



RUGBY BOROUGH LOCAL PLAN
PREFERRED OPTION CONSULTATION MARCH 2025
SOUTH WEST RUGBY PHASE 2 (SITE ALLOCATION REF 17)

REPRESENTATIONS ON BEHALF OF
TRITAX BIG BOX DEVELOPMENTS

MAY 2025
REF: PF/10598

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1. INTRODUCTION

- 1.1. These representations are made to the Rugby Borough Local Plan Preferred Option Consultation Document March 2025 on behalf of Tritax Big Box Developments (TBBD) who control the South West Rugby employment phase 2 site (Site ref. 17).
- 1.2. These comments should be read alongside previously submitted representations to the Rugby Borough Local Plan: Issues and Options 2024.
- 1.3. These representations relate to the land edged red as shown on the enclosed plan (Appendix 1).
- 1.4. The site is a draft allocation for employment in the Preferred Options document under Policy S3 'Strategy for employment land', and TBBD supports the draft allocation.
- 1.5. The site is located in the centre of the South West Rugby allocation which is allocated in the adopted Rugby Local Plan (2019) under Policy DS8 for a new neighbourhood of around 5,000 dwellings and 35 ha of B8 employment land. The site is currently identified in the adopted Local Plan (2019) Policies Map as 'Safeguarded Land', with paragraph 4.61 stating:

*"The site is a long term commitment for the Council in meeting the growth needs of the Borough and will continue to be built out beyond the life of this Local Plan. Once built, it will create a new community within Rugby and it is thus important for the Borough Council and developers of the site to do this to the highest standard possible. An essential element of this is sustainability and the balance of housing to jobs, and as such there is the potential for the growth targets of housing and employment to be revisited as a result of changing demands for the Borough as it moves beyond the 2031 period. **As such an area of land is safeguarded within the South West Rugby allocation, as identified in the Policies Map to assist in meeting the Borough's development needs beyond 2031**".*

- 1.6. TBBD therefore welcome the site's proposed allocation in response to the Council's evidence base that clearly identifies the need to make additional employment land provision. As safeguarded land under the adopted Local Plan, and as a non-Green Belt site, it is right that it has been considered first when assessing where best to meet this required need. TBBD support the Council's evidence base which demonstrate a need for B8 uses on the site and as a non Green Belt site which is adjacent to employment land, the TBBD site is the first site that should be allocated for employment (for the allocation of this site there will be no need to demonstrate 'exceptional circumstances' which would need to be demonstrated for the release of Green Belt sites).
- 1.7. The Safeguarded Land/Phase 2 land is located directly to the north of the B8 employment land which has been built out by TBBD (as allocated in Policy DS8 in the adopted Local Plan). A context plan is also attached (Appendix 2).
- 1.8. The adopted South West Rugby Masterplan Supplementary Planning Document (2019) also includes a Masterplan (Figure 2) which also shows the 'SW Safeguarded Area'; i.e. safeguarded land for future development.
- 1.9. The purpose of these representations are:

- to set out the need for the allocation of additional logistics floorspace in the emerging Local Plan;
- to provide comments on the draft policy wording;
- to confirm that the site is deliverable, is available now and can be readily developed, taking into account respective constraints, within the plan period – this is demonstrated by the fact that TBBD are currently preparing a planning application for a B8 logistics development on the site;
- to confirm that this non-Green Belt site is an entirely suitable and sustainable location to accommodate employment development.

1.10. The response to the questions raised in the Preferred Options consultation paper is appended (Appendix 3).

1.11. TBBD's view is that the allocation of the site for employment will:

- form a logical and obvious extension to the adjoining successful Symmetry Park, Rugby (Phase 1) employment development where, due to ongoing occupier discussions, and the buoyancy of the Industrial and Logistics market, there will shortly be no remaining B8 Logistics space.
- deliver employment to help meet the Borough's employment needs benefiting from the strategic location of the site and its proximity to the M45/A45;
- deliver new open space, and enhance the biodiversity credentials of the site, including through the provision of an enhanced publicly accessible park and buffer alongside Cawston Spinney;
- deliver strategic infrastructure for the South West Rugby, namely delivering the Potsford Dam Link road therefore providing comprehensive sustainable transport links that integrate with the existing networks and provide good connectivity within the development and to the surrounding area; and
- assist in contributing to the wider infrastructure costs and delivery of the South West Rugby allocation, where significant increases in the Appendix K costs are currently subject to consultation.

1.12. The representations respond to the following policies and documents (and evidence base documents):

Policies

- S2 (Strategy for Homes)
- S3 (Strategy for Employment Land)
- S7 (Employment Allocations)
- S8 (South West Rugby)
- S9 (South West Rugby Spine Road Network)
- CL1 (Net Zero Buildings)
- EN5 (Canopy Cover)
- D1 (Well Designed Places)
- I6 (Secondary Education)
- Annex – Employment Allocations

Documents

- Housing and Economic Development Needs Assessment (HEDNA) November 2022
- West Midlands Strategic Employment Sites Study (WMSESS) August 2024
- HEDNA-WMSESS Alignment Paper November 2024
- Housing and Economic Land Availability Assessment (HELAA) March 2025
- Development Needs Topic Paper March 2025
- Stage 2 Site Assessment Report March 2025
- Landscape Character Assessment January 2025
- Sustainability Appraisal March 2025
- Warwickshire, Coventry and Solihull's State of Habitats Report February 2025
- State of Habitats Summary, Rugby Borough February 2025

2. THE NEED FOR LOGISTICS FLOORSPEACE

Prime Minister Keir Starmer speech on Plan for Change: 5 December 2024

“Our plan for change that is the most ambitious and credible programme for government in a generation. ... Or take our planning system; a blockage in our economy that is so big it obscures an entire future, stops this country building roads, grid connections, laboratories, trainlines, warehouses, windfarms, power stations, you name it. A chokehold on the growth our country needs.”

The Need for Logistics Floorspace Logistics in a National Context

- 2.1. The need argument is first demonstrated by reference to recent National, Regional and Local policy (for example as demonstrated in the NPPF, NPPG, and then the evidence base of the emerging Local Plan).
- 2.2. There is a national policy recognition of the need for B8 and B2 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. This is demonstrated by reference to recent National policy as set out in the: NPPF (2024); the NPPG; and the Government's recently published Green paper 'Invest 2035: the UK's Modern Industrial Strategy' (November 2024).
- 2.3. There is an urgent need for more land for B8 use in the interests of UK and regional growth policy, and there is an evidenced local need. In the Government's recent consultation 'Invest 2035: the UK's Modern Industrial Strategy' (November 2024) Rachel Reeves, Chancellor of the Exchequer and Jonathan Reynolds, Secretary of State for Business and Trade, stated:
“Growth is the number one mission of this government. Our new industrial strategy is central to that growth mission”
- 2.4. The Government's headline policy is 'supercharging economic growth', logistics and advanced manufacturing are key sectors in achieving this mission as it is a foundation on which all other sectors depend. The provision of adequate logistics facilities are essential to powering economic growth, enhancing productivity and supporting the Government to deliver its vision for growth. To actually realise this growth, sustainable sites such as the subject site must come forward now.
- 2.5. The Invest 2023 green paper states that the government's growth mission will lead the way in delivering growth for all and acknowledges that reforms are already underway to address planning barriers to growth.
- 2.6. On 29 January 2025 Rachel Reeves made a speech at Siemens Healthineers, Oxfordshire which set out a series of major announcements on infrastructure projects, Reeves promised to go "further and faster" than previous governments after years of sluggish growth in the UK Reeves stated that to get Britain building again, the Government have delivered the most significant reforms to our planning system in a generation. She stated how genuinely shocked she has been about how slow our planning system is and how long it takes to get things done. She stated that the Deputy Prime Minister has already driven significant progress across government in addressing these issues: *“My*

colleagues have determined 13 major planning decisions in just six months including for airports, data centres and major housing developments.”

- 2.7. Reeves also stated that the Government have confirmed the Governments’ practises for the Planning and Infrastructure Bill: to rapidly streamline the process for determining applications; to make the consultation process far less burdensome; and to fundamentally reform our approach to environmental regulation.
- 2.8. Allocating the site for development i.e. meeting need, will respond to the Government’s number one mission for growth.
- 2.9. The updated NPPF, presented by the newly elected Labour Government, has an overarching theme to reinvigorate sustained economic growth. The new Labour government is driving a renewed focus on economic growth through the recent revisions to the NPPF. The recent 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 (Paragraph 85)

Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

- a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);*
- b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and...*
- c) the expansion and modernisation of other industries of local, regional or national importance to support economic growth and resilience” (Paragraph 87)*

- 2.10. Furthermore, the economic objectives of sustainable development in (NPPF paragraph 8) states that the planning system needs to be responsive by ensuring sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improve productivity.
- 2.11. Therefore, at paragraph 87, the onus is placed on Local Authorities to make sure that, through both planning polices and decisions, provision is made for B8 and B2 uses.
- 2.12. There is an urgent need for more land for B8 and B2 uses in the interests of UK and regional growth policy.
- 2.13. The Covid-19 health pandemic led to structural changes within the logistics sector in significant ways, including the dramatic shift in retail/purchasing away from ‘store attendance’ to online transactions. Other changes in the logistics sector include 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, global conflicts and natural disasters have consequences for reliability of supply chains. As a consequence, logistics companies supplying goods to UK manufacturers require greater levels of stock holding within the UK.

- 2.14. The logistics sector alone contributes £232 billion of GVA a year to the economy and supports 2.7 million jobs. The two sectors (logistics and advanced manufacturing) generate significant economic benefits supporting increasing numbers of high-quality jobs across the English regions. A thriving industrial and logistics sector is therefore critical to the Government delivering on its ambitions for growth.

Regional and Local Need

- 2.15. The evidence base for the emerging local plan comprises, inter alia:

- The Strategic Employment Sites Study Greater Birmingham and Solihull LEP (2021);
- The Coventry and Warwickshire Housing and Economic Development Needs Assessment (2022);
- West Midlands Strategic Employment Sites Study (WMSESS) August 2024;
- HEDNA-WMSESS Alignment Paper November 2024;
- Housing and Economic Land Availability Assessment (HELAA) March 2025;
- Development Needs Topic Paper March 2025.

- 2.16. The need at the regional and local level is demonstrated in the Rugby Borough Council Development Needs Topic Paper which states that with regards the need for industrial land (larger sites) (paragraphs 1.23 – 1.28) states (this comprises land for B2, B8 and classes E(g)(ii) and (iii) uses that is constructed on sites of 25ha or more in site area):

“The need for large industrial sites is calculated based on the methodology set out in the WMSESS. The methodology combines replacement demand, which is an assessment of the need to replace existing floorspace due to units reaching the end of their operational lifespan, with (for storage and distribution uses) an assessment of the floorspace needed to handle projected future freight volumes. Importantly, the methodology for calculating the need for large employment sites is a West Midlands-wide methodology. This is appropriate because businesses operating from such sites are likely to be regional/national businesses and the market for buildings on large employment sites is regional rather than localised.

The WMSESS assumes that large “strategic” industrial sites are developed at a plot ratio of 0.35. This means that the floorspace of the buildings is equivalent to 35% of the total site area.

The WMSESS does not identify need for larger industrial sites based on individual local authority areas. Instead, the projected future West Midlands need is apportioned to “opportunity areas” which correspond to groups of junctions on the main motorway and A-road network. This is because large-scale industrial uses would need to be located close to these junctions.

The opportunity area that encompasses part of Rugby Borough is “Area 7: M6/ A45/ A46 / M45 Coventry and Rugby”.....

The WMSESS calculates the need for additional large employment sites, beyond land that was already in the pipeline in 2022 (because it had planning permission or was allocated for development in a local plan). These existing pipeline sites are referred to as “commitments”. The Alignment paper updates this to take account of new commitments since 2022

The assessed need for industrial land on larger sites within Area 7 is:

	Land Need Hectares 2021- 2045	Floorspace Need in square metres 2021- 2045	Source of Need
industrial land on larger sites within Area 7 is	84	294.000	Alignment Paper

(emphasis added)

2.17. With regards to the need for industrial land in large sites, paragraphs 1.31 to 1.36 states:

“As set out above, the WMSESS/Alignment Paper calculates the need for employment sites of 84ha 2022-2045 after existing supply. Existing supply as at 2022 in the alignment paper appendix A1 totals 137ha. To this is added Padge Hall Farm for 64ha, bringing total identified commitments to 201ha.

If Rugby Borough accommodates all of the residual requirement of 84ha for opportunity area 7 and this is added to committed supply in Rugby Borough as at 2022, that brings the gross 2022- 2045 requirement to 285ha.

To bring this up to a 2024 base date, completions on the Alignment Paper strategic site commitments in the period 2022-2024 need to be subtracted. Those completions are detailed in the table below:

Site	Completed hectares 2022-2024	Completed 2022-2024 sqm
Tritax Symmetry, South West Rugby	24.51	89,800
Prospero Ansty	37.96	102,026
Prologis Park, Ryton	13.65	44,343
Total	76.12	236,169
Total adjusted at a standardised 0.35 plot ratio	67.5	236,169

Therefore, the gross 2024-2045 requirement is 217.5ha (84ha + 201ha – 67.5ha). At a standard plot ratio of 0.35 that would equate to a gross requirement for 761,250m² in additional floorspace on strategic sites 2024-2045.

To calculate the residual requirement for strategic sites, we must then subtract commitments. Sites that are counted as existing supply in those documents are set out in the table below:

Site	Committed/residual (hectares)	Committed/residual (sqm)
<i>Tritax Symmetry, South West Rugby committed/residual</i>	19.71	83,541
<i>Prospero Ansty committed/residual</i>	6.5	21,948
<i>Padge Hall Farm</i>	63.84	136,350
<i>Coton Park East</i>	8.7	26,421
<i>Permission R22/0861 Land off Vigen Way, Coombe Fields, Ansty Park (site not listed in alignment paper)</i>	1.04	4,715
Total	99.79	272,975
Total adjusted at a standardised 0.35 plot ratio	77.99	272,975

When 272,975m² is subtracted from a gross requirement of 761,250m² this leaves a residual requirement for 488,275m² (139.5ha at a 0.35 plot ratio). This net requirement is higher than the 84ha identified in the alignment paper because 16ha at Houlton is now not coming forward and because the 2022 commitments have been remeasured and plot ratios have been standardised at 0.35 which is the ratio used in the WMSESS and Alignment Paper” (emphasis added)

The combined industrial need is set out in paragraphs 1.36.5 -

“The combined gross industrial need (on large and smaller sites) is 761,250sqm + 265,296sqm = 1,026,546sqm. In hectares that is 284ha (217.5 + 66.3). After existing committed supply the requirement is for 739,559sqm (202.5ha)”

- 2.18. With regards to the unmet industrial need from Coventry, paragraph 1.36.7 to 1.36.10 states:

“It is understood that of its 2021-2041 requirement for industrial land on smaller sites Coventry City Council is unable to meet 45 hectares or 180,000 square metres.

This unmet need could in principle be met in any of Coventry’s neighbouring local authorities of Solihull Metropolitan Borough, North Warwickshire Borough, Nuneaton and Bedworth Borough, Rugby Borough or Warwick District.

If all of that unmet need were to be accommodated in Rugby Borough, it would increase the residual industrial need to 919,559 square metres.

The gross need 2024-2045 would, if Coventry’s unmet need were to be included, increase to 1,206,546sqm.” (emphasis added)

- 2.19. The paper then sets out what type of industrial land does Rugby need and states (paragraphs: 1.36.12 to 1.36.14:

“The HEDNA 2022 similarly recommended at paragraph 11.11 “...whilst B8 demand is very strong, (...) there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector.”

The WMSESS explains that “strategic sites” should meet the following criteria:

- *Good connections with the strategic highway network (for road)*
- *Sufficiently large and flexible - ideally sites would be a minimum of 25ha and readily over 50ha*
- *Is or can be served from an electricity supply grid with sufficient capacity.*
- *Is accessible to labour and includes a clear sustainable transport solution for the local road network.*
- *Is located away from incompatible land-uses*
- *The ability to deliver high-bay warehousing*

The WMSESS also identifies that it is important to include “separate allocations for mid-sized and smaller industrial areas, more suited to diverse uses. These uses may also be less suited to the criteria needed for strategic sites, preferring proximity to population density and urban areas over the strategic network.” (para 1.44).”

2.20. Of note the Sustainability Appraisal March 2025 states (paragraph 2.2.6):

“However, perhaps more significant than providing for housing needs is the matter of providing for needs in respect of employment land, which are very significant, with the residual need figure – after having accounted for the existing pipeline of committed sites – potentially in excess of 200 ha. Additionally, Coventry City Council has identified unmet need for 45ha of employment land. Also, there is an urgency, in that ahead of a new Local Plan that provides for needs there is a risk of not being able to defend against speculative applications and, in turn, poorly located / uncoordinated growth.”

2.21. Paragraph 5.2.39 states:

“... 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. These sites have already been introduced above (Section 2) and clearly must be discussed in further detail below (Sections 5.3 and 5.4) before a final decision is reached regarding their suitability for allocation, but they warrant being flagged here (Section 5.2).

These sites are introduced further in Box 5.2.

Box 5.1: Introducing two strongly performing employment land options First and foremost, SW Rugby Employment Land Phase 2 is an existing Reserve Site (as shown on the Adopted Policy Map for Rugby Borough) and there is now a well-established need to support this site in order to fund and ultimately deliver a new link road crucial to the SW Rugby Strategic Urban Extension (SUE) vision. The site would deliver significant public open space as a buffer to Cawston Spinney woodland. Secondly, Coton Park East is an existing allocation for residential, as opposed to employment, but the landowner now has a clear desire to deliver employment, such that there is insufficient confidence that a residential allocation would come forward (and a further lengthy delay to the site’s development would delay associated investment in the area). It is also the case that the site is well suited to employment land because of its location close to the M6 and because it is accessed through the existing Central

Park industrial area. The draft policy will require delivery of smaller units on part of this site, together with land to expand Rugby Free Primary School. Both of these sites will likely deliver B8, given existing demand, but could also be suited to some B2.”
(emphasis added)

2.22. Paragraph 5.2.42 states:

“Figure 2.3 shows eight options, and a further option is Magna Park (as introduced in Section 2, above). These nine options (and others) are discussed further in Section 5.4, but even at this early stage in the process (of defining growth scenarios) can be placed in a broad sequential order of preference:

- SW Rugby SUE (see Box 5.1) – performs strongly as an existing Reserve Site.*
- M6 Junction 1 (Coton Park East; see Box 5.1) – performs strongly as an existing allocation.*
- M6 Junction 2 – a northern expansion to Ansty Park performs strongly despite comprising Green Belt....”*

2.23. Paragraph 5.4.85 goes on to conclude:

“Section 5.2 goes on to explain that a first port of call is allocation of two site options at Rugby that are to some extent already committed, namely SW Rugby Employment Land Phase 2 (Site 17) and Coton Park East (Site 64). Both sites are suited to delivering large-scale logistics, which serves to emphasise the need for other allocations (beyond these two sites) to be focused on suitability for ‘general industrial’.”

Overall Conclusions on Need

- 2.24. The allocation of the site for logistics will address a specific national, regional and local need for logistics floorspace and will help build a strong and competitive economy. The development will create a significant number of jobs across a wide range of skill sets.
- 2.25. The allocation of the site for logistics will provide high quality logistics floorspace in a highly accessible location. The site is ideally placed to address the growing need for logistics floorspace as it will be highly accessible to the strategic road network (which is a fundamental requirement of logistics operators).
- 2.26. The key criteria for a successful logistics site are: motorway proximity; junction access; connectivity to road, rail, air and sea; as well as the size of the site and the potential quantum of accommodation. Economic and labour market considerations are also key drivers for the suitability of a site and location as a logistics hub, in addition to the transport links and connectivity the subject site benefits from.
- 2.27. The site is well related to the local highway network with the A4071 accessing onto the M45/A45. Therefore, the site is well located in relation to the strategic network (M45/A45), which provide opportunities to travel further afield and to nearby centres of employment including Coventry and Northampton, underpinning the locational strengths of the site and its appeal to this expanding business sector. The allocation of the site will address the above-mentioned significant need for logistics floorspace.

- 2.28. Economic and labour market considerations are also key drivers for the suitability of a site and location as a logistics hub, in addition to the transport links and connectivity the subject site benefits from.
- 2.29. The NPPF states that significant weight should be placed on supporting economic growth and recognises the specific locational requirements of the logistics sector. The allocation of the site for logistics aligns with this and will also significantly contribute towards several of the strategic objectives set out within the emerging Local Plan
- 2.30. The allocation of the site for logistics would contribute substantially to the national policy imperative, expressed in paragraphs 85 and 87 of the NPPF, to promote and support a strong competitive economy, particularly with regard to the need for storage and distribution facilities, at a variety of scales, in accessible locations
- 2.31. The industrial and logistics sector will be instrumental in the economic recovery of the UK. Logistics is an important part of Rugby's economy as a business sector in its own right and as an enabler to the success of other businesses of all sizes and sectors. This aspect of recovery will not be possible without suitable employment sites, such as the subject site, to accommodate the necessary growth.
- 2.32. The allocation of the site for logistics development would help drive economic growth in and provide a source of new employment opportunities, as the site has the benefits of an optimal commercially attractive location, but close to the motorway network and with a local labour supply.
- 2.33. TBBD has the knowledge and proven expertise to deliver the high-quality scheme at the scale proposed.
- 2.34. A substantial planning need exists for major logistics development of the kind proposed.
- 2.35. Without the site being allocated, the supply imbalance will worsen and contribute to the already high levels of unsatisfied need in Rugby and the wider region.
- 2.36. This unsatisfied need has been exacerbated by the Covid-19 pandemic and evolving consumer trends, and will continue given the limited development pipeline, which is not sufficient to satisfy the demand. Whilst the pandemic has certainly accelerated demand for more online shopping, there are many other longer-term factors driving a race for logistics floorspace from the growth of high-tech manufacturing to supply chain changes coming from our new trading relationships with the EU and the world. The allocation of the site will help address the need for high-quality logistics floorspace. Rapid changes are occurring to occupier requirements, in particular a trend towards larger footprint buildings which offer economies of scale and a shift for precautionary logistics in reaction to potential disruption of supply chains.
- 2.37. The allocation of the site would build on existing local economic strengths in the logistics sectors, making a readily deliverable, achievable and highly significant contribution to a strong and competitive economy.
- 2.38. Rapid increase in the number of logistics businesses in this market has resulted in employment land being in particularly short supply. Demand evidently also extends beyond warehousing and distribution, as production returns to the UK post Brexit, and operators seek locations with good access and labour supply.

2.39. TBBD recognise and support the Council undertaking the Local Plan review to identify additional employment land in response to the overwhelming evidence-based need. It is plain, from the foregoing assessment of employment need and supply, that the allocation of the site would contribute substantially to the national policy imperative, expressed in paragraphs 85-88 the NPPF, to promote and support a strong competitive economy, particularly with regard to the need for storage and distribution facilities, at a variety of scales, in accessible locations. TBBD agree with the Council's approach to meeting the identified and TBBD support the allocation of the site. The site being a non Green Belt site and being identified for development as 'safeguarded land', should be the Council's first choice for employment development.

2.40. The allocation of the site for logistics will also realise substantial economic benefits:

Construction Phase:

- Construction of the Proposed Development is anticipated to create a net addition of 490 jobs for residents (per year of construction);
- Indirect investment in local construction companies;

Operational Phase:

- Capital Investment into the economy;
- Supporting an estimated 1,200 direct jobs (gross full time equivalent) plus, indirect and induced jobs in warehouse and delivery operations and in other sectors across the wider economy;
- £62 million GVA generated per annum, boosting economic output and growing productivity;
- Deliver CIL monies (circa £650,000) and business rates revenue for the Borough; and
- Public Sector Revenue £42 million over next 20 years (net present value) space through business rates, NI and PAYE, which can be invested in local services and infrastructure.

3. SUBMISSIONS TO THE RUGBY BOROUGH LOCAL PREFERRED OPTION CONSULTATION DOCUMENT

- 3.1. TBBD support the continued allocation for 3,990 homes in the South West Rugby allocation as set out in **Policy S2 Strategy for Homes**.
- 3.2. TBBD support the draft allocation of the site, and have the following comments on the current policy drafting:

Policy Wording

“S3 Strategy for employment land

A. To meet Rugby Borough’s need for employment land in the period 2024-2045 the following levels of new employment development will be delivered:

- i. 22,013m² of use class E(g)(i) office floorspace (approx. 4.4 hectares)*
- ii. 1,026,546m² (approx. 284 hectares) of floorspace for use classes B2, E(g)(ii) and (iii), and B8*

B. New floorspace in use classes B2, B8, E(g)(ii) and (iii) will be delivered in the locations set out in the table below:

<i>Source</i>	<i>Approximate square metres floorspace 2024- 2045</i>
<i>Prospero Ansty and Ansty Park</i>	<i>26,663</i>
<i>Symmetry Park, Thurlaston</i>	<i>83,541</i>
<i>Coton Park east</i>	<i>26,421</i>
<i>Padge Hall Farm</i>	<i>136,350</i>
<i>Employment planning permissions on small sites as at 1 April 2</i>	<i>14,012</i>
<i>New allocations under Policy S7:</i>	
<i>Crowner Fields Farm, Ansty</i>	<i>275,000</i>
<i>Coton Park east</i>	<i>115,000</i>
<i>South West Rugby Employment Phase 2</i>	<i>130,000</i>
<i>Ansty Park north</i>	<i>75,000</i>
<i>Prologis Park west and Mountpark, Ryton-on-Dunsmore</i>	<i>350,000</i>
<i>Total</i>	<i>1,231,987</i>

Comments

- 3.3. TBBD support the allocation of the South West Rugby Phase 2 Land and believe that there is a compelling case to supporting the allocation of the South West Rugby Employment Phase 2 Land now, as set out below:
- The site is not Green Belt, and its future development potential is already explicitly acknowledged in the adopted Local Plan through its identified safeguarded status;

- As set out above (Section 2), Rugby Borough Council's evidence base for the emerging plan identifies a significant need to allocate more employment land.
- Phase 1 of Symmetry Park Rugby has been successful in attracting tenants to date with Iron Mountain taking the first 4 units, and the remaining 3 buildings that have recently been completed subject to positive ongoing occupier discussions.
- With its unrivalled occupier base, TBBB has had a number of strong enquiries for buildings of a quantum that cannot be delivered within Phase 1, that have had to locate elsewhere due to the lack of available land within Rugby – the allocation of the Safeguarded land would provide the ability to capture this investment.
- The development would form a logical and obvious extension to the adjoining successful Symmetry Park, Rugby (Phase 1) employment development where, due to ongoing occupier discussions, and the buoyancy of the Industrial and Logistics market, there will shortly be no remaining B8 Logistics space.
- The development would deliver employment to help meet the Borough's employment needs benefiting from the strategic location of the site and its proximity to the M45/A45.
- The development would be undertaken to the same high-level of environmental and energy efficient standards delivered at Phase 1.
- The development would deliver the remaining highways infrastructure for the wider South West Rugby allocation – the Potsford Dam link - prior to the construction of any significant quantum of planned residential development.
- Removing the financial burden of the delivery of the Potsford Dam Link by applying it solely to the Safeguarded Land would reduce the infrastructure burden across every remaining planned housing in South West Rugby by c.£2,000.
- There is the potential for the Safeguarded Land to offer further Section 106 and CIL contributions to further assist with the residential viability and deliverability of the South West Rugby Allocation.
- The development would deliver a substantial areas of new open space, and enhanced biodiversity credentials, including through the provision of an enhanced publicly accessible park and buffer alongside Cawston Spinney.
- The development would assist in contributing to the wider infrastructure costs and delivery of the South West Rugby allocation, where significant increases in the Appendix K costs are currently subject to consultation.

Policy Wording

“S7 Employment allocations

A. The sites shown on the policies map and set out in the development site allocations annex to this plan are allocated for development as detailed below.

B. The development of the sites shall accord with the development principles set out in the development site allocations annex and with other policies of this plan.

<i>Site ref</i>	<i>Site name</i>	<i>Floorspace</i>
64	Coton Park East	Circa 115,000m ²
17	South West Rugby employment phase	Circa 130,000m ²
14	North of Ansty Park	Circa 75,000m ²
95	Crowner Fields Farm and Home Farm, Ansty	Circa 275,000m ²
328	Prologis Park West and Mountpark Ryton on Dunsmore	Circa 350,000m ²
<i>Total</i>		945,000m ²

Comments

- 3.4. For the reasons set out above, TBBD support Policy S7. As set out above, being a non Green Belt site and as currently allocated land safeguarded development, arguable the subject site is most obvious emerging Local Plan site for employment development.

Policy Wording

S8 South West Rugby

A. South West Rugby as delineated on the policies map will be a new neighbourhood of around 4,000 dwellings together with employment land on land allocated by Policy S7.

B. The district centre will comprise:

- i. a convenience store, other Class E uses with residential or office uses on upper floors; and*
- ii. a 7 GP surgery.*

C. Development of the site shall deliver:

- . a 6FE secondary school and two 2FE primary schools, one of which will be co-located with the secondary;*
- ii. the spine road network detailed in Policy S9; iii. a comprehensive walking and cycling network;*
- iv. high quality public transport services to Rugby town centre;*
- v. public open space and sport provision including a continuous green and blue infrastructure corridor incorporating Cawston Spinney and Cock Robin Wood;*
- vi. the protection of the woodland within the site including appropriate buffers (in line with a woodland management plan); and*
- vii. other strategic infrastructure as detailed in the South West Rugby Masterplan SPD.*

D. Development shall be informed by the South West Rugby Masterplan SPD. Ad hoc or piecemeal development that is inconsistent with this policy or the Masterplan SPD will not be permitted.

E. Development shall accord with the South West Rugby Design Code SPD.

F. Physical and visual separation from the Dunchurch settlement boundary shall be maintained by a significant green buffer to prevent coalescence.

G. The employment land shall deliver landscaping to mitigate its impact on the landscape and heritage assets.

Comments

- 3.5. For the reasons set out above, TBBD support Policy S8. However, we note Point E references the South West Rugby Design Code. Please note that TBBD have set out significant concerns to the Council in its consultation document on the Design Code SPD and in its current form consider it should not be adopted.

Policy Wording

“S9 South West Rugby spine road network

A. South West Rugby shall deliver the full spine road network in accordance with the indicative alignment shown on the policies map, although the detailed alignment of the spine road network will be determined through planning applications.

B. Development proposals which would prejudice the delivery of the spine road network will not be permitted”

Comments

- 3.6. The estate road running East-West through the southern part of the allocation site forms part of the Sustainable Transport Corridor identified in Policy DS9: South West Rugby Spine Road Network in the adopted Local Plan. The estate road running North-South through the site forms part of the Potsford Dam Link (shown on Appendix 4).
- 3.7. Homes England have taken the lead on delivery of the Homestead Link Road amongst the residential parties of South West Rugby, with a resolution to grant secured in March 2024. The remaining section of land to deliver the preferred connection of the Potsford Dam Link into the A4071 Roundabout was controlled by a private landowner and Railway Paths, both parties outside of the South West Rugby allocation.
- 3.8. TBBD have now secured all necessary land to deliver this remaining highways infrastructure (the Potsford Dam Link), but the funding for this can only be released by the Safeguarded Land coming forward for development.
- 3.9. The allocation of the site for employment would ensure the delivery of the full highways infrastructure for the wider South West Rugby allocation prior to the construction of any significant quantum of planned residential development.
- 3.10. Removing the financial burden of the delivery of the Potsford Dam Link by applying it solely to the Safeguarded Land would reduce the infrastructure burden across every remaining planned housing in South West Rugby by c.£2,000.

- 3.11. There is the potential for the Phase 2 land to offer further Section 106 contributions to further assist with the residential viability and deliverability of the wider South West Rugby Allocation.
- 3.12. TBBD therefore support the above mentioned policy.

Policy Wording

“CL1 Net zero buildings

A. New buildings comprising one or more dwellings and new non-residential buildings of 100m² gross internal area or more must be designed and built to be net zero carbon in operation. To achieve this, new buildings must:

- i. be ultra-low energy,*
- ii. be fossil fuel free, and*
- iii. generate at least the same amount of renewable electricity on-site as the electricity they demand over the course of a year, such demand including all regulated and unregulated energy use, or*
- iv. if iii is not technically feasible, on-site renewable energy generation should equal 120kWh per square metre of building footprint per year.*

B. To help achieve criterion A.i. above, new dwellings shall achieve:

- i. a maximum space heating demand of 15kWh/m² /yr or for bungalows 20kWh/m² /yr; and*
- ii. total Energy Use Intensity (EUI) of no more than 35kWh/m² /yr*
- iii On major housing developments, the EUI requirement in (ii) above may be achieved as a site wide average provided that no single dwelling exceeds an EUI of 60kWh/m² /yr.*

C. To help achieve criterion A.i. above, new build non residential buildings shall achieve:

- i. a maximum space heating demand of 20kWh/m² /yr; and*
- ii. a maximum total EUI of 70kWh/m² /yr for schools and offices; or 35kWh/m² /yr for warehouses and light industrial uses (without refrigeration/conditioning); or a maximum regulated-energy-only EUI of 40kWh/m² /yr for all other uses.*

D. Proposals that are built and certified to Passivhaus Classic or a higher Passivhaus standard will be deemed to meet space heating demand and EUI requirements under paragraph B and/or paragraph C. Demonstration of compliance with the requirements in paragraph A for development to be fossil fuel free and for onsite annual renewable energy generation capacity to at least equal annual energy demand will still be required.

Comments

- 3.13. The proposed policy position would require all new development to demonstrate net zero operational carbon onsite.
- 3.14. Whilst TBBD would agree with the Council that there is a need to act to reduce carbon emissions TBBD would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the emerging Future Buildings Standard (FBH). The expected national policy requirement would require a 31% saving, compared to the carbon Target Emissions Rate (TER) set by Building Regulations Part L 2021, which would be a consistent target across non-domestic building types. The local authority requirements for industrial buildings would go beyond this national requirement, which is deemed sufficient in national terms to meet the UK's net zero commitments.

- 3.15. Any targets on Part L improvement should be applied to developer delivery only, as often schemes will be delivered on a speculative nature, and future occupier energy performance would be unknown (with a wide variety of possible uses in industrial buildings particularly, the energy use of occupiers would be too varied to estimate).
- 3.16. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the Borough, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.
- 3.17. However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the Written Ministerial Statement (WMS) published on the 13th of December 2023 titled “Planning – Local Energy Efficiency Standards Update”.
- 3.18. The approach proposed by the Council is based on energy use, and is inconsistent with the approach set out in the WMS and as such is unsound.
- 3.19. The WMS is extant policy, in force and advises against exceeding national policies. It is something Local Plans and Planning Authorities must take into account (See NPPF para 6). The Ministerial Statement clearly states:

“The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures... “

- 3.20. While TBBD do not consider the policy to be consistent with national policy we are also concerned that the Council has not properly considered the impact on viability or the deliverability of development. The Council will need to ensure the costs and deliverability of this policy are fully and robustly tested, and there is currently no evidence of this.
- 3.21. While TBBD understands the desire for LPAs to go further current policy recognises that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building performance against those technical standards. Indeed, this has long been the case in planning policy with paragraph 164b of the NPPF (December 2024) stating that “Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards”.
- 3.22. Should RBC continue to seek to progress the policy, the suggested amended wording is as follows (the amendments are in bold and strikethrough):

“CL1 Net zero buildings

A. New buildings comprising one or more dwellings and new non-residential buildings of 100m² gross internal area or more **should target to be** ~~must be designed and~~ built to be net zero carbon in operation, **where feasible**. To achieve this, new buildings must:

- i. be ultra-low energy,
- ii. be fossil fuel free, and
- iii. generate at least the same amount of renewable electricity on-site as the electricity they demand over the course of a year, such demand including all regulated and unregulated energy use, or
- iv. if iii is not technically feasible, on-site renewable energy generation should ~~equal~~ **target** 120kWh per square metre of building footprint per year, **where feasible**.

B. To help achieve criterion A.i. above, new dwellings shall achieve:

- i. a maximum space heating demand of 15kWh/m² /yr or for bungalows 20kWh/m² /yr; and
- ii. total Energy Use Intensity (EUI) of no more than 35kWh/m² /yr
- iii On major housing developments, the EUI requirement in (ii) above may be achieved as a site wide average provided that no single dwelling exceeds an EUI of 60kWh/m² /yr.

C. To help achieve criterion A.i. above, new build nonresidential buildings shall **target where feasible** ~~achieve~~:

- i. a maximum space heating demand of 20kWh/m² /yr; and
- ii. a ~~maximum~~ total EUI of 70kWh/m² /yr for schools and offices; or 35kWh/m² /yr for warehouses and light industrial uses (without refrigeration/conditioning); or a ~~maximum~~ regulated-energy-only EUI of 40kWh/m² /yr for all other uses.

D. Proposals that are built and certified to Passivhaus Classic or a higher Passivhaus standard will be deemed to meet space heating demand and EUI requirements under paragraph B and/or paragraph

C. Demonstration of compliance with the requirements in paragraph A for development to be fossil fuel free and for onsite annual renewable energy generation capacity to at least equal annual energy demand will still be required.

Policy Wording

EN5 Canopy cover

A. All major development, excluding development in Rugby town centre, shall increase the post-development canopy cover to at least 20% of the site area (excluding areas of the site that are high or very high distinctiveness habitats).

B. Where the canopy cover of the site exceeds 20% before development, the proposal should ensure retention of at least the existing level of canopy cover.

C. In meeting the requirements of this policy, existing canopy should be retained first, before considering new planting.

D. Within Rugby town centre (as defined on the policies map) development shall maximise opportunities for canopy cover and other green infrastructure including green roofs.

Comments

- 3.23. This policy will require a post-development canopy cover to at least 20% of the site area (excluding areas of the site that are high or very high distinctiveness habitats). TBBD consider this requirement to be overly onerous and unjustified.
- 3.24. It is not clear how this policy relates to draft policy EN5 which requires a net gain in biodiversity of 10% (and it indeed may conflict with and contradict this policy).
- 3.25. TBBD does not disagree with the broad thrust that the UK has seen a significant loss in woodland and understand the benefits of increasing canopy cover. However, it is important to recognise that in recent years new employment development has not been the driver of declining woodland. The main drivers of declining biodiversity in England, as outlined in the State of Nature Report 2023 (State of Nature Partnership, 2023), are identified as being *“Intensive management of agricultural land, largely driven by policies and incentives since World War II, has been identified as the most significant factor driving species’ population change in the UK”*.
- 3.26. Whilst species are in decline TBBD would suggest that it is not for new development to address the impact of other industries, it is considered that the supporting documents provided a lack of suitable justification of the local need for a 20% canopy cover policy. It is also considered that this is not a necessary policy requirement and can be controlled through the Development Management process.
- 3.27. The supporting text states that the requirement for sites to be subjected to a canopy cover assessment at application will be detailed in the new BS5837:2012 Trees in Relation to Construction, which is to be published this year, the consultation draft whilst advising of the requirement provided no ‘tool’ or specific methodology for undertaking this assessment. The Policy guidance advises that the assessment is to be undertaken ‘using the council’s approved calculator,’ we suspect that Rugby will adopt ‘Wycombe’ model of assessment, which also makes provision for green roofs to be included as part of the canopy cover assessment calculations.
- 3.28. Proposed amendments to the wording are set out below:

EN5 Canopy cover

*A. All major development, excluding development in Rugby town centre, shall **target to increase the post-development canopy cover to at least 20% of the site area (excluding areas of the site that are high or very high distinctiveness habitats). This will principally be achieved through retention and planting of trees, but where it can be demonstrated that this is impractical the use of other green infrastructure (e.g. green roofs and walls) can be used to deliver equivalent benefit. It is recognised that there may be sites for which achieving a 20% canopy cover is not possible or desirable. In such circumstances the Council may negotiate an alternative level of canopy cover.***

B. Where the canopy cover of the site exceeds 20% before development, the proposal should ensure retention of at least the existing level of canopy cover.

C. In meeting the requirements of this policy, existing canopy should be retained first, before considering new planting.

D. Within Rugby town centre (as defined on the policies map) development shall maximise opportunities for canopy cover and other green infrastructure including green roofs.

Policy Wording

Policy D1 Well Designed Places

“A. New development shall create or contribute to well designed places. Development that is not well-designed will not be permitted.

B. All development shall (where applicable):

i. respond appropriately to context and character (including historical characteristics as well as physical) in its build form, layout, orientation, density/grain, height, materials and massing;

ii. maximise connections beyond the site, for people and nature;

iii. create connected, legible and permeable public spaces;

iv. integrate and reuse existing natural and built assets within the site as far as possible, and where appropriate respond to natural and built assets beyond the site;

v. comprise visually attractive buildings and spaces;

vi. have an appropriate relationship with and enclosure to the street;

vii. incorporate well-designed parking, cycle and waste storage, servicing and utilities infrastructure;

viii. demonstrate efficient use of land, energy and water through the design, construction and management of buildings and spaces;

ix. create robust and adaptable buildings and spaces taking account of future maintenance; and

x. maintain high quality design integrity through the design and development stages.”

3.29. Supporting text at paragraph 8.1 states

“This overarching policy sets out high-level design principles for all new development across the borough. It will be supported by local design codes and guides which will provide further detail on the design requirements for development. Development proposals will need to respond to the 10 characteristics of well designed places outlined in the National Design Guide, some of which overlap with other policies of this plan.”

Comments

- 3.30. The reference to the Design Code in the supporting text is noted but TBBD have submitted objections to the draft Design Code for South West Rugby which is overly prescriptive, it is submitted that the policy text in Policy D1 will be more than adequate to ensure ‘well designed places’ and the reference to local design codes should be removed from the supporting text.

Policy Wording

Policy I6 Secondary Education

“A. Land as shown on the policies map is allocated for the provision of a new 6FE plus sixth form secondary school at St Thomas Cross north east of Rugby.

B. All new residential development in the borough which is major development shall contribute £X,XXXX per dwelling (or such updated amount as may be identified through an SPD) to the cost of delivery of expanded secondary education provision in the borough to meet future need.”

Comments

3.31. It needs to made clear that the South West Rugby development will not have to contribute to Secondary education for development within the the South West Rugby SPD area (in Appendix K) already require development in the Sor West Rugby SPD area to contribute to education.

3.32. The suggested amended wording is as follows:

“A. Land as shown on the policies map is allocated for the provision of a new 6FE plus sixth form secondary school at St Thomas Cross north east of Rugby.

*B. All new residential development in the borough which is major development shall contribute £X,XXXX per dwelling (**excluding residential land at South West Rugby** or such updated amount as may be identified through an SPD) to the cost of delivery of expanded secondary education provision in the borough to meet future need.”*

3.33. The Annex sets out the Development Site Allocations and states:

“Site ID: 17

Site name: South West Rugby employment phase 2

Site area: 40.70ha

Allocation: circa 130,000m2 of floorspace for employment use

Development requirements:

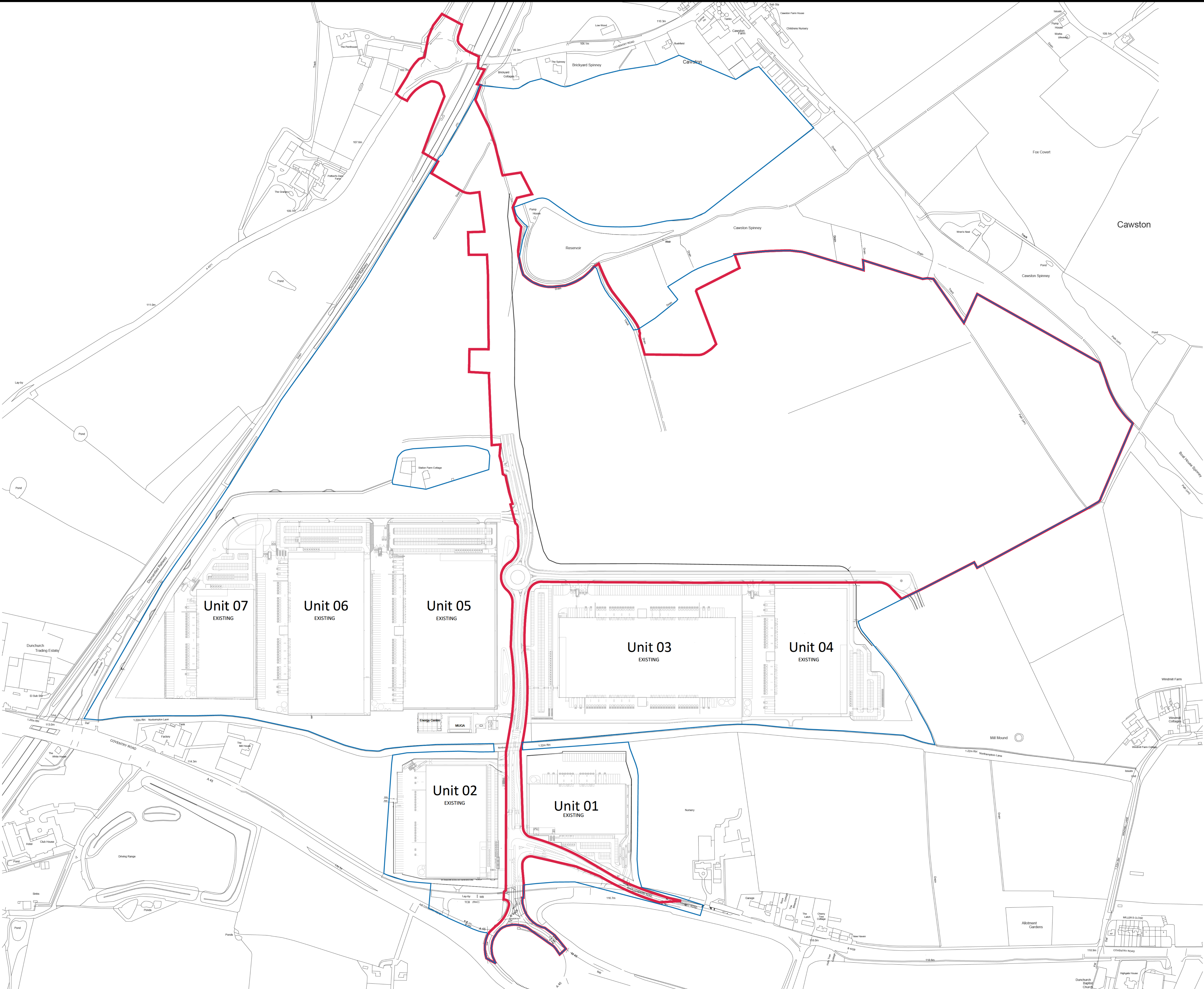
- *Creation of a wooded circa 8.6ha publicly accessible country park alongside Cawston Spinnery to include footpaths linking to existing routes and providing east-west connectivity along the northern site boundary.*
- *Provision of overnight lorry parking facilities sufficient to cater for the anticipated use of the units.*
- *Provision of tree lining to the Potsford Dam Link and Sustainable Transport Corridor.*
- *To accord with the South West Rugby Design Code SPD.*
- *Delivery of the northern section of the Potsford Dam Link (see Policy S9).*
- *The existing Public Rights of Way (PROW) must be maintained, and the design of the development must ensure they are pleasant to use. Wherever possible PROW should be routed through public open space, be segregated from roads, and be well overlooked. PROW should be maintained on their existing lines, with diversions only occurring where this is not practicable. PROW should be accessible to as many people as possible, including those who are disabled or less mobile.”*

Comments

- 3.34. Please note that TBBD have made separate representations to the Design Code. It is considered that the draft development requirement makes no reference to the now-completed 1.9 million square feet of logistics development to the south (Symmetry Park Phase 1), and how its design evolution came forward in full knowledge of the wider South West Rugby allocation, nor the influence that its design has on the context of the surrounding area.
- 3.35. For Phase 2 the proposed design and heights of the buildings will flow from the design language of the approved buildings on the existing Symmetry Park.
- 3.36. The development requirement needs to provide for flexibility and not be overly prescriptive as per the current drafting. It is considered that the allocation should just be referenced/illustrated by a red line, as per the other allocated sites in the Development Site Allocations Annex and should be amend accordingly.
- 3.37. There is no justification or supporting evidence explaining how the extent of 'indicative built development area' has been identified. To deliver the development plateaus required for logistics units, there will be a need for an earthworks exercise across the site to provide these as well as tying in to existing levels and taking account of other site constraints, opportunities and policy objectives. It is considered that this will most appropriately be dealt with through the development management process when all accompanying detailed information can be presented to the Council for full consideration and TBBD would welcome discussions to refine annex plan in the consultation document.

APPENDIX 1

Rev	Date	Iss. By	App. By	Description
P01	02.10.24	HA	RB	Trifix logo updated.
P02	27.02.25	HA	RB	Red Line area amended.
P03	12.05.25	HA	RB	Red Line area amended.
				Drawing Status changed to Planning.



Legend

Proposed Application Site Boundary

Ownership Boundary

Existing development

Red Line area = 46.362 Ha (114.561 Acres)
Unit 8 site area = 7.84Ha (19.375Ac)
Outline Application area = 23.678Ha (58.5Ac)

APPENDIX 2

Rev.	Date	Iss. By	App. By	Description
P01	15.08.24	HA	AK	Phase 2 plan and red line updated
P02	23.08.24	HA	AK	Drawing updated following TSL review
P03	29.08.24	HA	AK	Drawing amended following comments
P04	11.09.24	HA	AK	Phase 2 landscaping layout updated
P05	01.10.24	HA	AK	Unit 11 amended following addition of bund to SE corner
P06	27.02.25	HA	AK	Trifix logo updated
P07	12.05.25	HA	AK	Drawing amended to reflect updated site area
				Red Line Boundary updated
				Drawing Status changed to Planning
				Photobord Dam Link pond amended

Legend

Application Site Boundary

Proposed Infrastructure Landscaping

Existing development

Watercourse - Existing

Watercourse Diversion



APPENDIX 3



Questionnaire on Rugby's Preferred Options Consultation Document

1. Introduction

About this questionnaire:

The purpose of this questionnaire is to gather feedback on the ['Preferred Option' Consultation Document](#) produced by Rugby Borough Council. Information on the Local Plan review Preferred Options consultation.

The document sets out planning policies and proposals for the period of 2024 to 2045. These are intended to contribute to the achievement of the Council's vision for a healthier, thriving, greener and fairer Rugby Borough. The document covers many topics including:

- Where housing should be built.
- Which land can be used to provide employment.
- How the need for infrastructure, such as schools, green spaces, and transport connections, will be met.
- How the Borough will mitigate and adapt to climate change.

The document has been informed by a prior public consultation on key issues and options conducted in October 2023 to February 2024, information submitted by landowners and their agents in response to a call for sites, and a wide range of evidence gathered by the Council's planning team.

Feedback gathered through this questionnaire will help shape the document before another public consultation is conducted in January 2026.

Before completing the questionnaire, please review the [consultation document](#) and [policies map](#). You may also find it helpful to refer to our [FAQ document](#) or [consider the accompanying evidence](#).

The questionnaire contains a total of 27 questions about the consultation document, and 12 questions about the characteristics of the respondent. Although we encourage respondents to consider the consultation document in a holistic manner, we appreciate that some may wish to skip certain questions and focus only on specific elements that are of particular interest to them.

Objectives

The plan consultation document has six main objectives:

1. Support the diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy
2. Support the revival of Rugby town centre
3. Reduce emissions and adapt to climate change
4. Raise design standards
5. Deliver infrastructure-led growth
6. Facilitate a greener, more biodiverse borough and deliver new country parks

1. To what extent do you agree with the selection of these objectives?

- ☐ Strongly Agree
- ☒ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

2. What are the reasons for your answer to question 1?

Please see Section 2 in attached document.

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Questionnaire on Rugby's Preferred Options Consultation Document

2. Strategy for homes and residential allocations (policies S2 and S6)

The number of homes we need to plan for is determined by the standard methodology set by central government. Many of the homes we need to plan for in the period 2024-2045 already have planning permission or are allocated through Houlton, South West Rugby and Eden Park.

However, in addition to these, we will need to allocate land for around 3,500 additional homes.

The proposed spatial strategy for delivering those additional homes includes a range of small to medium-sized sites. The Rugby urban area remains the principal focus for new housing where, including existing commitments, around 75% of new homes are to be delivered. However, the consultation document also proposes residential sites across most of the larger villages with Wolvey, Long Lawford and Brinklow having the largest number of proposed homes.

This more dispersed strategy, which avoids

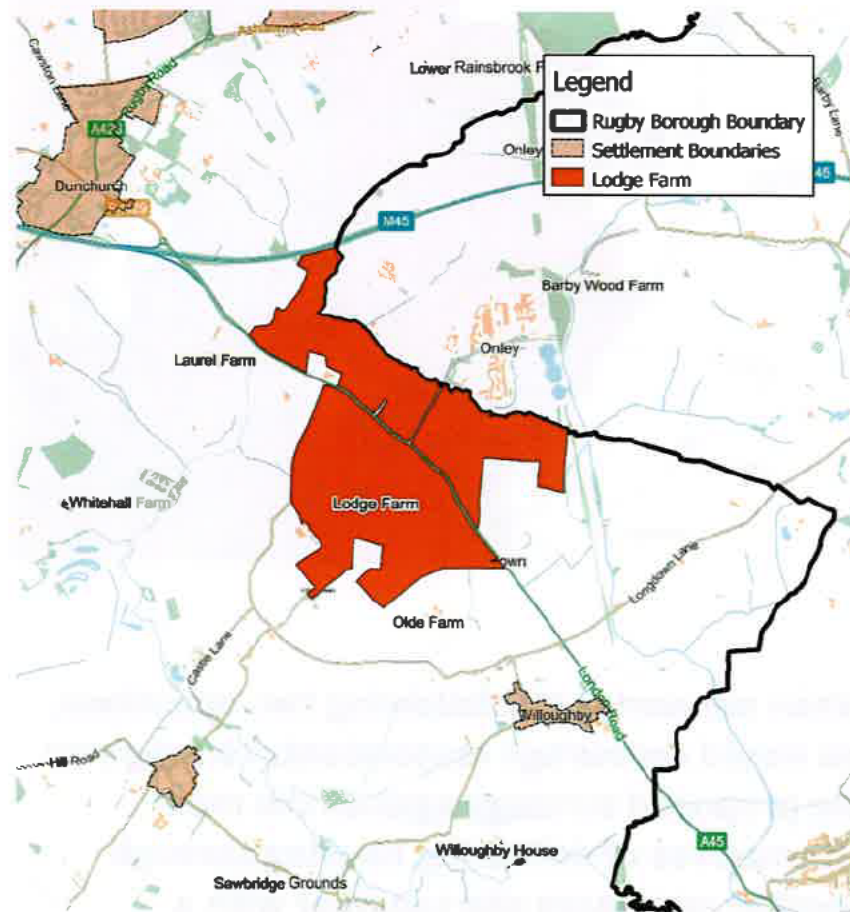
allocating very large sites, was chosen for several reasons:

- By having a range of smaller sites, that will come forward quickly and offer opportunities for small to medium housebuilders, the borough can avoid an over reliance on large sites (i.e. having 'all eggs in one basket').
- While large urban extensions to Rugby town (Houlton, Eden Park and South West Rugby) are being delivered, a strategy that placed further infrastructure strain on the town was deemed unfavourable.
- A strategy focused on small and medium sites is likely to deliver proportionately more affordable housing more quickly.
- The large sites put forward have significant concerns relating to their traffic impacts and their ability to fund necessary infrastructure, thereby making their deliverability uncertain.
- There are opportunities to utilise existing infrastructure in villages where school rolls are dwindling and to improve the range of facilities in villages, enhancing their sustainability.

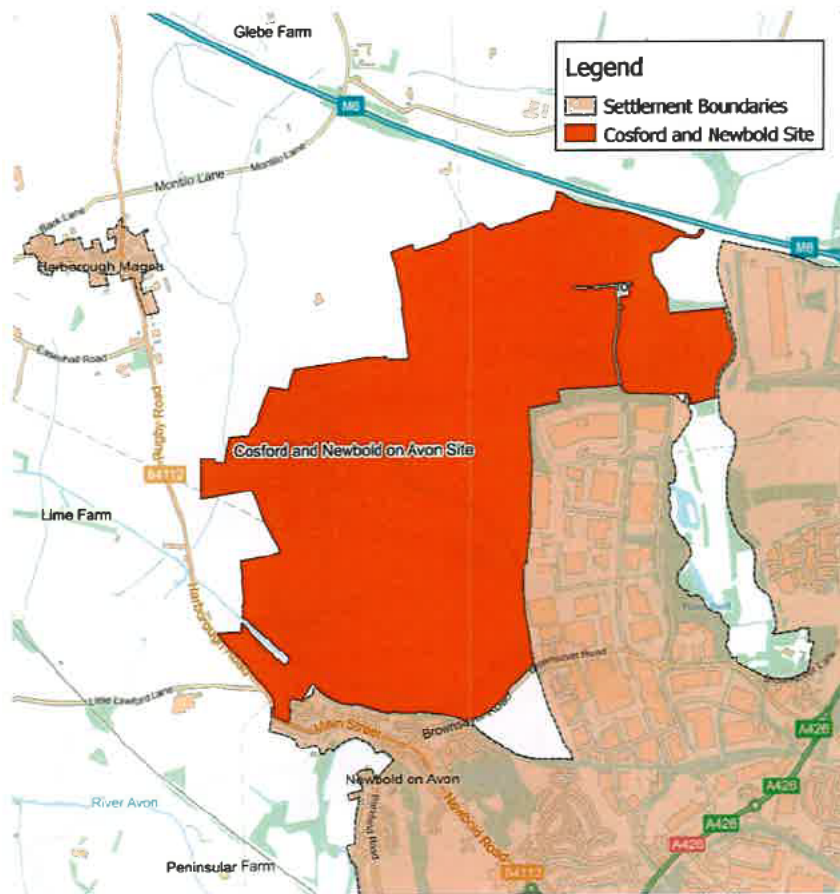
The alternatives to the preferred option are detailed in the interim Sustainability Appraisal Report. The main alternatives would include a further large site, together with somewhat reduced numbers of smaller and medium sites. Based on an assessment of the land which has been put forward to the Council by landowners and their agents, two main options for large sites have been identified.

The first alternative option would be to allocate land at Lodge Farm, southeast of Dunchurch, for a

new village to be built. The estimated range of dwellings to be delivered here would be between 1,800 and 2,000 homes by 2045, with further homes thereafter.



The second alternative would be to allocate land at Cosford, to the north of Newbold-on-Avon and north and west of Swift Valley industrial estate. It is estimated that this site could deliver 1,800 to 2,000 homes by 2045 with further homes thereafter.



When answering the following two questions, we would encourage respondents to weigh up the proposed strategy against the main alternatives of delivering housing through another very large site together with a somewhat reduced number of smaller and medium sized sites. This question asks about the proposed overall strategy, not specific sites, which are covered by questions 5 and 6.

3. To what extent do you agree with the more dispersed overall spatial strategy for new homes?

- ☐ Strongly Agree
- ☒ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree

☐ Strongly Disagree

☐ Do not know

☐ No Answer

4. What are the reasons for your answer to question 3 and if you disagree with the proposed spatial strategy what alternative should we pursue?

Questions 5 and 6 ask about the residential allocations in policy S6, more detail about this is provided in the development site allocations annex.

5. Is there a site that is proposed to be allocated for housing in policy S6 that you do not support? If so, which site and why?

6. The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.

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Questionnaire on Rugby's Preferred Options Consultation Document

3. Strategy for employment land and employment allocations (policies S3 and S7)

The spatial strategy for employment land proposes five new employment land allocations:

- At Coton Park east, on land which was allocated for residential development in the Local Plan 2011-2031 but which hasn't come forward and is considered more suitable for employment development.
- Within the South West Rugby site as a second phase north of the new Symmetry Park.
- As a northern extension to Ansty Park.
- South of the village of Ansty near M6 Junction 2 (there was recently a resolution to grant planning permission for an employment campus on this land, to be developed by Frasers Group).
- At Ryton-on-Dunsmore between Prologis Park (formerly Peugeot) and Coventry Airport.

In summary, we have selected these sites because:

- They are expansions to or are well-related to existing successful employment areas and major road links.
- They are close to the main centres of population in Coventry and Rugby, reducing commuting distances.
- They offer opportunities for diversification of the economy, a range of different scales of building and the delivery of other benefits including country parks/public open space and training facilities.

The sustainability appraisal highlights alternative locations. Some of the main alternatives considered were on the A5 south of Magna Park, on the A5 north of Houlton, and around Thurlaston south of Rugby. A further option would be greater dispersal to smaller sites in the rural areas.

7. To what extent do you agree with the strategy for employment land?

- ☒ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

8. What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?

Please see Section 2 in attached document:

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Questionnaire on Rugby's Preferred Options Consultation Document

4. Gypsy and Traveller sites (policy S4)

We are required to assess the need for pitches for Gypsies and Travellers and allocate land to meet this need. Policy S4 identifies sites that can meet some of the assessed need. We will continue to look for options to meet the remaining need, including by asking our neighbouring authorities to help.

9. To what extent do you agree with policy S4?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

10. What are the reasons for your answer to question 9?

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Questionnaire on Rugby's Preferred Options Consultation Document

5. Climate

The consultation document contains four policies that are focused on reducing greenhouse gas emissions and adapting to the effects of climate change. In summary, important proposed policy changes are as follows:

- New buildings must be designed and built to be net zero carbon in operation (policy CL1).
- More support for renewable and low carbon energy infrastructure including identifying areas as suitable for wind turbines on the policies map and supporting wind turbines on employment sites (policy CL2).
- Introducing water use efficiency standards for non-residential development (policy CL3).
- Putting into policy a requirement for developments to adapt to the effects of climate change by being designed to minimise overheating, minimise flood risk, and optimise green space to provide urban cooling (policy CL4).

11. To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☒ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

12. What are the reasons for your answer to question 11?

Please see 3- in attached document.

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Questionnaire on Rugby's Preferred Options Consultation Document

6. Economy

The consultation document contains three policies that relate to the topic of the Borough's economy. In summary, they are as follows:

- Land within Strategic Employment Sites, sites allocated for employment use development in the plan, and land designated for employment use within made neighbourhood plans, shall be retained for employment purposes. Changes to non-employment uses shall only be permitted where employment uses are proven to be unviable (policy E1).
- Outside the areas mentioned above, development of employment uses shall be permitted within settlement boundaries and in the countryside through conversions of buildings, proportionate expansion of buildings in employment use or infilling within existing employment sites (policy E2).
- Certain uses that support the rural economy (such as agricultural buildings, small-scale tourist

accommodation, and garden centres and nurseries) shall be accepted within rural areas, subject to their compliance with other policies including Green Belt policy (policy E3).

13. To what extent do you agree with the document's economic policies?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

14. What are the reasons for your answer to question 13?

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Questionnaire on Rugby's Preferred Options Consultation Document

7. Centres

The consultation document specifies a hierarchy which will direct the development of retail uses in the Borough. A 'town centre first policy' is maintained, with Rugby town centre at the top of the hierarchy, after which retail development is directed to the district centres and local centres, as defined below.

Town Centre The principal centre in the Borough as defined on the local plan map. The town centre is the main shopping and leisure location in the authority area serving the needs of those from across the Borough and beyond.	Rugby town centre
District Centres Areas comprising substantial concentrations of units with retail, leisure and community uses that act as secondary locations to the town centre serving large districts of the Borough. They typically include at least one large-format supermarket or superstore which attracts a high volume of visitors, a range of comparison retailers, and community facilities such as a school or community centre.	Houlton, South West Rugby
Local Centres Areas which include a wide range of units with retail, leisure and community uses that serve the day-to-day needs of a local catchment population which is within walking distance. They typically include a convenience store, Post Office, pharmacy, school and a place for community gatherings (community centre, pub, place of worship etc.), and have good public transport connections to the principal Town Centre.	Benn, Bilton, Brownsover, Dunchurch, Hillmorton, Houlton, Eden Park

The two district centres (Houlton and South West Rugby) and one of the local centres (Eden Park) are yet to be built out, but are designated as per the proposed masterplans for these urban extensions. The other local centres have been chosen based on an assessment of locations nominated by respondents to our prior Issues & Options consultation, and locations identified by Councillors and Council Officers.

Below the retail hierarchy 19 'neighbourhood hubs' have been designated. These are locations with small concentrations of units with retail, leisure and community uses that are of importance to a neighbourhood, but which are not fully capable of meeting all essential day-to-day needs. They complement the retail hierarchy by giving people access to local shops and services within walking distance.

There are four policies relating to the Borough's centres. In summary, these are as follows:

- Support is given for the regeneration of the town centre with specific priorities identified, including

the redevelopment of Rugby Central Shopping Centre, a refreshed Market Place square, a new mixed-use hub at Old Market Place, and a new apartment living quarter surrounding Rugby Station (policy C1).

- Permission for development of new main town centre uses (such as retail, leisure, entertainment and office uses) is restricted to the centres identified in the retail hierarchy, except under specific circumstances (policy C2).
- Existing main town centre uses within defined centres are protected (policy C3).
- The provision of commercial, business, service, learning and local community uses within neighbourhood hubs is supported (policy C4).

15. To what extent do you agree with the policies for retail centres?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

16. **What are the reasons for your answer to question 15?**

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50%

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Questionnaire on Rugby's Preferred Options Consultation Document

8. Environment

The consultation document contains eight policies that are focused on protecting or enhancing the environment of the Borough. In summary, these are:

- Sites designated as being of importance for wildlife shall be protected from adverse effects of development (policy EN1).
- Development shall avoid significant adverse impacts on the character and visual amenity of landscapes (policy EN2).
- A greater degree of protection is afforded to the 'Ironstone Fringe Area of High Landscape Value' centred around Flecknoe in the south of the Borough (policy EN3).
- Most developments shall deliver a net gain in biodiversity of at least 10% and this should be focused on site, close to the site or elsewhere within the borough.

(policy EN4).

- All major developments shall increase their canopy cover to at least 20% of the site area, or retain their existing level of canopy cover, if already above 20% (policy EN5).
- Development will be steered towards areas with the lowest probability of flooding (policy EN6).
- Development shall not cause or be affected by unacceptable harm to human health, living conditions or the natural environment through pollution, contamination or instability (policy EN7).
- Any developments within the Air Quality Management Area, or any major developments anywhere in the Borough, must achieve air quality neutral standards and reduce exposure of occupiers to poor air quality caused by traffic (policy EN8).

17. To what extent do you agree with the document's environmental policies?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☒ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

18. What are the reasons for your answer to question 17?

Please see Section 3 in attached document.

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Questionnaire on Rugby's Preferred Options Consultation Document

9. Housing

The consultation document contains eight policies that are focused on the development of housing. In summary, these are:

- New developments shall contain a mix of housing tenures, types and sizes (policy H1).
- Where ten or more homes are being built, at least 20% shall be affordable housing within the Rugby urban area, and 30% outside the urban area (policy H2).
- New dwellings for rural workers in countryside locations shall be permitted where there is an essential need for workers to live near their place of work and existing accommodation is not available locally (policy H3).
- Small sites for affordable housing shall be permitted on sites adjacent to settlements, including in the Green Belt, where there is a demonstratable need and they comply with other policies (policy H4).

- The size of replacement dwellings outside of settlement boundaries are restricted (policy H5).
- The provision of housing for older people and those with disabilities is supported, and the loss of such housing shall be resisted unless it can be demonstrated that there is no longer a need for the homes (policy H6).
- New minimum space standards, including the provision of private outdoor space, are applied to new homes to ensure they are of an adequate size for future residents (policy H7).
- The number and concentration of Houses in Multiple Occupation (HMOs) are restricted to limit their potential negative effects (policy H8).

19. To what extent do you agree with the document's housing policies?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

20. What are the reasons for your answer to question 19?

9 / 14

64%

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Questionnaire on Rugby's Preferred Options Consultation Document

10. Wellbeing

The consultation document contains two policies that are focused on promoting the wellbeing of residents. In summary, these are:

- Protection is afforded to community facilities such as pubs, libraries and community halls. Changes to the use of such sites shall be resisted, except where alternative provision is available or retention of the existing use is proven to be unviable. The policy outlines the council's support for the restoration of Coventry Stadium, Brandon for speedway, stock car racing and other motor sports (policy W1).
- Open space shall be protected in accordance with national policy, and developments of 10 or more homes shall provide or contribute to the provision and maintenance of open space in line with set standards (policy W2).

21. To what extent do you agree with the document's wellbeing policies?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

22. What are the reasons for your answer to question 21?

10 / 14

71%

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Questionnaire on Rugby's Preferred Options Consultation Document

11. Design

The consultation document contains five policies that are focused on the design of new developments. In summary, these are:

- New development shall create or contribute to well-designed places by complying with ten design principles (policy D1).
- Infill and householder development shall incorporate features of the street scene so that it appears cohesive. Extensions and alterations shall be subject to further restrictions seeking to ensure they are of a high-quality design (policy D2).
- Development shall adhere to principles intended to ensure that landscape design delivers greener spaces that are resilient to climate change, support biodiversity, encourage active travel and support wellbeing (policy D3).
- Development that sustains and enhances the Borough's heritage assets will be supported and national policy shall be applied when considering

proposals which have the potential to affect the significance of a heritage asset (policy D4).

· All developments that create the need for surface water drainage shall include Sustainable Drainage Systems for the management of surface water run-off, unless proven to be inappropriate (policy D5).

23. To what extent do you agree with the document's design policies?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

24. What are the reasons for your answer to question 23?

11 / 14

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Questionnaire on Rugby's Preferred Options Consultation Document

12. Infrastructure

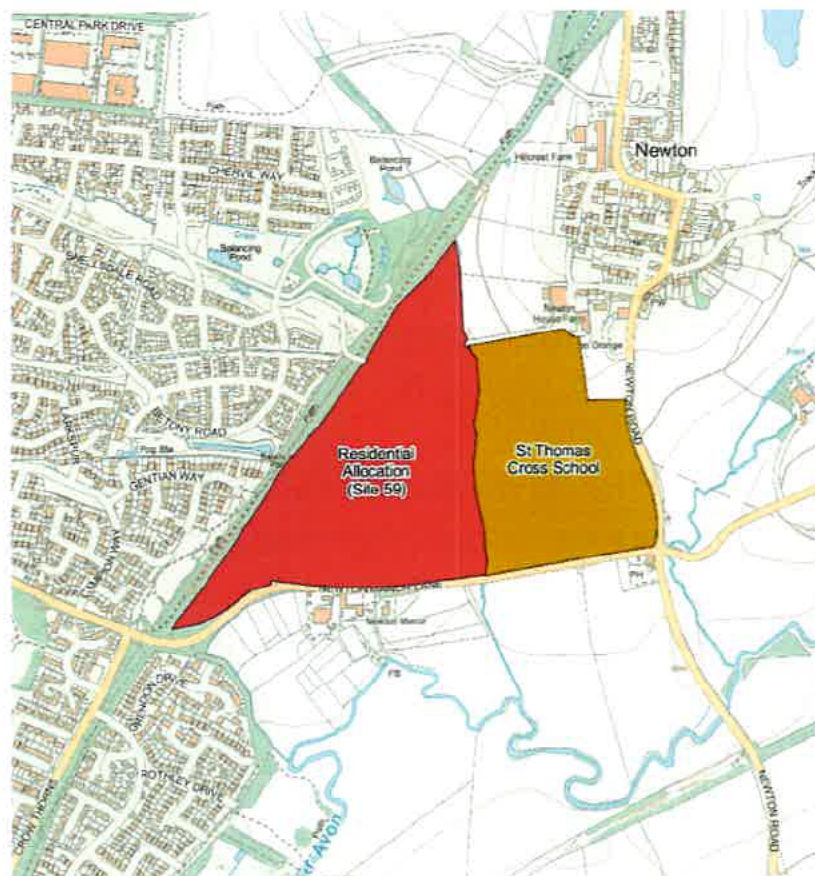
The consultation document contains six policies that are focused on infrastructure. In summary, these are:

- Development shall be designed to promote active travel and public transport use, while ensuring safe access and mitigating adverse impacts on the highway network (policy I1).
- Adequate parking for bicycles and vehicles, including parking to meet the needs of people with disabilities or impaired mobility, shall be provided in accordance with set standards (policy I2).
- New communications infrastructure shall be permitted where it is justified and in accordance with national and local policies, and where opportunities for using existing sites do not exist. All major commercial and residential developments shall include full fibre broadband connections (policy I3).
- Development shall only be permitted where

adequate infrastructure exists or will be provided. Such infrastructure may be delivered through planning conditions, planning obligations, or secured public funding (policy I4).

- Development of the new Rugby Parkway rail station is supported, and land is safeguarded for the delivery of the proposed Nuneaton Parkway station (policy I5).

- Land is allocated for a new sixth form secondary school at St Thomas Cross north east of Rugby town (see figure below), to be funded by contributions from all major residential developments in the Borough (policy I6).



25. To what extent do you agree with the document's infrastructure policies?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Do not know
- ☐ No Answer

26. What are the reasons for your answer to question 25?

Please see section 3 in the attached document

12 / 14

86%

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Questionnaire on Rugby's Preferred Options Consultation Document

13. Any Other Feedback

27. If there are any other comments you wish to make regarding the consultation document which you have not already given in your preceding answers, please enter them here:

Please see attached document.

13 / 14

93%

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Questionnaire on Rugby's Preferred Options Consultation Document

14. About you

Please let us know who you are and, if applicable, the organisation you are representing.

When we publish your representations we will also publish your name. This is necessary because we cannot accept anonymous representations in line with Planning Inspectorate requirements and requirements of our Statement of Community Involvement (SCI). We will not, however, publish your other personal information such as your postal address or email address which will be redacted. However, in line with our SCI you will need to supply your name and address as **we are unable to accept anonymous representations.**

You do not have to give us demographic information but if you do we will have a better understanding of how representative our consultation has been.

You can find Rugby Borough Council's Privacy Notice here:
<https://www.rugby.gov.uk/w/privacy#development-strategy>

* 28. **What is your name?**

29. **What organisation are you representing, if applicable?**

* 30. **Are you a resident of Rugby Borough?**

☐ Yes

☒ No

☐ Other

* 31. **Your contact email**

* 32. **Your contact address**

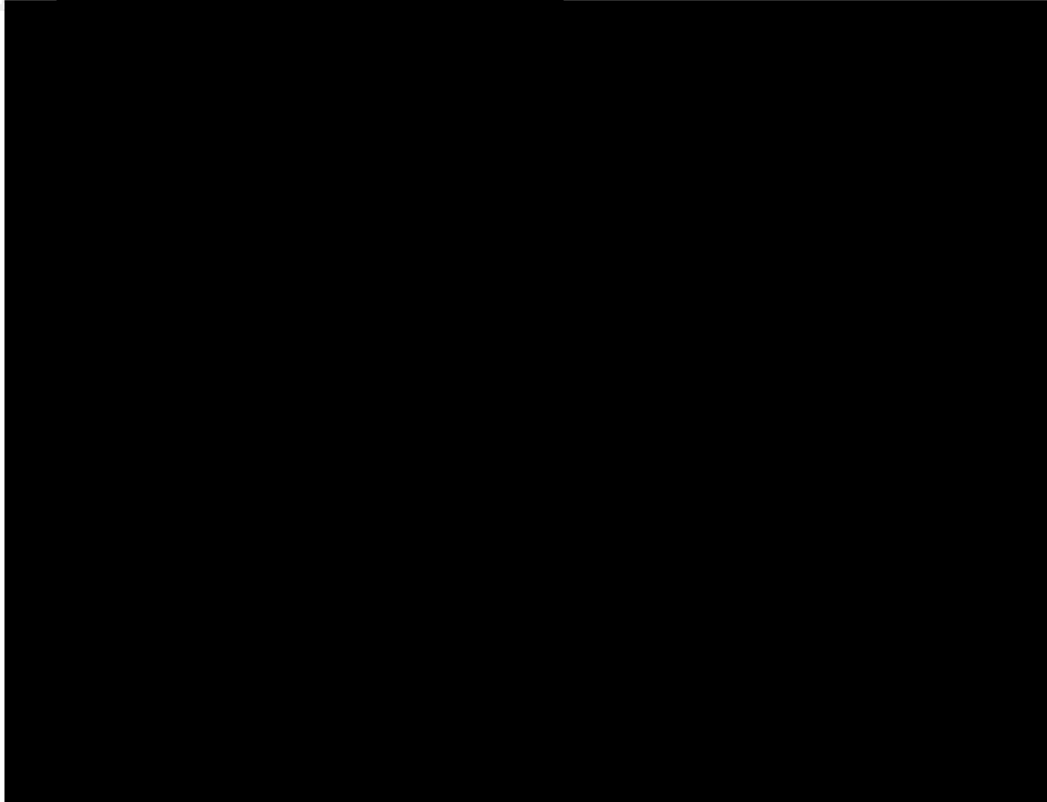
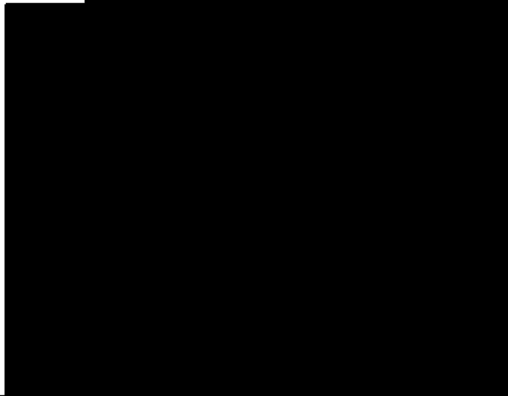
* 33. **Your Postcode**

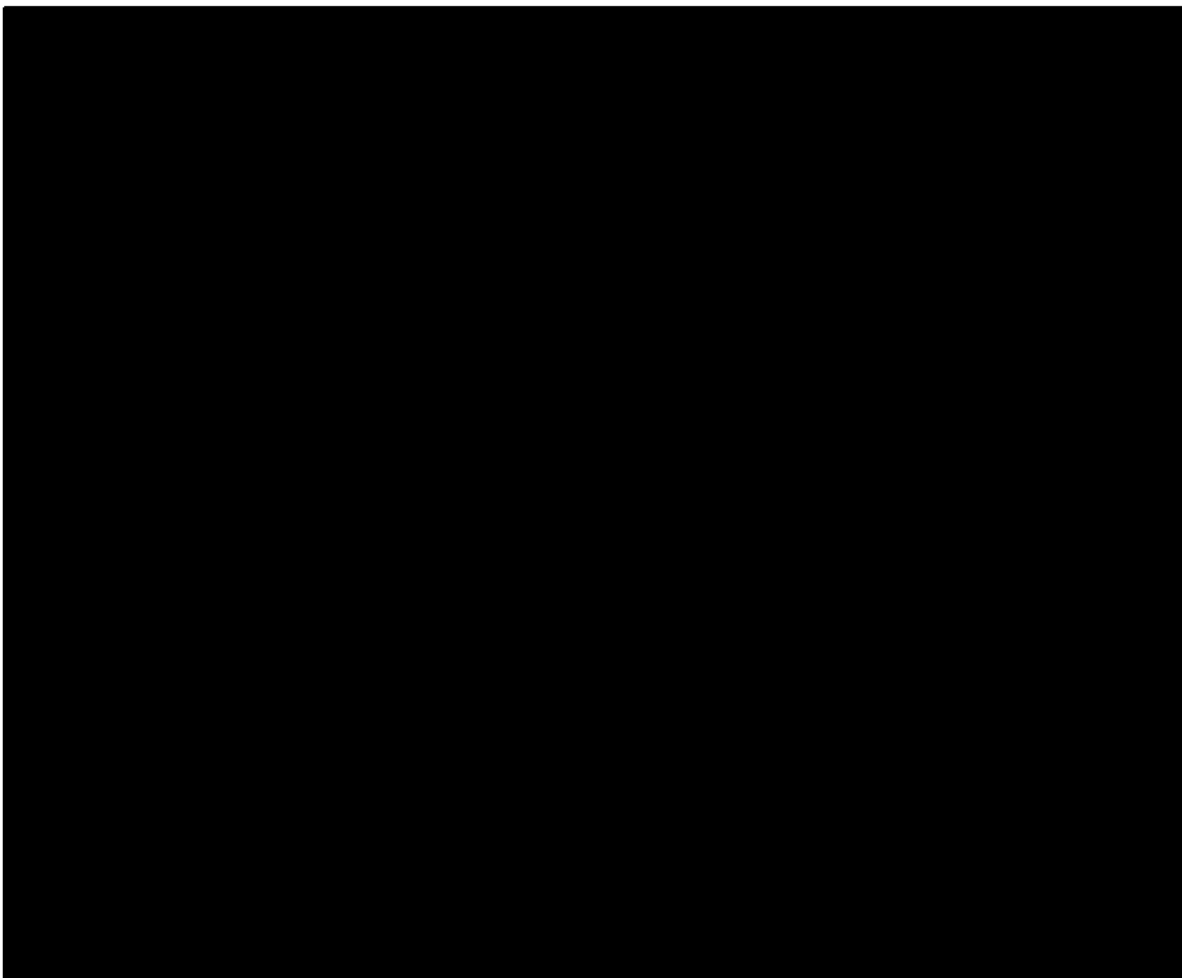
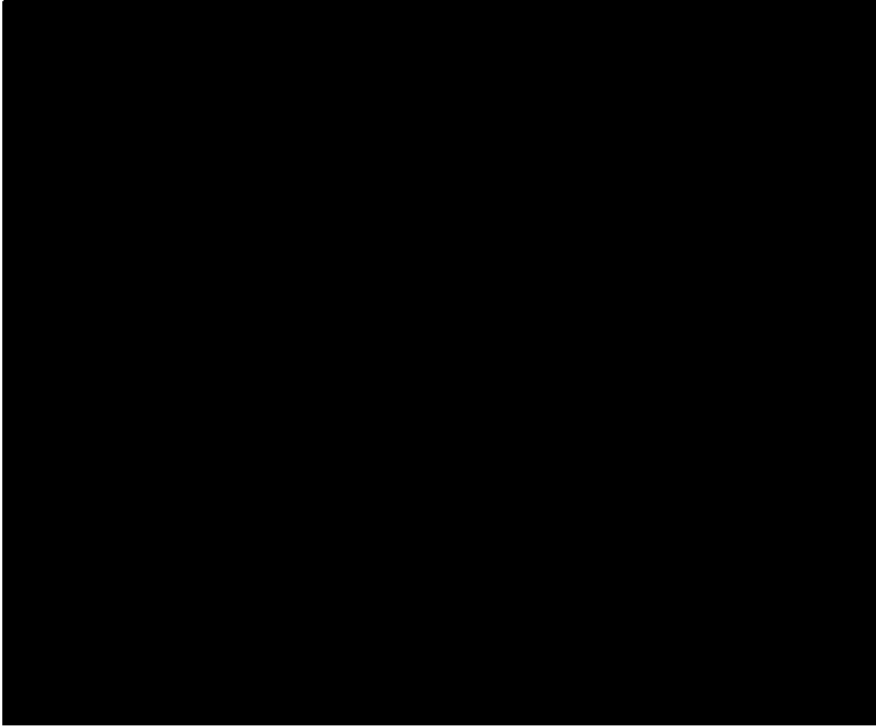
34. **What is your Gender Identity?**

35. **Age**

☐ 85+

36. **Ethnicity**





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APPENDIX 4

Rev	Date	Iss By	App By	Description
P05	28.06.24	MMS		Drawing scale revised
P07	04.07.24			Areas added/updated
P08	12.07.24			Drawing updated to Statute comments
P09	19.07.24	MC		Roads updated to north and east updated
				Northam road and Unit 05 updated
				Existing rules updated and new ones added
				Diverted watercourse shown
				Ridge height of units 3, 4 and 5 added
				Site boundary line and areas updated
P10	25.07.24	MC		Watercourse - extended, notes updated as per Statute comments
P11	13.08.24	HA		Drawing updated following review
P12	20.08.24	HA		Drawing updated following TSI review
P13	29.08.24	HA		Drawing amended
P14	11.09.24	HA		Updates to plan to Trampeter's (planning) comments
P15	19.09.24	HA		Drawing updated, GEAs added
P16	01.10.24	HA		Phase 2 outline developable area updated
P17	20.01.25	HA		Titix logo updated
				Drawing updated: Site boundary amended
				Existing and Proposed Public Rights of Way added
P18	07.03.25	HA		Proof and lodgpath location updated
P19	12.05.25	HA		Red Line boundary updated: Postford Dam Link Pond amended
				Drawing Status changed to Planning

- Legend
- Application Site Boundary
 - Development Zone: Includes all elements related to individual development plots, including buildings, hardstanding, parking, landscaping, bunding and storm water attenuation.
 - Proposed Unit 8 Area
 - Existing development
 - Indicative Foul Drainage
 - Watercourse - Existing
 - Watercourse Diversion
 - Existing Public Right of Way
 - Proposed Public Right of Way

