

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, May 19, 2025 3:05:59 PM
Last Modified: Monday, May 19, 2025 3:33:13 PM
Time Spent: 00:27:14
IP Address: [REDACTED]

Page 1: Introduction

Q1 **Strongly Agree**

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

Q2

What are the reasons for your answer to question 1?

Prologis strongly supports Objective 1 of the Local Plan review, which aims to support the diversification and growth in sustainable locations of the Borough's economy in line with the Economic Strategy. Prologis also strongly supports the key diagram which identifies land west of Ryton-on-Dunsmore as a proposed employment allocation and proposed country park.

The reasons for the above support are entwined with the reasons for supporting Policies S3 and S7 as set out further in our response to Questions 7 and 8.

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

Q3 **Respondent skipped this question**

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

Q4 **Respondent skipped this question**

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

Q5 **Respondent skipped this question**

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?

Q6 **Respondent skipped this question**

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.

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

Q7

Strongly Agree

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

Q8

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

Due to the length of the response, Prologis' full response is contained within the separate Representations Response report prepared by Delta Planning and Lichfields, which has been emailed to the Council. However, our summary and recommendations are captured below:

Prologis' response to the economic strategy in the Preferred Options Plan can be summarised as follows:

- Strong support for Objective 1 of the Local Plan review and the aim of supporting the diversification and growth in sustainable locations of the Borough's economy in line with the Economic Strategy.
- Strong support for the Key Diagram which identifies land west of Ryton-on-Dunsmore as a proposed employment allocation and proposed country park.
- Strong support for the employment land policy (Policy S3) and the employment allocations policy (Policy S7) which include the proposal to allocate land to the west of the Oxford Road at Ryton-on-Dunsmore to deliver some 350,000 sq.m of additional employment floorspace (Use Classes E(g)(ii), (iii), B2 and B8) across a combined site area of 171.86 ha. (Site name: Prologis Park West and Mountpark - Site ID 328).
- Agreement that the Council's interpretation of its employment land evidence is sound and fairly represented in Policy S3, on the proviso that the figure is expressed as a minimum.

The following requests are made to the Council as it finalises its draft policies and evolves its evidence base leading up to the Regulation 19 consultation. These are as follows:

- Employment land need: Ensure that this is stated explicitly within Policy S3 as a minimum figure for the plan period and that the policy is updated to expressly include that provision is being met to meet Coventry's unmet need.
 - That the Site Assessments for Sites 50 and 328 are updated to reflect the evidence that the site can be made sustainable with active and sustainable transport infrastructure in place (which will also directly benefit the existing Prologis Park Ryton site and the local community). Additionally, as a result of careful masterplanning, the site will not directly impact on the Ryton Woods SSSI or any LWS/PLWS, with the exception of very small sections of the River Avon and Tributaries LWS, which can be mitigated and in any event proposed to be surrounded by green infrastructure.
 - That the Green Belt release boundary for Prologis Park Ryton West be aligned with the Proposed allocation boundary.
 - That the site's release from the Green Belt is fully justified through a fully set out 'exceptional circumstances' paper.
-

Page 4: Gypsy and Traveller sites (policy S4)

Q9

Neither Agree nor Disagree

To what extent do you agree with policy S4?

Q10

What are the reasons for your answer to question 9?

At the present time Prologis neither agrees nor disagrees with proposed Policy S4.

Prologis fully recognises the need for Rugby to identify locations to meet Gypsy and Traveller site needs. However, Prologis has concerns over the sustainability of co-locating such provision alongside employment allocations as proposed through Draft Policy S4. In particular this approach raises issues around the need to provide separate and appropriate access arrangements, as well as the potential for conflicts with residential amenity due to noise and operational activity associated with employment parks.

With regard to the specific requirement for a site within the Prologis Park West/Mountpark area, we note that there is already a high concentration of Gypsy and Traveller sites in relatively close proximity to the proposed allocation. This includes approximately 8 locations proving 76 authorised pitches representing over 60% of the authorised pitches in the Borough. We would question whether such a concentration constitutes a sustainable or equitable approach to meeting the identified needs.

Prologis is keen to maintain an open and flexible dialogue with the Council on this matter to explore if there are other more appropriate and sustainable solutions.

Page 5: Climate

Q11

Agree

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

Q12

What are the reasons for your answer to question 11?

Prologis welcomes and broadly agrees with Rugby's approach to addressing issues relating to Climate, and draft Policies CL1-CL4.

There are however some suggested amendments that could be made to avoid unintended consequences and enhance the deliverability of Rugby's proposed climate change mitigation measures.

Prologis supports the overarching ambition of Draft Policy CL1, particularly the principle that new buildings should be net zero carbon in operation. However, we have concerns regarding Part A.iii of the policy, which requires buildings to generate sufficient energy to cover both regulated and unregulated energy use. Paragraph 2.3.3 further proposes that energy generation be assessed against actual consumption over a five-year period. The inclusion and measurement of unregulated energy use in this way may lead to unintended consequences, particularly due to the high variability of such energy demands across different occupiers and operational models.

Unregulated energy use can vary significantly across industrial buildings. While baseline energy demands for logistics buildings may be relatively low, actual consumption can differ greatly depending on specific occupier requirements such as the use of high levels of automation, inclusion of mezzanine pick towers, or cold storage facilities. Requiring developments to generate sufficient energy to meet all unregulated energy demands could therefore place undue constraints on operational flexibility. This, in turn, risks deterring major occupiers and investors who rely on bespoke energy solutions tailored to their business models.

This challenge is further compounded by the growing demand for electric vehicle (EV) infrastructure. While internal combustion engine (ICE) vehicles are not accounted for in a building's unregulated energy use, the switch to an electric fleet dramatically increases demand under that category. If policy frameworks penalise developments for such increases in unregulated energy use, operators may be discouraged from transitioning to EVs an outcome that would directly undermine wider sustainability and decarbonisation goals. Therefore, we suggest that the policy is amended as follows (full formatting of the policy wording can be found in our submitted report):

"All new non-residential development over 100m² gross internal area must be designed and constructed in line with the highest achievable environmental performance standards, supporting the transition to net zero carbon. Proposals must demonstrate the following:

- A. Design and Certification Standards
 - i. Achieve a minimum rating of BREEAM Excellent, with a clear pathway to target BREEAM Outstanding.
 - ii. Achieve an EPC rating of A+, demonstrating operational carbon neutrality.
- B. Energy and Carbon
 - i. Be powered by 100% electric energy sources, with no use of fossil fuels.
 - ii. Incorporate rooftop solar PV designed to generate the equivalent of 100% of the building's regulated energy demand as defined by Building Regulations.
 - iii. Undertake a Whole Life Carbon Assessment in accordance with recognised standards, such as the Net Zero Carbon Buildings Standard (NZCBS) or equivalent, to assess and reduce lifecycle carbon impacts.
 - iv. Measure, reduce, and mitigate embodied carbon, contributing to a verifiable long-term trajectory towards net zero.
- C. Transport and Mobility
 - i. Provide 100% passive provision for electric vehicle charging in all car parks, with a minimum of 10% of parking spaces fully equipped with EV charge points upon occupation.
- D. Health, Wellbeing, and Materials
 - i. Demonstrate that the building is designed to:
 - Minimise energy use through passive design and efficient systems;
 - Enhance health and wellbeing, including daylight access, indoor air quality, and thermal comfort;
 - Utilise low-carbon materials and technologies in construction and operation.
- E. Landscape and Amenity
 - i. Incorporate high-quality amenity and green space into site design, to support biodiversity, community wellbeing, and climate resilience."

resilience.

We would also suggest that RBC relooks at the way in which the policies pick out specific elements of BREEAM. For example, Policy CL3 paragraph D picks out Wat 01 of BREEAM. However, with a policy such as the above, which sets out clear overall standards required by development, there would be no need to specify individual elements of BREEAM.

Page 6: Economy

Q13

Agree

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

Q14

What are the reasons for your answer to question 13?

Prologis supports the principle of Policies E1 to E3. Prologis is especially supportive of draft Policy E2 which sets out that ancillary office provision to a principal strategic employment use would not require a sequential test/impact test.

In terms of the distribution of existing employment areas on the draft proposals map, the inclusion of the existing Prologis Park Ryton is strongly supported. It is however noted that land at Ryton Lodge, Oxford Road, which is located immediately opposite Prologis Park Ryton and adjacent to the Prologis Park West/Mountpark site draft allocation does not have any form of employment allocation. It is considered that this should be revised such that this land is retained in employment use. To not do so could result in unintended consequences such as this land being promoted as a brownfield site for housing, which would be an incompatible use with the emerging economic strategy.

We therefore suggest that Ryton Lodge is allocated as an existing employment site through draft Policy E1, similarly to Prologis Park Ryton, to secure its long-term use for employment.

Page 7: Centres

Q15

Respondent skipped this question

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

Q16

Respondent skipped this question

What are the reasons for your answer to question 15?

Page 8: Environment

Q17

Agree

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

Q18

What are the reasons for your answer to question 17?

Prologis supports Rugby's ambitions to protect or enhance the environment across Rugby. Prologis welcomes draft Policies EN1-EN4 and EN6-EN8. However, there are concerns regarding the implementation of draft Policy EN5.

In our previous representations, Prologis was supportive of a tree canopy cover policy in principle, provided it was implemented with a flexible approach. It is welcomed that paragraph 5.16 does provide some flexibility to the policy, but it is considered that the policy's flexibility needs to go further.

Firstly, the difference between the viability of developing brownfield and greenfield sites should be recognised, with greenfield sites offering the greatest potential for tree cover and brownfield sites being impacted by abnormal costs. Currently, only Rugby town centre is excluded.

Secondly, in seeking to retain existing tree cover before planting new, this could significantly constrain strategic employment sites which require large development plateaus that will inherently lead to the removal of some existing canopy cover (if present). Therefore, this element of the policy should be advisory only.

Thirdly, a requirement for 20% tree cover has the strong potential to conflict with the objectives of mandatory BNG and draft Policy EN4. The way BNG is achieved on each site will vary and it is often the case that tree cover does not generate the same level of BNG that other habitats can (such as grasslands). It is therefore requested that the policy be altered such that it does not compete with mandatory BNG requirements.

We consider that the policy should be merged with draft Policy EN4 with a two-step process, as follows:

- Deliver at least 10% BNG on site in accordance with statutory requirements; and
- Where there is no conflict with achieving mandatory BNG requirements on site, seek to achieve at least 20% tree cover, or the highest level reasonably achievable within the site, and where relevant, taking into account the financial viability of the site and the resultant development density.

Page 9: Housing

Q19

Respondent skipped this question

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

Q20

Respondent skipped this question

What are the reasons for your answer to question 19?

Page 10: Wellbeing

Q21

Respondent skipped this question

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

Q22

Respondent skipped this question

What are the reasons for your answer to question 21?

Page 11: Design

Q23

Strongly Agree

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

Q24

What are the reasons for your answer to question 23?

Prologis strongly supports draft Policies D1-D5 which seek to create well designed new developments. We have no further comments on this.

Page 12: Infrastructure

Q25

Strongly Agree

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

Q26

What are the reasons for your answer to question 25?

Prologis fully supports Rugby's approach to ensuring it has the right infrastructure in place to support development. Prologis is especially supportive of Rugby's approach to active and sustainable travel through draft Policy I1. Prologis is proactively pursuing active and sustainable transport at the heart of its proposed development at Prologis Park Ryton West/Mountpark, which will complement the Council's approach for the site at Policy S7 and the Annex. For further details of how this will be delivered through the proposed allocation, please refer to our response to question 8.

Prologis is also supportive of the flexible approach towards parking standards that ensures it responds to specific site and development requirements.

Prologis welcomes the requirement for an employment and skills plan for non-residential development over 10,000 sq.m. Prologis will be proactive in delivering a new Training Hub as part of the proposed allocation at Prologis Park Ryton West/Mountpark as set out in further detail in our answer to Question 8 and in the accompanying Vision Statement.

Page 13: Any Other Feedback

Q27

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:

Prologis submits a full response to this online questionnaire via email. The contents of this email include:

- Representations to Rugby Local Plan, prepared by Delta Planning and Lichfields (notably, this expands on question 8 in more detail)
 - Prologis Park Ryton West Vision Statement - Updated
 - Sustainable Transport Strategy, prepared by WSP
 - Ecology Technical Note, prepared by Enzygo
-

[REDACTED]

Q28

What is your name?

[REDACTED]

Q29

What organisation are you representing, if applicable?

[REDACTED]

Q30

No

Are you a resident of Rugby Borough?

Q31

Your contact email

[REDACTED]

Q32

Your contact address

[REDACTED]

Q33

Your Postcode

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]