

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

**Name of the Local Plan to which
this representation relates:**

Rugby Borough Council Proposed
Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026
By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in**
the subject line, OR by post to: Development Strategy, Town Hall, Evreux Way,
Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each
representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	Annex: Development Site Allocations	Policy		Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	✓	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	✓	No	

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

██████ object to the omission of the site it is promoting at Junction 2 of M6 (Site Ref: 70 – Stage 2 Site Options Report (December 2025)). In its responses to Policies S3 and S7, ██████ set out why the proposed strategy for the delivery of employment land is not sound and why the proposed employment allocations will not meet the employment needs of the Borough over the plan period. In light of the fundamental concerns about the soundness of the Plan, ██████ contend that additional or alternative employment site allocations are required to be identified in order to address the soundness of the Plan. A copy of a Vision Document prepared by Barberry and submitted as part of the Local Plan preparation process is attached.

The Council assesses the site as part of the preparation of the Local Plan and the conclusions are set out in respect of Site 70 in the Stage 2 Site Options Report (December 25). The Council concluded that the site was not constrained by ecology, landscape or heritage matters and that it was not affected by flooding and could be adequately drained. The key area of concern related to transport/accessibility and the site's location in the Green Belt. We address both of these matters below.

Highways / Accessibility

In respect of highways and accessibility the site was scored down due to its public transport accessibility or perceived lack of therefore. This is despite the fact that a service already passes the site, serving the existing Ansty Business Park development (also the location of another proposed employment allocation –

Ansty North ID14). Clearly, the existing public transport provision to the existing business park is considered acceptable and considered sufficient to serve more development on the park. As this service would need to pass directly in front of the [REDACTED] site it could just as easily serve the site as well, without any requirement to divert the route from its current alignment.

Similarly Ansty Park is also currently served by a footpath/cycle way that runs along the south side of the A46 from the edge of Coventry to the pedestrian crossing where the A46 slip road joins the traffic light junction access into Ansty Business Park. The accompanying Vision Document includes a proposed access arrangement into the [REDACTED] site that shows how vehicles, pedestrians and cyclists could cross the A46 to gain access to the site. The proposed access into the site would connect to the existing cycle way / footpath that currently serves the Ansty Business Park development.

Due to the proximity of the [REDACTED] site to the edge of Coventry it could in fact be argued that it is more accessible than the existing population within the built up area of Coventry. The proposed access would ensure a safe access for users of the development to gain access to the site.

Green Belt

The Site Assessment Report concludes that the site make a "strong" contribution to purpose a) and a "moderate" contribution to purposes b) and c). reviewing the Green Belt assessment the site is assessed as making a "weak / no" contribution to purpose d). [REDACTED] disagree with the assessment of purpose a).

The PPG advises that in assessing purpose a) to make a "strong" contribution assessment areas are likely to be free of existing development and have physical features within reasonable proximity that could restrict and contain development. Notwithstanding that the site is enclosed by two motorways and the A46 the site is considered to make a "strong" contribution to this purpose. [REDACTED] disagree.

[REDACTED] has undertaken its own Grey Belt assessment and a copy is attached for your information. It advises that the site does not provide a contribution to purposes a), b) or d). As such it is concluded that the site can be considered Grey Belt.

In light of the above, two areas where the Council considers present a constraint to development are not considered robust. The site is accessible both by walking and cycling and capable of being served by an existing bus service. Similarly, our own assessment of the Green Belt concludes that the site is Grey Belt and does not make a "strong" contribution to purposes a), b) or d).

The Council conclude that it is not subject to any other constraints which we agree. As such, in light of [REDACTED] representations herewith there is merit for additional employment sites to be allocated within the Plan and we consider that the site at Junction 2 of M6 is free from constraints and could make a contribution to the supply of employment land within the Borough.

It is notable that having undertaken a Green Belt Review and proposed the release of a number of sites from the Green Belt to meet the development needs in the current plan that the Council has decided against identifying any safeguarded land. Provision for safeguarded land is including in paragraph 149 of the Framework and is therefore surprising that no land is to be removed from the Green Belt and safeguarded for future development. This will likely mean that Green Belt boundaries need to be reviewed again when the plan is reviewed or a

new plan is prepared. The land being promoted by [REDACTED] is considered Grey Belt and as such, is considered a suitable site to be removed from the Green Belt and safeguarded for future development.

(Continue on a separate sheet /expand box if necessary)

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In order to address Barberry's objection the site at Junction 2 of the M6 should be allocated for employment development in the Plan.

The Local Plan should also include safeguarded land. If the site at junction 2 is not allocated, Barberry contend that it should be removed from the Green Belt and safeguarded for future development.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

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Yes, I wish to participate in hearing session(s)

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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	CL1	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	☒	No	☐
(2) is Sound	Yes	☐	No	☒
(3) complies with the Duty to co-operate	Yes	☒	No	☐

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■■■■■ as a market leader in developing sustainable and energy efficient commercial buildings welcome the intention of Policy CL1 and the Council's ambition to achieve net zero. To this end, ■■■■■ are currently developing new industrial and warehouse buildings to a BREEAM "excellent" rating demonstrating their commitment to energy efficiency and energy reduction. Policy CL1 would apply to future developments undertaken by Barberry in the Borough and unfortunately we must object to it at this time. The Government's objective is to achieve net zero by 2050. The supporting text to the policy at paragraph 2.1 indicates that the Council is seeking to achieve this sooner than 2050. Whilst this ambition is admirable it poses ■■■■■ a number of issues. The requirements in the policy will bite at the date of adoption which is likely to be 2027. Whilst clearly an ambitious target ■■■■■ are concerned in the step change that would be required with only a limited time to adapt their procurement and construction processes.

Applying the policies as drafted could result in potential promoters / developers seeking to argue that their developments are not viable which can either cause them to stall or not take place at all.

Furthermore, there must also be consideration of what the market is demanding and what is currently being provided. Whilst there is a clear shift by occupiers and funds to more sustainable buildings this cannot be taken for granted. Similarly, ■■■■■ wish to avoid a situation where achieving more onerous energy standards deters building in the Borough, if they know they can do the same locally outside of the Borough whilst achieving lower levels of sustainability.

■■■■■, therefore, suggest that for the policy to be effective it must incorporate a stepped requirement which reflects the Government's transition to the future building standard which is currently in preparation. Clearly aligning the policy to the Future Building Standard would require all future developments to meet the increase levels of sustainability. It would also allow the policy to evolve and the Council to seek increasing levels of sustainability in new development over the life of the Plan without having to review the policy.

The policy also requires specific measures to reduce energy use. ■■■■■ currently specify the buildings that they are constructing are structurally capable of accommodating PV panels on the roof. However, the extent and amount of PV panels that is ultimately installed is a decision for the end occupier. Whether an occupier will install PV panels will depend on a number of reasons which are outside of the control of the developer. As such, whilst a building could ultimately be designed to the standards required in the policy, if an occupier does not want what is proposed the building will not get built. ■■■■■, therefore, see little point in planning permission being granted for buildings that have limited appeal to the market at the current time. This reinforces our view that a stepped requirement that seeks to gradually ratch it up via the Plan and the environmental performance standards in new buildings has a more effective way of addressing this matter.

(Continue on a separate sheet /expand box if necessary)

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Revisions to the policy are required that will allow the stepped increase in environmental standards over the life of the plan to align with national policy contained in the Future Buildings Standard

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Part B – Your representation(s). Please fill in a separate sheet for each
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Part A

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Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	CL3	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	☒	No	☐
(2) is Sound	Yes	☐	No	☒
(3) complies with the Duty to co-operate	Yes	☒	No	☐

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Part D of the policy requires non-residential development to achieve full credits for category WAT 01 of BREEAM. As noted in our response to Policy CL1, [REDACTED] are currently seeking to achieve where possible "excellent" BREEAM ratings for their new buildings, so the requirement in CL3 does not particularly trouble them. However, the way the policy is framed only requires developers to demonstrate compliance with one element of the BREEAM assessment process. There is no other requirement in the rest of the Plan for non-residential development to meet a specific BREEAM rating. The requirement would therefore require the instruction of a BREEAM Assessor to assess one element of the development in order to demonstrate compliance with the policy.

[REDACTED] suggest that as an alternative the issue of water use and efficiency can better be dealt with through the application of building regulations rather than requiring adherence to another non-statutory standard. As it stands, we consider policy unsound and is not consistent with national policy and seeks to duplicate other forms of control.

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In order to address [REDACTED] concerns we suggest that the policy is re-worded to require new non-residential development to adhere to the latest standards within the building regulations.

(Continue on a separate sheet /expand box if necessary)

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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	EN5	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	☒	No	☐
(2) is Sound	Yes	☐	No	☒
(3) complies with the Duty to co-operate	Yes	☒	No	☐

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The requirements in Policy EN5 mirror those in Part 6 of the Environment Act 2021. As such, [REDACTED] have no objection to this. As they are a statutory requirement under other legislation it is questioned whether the policy is necessary. If it is deemed that a policy is necessary could it be simplified to say that biodiversity net gain ("BNG") must accord with the Environment Act requirements.

Whilst not part of the policy, the supporting text at paragraph 5.11 refers to "a minimum 10% biodiversity net gain can be achieved on site". The wording of the requirement in the Environment Act refers to the relevant percentage as 10% (Schedule 7a, Part 1, Reg 2(3)).

To ensure consistency, [REDACTED] ask that the supporting text at 5.11 is amended to reflect the wording in the Environment Act to clarify that only 10% biodiversity net gain is required. [REDACTED] would not object to the Council adding additional wording in the supporting text to say if developers / promoters wanted to exceed the 10% requirement the Council would welcome the approach, but it must be clear that this is a choice rather than a requirement.

[REDACTED] therefore object to the inclusion of the policy within the Plan on the basis that it effectively duplicates requirements under other statute.

(Continue on a separate sheet /expand box if necessary)

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If a policy is required [REDACTED] suggest that it could be simplified as per the suggestion above with the associated recommended changes to the supporting text proposed.

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comment in respect of this policy reflects the type and form of development they undertake, which is predominantly the construction of industrial and warehouse buildings. The general configuration of such developments generally comprise the building itself, accompanied by service provision and yards, car parking and access road, with landscaping proposed (or retained) around the periphery of the site. Small areas of landscaping tend to be accommodated within the areas around the building and/or the entrance into the site.

In achieving 20% canopy cover this would significantly reduce the developable areas of such sites resulting in either smaller buildings being developed or reduced areas of servicing and/or car parking being provided on site.

The policy acknowledges that where tree planting can impact on BNG hence there may be exemption. This is likely to be the case in commercial development where the more peripheral areas of a site will be required for on site BNG. Tree planting in itself will not make a significant contribution to BNG in the short term, some other forms of habitat and planting are likely to be proposed in order to achieve the 10% net gain.

In light of the above in that there are likely to be cases, particularly with commercial development, where 20% canopy cover cannot be achieved. The way the policy is drafted is not effective and therefore not sound, as it does not include a clause for developers to agree an alternative.

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■■■■■ suggest that the wording in the supporting text at paragraph 5.17 is integrated into the policy to address this concern.

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

**Name of the Local Plan to which
this representation relates:**

Rugby Borough Council Proposed
Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026
By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in**
the subject line, OR by post to: Development Strategy, Town Hall, Evreux Way,
Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each
representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	I4	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	☒	No	☐
(2) is Sound	Yes	☐	No	☒
(3) complies with the Duty to co-operate	Yes	☒	No	☐

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Part D of Policy I4 requires the provision of an employment and skills plan for the development of more than 50 houses or 10,000 square metres of floorspace.

██████████ objection to the policy focuses on when and whom should be producing the employment and skills plan. ██████████ contend that delivering skills and training for local residents should fall on the future occupiers of the building once it is constructed. As future employers, the occupiers would be best placed to undertake skills and training with local residents rather than ██████████ as the developer.

The policy could be usefully clarified to ensure it is clear who the responsibility for employment and skills plan falls on making it clear that this should be the future occupier of the building rather than the developer itself. As it stands the policy is not effective and the objective of the policy will not be deliverable unless it is clarified who needs to undertake the employment and skills plan.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policy could be usefully clarified to ensure it is clear who the responsibility for employment and skills plan falls on making it clear that this should be the future occupier of the building rather than the developer itself.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to participate in the examination in order to fully debate the soundness of the Plan and to set out [REDACTED] case for the need for more/alternative employment land provision.

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Job Title (where relevant)		
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Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	S3	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	✓	No	
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes	✓	No	

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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██████ object to Policy S3 principally on the grounds that not enough land has been allocated to meet the Borough's (and those of Coventry's) needs over the plan period. ██████ contend that additional land and sites should be allocated, including land it is promoting at Junction 2 of the M6 at Ansty. The reasons for this are set out below.

Paragraph 8 of the National Planning Policy Framework ("the Framework") at paragraph 8 sets out three strands of sustainable development. One of which is an economic objective that seeks to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improve productivity. Paragraph 86 goes on to confirm that policy should set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. The Council is one of the parties that instructed the West Midlands Strategic Employment Site Study ("WMSESS") and the subsequent alignment paper which sought to set out the requirement for employment land in the plan. The Development Needs Topic Paper (December 25) produced by the Council helpfully summarises the outputs from the WMSESS. The need for employment land can be summarised in the table below:

Large Sites (gross requirement)	791,525 square metres	226.15ha
--	-----------------------	----------

Small Sites (gross requirement)	232,600 square metres	58.15ha
Total	1,024,125 square metres	284.3ha

When existing completions are deducted from the gross requirement the total need for employment floorspace is 529,882 square metres (143.56ha). Of this the Council is proposing that 10,000 square metres or 2.5 hectares is provided to meet the needs of Coventry.

The total amount of employment land proposed (plus the contribution to meet Coventry's needs) is practically exactly the same as the level of identified need. No non-implementation allowance is included and all four sites would need to come forward in full and as expected for the Borough's needs to be met in full. ■■■■■ consider that this is questionable whether this will occur and suggest that a buffer for non-implementation should be incorporated. The Council, in its Development Needs Topic Paper, state at paragraph 3.57.4 that a further supply buffer is not required as two of the proposed allocations are controlled by large developers. Whilst this is not disputed, we set out in in response to S7 the type of units both SEGRO and Panattoni typically develop, noting that these tend to be on larger side catering to the big box market. This reinforces our view that other sites that can cater to the mid-box market are needed.

The proposed strategy also relies on all of the existing commitments (which 219,243.4 square metres) also coming forward as expected. Whilst the sites do have planning permission and are included as commitment it is not clear that they still remain developable and that they will come forward as expected.

■■■■■ consider that by focusing new employment development on 9 key sites (acknowledging that there is also a pool of smaller sites with extant planning permissions) that will undermine the attractiveness of the Borough as a location for developers as there is a limited choice of sites and locations within which to locate. Furthermore, ■■■■■ are concerned that the sites that are allocated will dictate to a large degree the type of occupier that is likely to locate there by virtue of the size of unit that can be developed or is expected to be developed on these sites, the tenure of those units and the restriction on uses that the Council have placed on certain sites that are allocated. We return to these points further in our response to Policy S7.

We note that the Council is proposing to accommodate 10,000 square metres of floorspace or 2.5 hectares of employment land to help meet Coventry's needs. Coventry's unmet needs are identified in the Development Needs Topic Paper as totalling 9 hectares or 36,000 square metres of floorspace in total. With the 2.5 hectare contribution from the Council this would reduce to 6.5 hectares. The size of the site being promoted by ■■■■■ is just over 5 hectares. By allocating it nearly all of Coventry's unmet needs could be met. Due to the proximity to Coventry it would make more sense to propose this site for Development than others further from the edge of Coventry.

In order to address the concerns identified above, ■■■■■ suggest that an increased range of sites are proposed as allocations within the Plan in order to appeal to a wider range of occupiers and meet a different range of needs. The site that ■■■■■ is promoting at Junction 2 of M6 is one such site that should be considered for allocation as a result.

We also note that the Crouner Fields Farm site is included as a new allocation despite it already having planning permission. ■■■■■ consider that this should

be referred to as a commitment and it is already largely intended to meet the needs of a specific occupier (Fraser's Group). We return to this point in our response to Policy 7 as well.

██████████, therefore, consider that Policy S3 is unsound and it is not consistent with national policy as the proposed strategy will not deliver the economic strand of sustainable development and sufficient land of the right type and in the right location is not proposed within the strategy.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To address ██████████ concerns and to make the Plan sound the Council should allocate additional or alternative employment sites including the one that ██████████ is promoting at Junction 2 of M6, Ansty.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We wish to participate in the examination in order to fully debate the soundness of the Plan and to set out [REDACTED] case for the need for more/alternative employment land provision.

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Telephone Number		
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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	S7	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	☒	No	☐
(2) is Sound	Yes	☐	No	☒
(3) complies with the Duty to co-operate	Yes	☒	No	☐

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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■■■■■ object to Policy S7 on the basis of the choice of proposed allocations. We set out the reasons for this below.

The employment land strategy and proposed allocations do not differentiate between which types of need are intended to meet. In fact, paragraph 1.10 of the Regulation 19 Plan confirms that the strategy will deliver all of the Borough's local industrial land and together with its sub-regional large site requirements. Whilst ■■■■■ welcome the intention to meet identified needs, we consider that the proposed allocations would not be the most effective way to do so.

The WMSESS split out the requirement for the need for industrial land on smaller sites and larger sites. Smaller sites were referred to as less than 25 hectares whilst larger sites were greater than 25 hectares. In distinguishing between the two a requirement of 310,711 square metres of large sites and 219,170 square metres for small sites was identified (excluding completions/commitments).

The Plan and proposed allocations do not provide clear evidence as to how identified needs are to be met. The Council state at paragraph 1.13 of the Regulation 19 Plan that certain sites will include requirements to deliver smaller units whereas others will be allocated specifically for certain uses. For example, the Coton Park East and Walsgrave Hill allocations both include a requirement for 7,500 and 4,000 square metres of floorspace respectively to be developed for smaller units. Smaller units are defined as up to 1,500 square metres.

██████ acknowledge that whilst this will make a contribution to meeting the needs of smaller SMEs, out of 540,000 square metres of proposed new floorspace to be allocated only 11,500 square metres is proposed for smaller units. There is no restriction in the Annex: Development Site Allocations (in the Reg 19 plan) policies for each site that restricts how the sites can be developed. ██████ are, therefore, concerned that the remainder of the allocations could be developed for larger big box units (greater 100,000 square feet). In light of this, ██████ consider that the mid-box sized unit is not adequately catered for within the Plan and the proposed allocations would not necessarily deliver this size of unit.

The above point is reiterated by the fact that the promoters of the Coton Park East and Walsgrave Hill sites are market leaders in the development of large scale warehouse and distribution units, typically in excess of 100,000 square feet but can also build units of up to 1 million square feet. Whilst both parties do develop smaller units their focus tends to be on the larger end of the market.

Furthermore, these two developers build units to retain within their own portfolios thereby limiting the use of units to a leasehold basis.

In light of the above concerns about the size of unit that is likely to be developed on two of the proposed allocations and possible restrictions on the tenure basis that they can be occupied the site being promoted by ██████ can meet a specific need that is not currently being catered for within the Plan. By this we mean the delivery of mid-box units that can meet the need of 18,000 and 100,000 square feet. Furthermore, ██████ develop units on both a leasehold and freehold basis, the latter of which is of particular interest to certain occupier interest within the market, and would differentiate their site from some of the proposed allocations.

Standalone sites such as the one ██████ are promoting at Junction 2 of M6 also have the benefit of being developed quickly. They are not hindered by the need to deliver significant new infrastructure to facilitate their development. We note that the Walsgrave Hill site would ultimately benefit from the proposed junction upgrade on the A46 that seeks to create a separated junction to the south of the proposed allocation. These works are due to commence in 2027. Whilst these works are being completed ██████ site could come forward as it would not be dependent on the junction improvement to access the site. In allocating a range of smaller sites such as ██████ this would help with early delivery of the employment land in the early part of the plan period if the larger strategic allocations came on stream. ██████ confirm that there has been significant market interest in the proposed site and should this site be allocated the site could come on stream early in the plan period.

The Plan also seeks to restrict the use of some of the proposed allocations to specific uses. For example, the Ansty North site is proposed for Classes B2 and E(g)(ii) use. Whilst intended to meet specific needs it does reduce the marketability and attractiveness of the proposed allocation to potential occupiers which could lead to some potential users looking for alternative sites outside of the Borough. To avoid such a scenario, alternative sites with the full range of employment uses such as the ██████ site at Junction 2 should be allocated to avoid this happening.

We commented in our response to Policy S3 about the availability of the Crowner Fields Farm allocation, noting that it has planning permission and is intended to be occupied by Frasers Group. Whilst clearly contributing to meeting overall employment needs in the Borough and wider sub-region, the fact that the site is due to be occupied by a named operator means that the site is unavailable to other potential operators looking for new employment floorspace within the

Borough. As such, the site should be referred to as a commitment rather than an allocation in the Plan.

As a note to the Council the proposed floorspace included within the allocation table to Policy S7 is stated as adding up to 865,000 square metres, whereas in fact it should be 815,000 square metres.

We, therefore, object to the policy on the basis that it will not be effective in meeting the full employment needs of the Borough and wider sub-region as the proposed allocations will not provide sufficient choice to meet identified needs. As such, the policy is also not consistent with national policy.

(Continue on a separate sheet /expand box if necessary)

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IN order to address [REDACTED] concerns we propose that additional site allocations are included in the plan that would specifically cater for the mid-box range of users/occupiers that want a strategically located site but which offers flexible tenure terms and the ability to be constructed quickly. The land at Junction 2 of the M6 that is promoted by [REDACTED] is suggested as an additional/alternative allocation to meet the needs of the Borough.

(Continue on a separate sheet /expand box if necessary)

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