
**Rugby Borough Local Plan
Preferred Options Consultation
Representations on behalf of
Richborough Commercial**

Richborough Park M45 Junction 1

Representations Document



Rugby Borough Local Plan Preferred Option Consultation 2025: Representations

19 May 2025

Preferred Option Consultation
Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR

Re: Rugby Borough Local Plan Preferred Option Consultation 2025: Representations on behalf of Richborough Commercial – Richborough Park M45 Junction 1

Dear Sir/Madam

We write to formally submit representations in response to the Preferred Option (Regulation 18) Consultation Document in respect of the Site known as Richborough Park M45 Junction 1 ('the Site').

On behalf of our client, Richborough Commercial, these representations seek to promote the Site for an employment-led allocation in the new Local Plan.

They follow on from the previous representations submitted to the Local Plan Review: Issues and Options (Regulation 18) Consultation in October 2023.

This submission is accompanied by a Vision Document prepared by the project design team and a suite of technical reports and surveys undertaken by specialist consultants. This Vision Document provides a detailed assessment of the Site taking account of this due diligence, leading to an illustrative masterplan, showing four potential options for the Site.

We respectfully ask that Rugby Borough Council consider these representations and the opportunity for the Site to meet local economic needs in accordance with their evidence base. We welcome the continued opportunity to engage with Rugby Borough Council in respect of the emerging Local Plan in due course.

Yours faithfully,

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1. Richborough Commercial

- 1.1. Richborough Commercial is the commercial development arm of leading strategic land promoter, Richborough. Established in 2003, it is UK's foremost specialist land promotion company, working in partnership with landowners, agents, communities, stakeholders and local authorities to bring forward land for development. It is a founding member of the Land, Planning and Development Federation (LPDF) and a proud member of the British Property Federation (BPF).
- 1.2. As a specialist land promoter, Richborough Commercial takes a bespoke approach to each site opportunity to promote development which suits the local and wider strategic context within which the site is situated. It can flex its approach to meet the aspirations of local authorities and respond to growing demand arising from changing market conditions, including interest from prospective developers and potential future occupiers. As testament to this, it is currently promoting over 15 million sq ft of floorspace for various employment-generating uses, including industrial and logistics, retail, roadside schemes, data centres and mixed-use developments, in a variety of well-connected and sustainable locations.
- 1.3. Richborough oversees the entire planning process from start to finish. It identifies suitable sites, undertakes technical surveys, designs masterplans, promotes sites through local plans, secures outline planning permission and sells consented land to developer partners. The Richborough team comprises a blend of chartered industry professionals, including planners, surveyors, architects, urban designers, engineers and project managers. This makes Richborough well equipped to accelerate the delivery of realistic market-facing schemes.
- 1.4. As well as being a strong advocate of high-quality urban design and place making, Richborough Commercial prides itself with creating additional local training and employment opportunities and leaving a lasting legacy for future generations. Richborough has worked successfully within the commercial sector over many years, promoting multiple sites across the country and seeing them built out by development partners and successfully occupied by local and national employers.

2. Site Location and Context

- 2.1. The Site, known as Richborough Park M45 Junction 1, shown **at Page 6 of the Vision Document**, comprises greenfield undeveloped land located to the northeast of the M45/A45 Thurlaston Interchange with the M45 bounding the site along the southern boundary and the B4429 Coventry Road located along the northern boundary. The settlement of Thurlaston is located to the south on the opposite side of the M45. Dunchurch is located further to the east and Rugby is further to the north of the site.
- 2.2. The Site totalling 29.09 Acres (11.81 ha) comprises two adjacent parcels separated by Main Street. The larger eastern parcel comprises 19.9 Acres (circa 8 ha); and the western parcel comprises 9.19 Acres (circa 3.7 ha).
- 2.3. There is no relevant planning history on the site. It has been assessed by the Council as 'Site 133: Land North of M45' in the Stage 2 Site Options Assessment (March 2025) and similarly by AECOM in the Interim SA Report (March 2025).
- 2.4. The site lies adjacent to, but outside of, land allocated for the South West Rugby Sustainable Urban Extension (SUE). It is not located within the Green Belt. The Green Belt boundary for this part of the Borough is located further to the west.
- 2.5. The Site is also located adjacent to Symmetry Park, to the north. This is a Tritax development that benefits from planning permission to deliver 2 million sq ft of logistics floorspace. The development is currently under construction and includes completed industrial units. Symmetry Park sits outside of the SUE and its planning permission was standalone from the SUE allocation and aspirations.
- 2.6. Phase 1 of Symmetry Park has delivered 1 million sq ft of logistics space to Iron Mountain. The remaining balance of the site forms Phase 2 and has the capability to offer bespoke design and build facilities ranging between 100,000 sq ft and 1 million sq ft to meet an occupation date of 2026.
- 2.7. The wider area, within which Rugby is situated, is known as the 'Golden Triangle' for logistics and is an established key distribution and manufacturing location.
- 2.8. These representations are supported by a suite of technical reports and surveys which demonstrate that there are no significant constraints on the site that cannot be mitigated or overcome. In all respects, the site is a deliverable employment opportunity that can create new employment opportunities in the short-term.
- 2.9. The submission of representations includes:
 - This Representations Document, prepared by Newmark
 - The Vision Document, prepared by the project design team; and
 - The Technical Reports, which are included in the Appendices Document, comprising:
 - Employment Land Statement, prepared by LSH
 - Roadside and Retail Uses Supporting Statement, prepared by LSH
 - Acoustics Technical Note, prepared by BWB
 - Agricultural Quality, prepared by Kand Research Associates Ltd
 - Air Quality Technical Note, prepared by BWB
 - Arboricultural Constraints Assessment, prepared by BWB

SECTION 2: SITE LOCATION AND CONTEXT

- Biodiversity Net Gain Statement, prepared by BWB
- Preliminary Ecological Appraisal, prepared by BWB
- Energy and Sustainable Building Vision Statement, prepared by BWB
- Flood Risk and Drainage Technical Note, prepared by BWB
- Technical Note: Vision Document Health Input, prepared by BWB
- Initial Heritage Assessment, prepared by BWB
- Landscape Technical Note, prepared by Tyler Grange
- External Lighting Technical Note, prepared by BWB
- Minerals Assessment Note, prepared by Heatons

3. Planning Policy Context

National Planning Policy Framework (December 2024)

- 3.1. The NPPF was most recently revised in December 2024 and places much more significant focus on supporting commercial development with various sectors, including industrial and logistics, giving more prominence for their crucial role in driving the economy.
- 3.2. Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
- a) *'all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
 - b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*
- 3.3. Chapter 6 of the NPPF sets out the Government's strategy to building a strong, competitive economy. Paragraph 85 states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. In doing this, the NPPF specifically sets out that planning policies should pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics, as well as being flexible enough to accommodate needs not anticipated in the plan and enabling a rapid response to changes in economic circumstances (Paragraph 86).
- 3.4. Recognising and addressing the specific locational requirements of different sectors is also central to the NPPF (Paragraph 87). This includes making provision for 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, in addition to the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.
- 3.5. Turning to main town centre uses, Paragraph 90 states that policies and decisions should *'support the role that town centres play at the heart of local communities'*. Planning policies should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed *'looking at least ten years ahead'*. Where there are no suitable and viable town centre sites, edge of centre and then out of centre sites can be considered.
- 3.6. Paragraph 91 states that a sequential test should be applied to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Paragraph 92 further states that preference should be given to accessible sites which are well connected to the town centre when considering edge of centre and out of centre proposals. An impact assessment is also required under Paragraph 94, if the development is over a set floorspace threshold for retail and leisure development applications outside of town centres (a default national threshold of threshold of 2,500 sq.m gross floorspace is to be applied if no local threshold is adopted).

SECTION 3: PLANNING POLICY CONTEXT

3.7. In promoting healthy and safe communities (Section 8 of the NPPF), Paragraph 98 criterion (a) sets out the need to plan positively for the provision of shops and local services to enhance the sustainability of communities and residential environments. Criterion (e) identifies that there should be an integrated approach in respect of the location of housing, economic uses, community facilities, and services.

Emerging Local Plan: Preferred Option Consultation

3.8. Rugby Borough Council are currently consulting on the Local Plan Preferred Option (Regulation 18). The Consultation Document sets out a proposed development strategy for the borough for the period 2024-2045.

3.9. Whilst representations were submitted in respect of the Site at the Issues and Options (Regulation 18) stage, we note that the Site remains unallocated within the Preferred Options Consultation document and sits outside of the Rugby Urban Area settlement boundary.

3.10. **Draft Policy E1: 'Employment land protection'**, confirms that land within Strategic Employment Sites, and employment allocations (which includes the adjacent Symmetry Park; and the employment allocation within the South West Rugby Strategic Site); or land designated for employment use will be retained in or developed for employment uses.

3.11. **Draft Policy E2: 'Employment development'** sets out that within settlement boundaries but outside of Strategic Employment Sites and employment allocations the development of employment uses will be permitted subject to compliance with other policies of this plan.

3.12. **Draft Policy S3: 'Strategy for employment land'**, sets out that new floorspace in use classes B2, B8, E(g)(ii) and (iii) will be delivered in strategic employment locations, including the adjacent Symmetry Park which is identified to deliver approximate 85,541 sqm of floorspace.

3.13. **Draft Policy S7: 'Employment allocations'** identifies the allocations, including within the South West Rugby Strategic Site which is identified to deliver circa 130,000 sqm of employment (non-office) floorspace for phase 2 of the development.

3.14. **Draft Policy S8: 'South West Rugby'**, provides details for the future development for the whole South West Rugby Strategic Site (previously referred to as SUE in the adopted Local Plan). The draft policy sets out that the new neighbourhood will include around 4,000 dwellings, together with employment land as allocated by Policy S7.

3.15. Additional details of the adjacent allocation include:

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.*

Development of the site shall deliver:

- i. 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.*

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LOCAL PLAN EVIDENCE BASE

3.16. The emerging Local Plan is supported by a suite of evidence base documents which inform the Plan's strategy, emerging policies and allocations.

3.17. This section seeks to summarise and respond to some of the relevant strategic evidence documents in considering an employment-led development at the Site.

3.18. In respect of subsequent sections of these representations, which identify the opportunity for local employment and roadside retail uses at the Site, the Council's relevant evidence-based documents are also relied upon.

| RUGBY'S EVIDENCE BASE DOCUMENT | RUGBY'S DOCUMENT EVIDENCE | OUR RESPONSE |
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| <p>Stage 2 Site Options Assessment (March 2025)</p> | <p>This report assesses the Site (referred to as 'Site 133: Land North of M45') in respect of Transport, Ecology, Landscape, Heritage, Other constraints, and Opportunities/benefits.</p> <p>Following the detailed assessment of the Site, the Council concludes the following:</p> <p><u>Transport</u>: The current level of concern for this site is Medium.</p> <p><u>Ecology</u>: There are low ecological constraints at Site 133.</p> <p><u>Landscape</u>: The overall landscape sensitivity of the site is Medium/Low.</p> <p><u>Heritage</u>: There were no designated heritage assets identified within 50 metres of the site.</p> <p><u>Other Constraints</u>: The site is not within the Green Belt. Constraints for foul water drainage are assessed as Medium, constraints for surface water drainage are assessed as Low.</p> <p><u>Opportunities/benefits</u>: Employment</p> | <p>The Vision Document provides our technical assessment and surveys of the Site, including considerations for Transport, Ecology, Landscape, Heritage, and Drainage (amongst other matters).</p> <p>Our full technical assessment of the Site has informed the proposed employment-led allocation being sought.</p> <p>Taking into consideration the technical analysis, we agree with the Council's assessment that the Site has the opportunity for employment development.</p> |
| <p>Landscape Sensitivity Assessments (March 2025)</p> | <p>This report assesses the Site (Site 133) in respect of its landscape sensitivity. Of note, the assessment sets out that:</p> <p>The agricultural character of the site is heavily impinged upon by the man-made influences in close proximity.</p> <p>The site does not feel remote due to the urbanising effects of the warehouses of Symmetry Park. It is not tranquil at all due to the constant noise of traffic from the Coventry Road and M45.</p> <ul style="list-style-type: none"> The site is visible from the grounds of the Dunchurch Baptist Church to the east, and partly visible from some of the dwellings on Coventry Road. Clear views of the site can | <p>As evidenced by our own technical analysis of the Site, set out in the Vision Document, we agree with the Council's key conclusion that there are limited landscape sensitivities that would preclude future development opportunities of the Site.</p> <p>Our Landscape Assessment recommends:</p> <ul style="list-style-type: none"> retaining and enhancing the existing tree and hedgerow network, where possible. Including the replacement planting on-site, where loss occurs to facilitate access Including a development offset (circa 10-15m) and lower building heights to the south of the Site, to allow for mitigation |

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| RUGBY'S EVIDENCE BASE DOCUMENT | RUGBY'S DOCUMENT EVIDENCE | OUR RESPONSE |
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| | <p>be gained from Main Street bridge, and there is some limited intervisibility of the site with Thurlaston village.</p> <p>In respect of the overall landscape sensitivity (landscape, visual and value) the assessment concludes that:</p> <ul style="list-style-type: none"> This is a medium sized site consisting of two arable fields just to the north of Thurlaston. It is enclosed by the M45 to the south and Coventry Road to the north. Sensitivities are only likely to arise from the site's intervisibility with adjacent properties on Coventry Road, and from the natural value of the trees and hedges that enclose the site and from its contribution to the rural setting of Thurlaston. | <p>planting to soften views and prevent skyline intrusion from the south; and</p> <ul style="list-style-type: none"> Introduce new tree and woodland planting within the southern offset and within a northern boundary landscape buffer to mitigate visual impact at local level and strengthen landscape character. <p>Our assessment concludes that with sensitive design and strategic planting, the Site has potential to accommodate new development without undue adverse effects on landscape character or views.</p> |
| <p>Ecological Constraints Assessment (March 2025)</p> | <p>This report assesses the Site (Site 133) in respect of ecological constraints. The assessment sets out that:</p> <ul style="list-style-type: none"> There are no LWSs located within or adjacent to the site. There are no habitats of medium to high distinctiveness located within the site. Dense scrub and planted broadleaved woodland are located adjacent to site boundaries. There are no records of irreplaceable habitat located within, within 50m of the site boundary, or hydrologically linked to the site. <p>Based on this assessment, the overview for the Site sets out the following: Site 133 is proposed for employment development. The site comprises of 11.81ha and has capacity of 4.29ha.</p> | <p>The Vision Document includes our ecological assessment of the Site.</p> <p>It concludes that, by following the recommended mitigation measures set out in this assessment, and any mitigation as a result of any further surveys, ecology should not be a constraint to the Proposed Development.</p> |
| <p>Sustainability Appraisal (SA) of the Rugby Borough Local Plan Interim SA Report (March 2025)</p> | <p>The aim of the Council's Interim SA Report is to appraise the current Draft Rugby Local Plan alongside "reasonable alternatives".</p> <p>The document identifies the two broad categories relating to industrial land, these being:</p> <ul style="list-style-type: none"> 'Big box' strategic logistics operations that often need sites of at least 25 ha; and Local need – other industrial land where needs are often met most effectively on sites below 25 ha. | <p>The Site comprises an 11.81 Ha, i.e. below the 25 Ha threshold defined as 'Bix box' strategic sites.</p> <p>As these representations set out, the Site provides an excellent opportunity to deliver local economic need. The Council's own assessment identifies land to the southwest of Rugby as an appropriate location to progress an additional employment land site, and in doing so, specifically identifies the Site (Site 133) as a feasible option.</p> |

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| | <p>In considering Employment Land scenarios, the assessment considers the possibility of allocating one further strategic site.</p> <p>While the assessment notes that there is the potential to not progress any further employment land options for appraisal, it considers that on balance it is considered appropriate to progress one further broad option, namely the option of further employment land to the southwest of Rugby in the vicinity of the A45/A4071 junction. The two sites considered for this additional employment site are Site 18; and Site 133 (The Site).</p> | |
| <p>Rugby Borough Council Economic Strategy 2025-2035 Consultation Document</p> | <p>Rugby Borough Council launched its new Economic Strategy for consultation in March 2025. The strategy aims to place businesses and people at the heart of the Council's plan for growth, outlining how the economy will develop between 2025 and 2035.</p> <p>Recognising how Rugby works as an economy, the strategy has been split into three core priorities focusing on People, Business and Growth. Each theme has a number of commitments on how the Council, working with its partners, stakeholders, businesses and residents, aims to succeed.</p> <p>Some key areas of the Strategy are highlighted below:</p> <ol style="list-style-type: none"> 1. One of the stated outcomes of the Strategy is "a growing and diverse business base through the provision of employment space to meet demand." 2. The Strategy recognises the potential for the logistics sector to secure skilled jobs to support automation and other technologies but also the barriers that exist in finding skilled workers within the local population. 3. The Council have stated that the strategy will be funded by investing savings from council tax and business rates (reserves) and investing Community Infrastructure Levy collected from development. 4. The priority to "Developing our business support infrastructure" is identified as key to enabling every business to succeed. The strategy identifies the role of allocations in the Local Plan to ensure the delivery of high quality small to medium-sized industrial space in accessible locations across the borough. 5. The strategy recognises the existing barriers faced by local businesses. <p>The Strategy's economic vision explicitly expresses that a top priority of the emerging Local Plan is "to</p> | <p>LSH submitted representations on behalf of Richborough Commercial to the public consultation on Rugby's new Economic Strategy which closed on 7th April 2025.</p> <p>We respond below in respect of each of the key areas as summarised in the adjacent column:</p> <ol style="list-style-type: none"> 1. Richborough Commercial welcomes the stated outcome of growing a diverse business base. However, achieving this outcome requires a flexible approach to capture the missed opportunities of the recent past. This includes the promotion of sites that provide a range of unit types and sizes to respond to market requirements. Recognition should also be given to sites where there is an opportunity to provide local employment premises close to existing logistics locations which benefit from established infrastructure and a labour pool. 2. Richborough Commercial welcomes the Strategy's objective to forge alliances between businesses and education to provide training and giving access to better jobs with better pay. 3. Promotion of the Site (Site No. 133) through the Local Plan process would provide, opportunities for flexible floor space, meet a range of business needs and provide the economic benefits, including business rates, that are necessary to help the Council deliver its Economic Vision for Rugby. 4. While this priority "Developing our business support infrastructure" is welcomed, in order to achieve meaningful progress towards achieving growth of the economy within the 10-year time period of the Strategy, it can't solely rely on the provision of sites and premises through Local Plan allocations. The plan period covers a longer-term timescale of 2024 to 2045. |

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| | <p><i>ensure the delivery of high quality small to medium size industrial space in accessible locations across the borough”.</i></p> | <p>Therefore, the Economic Strategy should place greater emphasis on facilitating economic growth in the shorter term. This should recognise the ability of sites that are located in sustainable accessible locations, that already benefit from the infrastructure provided by the large-scale investment in the logistics sector that has occurred under the current local plan. By actively encouraging complementary growth in these locations to address local needs, the Strategy will achieve its aim of boosting the economy in the short term with a form of development that will dovetail with the emerging Local Plan without being held up by its differing timescales. One such location is that of the Site promoted in these representations (Site No. 133).</p> <p>5. In recognising the existing barriers faced by local businesses, it is pertinent to assess the supply of employment land that has come forward since the adoption of the Local Plan, where very few small to medium sized units have come forward on new purpose-built land to support such local businesses.</p> <p>Accordingly, the Strategy should look to prioritise the importance of providing new sites, enabling existing local businesses to relocate from unsuitable sites that no longer fit their purpose, to those which are better located, provide high quality premises and are constructed to high sustainability standards.</p> <p>In addition to the promotion of additional employment land, the Economic Strategy should look to prioritise sites that can be developed for a flexible range of employment uses and sizes. The need for 'grow-on' space does not necessarily just mean small size units. This would ensure greater alignment with the evidence base behind the emerging Local Plan Regulation 18 consultation, which differentiates a 'local' employment need for industrial land on smaller sites of less than 25 hectares in area and a need for industrial land on larger 'strategic' sites.</p> <p>Promotion of the Site for an employment-led allocation, as sought in these representations would help address the aims of Rugby's Economic Strategy.</p> |
| <p>West Midlands Strategic Employment Sites Study (WMSESS) (2023/24) – (August 2024)</p> | <p>This report covers a study area across 24 authorities in the broad market areas of Greater Birmingham, Coventry and Warwickshire and Staffordshire.</p> <p>The WMSESS (2024) defines Strategic Sites as typically over 25ha and acknowledges that large units (greater than 9,000sqm) can be accommodated on smaller sites.</p> | <p>The report provides an assessment of strategic employment sites defined as typically over 25 ha. The Site comprises 11.81 ha and would not be considered a Strategic Site for the purposes of an allocation.</p> |

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| | <p>The report concludes that the apportioned need for Area 7, which includes Coventry and Rugby, is an overall indicative need for between 200 – 375 ha of land on additional strategic sites across the Coventry and Warwickshire sub-region.</p> <p>Whilst not identifying specific sites, the report does include both road-based and rail-based Opportunity Areas on plans.</p> | <p>Given the size of the Site and the Council's pattern of focusing on allocating larger sites, these representations identify the opportunity for the Site to meet the need for smaller sites.</p> <p>However, the WMSESS does acknowledge that large units (greater than 9,000sqm) can be accommodated on smaller sites.</p> <p>The four illustrative masterplan options set out in these representations reflect a flexible range of unit sizes to demonstrate that the needs of local businesses could be met by development at the Site.</p> |
| <p>Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (September 2024)</p> | <p>This paper considers the relationship between employment land need recommendations in the West Midlands Strategic Employment Sites Study (WMSESS) 2023/24 and the Coventry and Warwickshire Housing and Economic Development Needs Assessment (C&W HEDNA) 2022.</p> <p>The WMSESS study and the C&W WMSESS alignment paper concludes that there is greater need for local employment land over strategic land in the C&W area and in particularly in the Rugby BC area.</p> | <p>As set out in these representations, the Alignment Paper (2024) found that no large units have been completed on smaller sites in Rugby BC since 2011 and only 2% (5 ha out of 244 ha) of Coventry & Warwickshire's Non-Strategic Site supply is located in Rugby BC.</p> <p>This highlights a continued lack of provision for smaller employment units that the emerging Local Plan should seek to address.</p> |

4. Promotion of the Site for an employment-led allocation

- 4.1. Based on the work undertaken by Richborough Commercial and its specialist consultants, there is an excellent opportunity to deliver an employment-led development on the Site.
- 4.2. As we explore in further detail below, the design team has prepared several masterplan options that illustrative how the Site could theoretically be built out – accommodating both employment and/or roadside retail elements in a mix of different unit configurations and sizes. At this stage, Richborough Commercial does not have a fixed preference on a particular form of development. It is able to flex its approach to suit changing circumstances, including the need and demand for specific uses. This could prove to be useful as the Local Plan progresses, for example, should the Council find itself in the position of needing to allocate additional land and/or indeed allocate a more diverse range of sites to accommodate a mix of future occupiers. As such, we invite the Council to consider the evidence submitted here and appended to these representations when forming a view on the suitability of the site to accommodate development.
- 4.3. The Site has a unique set of locational benefits given its position directly adjacent to:
- the M45/A45 Thurlaston Interchange;
 - the South West Rugby Strategic Site which, under the Preferred Options Consultation Document, is allocated for around 4,000 dwellings and circa 130,000 sqm of employment (non-office) floorspace for phase 2 of the development; and
 - the permitted Symmetry Park development of which Phase 1 has delivered 1 million sq ft of logistics space.
- 4.4. As previously mentioned, the Site sits outside of the Green Belt and is located within the logistics ‘Golden Triangle’ with strong road frontage in a prominent strategic location on the motorway network.
- 4.5. Whilst the Site currently sits outside of the Rugby Urban Area, the South West Strategic Site allocation and the ongoing development of Symmetry Park will result in an urban transformation of this area. In light of this changing context, we consider that the Site could be brought forward within the new Local Plan to provide a complementary allocation to meet more local economic and/or retail needs which would in turn align with the existing and future infrastructure being delivered in this location.

Options for future development on the Site

- 4.6. Below we set out some key driving factors influencing the vision and illustrative masterplan options for the Site. Each option has been informed by specialist input from Lambert Smith Hampton (LSH) (supporting statements on employment land and roadside retail uses) as well as advice from the wider design team who have undertaken technical assessments of the Site (including acoustics, agricultural land, air quality, arboriculture, ecology, energy and sustainability, flood risk and drainage, ground conditions, health, heritage and archaeology, highways, landscape, lighting, minerals and utilities). These are appended to the accompanying Vision Document.

THE ILLUSTRATIVE MASTERPLAN OPTIONS INCLUDE:

- 4.7. The four potential illustrative masterplan options are presented at **Section 5.2 of the Vision Document**. These include:
- **Option 1** – full industrial and logistics scheme with larger ‘mid’ to ‘big box’ units on the eastern parcel:
 - Total GIA – 34,620m² / 372,635ft².
 - **Option 2** – full industrial and logistics scheme but with smaller ‘small’ to ‘mid box’ units across the site:
 - Total GIA – 29,527m² / 317,825ft².

SECTION 4: PROMOTION OF THE SITE FOR AN EMPLOYMENT-LED ALLOCATION

- **Option 3** – roadside / retail scheme to the left-hand side of the western plot with larger ‘mid’ to ‘big box’ industrial and logistics units to the rest:
 - Retail GIA – 2,793m² / 30,063ft².
 - Industrial GIA – 30,950m² / 333,143ft².
 - **Option 4** – roadside / retail scheme to the left-hand side of the western plot with smaller ‘small’ to ‘mid box’ industrial and logistics units to the rest:
 - Retail GIA – 2,793m² / 30,063ft².
 - Industrial GIA – 27,610m² / 297,191ft².
- 4.8. The illustrative masterplan options respond to Rugby’s requirements to meet local economic needs and recognise the opportunity to also provide some complementary retail and commercial uses, through a flexible approach to future development of the Site.
- 4.9. In providing such flexibility, the options include bringing forward the Site either in its entirety as an employment site, where use classes B2; B8; and E(g)(ii)&(iii) are promoted; or seeking employment uses on the eastern parcel only, which would provide the opportunity for the western parcel, directly adjacent to the M45/A45 Thurlaston Interchange, and Tritax development, to come forward for complementary retail, drive-thru/to, petrol filling station, and EV charging uses to support the current and future needs of the area.
- 4.10. Also of note, in respect of the four masterplan options, is the flexible range of larger and smaller industrial unit sizes provided. While one of the key opportunities in promoting the Site for an employment-led development is to help meet local employment/economic need, we are also cognisant that local businesses require both smaller and larger industrial units.
- 4.11. We address the justifications for the options below, focusing firstly on the employment uses, followed by the roadside retail uses.

Opportunity for Local Employment Uses

- 4.12. The Employment Land Supporting Statement, prepared by LSH, sets out the opportunity for the Site to meet local employment need. In doing so, it has considered the following evidence base documents informing the emerging Local Plan:
- Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA);
 - West Midlands Strategic Employment Site Study 2024 (WMSESS);
 - The HEDNA-WMSESS Alignment Paper 2024 (Alignment Paper);
 - Development Needs Topic Paper (2025); and
 - Rugby’s emerging Economic Strategy (2025).

OPPORTUNITY FOR THE SITE TO MEET LOCAL NEED

- 4.13. LSH conclude that the adopted Rugby Local Plan recognised a quantitative need to provide smaller employment units to meet the needs of local businesses. Despite this, employment development to date has failed to provide such units.
- 4.14. The emerging Local Plan and Rugby Economic Strategy recognise that the pattern of new employment sites developed since the adoption of the Local Plan has been focused on large units. To address this, the Preferred Option Consultation Document (Draft Plan) makes provision for the supply of 26,012 sqm of floorspace to provide space for small and medium sized businesses that wish to expand.

SECTION 4: PROMOTION OF THE SITE FOR AN EMPLOYMENT-LED ALLOCATION

- 4.15. The WMSESS (2024) defines Strategic Sites as typically over 25 ha and acknowledges that large units (greater than 9,000sqm) can be accommodated on smaller sites. This distinction has been carried through into the calculation of employment land needs.
- 4.16. The Alignment Paper (2024) reconciles the recommendations of the HEDNA and WMSESS and found that no large units have been completed on smaller sites in Rugby BC since 2011 and only 2% (5 ha out of 244 ha) of Coventry & Warwickshire's Non-Strategic Site supply is located in Rugby BC. **This highlights a continued lack of provision for smaller employment units that the emerging Local Plan should seek to address.**
- 4.17. The Development Needs Topic Paper (2025) highlights the quantum of industrial need which the emerging Local Plan needs to meet. This gives a floorspace requirement of 265,296 sqm (66.3 ha) on smaller sites and 761,250 sqm (217.5 ha) on larger Strategic sites within the plan period of 2024-2045, a total of 1,026,546 sqm of employment development floorspace.
- 4.18. The total floorspace provided by the Commitments and Allocations equates to 1,231,987 sqm. Whilst this exceeds the overall level of need, all of the proposed allocations identified in the emerging Local Plan are strategic sites and only 14,012 sqm of committed floorspace is located on small sites. The Preferred Option provides no clarity as to how the residual need for 265,296 sqm (66.3 ha) of floorspace on small sites will be met.
- 4.19. The supply of sites identified in the Preferred Options Consultation is based on the assumption that the Strategic Site Need for Coventry & Warwickshire will be fully met in Rugby. **However, there is no clarification within the Draft Plan as to whether Coventry City's unmet needs for smaller sites will be provided for and if so, how.** The Development Needs Topic Paper states this to be 45 hectares or 180,000 sqm. If this were to be accommodated in Rugby BC, it would increase the overall need to 1,206,546 sqm. Whilst this would still be met by the Commitments and Allocations, the unmet need for smaller sites would increase to 445,296 sqm (111 ha.)
- 4.20. LSH have analysed commercial market data from CoStar. This shows that:
- The industrial vacancy rate in Rugby has been consistently below a healthy equilibrium of 7-8% for the past ten years. This indicates Rugby's industrial market is constrained in terms of its available industrial supply.
 - Industrial prices have been steadily increasing over the past ten years. The combination of limited availability and constrained supply is driving up rental prices.
 - Almost all of the availability in Rugby BC is located within the Town Centre and none at the edge of town locations. This contrasts with the pattern of recent activity which shows demand in the town is split between these two locations.
 - This shows that the constrained supply affecting Rugby will be particularly acutely affecting the edge of centre locations where availability is even more limited.

OPPORTUNITY FOR THE SITE TO MEET LOCAL NEED: KEY CONCLUSIONS

- 4.21. The evidence base of the Preferred Options Consultation Document refers to the need to provide mid-sized and smaller industrial units, more suited to diverse uses and a need for separate allocations for Class E(g)(ii)&(iii)/B2 uses where land is delineated from sites for Class B8 logistics use in order to support the manufacturing sector.
- 4.22. This need has been quantified in the emerging Local Plan as 265,296 sqm of floorspace on smaller sites of less than 25 ha. A total of approximately 14,012 sqm of floorspace is committed, but none of the proposed allocations will meet this specific need for smaller sites. There is therefore an unmet need for 251,284 sqm that the emerging Local Plan does not meet.
- 4.23. This shortfall in provision will become more acute if Rugby BC accommodates the unmet needs of Coventry, which amount to a further 180,000 sqm of floorspace on smaller sites.

SECTION 4: PROMOTION OF THE SITE FOR AN EMPLOYMENT-LED ALLOCATION

- 4.24. Whilst some smaller units will inevitably come forward on the larger allocated sites, there remains a requirement for the emerging Local Plan to identify smaller sites. The Site is capable of delivering the exact type of smaller site that the emerging Local Plan identifies as being required. The site is less than 25 ha and provides an opportunity to deliver a smaller site for industrial and logistics uses, providing approximately 11 ha and 38,500-44,000 sqm of floorspace to meet a range of employment and commercial needs in a sustainable location. This will help Rugby BC address the current under provision in the emerging Local Plan.
- 4.25. Development of the Site will help to achieve the objectives of the emerging Local Plan, principally to support the diversification and growth in sustainable locations of Rugby's economy. It will also help to deliver the desired outcome of the Rugby Economic Strategy to provide *"a growing and diverse business base through the provision of employment space to meet demand"*.
- 4.26. In parallel for the need for smaller sites, the Preferred Options Consultation Document and evidence base identifies the need for smaller units. Indeed, Rugby's Economic Strategy explicitly expresses that a top priority of the emerging Local Plan is *"to ensure the delivery of high quality small to medium size industrial space in accessible locations across the borough"*. The Economic Strategy also recognises the barriers faced by local businesses in the borough where there is *"very little opportunity to 'grow-on' as the vacant premises are not the right size, causing them to either stagnate or leave Rugby."* The issues faced by local businesses in Rugby is exacerbated by the pattern of supply of employment land that has come forward since the adoption of the Local Plan, where very few small to medium sized units have come forward on new purpose-built land to support such local businesses. Development at the Site would help to directly address the identified void for available sites capable of delivering unit sizes required by local businesses. The Sites four illustrative masterplan options provide a flexible range of larger and smaller industrial unit sizes to respond to these needs.
- 4.27. The Site will provide a sustainably located flexible employment site, enabling existing businesses to relocate from unsuitable sites that no longer fit their purpose, and for new businesses to invest in Rugby. It will provide high quality premises and be constructed to high sustainability standards and complement the proposed allocated employment sites in the emerging Local Plan.

Opportunity for Other Employment-generating Uses

- 4.28. The Roadside and Retail Uses Supporting Statement, prepared by LSH, demonstrates that the development would be consistent with national retail planning policy and would provide a benefit to the local area in terms of meeting current and future needs in a convenient and sustainable manner.
- 4.29. Importantly, the area will witness significant future growth in the form of the South West Rugby Sustainable Strategic Site, which provides for approximately 4,000 new homes. The South West Rugby Strategic Site acts to connect the Site with the existing Rugby built-up area. Taking this context into consideration, alongside national and local town centre policy tests and Rugby's Retail and Town Centres uses evidence base study, this Statement considers that the Site has the potential to make a significant contribution to future employment, retail and service needs. In this regard, Richborough Commercial seeks to establish that the allocation of the Site for a mix of such uses is fully justified.

PROPOSED MIX OF USES AT THE SITE

- 4.30. Whilst the precise mix of uses would be established through a future planning application, as informed by the Council's views, the Statement establishes that the Site is suitable for roadside uses including foodstore retail, drive thru/to, petrol filling station and EV charging uses, alongside employment uses.
- 4.31. The Statement proposes that any Local Plan allocation could specify an upper limit in respect of the retail and roadside uses.
- 4.32. The Statement has addressed the site suitability to accommodate:

SECTION 4: PROMOTION OF THE SITE FOR AN EMPLOYMENT-LED ALLOCATION

- a food supermarket (with a gross internal area of up to 2,300 sq.m);
- up to two drive to food & beverage units with a gross internal area of up to 477 sq.m, suitable for occupation by bakery, coffee shop, or restaurant operators; and
- a drive thru unit with a gross internal area of up to 180 sq.m suitable for occupation by coffee shop or restaurant operators.

OPERATOR DEMAND

- 4.33. The mix of uses is supported by market engagement which demonstrated in principle occupier demand for such uses. The strength of occupier interest in the Site is reflective of high vehicular numbers using the A45/M45; the ease of access via the roundabout junction; and its visibility/prominence. In combination, these provide a strong roadside retail location. In this regard, LSH note that roadside occupiers whose target market is largely car-borne travellers do not typically take space within district and local centre locations since vehicular flows are insufficient to support their business model.
- 4.34. The proposed district centre which will be delivered as part of the South West Rugby Strategic Site is embedded in the heart of the urban extension in proximity to educational and medical facilities, and other local services. The proposed district centre meets an entirely different need to the commercial uses proposed for the Site which are focused around main food shopping and roadside service provision. The two sites would have complementary roles and there would be no direct competition between the proposed district centre and the facilities at the Site.

OBJECTIVELY ASSESSED NEED SUMMARY

- 4.35. The Site benefits from high levels of passing vehicular traffic. As such, the proposed roadside uses would cater for fundamental refreshment, sustenance, and refuelling needs in an efficient and sustainable manner.
- 4.36. The delivery of a foodstore at the Site would address the following matters.
- 4.37. *Firstly*, there is no existing main food shopping provision in the south western part of Rugby. In particular, existing discount foodstore provision is distant from the Site. The provision of a foodstore in this accessible location would therefore provide a clear qualitative benefit in improving local consumer choice.
- 4.38. *Secondly*, the household survey and trading data provided by the Rugby Retail and Town Centre Uses Study indicates that the three existing discount foodstores in the Rugby area 'overtrade' substantially (i.e. their actual performance is significantly in excess of their expected turnover calculated with reference to company average performance).
- 4.39. In this regard, paragraph 7.33 of the Rugby Retail and Town Centre Uses Study notes the potential for new foodstores in sustainable locations to 'level out' overtrading. Paragraph 7.34 of the Study commends that the potential qualitative benefits arising from improved consumer choice should be afforded weight when determining the acceptability of foodstore proposals.
- 4.40. *Thirdly*, there is a localised quantitative need for additional provision in the south west Rugby area related to the strategic site allocation. LSH's assessment estimates that the South West Rugby strategic site population would generate approximately £26.8m of convenience goods expenditure. This is very substantially greater than the turnover of the proposed foodstore use. The proposal would help meet an objectively assessed localised main food shopping need.

SEQUENTIAL APPROACH SUMMARY

- 4.41. Richborough is promoting the Site on the basis that it can potentially support a food supermarket and food and beverage uses. The supermarket would likely support a discount operator in practice.
- 4.42. Discount foodstores generally draw a high proportion of their turnover from a five minute off-peak drivetime catchment area. Whilst some trade will be drawn from outside of the five minute drivetime, this area is considered instructive in determining the area of search in applying the sequential test to the supermarket use.

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4.43. LSH have reviewed potential opportunities within the five minute drivetime isochrone, and are unaware of any site within this area that is both available and suitable to accommodate a broadly similar foodstore operation.

4.44. The proposed food and beverage uses respond to a location specific need, i.e. they would principally serve passing motorists and provide a de facto roadside services use.

4.45. Paragraph 012 of the Town Centres PPG identifies that, in applying the sequential test, it should be recognised that certain main town centre uses have potential market and locational requirements which mean that they may only be accommodated in specific locations. In this context, it is clear that the food and beverage units meeting the needs of passing motorists could not be accommodated within any defined centre within the local area.

4.46. The use of the site for appropriately scaled retail and food and beverage facilities is therefore found to be compliant with the requirements of the NPPF sequential test.

TOWN CENTRE IMPACT SUMMARY

4.47. The Town Centres PPG identifies that issues of adverse impact should not arise where there is an assessed need that supports a retail and/or leisure proposal.

4.48. In this regard, there is a clear objectively assessed need to support the proposed foodstore arising from:

- the lack of provision in this part of Rugby;
- the benefit in 'levelling out' overtrading at existing discount foodstores; and
- the additional expenditure associated with the population growth delivered by the South West Rugby SUE.

4.49. Notwithstanding the above, the principal town centre of Rugby and the most proximate local centre of Dunchurch have both been found by evidence base studies to be healthy.

4.50. Given the above, there is no issue in respect of adverse impacts relating to the proposed retail and food and beverage uses.

OTHER EMPLOYMENT-GENERATING USES: KEY CONCLUSIONS

4.51. The proposed main town centre uses are found to be wholly compliant with:

- the sequential test given that there is no available and suitable site in this part of south west Rugby that could meet the same foodstore and food and beverage market opportunity;
- the impact test given that the proposal will meet an objectively assessed need that cannot be met within defined town centres.

4.52. The petrol filling station and EV charging use are not main town centre uses and are therefore not subject to 'town centre first' national planning policy tests. However, these uses – as with the rest of the development – serve a clear need which arises due to the locational attributes of the Site. As a consequence of meeting a clear objectively assessed need, the proposal would deliver clear positive impacts in terms of: supporting the new South West Rugby community in a sustainable manner; reducing the need to travel; providing additional consumer choice; and, supporting additional jobs.

5. Benefits through the proposed employment-led development of the Site

Economic Benefits

- 5.1. The Site provides opportunities for flexible employment floorspace, meeting a range of business needs and providing economic benefits, including Business Rates, that are necessary to help the Council deliver the objectives of its Local Plan and its Economic Strategy for Rugby.
- 5.2. In this regard, and to better illustrate the benefits that could be accrued, a high-level Economic Benefit Assessment has been carried out by LSH. The assessment quantifies the economic uplifts of the proposed employment development of the site in terms of jobs growth, business rates and gain in local productivity (measured in Gross Value Added (GVA)).
- 5.3. This captures the quantified economic uplifts as follows:
- **Total Job Creation: 1,055 – 1,823 Full Time Equivalent (FTE)**
 - Direct Jobs: 620 – 1,215 FTE
 - Indirect Jobs: 248 – 365 FTE
 - Induced Jobs: 170 – 243 FTE
 - **Total GVA: £49.4m - £83.5m**
 - Direct GVA: 25.7m - £50.3m
 - Indirect GVA: £13.6m – 19.9m
 - Induced GVA: £10.1m - £13.3m
 - **Business Rates: £2.1m p/a**

Social Benefits

- 5.4. Some of the potential social benefits include:
- Delivering high quality job opportunities including for different age ranges / skill levels in both employment and retail/service jobs in order to provide workplace opportunities for the residents in the immediate and surrounding area.
 - Providing viable and deliverable employment units with the flex to provide multiple sizes to meet the needs of local businesses.
 - Delivering benefits to the residents of the nearby, and wider, area by providing elements of ancillary retail uses to provide a service and additional opportunities.

Environmental Benefits

- 5.5. Some of the potential social benefits include:
- Delivering a considered landscape strategy which will cultivate the natural screening to the Site but also provide intentional landscape infrastructure.
 - The protection and enhancement of existing features of the site that add value, including mature trees, hedgerows.

6. Response to Rugby's Preferred Options Consultation

Response to the Preferred Options Consultation Questionnaire

- 6.1. In consulting on the Preferred Options (Regulation 18), the Council have provided a questionnaire to gather feedback on the emerging Local Plan. Informed by the detailed analysis set out in these representations, Vision Document and supporting technical reports, this section provides Richborough's response to these questions and sets out what we are asking the Council to consider as part of progressing the Local Plan to the Regulation 19 stage.
- 6.2. In respect of the Council's questionnaire, we are responding in respect of:
- Questions 1 and 2: Objections;
 - Questions 7 and 8: Strategy for employment land and employment allocations (Policy S7);
 - Questions 13 and 14: Economy (Policy E2); and
 - Questions 15 and 16: Centres (Policy

OBJECTIVES

- 6.3. The Preferred Options Consultation Document has six main Objectives, as follows:
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

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

- 6.4. **Response:** Neither Agree nor Disagree.

Question 2: What are the reasons for your answer to Question 1?

- 6.5. Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.
- 6.6. We recognise and agree that the six main objectives set out in the emerging Local Plan seek to address the requirements of Paragraph 11 of the NPPF.
- 6.7. Specifically in relation to Objective 1, we agree with the aim to support diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy. As per our responses to Question 8 and 14 (set out further below), we question how the emerging Local Plan, as currently drafted, will achieve this, for the following reasons:
- The Draft Plan fails to allocate smaller sites to meet local employment needs in line with the Economic Strategy;
 - The Draft Plan fails to provide sufficient flexibility in its employment policies to support economic growth in sustainable

SECTION 6: RESPONSE TO RUGBY'S PREFERRED OPTIONS CONSULTATION

locations, where these locations may fall outside of the proposed Strategic Employment Sites and employment allocations.

6.8. Furthermore, we believe that greater recognition should be given to the role of the industrial and logistics sector in Rugby and its continuing importance to the local economy. The emerging Economic Strategy for Rugby references the ability of businesses in the logistics sector to deliver skilled jobs to support automation and other technologies. It also highlights Rugby's role at the heart of the Golden Triangle, providing a highly sought after location for the logistics sector. Whilst the need to diversify Rugby's economy is acknowledged, the continuing importance of the logistics sector should not be lost.

What we are asking the Council to consider:

6.9. We invite the Council to revisit the objectives and consider the allocation of the Site given it is of a smaller site capable of meeting more local employment needs in line with the Economic Strategy; and within Policy E2, include the consideration of all sites outside of the proposed Strategic Employment Sites and employment allocations for their potential to deliver employment development where they are appropriated located.

STRATEGY FOR EMPLOYMENT LAND AND EMPLOYMENT ALLOCATIONS

6.10. 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.

Question 7: To what extent do you agree with the strategy for employment land

6.11. **Response:** Disagree.

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

6.12. Richborough support the allocations chosen to deliver the employment land strategy.

6.13. However, Richborough believe that the employment need has been underestimated and finds there is a need to allocate smaller sites to meet local employment needs as identified in the Preferred Option Consultation Document and supporting evidence base documents.

6.14. As currently drafted, the Draft Plan does not address how the specific identified need for smaller sites, which could accommodate mid-sized and smaller industrial and logistics units, is going to be met; or indeed include any proposed allocations to meet this local need.

6.15. The Alignment Paper (2024) found that no large units have been completed on smaller sites in Rugby BC since 2011 and only 2% (5 ha out of 244 ha) of Coventry & Warwickshire's Non-Strategic Site supply is located in Rugby BC. **This highlights a continued lack of provision for smaller employment units that the emerging Local Plan should seek to address.**

SECTION 6: RESPONSE TO RUGBY'S PREFERRED OPTIONS CONSULTATION

6.16. The supply of sites identified in the Preferred Option Consultation is based on the assumption that the Strategic Site Need for Coventry & Warwickshire will be fully met in Rugby. **However, there is no clarification within the Draft Plan as to whether Coventry City's unmet needs for smaller sites will be provided for and if so, how.** The Development Needs Topic Paper states this to be 45 hectares or 180,000 sqm. If this were to be accommodated in Rugby BC, it would increase the overall need to 1,206,546 sqm. Whilst this would still be met by the Commitments and Allocations, the unmet need for smaller sites would increase to 445,296 sqm (111 ha).

What we are asking the Council to consider:

6.17. In progressing the emerging Local Plan, we invite the Council to consider:

- How the continued lack of provision for smaller employment units in the emerging Local Plan will be addressed.
- Does the emerging Local Plan provide for Coventry City's unmet needs for smaller sites; and if so how.

6.18. In addition to the above queries, and for the reasons set out in these representations, Vision Document and supporting technical reports, we are seeking an employment-led allocation at Richborough Park M45 Junction 1 to be included under Policy S7. As shown in the illustrative masterplan options, this could be for purely employment use, or it could be for a combination of employment and roadside retail uses.

6.19. We acknowledge the reasons why the Council have selected the five allocated sites included within Policy S7:

1. They are expansions to or are well-related to existing successful employment areas and major road links.
2. They are close to the main centres of population in Coventry and Rugby, reducing commuting distances.
3. 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.

6.20. Applying the Council's criteria above to our Site, we confirm that:

1. The Site is well-related to the existing and successful employment area of Symmetry Park, which is allocated as a Strategic Employment Site in the Local Plan and benefits from planning permission (over two phases) to deliver 2million sq ft of logistics floorspace. The Site is also located in a sustainable location adjacent to the M45/A45 Thurlaston Interchange.
2. The Site is located adjacent to the South West Rugby Strategic Site which is allocated to deliver a district centre, along with 4,000 new homes. The Site is therefore excellently located to reduce commuting distances.
3. As demonstrated within the four illustrative masterplan options, the Site offers opportunities to meet local economic need through a range of different unit configurations and sizes. The Site would generate significant economic benefits as set out at Section 5 of these representations. At the heart of the vision for the Site is a considered landscape strategy which will cultivate the natural screening to the Site but also provide intentional landscape infrastructure.

6.21. The Site is capable of delivering the exact type of employment floorspace that the emerging Local Plan identifies as being required. The site is less than 25 ha and provides an opportunity to deliver a smaller site for industrial and logistics uses, providing approximately 11 ha and 38,500-44,000 sqm of floorspace to meet a range of employment and commercial needs in a sustainable location. This will help Rugby BC address the current under provision in the emerging Local Plan.

SECTION 6: RESPONSE TO RUGBY'S PREFERRED OPTIONS CONSULTATION

- 6.22. In parallel for the need for smaller sites, the Preferred Option Consultation Document and evidence base identifies the need for smaller units. Indeed, Rugby's Economic Strategy explicitly expresses that a top priority of the emerging Local Plan is *"to ensure the delivery of high quality small to medium size industrial space in accessible locations across the borough"*. The Economic Strategy also recognises the barriers faced by local businesses in the borough where there is *"very little opportunity to 'grow-on' as the vacant premises are not the right size, causing them to either stagnate or leave Rugby."* The issues faced by local businesses in Rugby is exacerbated by the pattern of supply of employment land that has come forward since the adoption of the Local Plan, where very few small to medium sized units have come forward on new purpose-built land to support such local businesses. Development at the Site would help to directly address the identified void for available sites capable of delivering unit sizes required by local businesses. The Site's four illustrative masterplan options provide a flexible range of larger and smaller industrial unit sizes to respond to these needs.
- 6.23. In appraising the current Draft Rugby Local Plan alongside "reasonable alternatives", the evidence set out in the Interim SA Report (March 2025) considers that on balance it is considered appropriate to progress a further employment site option and identifies this option for further employment land to the southwest of Rugby in the vicinity of the A45/A4071 junction. The report goes on to identify the Site (referred to in the Council's evidence as 'Site 133') for consideration for an additional employment site.
- 6.24. We invite the Council to consider the evidence submitted here and appended to these representations when forming a view on the suitability of the site to accommodate development.

ECONOMY

- 6.25. The consultation document contains three policies that relate to the topic of the Borough's economy. These include Policy E1, which relates to land within Strategic Employment Sites, Policy E2, which relates to sites allocated for employment use development in the plan, and Policy E3, which establishes specific uses that support the rural economy.

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

- 6.26. **Response:** Disagree.

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

- 6.27. Richborough disagree with Policy E2: 'Employment Development', which sets out the Council's emerging strategy for employment development in the Borough.
- 6.28. We consider this policy, as currently drafted, is very restrictive and will limit available sites in sustainable and strategic locations coming forward for potential economic development. The draft policy does not reflect the revised NPPF which places significant focus on supporting commercial development with various sectors, including logistics, giving more prominence for their crucial role in driving the economy. In doing this, the NPPF seeks that appropriate sites for commercial development need to be identified, including suitable locations for freight and logistics.
- 6.29. We also note that Part E of Policy E2 sets out the criteria for the development of employment uses outside of settlement boundaries. Adopted Policy ED3 also provides a similar set of circumstances for such development, albeit one of the criteria allows for the *"sustainable expansion of an existing group of buildings for business uses where the site is readily and regularly accessible by means of transport other than the private car"*. We disagree with emerging Policy E2 in this regard which applies a more restrictive approach, at Part E iii, which states *"it would comprise a proportionate expansion of an existing building in employment use"*. The approach applied in emerging Policy E2 does not take account of Paragraph 86 of the NPPF, which seeks planning policies to (e) be flexible enough to accommodate needs not anticipated in the plan. Furthermore, the Draft Policy E2, as currently worded, only allows for the expansion of a single existing building which is a far more constricting policy than that applied in adopted Policy ED3.

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6.30. We note that the Draft Plan has a separate Policy E3, which relates to the rural economy, and seeks to address development both in and outside of rural settlements boundaries. This policy is however very specific in terms of the forms of development that will be acceptable in principle in these locations, including small-scale tourism, visitor accommodation and leisure-based uses; small-scale expansion of existing holiday caravan/chalet sites; garden centres and nurseries; equine and equestrian development; agricultural and forestry buildings. This policy does not allow for sites outside of rural settlement boundaries to be considered for economic development.

6.31. In line with the revised NPPF, we consider that the emerging Local Plan's employment policies should apply a flexible approach where there is an opportunity to consider sites beyond the settlement boundary where it can be demonstrated that such sites are in a sustainable location and benefit from site specific locational requirements.

What we are asking the Council to consider:

6.32. In accordance with the above, draft Policy E2 should be revised to include the consideration of all sites outside of Strategic Employment Sites and employment allocations for their potential to deliver employment development on a case-by-case basis where they are appropriately located and can demonstrate compliance with other policies of the Local Plan.

6.33. In addition, we consider the inclusion of criteria for the development of employment uses outside of settlement boundaries, should revert to the more flexible approach provided in adopted Policy ED3. A more flexible approach here should align with Paragraph 86 of the NPPF, where planning policies should allow for the development of suitable locations; and should be flexible enough to accommodate needs not anticipated in the plan and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.

CENTRES

6.34. 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.

6.35. There are four policies relating to the Borough's centres. These include Policy C1, which relates to Rugby Town Centre; Policy C2 'Main Town Centre Uses' which identifies criteria for applications for main town centre uses outside of defined centres; Policy C3 'Local and District Centres'; and Policy C4 which relates to neighbourhood hubs.

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

6.36. **Response:** Disagree.

Question 16: What are the reasons for your answer to Question 15?

6.37. Policy C2 as currently drafted is not considered to be consistent with national planning policy for the following reasons:

- *Firstly*, whilst the NPPF is silent on the matter of disaggregation and how it is to be applied to the sequential test, there will be occasions where the grouping together of related retail and main town centre uses may be merited on operational and viability grounds. There is no national planning policy requirement to disaggregate all proposals for out of centre main town centre use development.
- *Secondly*, paragraph 94 of the NPPF identifies that the impact test applies to retail and leisure uses only (rather than all to all main town centre use development).
- *Thirdly*, there is no national planning policy requirement for main town centre uses to be located within 400 metres of a public transport stop.

SECTION 6: RESPONSE TO RUGBY'S PREFERRED OPTIONS CONSULTATION

6.38. We are unaware of any local circumstances that are supportive of development plan policy departing from national planning policy requirements.

What we are asking the Council to consider:

6.39. The Rugby Local Plan Preferred Option provides for very significant levels of future housing growth, but does not propose any substantial main food shopping retail provision to support the additional population.

6.40. In respect of the South West Rugby strategic site, the Preferred Option identifies that a new district centre would incorporate a convenience store. The proposed district centre is 'embedded' within the residential area and is therefore well-located to serve a local walk-in catchment area. The proposed South West Rugby district centre is not considered to be a suitable site to accommodate a new food supermarket.

6.41. This is because main food retailing necessitates the transportation of heavy bags of groceries, which is generally undertaken by car. The South West Rugby district centre allocation is reflective of this in referring to a requirement for convenience store to be incorporated within the scheme.

6.42. In respect of the above, the emerging Local Plan should seek to address the requirement for main food shopping provision, where consideration should be given to the proposed roadside retail uses at the Site, given this area is currently poorly served in respect of grocery retail and larger scale food & beverage outlets. The Site is exceptionally well connected in terms of its proximity to the strategic highway network and in respect of existing and proposed residential and employment uses.

6.43. The Council should also seek to address draft Policy C2 inconsistencies with national planning policy in respect of:

- the sequential test mandating that disaggregation should be applied to all proposals for multiple main town centre uses on out of centre sites;
- the application of the impact test to all main town centre use development with a gross internal floor area of more than 500 sq.m (rather than to retail and leisure uses); and
- the requirement for main town centre use development outside of town centres to be located within 400 metres of a public transport stop.

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