Local Plan, this allocates the two locations identified for employment growth at MPL ‘green’ ratings, with the assessment noting that the sites are attractive locations within/adjacent to an established logistics park, with strong access to the A5 and within close proximity to the M1. The sites will also benefit from the established public transport network servicing the MPL site.</p>
<p>“Also there is a need to carefully consider in-combination impacts of growth on the strategic road network”</p>	<p>A Vision-Led Transport Note prepared by Apex Transport Planning supports these representations (Appendix 5). The note considers the opportunities for sustainable transport and sets out a vision-led approach for increasing sustainable transport movements and constraining vehicle movements to and from the site, whilst also reducing background movements across the existing Magna Park through a joined up sustainable travel strategy and consolidation of operational vehicle movements.</p> <p>The Transport Note demonstrates that the site is ideally located for accommodating employment uses and minimising vehicle movements, as well as for facilitating the delivery of key strategic infrastructure improvements which would offer further benefits on the network.</p> <p>The Note also includes updated traffic survey information which demonstrated that traffic flows have reduced significantly between the period 2013/14 to 2025 by up to nearly 7,000 (26%) daily trips per day within the study area, and around 600 (30-40%) trips in each of the network peak hours. There are a number of potential reasons for the reduction in flows, but this does demonstrate that there is likely to be capacity on the network for accommodating additional development west of MPL and, subject to more detailed analysis, there should be viable highway mitigation solutions to deliver the site appropriately and without a severe impact.</p> <p>It should also be noted that sites with ‘High’ transport concerns on the SRN (i.e. Prologis Park Ryton and Land north of Houlton) as identified in the Stage 2 Site Assessment document, are seen as sequentially preferable to land west of MPL. The Transport Note prepared by Apex demonstrates that site no. 325 has a preferential location for access by sustainable modes than other sites considered by RBC for employment development.</p>
<p>“There is also a limited numerical argument for allocation, given sequential preferable locations suited to delivering B8 at Rugby”</p>	<p>As set out in these representations, we consider RBC’s assessment of need wholly underestimate the overall requirement for employment land in Rugby Borough.</p> <p>The proposed expansion to the west of MPL also provides an opportunity to deliver both B2 and B8 uses, in a range of different unit sizes, catering for market demand and providing a range of job opportunities.</p> <p>Moreover, the sites noted by RBC as being ‘sequentially preferable’ comprise land within the Green Belt. As set out above, and in the accompanying Legal Opinion (Appendix 3) we consider this approach to be fundamentally flawed and unlawful. Paragraph 147 of the NPPF requires an authority to demonstrate it has fully examined all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. In this instance, a “reasonable option” includes consideration of meeting employment need without using land that is</p>

	located in the Green Belt, which hasn't been tested by RBC and rather considered sequentially less preferable.
<p>“Site is distant from main centres of population and there would be a concern around the in-combination impacts of high B8 growth on Rugby, given that a high proportion of Magna Park workers are thought to live in Rugby. In particular, the concern around a recent increase in HMOs within Rugby, with the Council now having introduced an Article 4 Direction to address this issue.”</p>	<p>As detailed in the CBRE work that supports these representations (Appendix 4), MPL attracts workers from a number of locations including Leicester, Coventry, Birmingham, Lutterworth, Rugby, Hinckley and Nuneaton. This work also highlights the different demographics that make up the workforce at MPL, the majority of which are not ‘transient renters’ or ‘rental hubs’, but rather ‘aspiring homemakers’ who tend to own their own home. The CBRE assessment also comments on the potential wages associated with jobs in the logistics and manufacturing sectors, which tends to be higher than those in the wholesale and retail, and the accommodation and food service sectors.</p> <p>Whilst the existing MPL in Harborough is subject to a planning policy restriction specifying that units must be B8 and over 9,000sqm, the same restriction does not need to be applied to an extension to MPL to the west of the A5 in Rugby, with the site instead being able to accommodate both B2 and B8 uses in a range of unit sizes (including move-on premises and mid-box units).</p> <p>In a recent planning appeal decision (ref APP/W2845/W/24/3354423 Land north of Bell Plantation, Watling Street, Towcester NN12 8EU), the Inspector made reference to the ONS Annual Population Survey 2018 which identifies that 12.8% of jobs in the logistics sector are for managers, directors, senior officials and professional occupants. The Inspector therefore concluded that the proposed scheme (which was 75% B8 floorspace) would therefore be likely to offer employment opportunities for a wide range of people in the local area.</p> <p>The relevance of the statement around HMOs is also unclear. Rugby introduced an Article 4 Direction relating to the removal of permitted development rights to change use from C3 (dwelling house) to C4 (house in multiple occupation) within central wards in Rugby on 23rd February 2025. Therefore, even if an expansion at MPL was to directly lead to more HMOs (for which there is no evidence), the Council now has a mechanism to control against this.</p>

Table 4. Response to commentary in section 5.2 of the SA concerning land west of MPL

- 4.79 Thus, the land west of MPL should not have been discounted as a preferred option for allocation and rather assessed as an option for an employment allocation, given it is relatively unconstrained, is located outside the Green Belt and can provide a number of benefits associated with extending an existing Nationally recognised employment park.
- 4.80 Omitting land west of MPL as a potential option at this stage in the SA methodology, led to three potential options for growth being tested – all of which exclude the expansion of MPL. We object to this approach for the reasons set out above, including that this fails to comply with Paragraph 147 of the NPPF which requires all reasonable options to be assessed before releasing Green Belt. The inclusion of Green Belt sites within all of the options tested means that the approach is not in accordance with national policy. The Legal Opinion provided to accompany these representations supports this position and concludes that the approach in the draft Local Plan to the allocation of employment land is fundamentally flawed and unlawful (**Appendix 3**).
- 4.81 We also note that the Employment Growth Scenarios on page 44 of the SA do not show site no. 328 as being within the Green Belt, which is incorrect.
- 4.82 It is also unclear how all employment land scenarios tested scored the same in terms of biodiversity, given the significant ecological constraints associated with site no. 328 (Table 6.2).
- 4.83 Based on the assessment of growth scenarios, the SA concludes that Scenario 1 (i.e. site nos. 95, 17, 64, 14 & 328) is the preferred option, acknowledging that there will need to be exceptional circumstances to support this approach given the reliance on Green Belt release.

4.84 Whilst not forming part of the evidence base, the Officer's report on the draft Local Plan to the Council's Cabinet meeting on 4th March 2025 does provide some narrative text explaining the rationale for the employment allocations and why the Council considers there are exceptional circumstances to justify Green Belt release. These are:

- The importance of allocating land close to Coventry as the economic centre of the FEMA
- Advantages in terms of clustering, with this not being replicable in more distribution-focused locations such as the A5
- The potential of a 55ha country park at site no. 328.

4.85 Additionally, para 7.1.8 makes reference to the 'unique opportunity' at the land west of Ryton (site no. 328 – typo in the report says site no. 138), in relation to:

- *"It would deliver a 55ha country park alongside the River Avon (contiguous with the existing country park west of the Avon and would also link with Ryton Pools Country Park). No other site opportunity can deliver habitat creation on this scale, in the context of the Corporate Strategy objective for a greener Rugby."*
- *It would deliver a new on-site training centre and land that would be ring-fence for smaller units (particularly that part of the site that is owned by the County Council, and allocating for expansion here has clustering and agglomeration benefits which would support more higher-skilled jobs and expansion in high value-added industries."*

4.86 We do not consider that these constitute exceptional circumstances for release of Green Belt, and specifically allocation of site no. 328 ahead of other potential locations outside the Green Belt, on the basis that there is limited evidence to support allocating land close to Coventry instead of other locations within the borough, and given it has not been fully considered whether other locations could achieve comparative benefits.

4.87 As site no. 325 was excluded from any further consideration, the potential benefits of a development in this location have been discounted. The opportunity associated with an extension to the west of MPL is expanded on in Section 5 of these representations, but in summary:

- Provision of c. 580,000sqm of employment floorspace in a highly sustainable location via an expansion to the existing MPL and ability to leverage already established transport and community infrastructure.
- The ability to accommodate B2 and B8 occupiers in a range of unit sizes, to be able to attract a range of blue-chip businesses and provide diverse employment opportunities, plus associated GVA and Business Rates benefits.
- Clustering and agglomeration benefits associated with expanding the MPL ecosystem, plus opportunities to enhance existing education and training provision.
- A landscape-led scheme which will provide habitat creation and biodiversity benefits, plus opportunities for the establishment of a country park with links to the existing 200 acre country park at MPL.
- A highly sustainable location in terms of labour availability and existing public transport network. Ability to provide additional employment floorspace in a location which acts as a satellite to DIRFT, providing opportunities for businesses to use the open rail terminal in this location.

- 4.88 Therefore, we do not consider the Council is able to demonstrate exceptional circumstances exist to justify the release of Green Belt. Nor do we consider the Council's overall approach to the preferred strategy to be sound for the reasons set out within this section.

5. Magna Park Extension – The Opportunity

Magna Park Lutterworth

- 5.1 Established in 1987, Magna Park Lutterworth (MPL) is an example of a pioneering logistics cluster set within a parkland setting, incorporating sustainability; wellness; innovation; education and environmental initiatives. It is the UK's first and Europe's largest dedicated distribution location, with 1.2m sqm of sustainable logistics floorspace across 50+ separate units.
- 5.2 It is GLP's flagship distribution park, home to some of the UK and Europe's most recognisable brands which has contributed significantly to the development of the local economy and infrastructure. The existing Magna Park (Central) and its subsequent expansions (North and South) have made a significant contribution to local and regional employment levels and associated benefits for the wider economy. Taking into account Magna Park Central, plus the MPN & MPS expansions, once fully built out and occupied, MPL will accommodate between 14,500 – 16,500 jobs directly on site, contributing an estimated £700m - £800m in GVA annually to the economy. It will also be contributing £50m annually in business rates.
- 5.3 MPL is home to over 30 businesses, including a range of blue-chip businesses including Toyota, BT, Asda Walmart, Amazon, DHL and Britvic. One of the most recent customers at the Park is Centrica who occupy MPS6 and MPS7. Centrica, who employs 7,500 engineers and serves more than nine million homes across the UK, gained permission for the dual use of MPS6 as a storage and distribution facility and a Centre of Excellence for British Gas. The Centre of Excellence will comprise a combination of training, research and supporting office functions, and will bring together training activity with research and development of Net Zero products and services. This will help future-proof training by including solar, battery and hydrogen technologies across the full lifecycle of activities and provide opportunities for collaboration between training, scientists and entrepreneurs. The selection of MPS6 is an important development for Centrica given its aspirations to double the current number of Hive customers to 2.5 million, its commitment to Net Zero carbon, and to upskill and train 3,000 apprentices in green jobs.
- 5.4 Additionally, MPL continues to provide essential skills training and financial support to the local community through a number of initiatives, including:
- Establishing the Lutterworth Area Community Projects Limited as a means to administer and manage the distribution of financial contributions. As of February 2025, the fund has donated over £1.2m to over 100 local organisations and charities.
 - Creation of the Centre for Logistics Education and Research (CLEAR) which is a prime example of the social value that MPL provides. The partnership between GLP, North Warwickshire and South Leicestershire College and Wincanton offers skills training and professional development at all levels across the spectrum of logistics and supply chain roles as well as applied research and associated facilities for up to 1,000 students.
 - MPL is home to Creating Tomorrow College which is a Specialist Post-16 Institution for 16–25-year-old adults with SEND, with a mission to address the employment deficit for adults with learning needs. Creating Tomorrow College has a clear 5-year development strategy for growth in both cohort resources and curriculum offer, and is located in the Iron Mountain Building at MPL adjacent to the CLEAR campus.

- Planning permission has been granted for a truck parking / services facility within the MPL development. The 9-acre site will provide overnight truck parking, amenity building and HGV EV charging stations. Works to provide the services has commenced on site and an operator has been identified, anticipating delivery of the facility in 2026 which will be open to customers on the park as well as the public.
- Planning permission is also being sought for an Innovation Centre at MPL which will provide a space to host innovation events for the customers on the park and wider logistics industry. The focus of these innovation events will be on sustainability and construction within the logistics sector. Subject to planning permission, GLP will be launching the Magna Park Innovation Centre in 2025.

5.5 At MPL, sustainability is a key priority. GLP has invested in extensive green spaces, energy-efficient buildings and initiatives aimed at reducing carbon footprints.

5.6 As part of the planning consent for Magna Park North, a 200 acre Country Park was created. Bittesby Country Park is a harmonious blend of diverse wildlife habitats, agricultural, community space and educational engagement. Over half of the Magna Park North site area was dedicated to Bittesby Country Park and open green public spaces, including woodlands, meadows and wetlands integrated as part of a sustainable drainage system. This creates a habitat for diverse wildlife, providing a sanctuary for both nature enthusiasts and the wider community. Bittesby Country Park incorporates grazing areas, orchards, and forest gardens, all woven seamlessly into the historical fabric of the rich heritage and archaeology across the site alongside the deserted medieval village scheduled monument. Pathways traverse the park’s interconnected green corridors, following the permissive paths that intertwine with existing public rights of way. These routes offer an array of experiences, from invigorating ridge walks to tranquil strolls along stream corridors. Explore the species rich meadows, lakeside edges, and diverse woodlands, or embark on a longer journey to immerse yourself in the park’s natural richness through the foraging woodland and orchards. The existing Park is not just a picturesque escape but also an educational haven. With interpretive resources and educational facilities located at key vantage points, it aims to foster an understanding of ecological resilience, climate adaptation, and the importance of sustainable landscapes.

5.7 Buildings within MPL have also been designed to ensure that any environmental impacts are reduced with the site being set within a fully landscaped parkland with stringent measures in place to preserve natural habitat and wildlife. This includes the planting of over 1.5 million trees across the MPL campus as well as a partnership with the British Beekeepers Association which led to GLP’s third and fourth UK apiary sites being installed at MPL in July 2020.

5.8 Furthermore, Unit MPS9 (33,583sqm) has recently been awarded a BREEAM Outstanding rating of 97.8% making it the highest scoring industrial BREEAM rated building in the UK as of June 2024. This demonstrates that MPL remains at the forefront of logistics sector, delivering buildings that are both functional for operators and beneficial to the environment.

5.9 MPL is strategically positioned within the Midlands “Golden Triangle” of logistics, offering excellent connectivity to major motorways such as the M1, M6 and M69. This prime location enables access to approximately 85% of the UK population within a four-hour truck drive-time. It is well located to existing settlements at Lutterworth, Rugby, Coventry and Hinckley. Distances and drive times (from the AA Route Planner website) to the nearest urban edges of these cities/towns are as follows:

City / Town	Miles	Minutes Driving
Lutterworth	2.3	7

Rugby	5.6	12
Coventry	14.9	22
Hinckley	7.4	12

Table 5. Drive times from MPL

- 5.10 Staff working at MPL are encouraged to travel to work sustainably with occupiers implementing Travel Plans to promote sustainable transport modes.
- 5.11 The majority of staff employed on site work shift patterns. GLP have formed partnerships with local Public Transport operators to provide sustainable, efficient and cost-effective travel options to MPL. This includes regular bus services from across the local area, operated by Arriva, which includes the following services:
- X45 – Lutterworth & Leicester
 - X84 – Rugby, Lutterworth & Leicester
 - 8 – Lutterworth & Hinckley.
- 5.12 There is also a pay on demand bus service to MPL from rural areas of South Leicestershire in place (Fox Connect). In addition, some agency colleagues travel to site by minibus from Leicester City Centre and some occupiers engage coach firms to transport workers during peak periods.
- 5.13 GLP has also partnered with Liftshare to offer a free liftshare scheme to all park employees, supporting key workers to access the park with ease, save on commuting costs and travel more sustainably. With over 500 members, it is estimated that MPL has removed 335,525 miles off the local roads, reduced 73 tonnes of CO2 emissions and saved its key workers a total of £84,000 over 5 years.
- 5.14 A significant benefit of MPL is the proximity to the open-rail terminal at DIRFT which is c. 7m south on the A5. A number of customers at MPL utilise the rail head, including Asda and Britvic. The proposed expansion into Rugby would also be able to make use of the rail head. This is a unique proposition and unlike other potential sites in Rugby which are not located near rail terminals.
- 5.15 Further detail on the existing MPL and the associated benefits listed above is included in **Appendix 6**.

Proposed Magna Park West Extension

- 5.16 The proposals to extend MPL to the west of the A5 will build on the established principles underpinning the existing distribution park, ensuring the site remains a benchmark for modern logistics while maintaining its strong environmental and community-focused approach. A western extension will be able to build on MPL's proven success, leveraging the existing infrastructure and strong transport links.
- 5.17 An expansion at MPL would allow for a high proportion of future employment need to be concentrated in a single, sustainable location that has a proven track record of successful delivery over the past 30 years. It is important to note the speed at which the Magna Park North and South extensions were built and occupied, demonstrating an immediate demand for B8 space in this location. Also, despite the age of some of the older units at MPL, occupancy levels remain

extremely high with only 4 units unoccupied (out of 50 units total) across the entire site (including north and south extensions) as of Q1 2025.

- 5.18 The existing MPL development in Harborough is safeguarded for strategic storage and distribution (Class B8) uses only, with units to be in excess of 9,000sqm as per Policy BE2 of the adopted HDC Local Plan. This is also true of the two proposed allocations in the emerging HDC Local Plan (ref MP1 and MP2), both of which are designated for Class B8 uses.
- 5.19 An expansion to MPL to the west of the A5 therefore provides an opportunity to be able to accommodate both B2 and B8 occupiers in a mix of units. Given the size of the site, there is also an opportunity to provide smaller / incubator units to support SMEs, alongside larger units catering for manufacturing and logistics demand in this location.
- 5.20 The accompanying plans (**Appendix 1**) show how built development on the site could be positioned, with a 35% plot density equating to the delivery of just over 580,000 sqm of employment floorspace. The proposals would be landscaped to provide habitat enhancements to deliver significant biodiversity and amenity enhancements. This includes the potential for a country park to be delivered comprising community parkland and habitat creation along the western boundary of the site, for use both by the site employees and local community. Opportunities to link this with the existing 200 acre country park at MPN could also be explored.
- 5.21 Business operating from a proposed expansion to the west of MPL would also benefit from the site's unique position as a satellite location to DIRFT, with businesses able to capitalise on using the existing open rail terminal.
- 5.22 There are successful HGV routeing arrangements in place for MPL and this would be carried through to the new development, ensuring that restrictions on HGVs accessing nearby villages would continue.
- 5.23 As detailed above, MPL already benefits from a number of bus services, linking the site to Rugby, Leicester, Harborough and Hinckley, which the proposed extension would be able to utilise and also explore opportunities for network enhancement. The proposals could also benefit from other on-demand public transport services already established such as Fox Connect and Liftshare.
- 5.24 Through further masterplanning, opportunities for other on-site amenities can be explored, including the provision of additional lorry parking to complement the provision of a service facility at MPL which is currently being built.
- 5.25 Further opportunities for training and education can also be explored, including links to the already established CLEAR Centre and other initiatives as part of the existing MPL.
- 5.26 There are a significant number of benefits associated with the proposed western extension of MPL, including:

Ability to respond to specifically identified need – unit sizes, heights, location etc.

- 5.27 The Site's location in the Golden Logistics Triangle is regarded as a strategic hub for distribution and logistic operations. Research indicates that this area provides access to 95% of the British population, making it an ideal location for same-day and next-day delivery services.

Job creation

- 5.28 The proposed 166ha extension of MPL to the west of the A5 will create substantial job opportunities in the local area, both during the construction and operation phase.

- 5.29 During the construction phase, it is estimated that over 3,000 direct construction jobs could be supported per annum, across a wide range of trades and sub-sectors. It is anticipated that the Proposed Development will lead to opportunities for apprenticeships and training during the construction phase, alongside opportunities for existing local contractors. The GVA benefit of the direct construction phase could exceed £200m.
- 5.30 The proposals will also support a further indirect and induced additional jobs at the local and wider regional level during the construction phase, equivalent to around a further 1,800 jobs supported through the development process. Total national GVA benefits of the construction phase would be expected to exceed £500m.
- 5.31 Once operational, the proposals would support permanent employment opportunities in Rugby and the surrounding area.
- 5.32 During the operational phase, the proposals for around 580,000 sqm could generate in excess of 4,000 jobs, assuming employment densities in line with the existing MPL occupiers. This may vary seasonally. At the sub regional level the benefits associated with both supply chains as well as the wage spend of workers will support further employment creation in the sub region being around 2,600 jobs.
- 5.33 The direct annual GVA benefits of the scheme are estimated to be around £260m, rising to over £400m taking into account regional multiplier benefits.
- 5.34 These employment opportunities are likely to be in a range of sectors depending on the final occupants of the floorspace, but is likely to include roles in warehousing and distribution, manufacturing, wholesale, business administration, IT and professional services.
- 5.35 Research indicates notably increases in professional and associate professional / technical occupations in the logistics sector, reflecting increased levels of automation as well as the prevalence of collocating offices with warehousing. Logistics sector jobs postings in 2021 in the South East Midlands reported that 65% of requirements were for technical workers including project managers, sales managers, supply chain analysts and software developer / engineers.

CIL Income

- 5.36 Rugby Borough Council's CIL Charging Schedule came into effect from 1st April 2024. This includes a £5 per sqm rate for industrial, light industrial and storage and distribution uses (B2 / B8).
- 5.37 Based on a proposed floorspace of 580,000 sqm, the proposed extension could contribute £2,900,000 in CIL revenue for RBC.

Business Rates

- 5.38 The 2020 business rates income for MPL was estimated at £24m, a proportion of which is retained locally. Applying this ratio to the future development proposals indicates future additional contributions of at least £16m, however this is expected to be substantially higher based on the new and higher quality floorspace.
- 5.39 The business rates income from MPL in 2023/2024 meant that Harborough District Council was able to freeze council tax for all residents in 2024/2025.
- 5.40 As such, substantial increases in business rates will benefit Rugby Borough Council and its residents by reducing the cost of public services leading to tax savings for residents.

Transport & Sustainability

- 5.41 A western extension to MPL would allow the new development to take advantage of established infrastructure already in place to promote sustainable transport patterns. Staff would be able to utilise the bus services that currently serve MPL as well as the potential for additional highways contributions to support sustainable modes of travel.
- 5.42 In addition, these representations are accompanied by a Transport Note prepared by Apex Transport Planning (**Appendix 5**) which considers the opportunities for sustainable transport and sets out a vision-led approach for increasing sustainable transport movements and constraining vehicle movements to and from the site, whilst also reducing background movements across the existing MPL through a joined up sustainable travel strategy and consolidation of operational vehicle movements. The Note demonstrates that the site is ideally located for accommodating employment uses and minimising key vehicle movements, as well as for facilitating the delivery of key strategic infrastructure improvements which would offer further benefits on the network.

Green Infrastructure & Biodiversity

- 5.43 As detailed above, the proposals would be landscape-led to provide habitat enhancements to deliver significant biodiversity and amenity enhancements. This includes the potential for a country park to be delivered comprising community parkland and habitat creation along the western boundary of the site, for use both by the site employees and local community. Opportunities to link this with the existing 200 acre country park at MPN could also be explored.

Community Initiatives

- 5.44 As detailed above, the existing MPL supports the community and local voluntary organisations to deliver local projects within the geographical area surrounding MPL. The Lutterworth Area Community Fund has contributed over £1m to community projects in the local area. There is also an established Community Liaison Group for the purposes of providing information and updates on current development proposals and operations at MPL. Members include local parish councils and local interest groups.
- 5.45 A western expansion would be able to build upon these already established community initiatives and further extend the benefit to community groups within Rugby.
- 5.46 Therefore, as demonstrated, there are significant benefits associated with locating employment development to the west of MPL, including for this to be a highly sustainable development given the ability to leverage the existing infrastructure associated with MPL.
- 5.47 We also consider that an allocation to the west of MPL would also fully align with the criteria in Para 5.50 of the WMSESS for identifying, allocating and delivering strategic employment sites. An assessment of site no. 325 against these criteria is set out in the Table below:

Criteria in para 5.50 of the WMSESS	Assessment of site no. 325
Good connections with the strategic highway network – close to a junction with the motorway network (ideally within 3km and up to 5km) or long-distance dual carriageway suitable for HGVs (reflecting the	MPL is located within the ‘Golden Triangle’, a region that is pivotal to the UK’s supply chain and distribution networks due to its central location and connectivity to the strategic road network (SRN). The Golden Triangle area is within a four-hour drive of 90%

<p>success of parks on the A1, A14 and other linking A-roads).</p>	<p>of the British population, and specifically in the context of MPL, has good access to the SRN including the M1 and M6 motorways, and the A5 trunk road, all of which provides for efficient transportation and logistics operations.</p> <p>MPL already has an extensive network of infrastructure catering for sustainable transport modes, including a shared pedestrian/cycleway connecting MPL to Lutterworth, and regular bus services from across the area. The site already implements successful travel planning initiatives.</p>
<p>Sufficiently large and flexible in its configuration so that it can accommodate the range of sizes of distribution centre warehouse units now required by the market. Preferred plot ratios being a minimum of 0.3516 and building sizes of over 9,000 sq.m which means a minimum of 2.5 ha, however ideally sites would be a minimum of 25ha and readily over 50ha which takes into account the landscaping and infrastructure involved in delivering sites of this scale as well as inclusion of smaller employment units where appropriate</p>	<p>The site as a whole totals 166ha and therefore is sufficiently large and flexible in its configuration to accommodate a range of unit sizes plus associated amenities and green infrastructure, including a country park.</p>
<p>Is served from an electricity supply grid with sufficient capacity to permit the charging of large fleets of battery-electric freight vehicles simultaneously / able to support high tech facilities, or part of the electricity supply grid which can be upgraded (network reinforcement) relatively easily and at a reasonable cost.</p>	<p>The existing Local DNO Bulk supply point (BSP) has at present sufficient spare capacity to cater for the demands of HGV fleet charging and high tech facilities without the requirement of major reinforcement works.</p>
<p>Where relevant, is sufficiently large (+100 ha but often towards 300ha) and flexible in its configuration so that it can accommodate an intermodal terminal and internal reception sidings (for rail).</p>	<p>Whilst the site is not being promoted as rail-connected, it is sufficiently large and over 100ha (166ha total). It is also well-located to DIRFT International Rail Freight Terminal, with MPL being located 9.3 miles north of DIRFT on the A5 (15 minute drive). MPL therefore acts as a satellite location to DIRFT with businesses at the existing park utilising the open rail terminal. A further expansion of MPL to the west of the A5 would also enable future businesses occupying space to capitalise on the close proximity to DIRFT.</p>
<p>Is accessible to labour, including the ability to be served by sustainable and/or active transport, and</p>	<p>MPL attracts workers from across nearby areas, including Leicester, Coventry, Birmingham, Lutterworth, Rugby, Hinckley and Nuneaton, with worker travel patterns closely aligning with the bus services already established to serve the park. As per the</p>

where appropriate being located close to areas of employment need.	CBRE analysis, it is anticipated that future planned housing development could provide an additional 17,000 workers in the MPL catchment over the next 20 years.
Is located away from incompatible land-uses (including residential) and has the ability to undertake 24/7 unrestricted operating hours and manage noise/lighting expectations.	The site is located adjacent to an existing employment park and offers the opportunity to strategically extend MPL into Rugby. The nearest residential properties are in the village of Willey. Appropriate landscaping and offsets can be included in any masterplan to ensure there is sufficient mitigation to protect residential amenity.
Is located such that the development does not significantly crowdout alternative land uses, such as office and lab space, and ensures a balanced supply of commercial premises and strategic employment opportunities in the local area.	The site is sufficiently large to be able to accommodate a range of employment uses and unit sizes.
The ability to deliver high-bay warehousing at least 20m height (recognising the landscape impacts and need for appropriate locations and / or mitigation).	As concluded by the Council in the Stage 2 Site Assessment, the overall landscape sensitivity of the site is medium/low. The site comprises arable and pastoral fields located within a broadly rural landscape to the west and warehouse development and transport infrastructure to the east. There are no known cultural heritage or historic features within the site and views from and into the surrounding RPGs are unlikely to be affected by the development. Views into the site are filtered from the surrounding transport infrastructure. The A5 and B4027 and surrounding warehousing development detracts from the tranquillity and visual value of the site. As such, the site has the ability to accommodate high-bay warehousing with the appropriate landscaping mitigation in place.
Has access to or potential for broadband capabilities and infrastructure	The existing local MPN Openreach infrastructure can be extended to provide the site high speed fibre.

Table 6. Assessment of site no. 325 against the criteria in paragraph 5.50 of the WMSESS (2024)

- 5.48 Therefore, as demonstrated, the proposed extension to the west of MPL would deliver a number of significant benefits and fully aligns with the criteria in the WMSESS in terms of where strategic employment development should be located.
- 5.49 The site is also considered deliverable given it is available for development, in a suitable location, and achievable within the plan period. This is evidenced by the different parties with land interests in the combined site no. 325 working together on these representations.

6. Conclusion

- 6.1 These representations have been prepared jointly on behalf of GLP Europe, [REDACTED] in response to the Rugby Borough Council Local Plan Review Preferred Options Consultation and specifically in relation to land west of Magna Park Lutterworth (Strategic Site no. 325).
- 6.2 As demonstrated by the representations and supporting information, we do not consider the proposed approach in the draft Local Plan is sound for a number of reasons, in particular the approach taken to identifying development sites to satisfy the (underestimated) employment need which is unsound due to the prioritisation of sites within the Green Belt, which does not accord with national planning policy.
- 6.3 Site no. 325 represents a significant opportunity for the expansion of the existing Magna Park Lutterworth on land that is entirely outside Green Belt and is available, suitable, achievable and deliverable for employment development within the plan period.
- 6.4 As set out in these representations, a western expansion to the highly successful employment ecosystem at Magna Park in a very sustainable location would deliver a number of benefits to Rugby Borough and the wider area, particularly as the proposed development would be able to leverage the existing physical and community infrastructure already established.
- 6.5 Therefore, we strongly recommend that the next iteration of the draft Local Plan should allocate Strategic Site no. 325 for employment development as it will meet the identified needs for employment land for Rugby in the most sustainable manner and in conformity with national planning policy.
- 6.6 The site promoters welcome the opportunity to work with Rugby Borough Council and the local community in order to realise the opportunity.

Appendix 1 – Plans

Appendix 2 – Technical Note on Employment Land Need

Appendix 3 – Legal Opinion

Appendix 4 – Labour Assessment

Appendix 5 – Vision-Led Transport Note

Appendix 6 – MPL Presentation

