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Our Ref: RC/WV
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File Ref: 009561-BI-0000

Dear Sirs

Rugby Borough Council – Proposed Submission Local Plan Consultation Land at Wolvey Heath

This consultation response has been prepared by Lambert Smith Hampton (LSH) on behalf of our clients Richborough Commercial (Richborough) in support of its promotion of land at Wolvey Heath adjacent to Junction 1 of the M69. This covering letter should be read in conjunction with the Representation Form appended to this letter.

LSH also made representations on behalf of Richborough at Regulation 18, Preferred Option stage and the covering report is appended for reference.

Site Context and Location

The site comprises three parcels of agricultural land extending to approx. 99.5 hectares (246 acres) and is bounded by Hinckley Road to the north and east, Lutterworth Road to the south and the M69 to the west. The site is well located relative to the strategic road network with junction 1 of the M69 less than 500 metres from the northern point of the site, and the A5 within 1km of the site. The site is shown edged red below.



Within close proximity to the site are a range of commercial and leisure uses including the IM Properties Hinckley Park development on the opposite side of the A5. Further commercial and leisure uses are clustered around the M69 Junction 1 roundabout, with Hinckley Town Centre some 3km to the north.

The site lies within Rugby Borough but is close to Hinckley Borough to the north-east, with the A5 forming the boundary between the two authority areas.

Previous Consideration of the Site

As stated above, the site was previously promoted at Regulation 18 stage with a detailed report being provided as part of the consultation submission (re-submitted for ease of reference). The representations made at Regulation 18 stage remain relevant.

The site was assessed in the HELAA (December 2025) under site reference 141 as being Potentially Suitable. The suitability commentary stated:

“Green Belt site. Road improvement works would be required including new traffic lights on M69 roundabout. Gas main crosses site. Site impacted by Overhead Electricity Lines. Gas pipeline runs through site - will need appropriate mitigation in accordance with National Gas guidelines (discount from site area). Site contains a small area of Priority Habitat - Traditional Orchard. Impact on A5 needs consideration. Further assessment required to determine sustainability of site in comparison to other proposed employment sites - also whether it is appropriate for the site to come forward with adjoining land.”

The conclusion given was that the site was not currently developable without changes to policy. It is assumed that this relates to Green Belt policy with no other overriding policy objections apparent.

Proposed Submission Local Plan Consultation

The current Regulation 19 consultation makes provision for delivery of 284ha of employment land during the plan period (2025-2042) from existing commitments and new allocations. Delivery of new allocations is from five main sites:

- Coton Park East
- South West Rugby
- North of Ansty Park
- Crowner Fields Farm/Home Farm, Ansty
- Walsgrave Hill

Land at Walsgrave Hill has been included at Regulation 19 stage with removal of an allocation at Ryton-on-Dunsmore from the Regulation 18 consultation.

The majority of the site area covered by these allocations is focused in the west of the Borough close to Junction 2 of the M6 and will potentially deliver development arising from unmet need in Coventry.

The employment land requirements contained within the Proposed Submission Local Plan are derived from a variety of sources including the Coventry & Warwickshire Housing and Economic Development Needs Assessment (C&W HEDNA) 2022, the West Midlands Strategic Employment Sites Study (WMSESS) 2023/24 and the HEDNA/WMSESS Alignment Paper 2025 (including the 2025 Addendum).

The findings of the WMSESS highlight that Rugby has been and will continue to be an attractive location for Strategic Sites (Strategic Sites are defined as being typically over 25ha and capable of accommodating the needs of units larger than 9,000 sqm), albeit these Strategic Sites are also capable of accommodating smaller units of below 9,000 sqm.

As part of the Proposed Submission Local Plan Evidence Base, the Council has commissioned two studies in relation to the Green Belt. The first is a strategic high-level review (October 2025), intended to inform the early stages of the Council's Local Plan, and specifically the early spatial options for the Local Plan, albeit this report post-dates earlier consultation versions of the Local Plan.

The second report published in December 2025 considers the contribution that allocated sites make to the five purposes of Green Belt, and inter alia, their suitability for removal from the Green Belt for development. This report was published shortly before the current Local Plan consultation.

Conclusions

The site which is subject of this consultation response extends to over 100ha near the strategic road network and presents an opportunity to deliver a strategic employment site which would deliver significant benefits both to Rugby Borough and to the wider Midlands.

The site is identified within the HELAA as being Potentially Suitable but requiring changes to Policy to enable development, with a Green Belt review only being carried out at a very late stage of the Local Plan review process

Further consideration of the development potential of the site for delivery of a Strategic Employment site should be made through a detailed Green Belt review, should the Inspector conclude that additional employment allocations are required to make the plan 'sound'.

Yours faithfully



Stephen Hemming MRTPI
For: Lambert Smith Hampton

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Enc: Reg 18 Report

**PLANNING,
REGENERATION +
INFRASTRUCTURE**

**RUGBY BC
PREFERRED OPTION
REPRESENTATIONS**

Land off Wolvey
Heath,
M69/A5

RICHBOROUGH COMMERCIAL
MAY 2025

Prepared by: Gareth Denning

Reviewed by: Alex Roberts

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Inspection Date: 19/05/2025

Report Issue Date: 19/05/2025

This document has been prepared and checked in accordance with the Lambert Smith Hampton Quality Assurance procedures and authorised for release.

Signed: *Lambert Smith Hampton*

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For and on behalf of Lambert Smith Hampton

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Appendix 1 – Copy of response to Rugby BC Local Plan review Preferred Options consultation questionnaire

1.0 INTRODUCTION

1.1 Overview

1.1.1 This report has been prepared by Lambert Smith Hampton (LSH) on behalf of Richborough Commercial Limited (“Richborough”) in support of its promotion of Land at Wolvey Heath off Junction 1 of the M69 for employment development.

1.1.2 The report has been prepared to accompany Richborough’s representations to Rugby Borough Council’s Local Plan Preferred Option Document (Draft LP) consultation exercise.

1.1.3 This section of the report sets the context of the site and introduces Richborough Commercial. Section 2 sets the Planning Policy context, Section 3 presents a site appraisal, Section 4 analyses the Preferred Option evidence base, Section provides commentary on the Preferred Option draft policies and Section 6 summarises and concludes this report.

1.2 Site Context and Location

1.2.1 As indicated by Figure 1 below, the site comprises three parcels of agricultural and greenfield land, which amount to approximately 245.8 acres / 99.5 hectares. The site is bounded by Hinckley Road (B and C Road) to the north and east, Lutterworth Road to the south, and the M69 the west. The site is well-located relative to the strategic road network, with Junction 1 of the M69 and the A5 both being situated less than 500m and 1km respectively of the northernmost part of the site.

Figure 1 - Site Plan



1.3 Richborough Commercial

- 1.3.1 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).
- 1.3.2 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, including Green Belt land.
- 1.3.3 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.
- 1.3.4 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."

2.0 PLANNING POLICY CONTEXT

2.1 National Planning Policy Framework (NPPF) – Adopted December 2024

2.1.1 The NPPF was most recently revised in December 2024 and places a much more significant focus on supporting commercial development with various sectors, including industrial and logistics, given more prominence for their crucial role in driving the economy.

2.1.2 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. (NPPF, page 6)

2.1.3 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).

2.1.4 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.

Green Belt

2.1.5 The NPPF states that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open and identifies that the essential characteristics of Green Belts are their openness and their permanence (Paragraph 142).

2.1.6 Paragraph 143, as referred to in para 2.1.5 above, sets out the five purposes of the Green Belt:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.” (NPPF, page 42)*

2.1.7 The NPPF states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans (paragraph 145).

2.1.8 These exceptional circumstances can include instances where an authority cannot meet its identified need for homes, commercial or other development through other means. Where this situation has been established, LPAs should review Green Belt boundaries and propose alterations to meet these needs in full, unless there is clear evidence that doing so would fundamentally undermine the purposes of the remaining Green Belt (Paragraph 146).

2.1.9 The revised NPPF introduces a new tiered approach to developing within the Green Belt, through the anticipated new ‘Grey Belt’ category. Grey Belt land is defined as:

“... land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development”. (NPPF, Annex 2: Glossary, p73).

2.1.10 Paragraph 148 states that where it is necessary to release Green Belt land for development, plans should:

“give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” (NPPF, page 43)

2.1.11 In summary, the NPPF sets out the Government’s guidance for local planning authorities when formulating employment policies and allocating sites. Local planning authorities should, at the start of the plan, allocate sufficient employment land to meet objectively assessed needs over the plan period. This should include consideration of the release of Green Belt and Grey Belt land for development. Once the plan is adopted, local planning authorities should undertake regular reviews of need. Local plan policies should be flexible enough to accommodate needs not anticipated in the plan and recognise the specific locational requirements of different sectors.

2.2 Preferred Option Draft Consultation

2.2.1 As part of the review of its Local Plan, Rugby BC is currently undertaking a Preferred Options (Regulation 18) Consultation. Policy S3: Strategy for Employment Land makes provision for 1,026,546sqm of B2, E(g)(ii) and (iii), and B8 to be delivered over the plan period (2024-45) through a combination of existing commitments and new allocations.

2.2.2 Policy S7 allocates the following sites to provide a total of 945,000sqm of non-office employment uses as illustrated in the Table below:

Table 1: Rugby BC Local Plan Commitments and Proposed Employment Allocations

Commitments	Floorspace (sqm)	Allocations	Floorspace (sqm)
Prospero Ansty and Ansty Park	26,663	Crowner Fields Farm, Ansty	275,000
Symmetry Park, Thurlaston	83,541	Coton Park east	115,000
Coton Park east	26,421	South West Rugby employment phase 2	130,000
Padge Hall Farm	136,350	Ansty Park north	75,000
Employment planning permissions on small sites as at 1 April 2024	14,012	Prologis Park west and Mountpark, Ryton-on-Dunsmore	350,000
SUBTOTAL	286,987		945,000
TOTAL	1,231,987 sqm		

Source: Rugby BC Local Plan Preferred Option Draft

2.3 Rugby Economic Strategy 2025

2.3.1 Rugby BC have recently consulted upon a new Economic Strategy for the Borough. The Consultation draft of the Strategy recognises major completions of employment development over the last 15 years, some of which *“has involved the change of use of substantial tracts of agricultural or otherwise*

rural land which has been necessary to support businesses and bring the jobs necessary to support the expanding population".¹

2.3.2 The Strategy's SWOT analysis identified the following strengths of the current economy in Rugby BC:

- One of the UK's most dynamic and in demand locations
- At the heart of the Golden Triangle motorway network
- Highly sought after location for logistics sector
- Above national average workplace earnings (ONS2024)
- Above national average of higher skilled residents (ONS2023)

¹ Rugby BC Economic Strategy 2025

3.0 SITE APPRAISAL

3.1 Site and Surrounding Context

- 3.1.1 As indicated by Figure 1 above, the site comprises three parcels of agricultural and greenfield land, which amount to approximately 245.8 acres / 99.5 hectares. In regard to ownership, the site is held freehold under a single title, number WK443638 under the control of a specialist land promoter (Richborough Commercial).
- 3.1.2 In terms of built form, there is an isolated rural dwelling and some farm buildings within the vicinity of the site but these are not within the red line boundary. Electricity pylons also traverse the northern part of the site in an east-west direction, and there is a telecommunications mast towards the site's western boundary.
- 3.1.3 The site is bounded by Hinckley Road (B and C Road) to the north and east, Lutterworth Road to the south, and the M69 to the west. The three parcels are also trisected by Hinckley Road (C Road) which provides access northwards towards Junction 1 of the M69, southwards towards the villages of Wolvey and Wolvey Heath, and westwards towards the village of Burton Hastings.
- 3.1.4 The site is well-located relative to the strategic road network, with Junction 1 of the M69 where it meets the A5 being situated less than 500m from the northernmost part of the site. Within the immediate proximity of the site, there are a range of commercial and leisure uses, including, most notably, IM Properties' Hinckley Park development which accommodates DPD, Amazon and Octopus Energy. Further afield, the site is approximately 3km south of Hinckley Town Centre (which provides the nearest train station, with services across the East and West Midlands) and 2km south of the village of Burbage.
- 3.1.5 In heritage terms, the site is not located within a Conservation Area, nor does it contain any statutorily listed buildings. To the east of the site, beyond the boundary adjoining the B4109 Hinckley Road, there is a bowl barrow scheduled monument (List Entry Number: 1016845). There are no Public Rights of Way traversing the site.
- 3.1.6 In regard to flood risk, the Environment Agency's Flood Map for Planning confirms that the site is located within Flood Zone 1, where there is a low probability of fluvial flooding. There are also small, fragmented portions of the site, for which there is a 1 in 30-year chance of surface water flooding.
- 3.1.7 The site is wholly within the administration of Rugby Borough Council, with the relevant parish being Burton Hastings and Stretton Baskerville, and ward being Wolvey and Shilton.

3.1.8 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.

3.2 Planning History

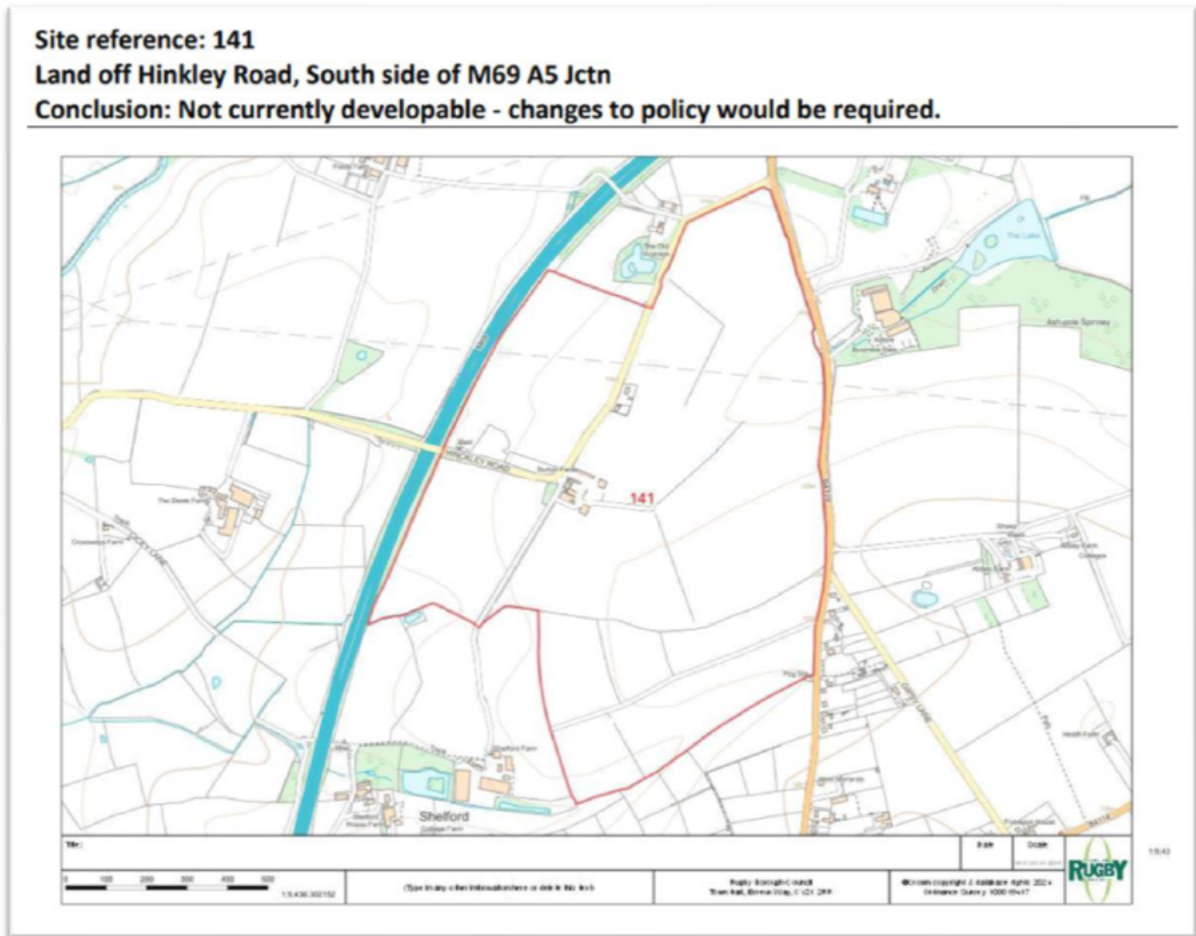
3.2.1 A review of the Local Planning Authority's (LPA's) online planning records does not find any relevant applications for the site.

3.2.2 Whilst more recently there have been a number of applications submitted for the area surrounding the site, these are relatively minor in scale and type and therefore are of limited relevance to this appraisal.

3.2.3 An exception to this, however, is the proposal for a new motorway service area on the opposite side of the M69 junction, to the south of the A5, for which Hinckley and Bosworth Borough Council resolved to grant planning permission in February 2025 (ref. 23/01023/HYB), with the same anticipated by Rugby Borough Council in due course (ref. R23/1047) due to the cross-boundary nature of the application.

3.2.4 With reference to the most recent Housing and Economic Land Availability Assessment (HELAA) undertaken in March 2025, the entirety of Richborough's site, including the traversing part of Hinckley Road (C Road), has previously been assessed in terms of its suitability for employment use. Under site reference 141 (see figure 2 below), the Assessment concludes that the site is "not currently developable – changes to policy would be required". The Stage 2 Site Options Assessment, which follows the HELAA, outlines that the site is not progressed further due to the perceived principal concerns of accessibility, Green Belt status and agricultural land loss.

Figure 2: SHELAA 2025 Site

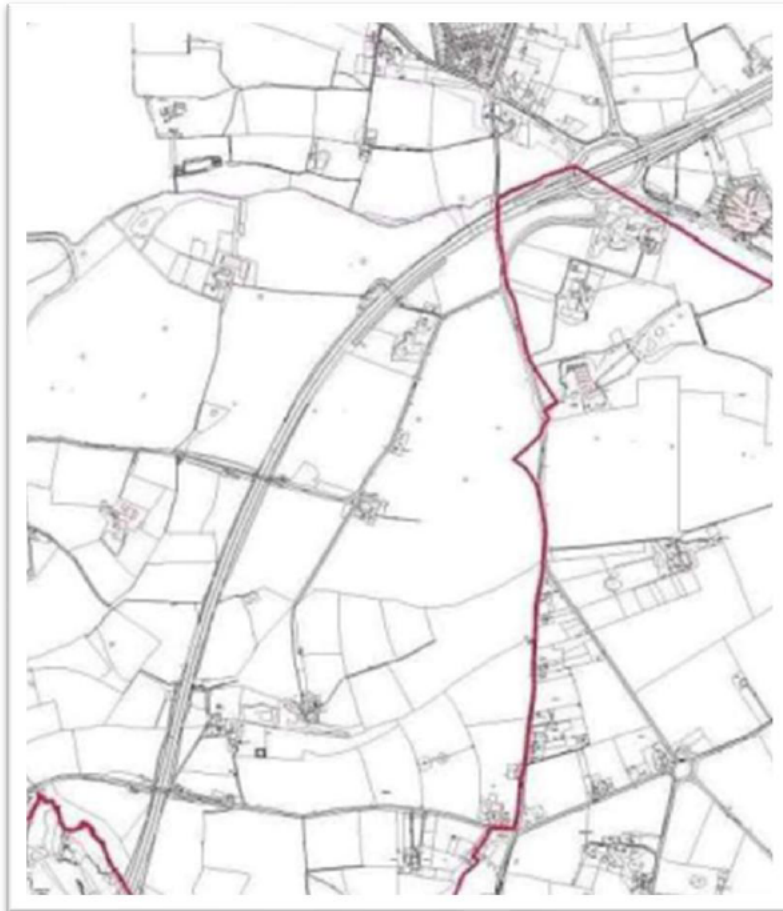


Source: SHELAA 2025

3.3 Planning Policy Considerations

- 3.3.1 The Local Plan for the Borough was adopted in June 2019, covering the period from 2011 to 2031. The accompanying Rural Policies Map identifies the site as being wholly located within the Green Belt. However, the Green Infrastructure Policies Map does not identify the site as being located within the Strategic Green Infrastructure Network or the Potential Green Infrastructure Corridor.
- 3.3.2 As indicated by Figure 3 below, a small part of the site to the west of the B4109 Hinkley Road is located within the designated area boundary of the Wolvey Neighbourhood Plan, which was made in May 2022.

Figure 3 - Wolvey Designated Area



Source: Wolvey Neighbourhood Plan

4.0 LOCAL PLAN EVIDENCE BASE

4.1 Employment Need and Supply

4.1.1 The need for strategic employment sites and the absence of a sufficient pipeline of such has been the continuous theme and message arising from numerous regional studies undertaken into strategic employment land over the last 10 years including the Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA, 2022), the West Midlands Strategic Employment Sites Study (WMSESS, 2024) and Coventry & Warwickshire HEDNA-WMSESS Alignment Paper.

4.2 Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA)

4.2.1 The HEDNA considered the need for employment land across Coventry and Warwickshire (C&W) for the period 2021 to 2041 and 2050.

4.2.2 The HEDNA identified a need for strategic B8 development of 551 ha to 2041 across C&W (rising to 735 ha to 2050). This was based on an estimate of future strategic B8 needs using a combination of past completions trends (2021-31) and an estimate of replacement demand and traffic growth (2031-41 / 2031-50).

4.2.3 There are several concerns with the modelling undertaken in the HEDNA which suggest that the assessment of Strategic B8 needs have been underestimated. The concerns are summarised as follows:

- The completions trend data used in the HEDNA is incomplete, does not include all data from the period used (2011-19) and does not provide a robust data source for projecting forward future needs.
- There have been considerable changes in the e-commerce sector since 2019 resulting in increased demand for strategic B8 space. Completions data from 2019-23 show considerably higher growth rate than seen before the pandemic. The HEDNA's use of completions data from 2011-19 will not capture the growth in demand since 2020.
- From 2031 onwards the HEDNA uses the Replacement Demand and Traffic Growth Scenarios which shows a lower level of growth than the 2011-19 completions trend. This means that the strategic B8 need identified in the HEDNA is actually lower than the completions trend seen over the pre-pandemic period (2011-19).

- The HEDNA approach does not reflect the wider commercial market dynamics seen within the distribution sector nor does it reflect up-to-date data and evidence. It is therefore not considered PPG compliant.

4.3 West Midlands Strategic Employment Site Study 2024 (WMSESS)

4.3.1 The WMSESS 2024 covers a wider geography than the C&W HEDNA and considers the level of need for Strategic Employment Land for the period 2022-2045.

4.3.2 The WMSESS identified an overall need for road-based strategic sites of 1,555-1,848ha and a rail need of 365-433ha. As with the HEDNA, this was based on an estimate of future strategic B8 needs using a combination of past completions trends (2021-31) and an estimate of replacement demand and traffic growth (2031-41 / 2031-50). Many of the same concerns raised in para 4.2.3 are relevant to the WMSESS, albeit the completion modelling used data up to 2021/22. However, it is worth considering the replacement demand and traffic growth modelling in further detail as the results from this represent the upper end of the recommended level of overall need.

New Demand due to Replacement Build

4.3.3 The Replacement Demand element assumes all units will require replacing after 20 years (High Replacement Scenario), 30 years (Central Replacement) or 40 years (Low Replacement) of life. These scenarios quantify the amount of land which will be required to support the levels of replacement based directly off these assumed unit lifespans. For the Central Replacement Scenario this means that 77% of existing stock will require replacing by 2045 (WMSESS, para 7.18).

4.3.4 However, no evidence is provided within the WMSESS to support the key assumption that after 30 or 40 years, units will require demolition and replacement. After a time period of this length, it is reasonable to expect the unit may no longer be fit for purpose. However, it is also reasonable to expect other options being considered such as replacing the cladding and roofing, rather than simple demolition and replacement.

4.3.5 The implication that 77% of existing sites will no longer be in use by 2045 and will have been replaced is clearly not realistic. However, the WMSESS provides no consideration or data regarding this issue. It is standard practice for employment land studies to consider rates of losses and loss replacement and consider the proportion of redevelopment at employment sites which is likely to be for continued employment uses and the proportion which will be for alternative (non-employment) uses.

New Demand Due to Traffic Growth

- 4.3.6 This element of the forecasting lacks transparency, and it is unclear from where the data which underpins the modelling has been sourced. The only source provided for the data in this section is ‘MDS Transmodal GB Freight Model’. As MDS Transmodal are co-authors of the WMSESS this is essentially referencing themselves. Further analysis of these figures is therefore not possible due to a lack of clear, transparent, information.
- 4.3.7 However, the New Demand Due to Traffic Growth element produces outputs which are very low. The land requirements (ha) of the Replacement Demand and Traffic Growth Scenario (High Replacement Scenario) are shown in the table below. This shows that the Growth Build element constitutes only 245ha of the total 1,993ha forecast land requirement by 2045. In other words, just 12% of the identified need will be to provide additional, rather than replacement, floorspace.

Table 2: WMSESS Replacement Demand and Traffic Growth Scenario (Central Replacement Scenario) Outputs by Element (ha)

Central Replacement Scenario	2045 (ha)	2045 (000s sqm)
Replacement Build	1,749 (88%)	6,120 (88%)
Growth Build	245 (12%)	857 (12%)
Total	1,993 ha	6,977,000 sqm

Source: Derived from WMSESS modelling (Road only)

- 4.3.8 This means that the WMSESS modelling is identifying only 10ha of land per annum (2022-45) across the whole of the West Midlands to meet the growth needs of the sector. This is a significantly low growth rate.
- 4.3.9 This shows that the WMSESS’s forecast of new demand for strategic B8 growth is considerably below the general levels of growth seen across all industrial uses. This contradicts the Market Dynamics set out in Section 4 of the WMSESS, which shows that the strategic B8 market is performing particularly strongly in this area:

“Net delivery of floorspace has been strong but 3 consecutive years of greater net absorption 2019-21 has driven vacancy rates down. High net absorption indicates strong demand and the need for increased supply. Rents have continued to rise over the past 10 years to reflect this” (WMSESS, para 4.65, pg 83)

4.3.10 Taking account of existing commitments (as of April 2022) the WMSESS recommended a residual need of 615-977ha across the West Midlands (548-841ha road need, 67-135ha rail need) as indicated in the Table below:

Table 3: WMSESS Supply Demand Balance Summary (Ha)

	Traffic Growth and Replacement Demand (MDS Transmodal) (Ha)	Completions (Ha)
Forecasted Need 2022- 45 with adjustments and margin	3354	3080
Strategic sites adjustment (25%**)	2516	2310
Brownfield recycling adjustment***	2282	1920
Adjusted Road Need****	1848	1555
Adjusted Rail Need****	433	365
Commitments 3		
Road Shortfall	841	548
Rail Shortfall	135	67
Shortfall (Ha)	977	615

Source: WMSESS 2024

4.3.11 As can be seen from the above, a number of further adjustments have been made to the forecasting which reduce the overall level of need. These included the following:

Strategic sites adjustment (25%)

4.3.12 A 25% adjustment to the total forecasted need to reflect the presence of small units on strategic sites (an uplift of 10%) and big strategic units on non-strategic sites (a reduction of 35%)² – however, the corresponding figures for Rugby BC is that **8%** of total floorspace on strategic sites is taken up by small units, and only **4%** of strategic unit floorspace is to be found on non-strategic sites (Source Appendices 6 & 7 of the WMSESS).

4.3.13 This shows that in the case of Rugby BC, the majority of Strategic Unit floorspace is taken up on Strategic Sites of over 25ha and applying regional patterns represents a crude method of apportioning need from district to district.

² The WMSESS defines Strategic Sites as >25ha; Strategic units are broadly recognised as above 100,000 sq ft or 9,300sqm (Para 1.4, WMSESS 2024)

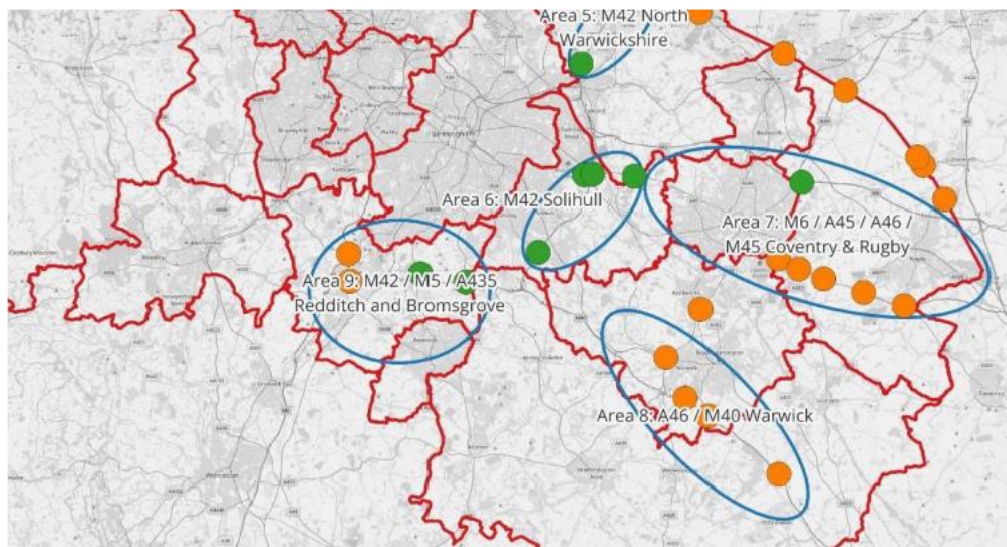
Brownfield Recycling adjustment (30%)

- 4.3.14 A 30% reduction was made to reflect brownfield recycling opportunities. This recognises the weakness of the MDST modelling in acknowledging that some older site replacement will take place onsite. However, there appears to be limited evidence of why a 30% figure is deemed appropriate.

WMSESS Recommendations

- 4.3.15 Taking into account existing commitments, the study identified areas of opportunity for additional strategic employment sites. Of the Areas of Opportunity identified, Area 7 falls within Rugby BC as can be seen below:

Figure 4: Excerpt of WMSESS Road Opportunity Areas



Source: West Midlands Strategic Employment Sites Study 2023/24

- 4.3.16 Area 7 also incorporates the local authorities of Coventry, Warwick, Rugby and NBBBC and is focused on the M6 / A45 / A46 / M45 junctions. Land at Wolvey Heath is located outside of Area 7, though the WMSESS states that the boundaries are not precisely defined or delineated.³ Paragraph 1.30 of the WMSESS provides further clarity as follows:

“This is not to say that sites will not come forward through allocations or applications in other locations, and where this is the case, they would still be considered to contribute to any ‘need’ at the regional level”.

- 4.3.17 The definition of the Areas of Opportunity included in the WMSESS focussed on the following criteria:

³ WMSESS 2024, Para 1.29, page 14

- The strategic highway network routes, given the centrality of this as an investment requirement.
- Contained in the main market areas, which reflect demand.
- Reasonable access to labour, which has focused the Oas around the urban areas rather than the highway network - particularly for Coventry / Rugby and South Staffs / Stafford. This enables breaking down of some of the main highway routes into labour catchments.
- Reflects the junction assessment work undertaken – in terms of broad achievability of locations.

4.3.18 Whilst the junction assessment work has not been published, Land at Wolvey Heath scores positively against all of the other criteria and should be considered capable of meeting the needs of Coventry and Rugby. Its location, close to the urban area of Burbage and Hinckley, is such that it should be considered capable of meeting the needs across the wider region.

4.3.19 The recommended provision from the WMSESS being as follows:

Table 4: WMSESS Recommendations

Opportunity Area	Type of Site	Indicative Strategic Site Requirement	Indicative Land Need (B8/mixed c50ha, B1/B2 c25ha)
Area 7: M6 / A45 / A46 / M45 Coventry & Rugby	B8 / Mixed	1-2	50-100 ha
	B2	1-2	25-50 ha
TOTAL			75-150ha

Source: WMSESS

4.4 The HEDNA-WMSESS Alignment Paper 2024 (Alignment Paper)

4.4.1 An Alignment Paper was produced in 2024 to consider the relationship between the findings of the HEDNA and the WMSESS and was commissioned by Rugby BC on behalf of the C&W authorities. The Alignment Paper calculated a total employment need consisting of three elements: Strategic Site Need, Local Industrial Need and Big Box Need on Non-Strategic Sites.

4.4.2 In calculating the need for Strategic Sites, the Alignment Paper identified a need for between 200-375ha of land across C&W based on the WMSESS recommendations for each of the 3 Areas of Opportunity located in C&W for 2022-45. This figure was pro-rata'd back one year to align with the HEDNA base year of 2021, producing a residual figure of 177-359ha. The WMSESS figures are a residual need figure, so once the identified commitments in C&W are added back in, a gross strategic sites figure of **833-1015ha** is produced.

4.4.3 Once commitments across C&W are factored in (including the Padge Hall Farm site in Rugby) the residual need is considered to be 136-311ha as follows:

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

4.4.4 Within Area 7, the Alignment Paper states that the local authorities of Coventry, Warwick, Rugby and NBBC will need to work together to consider potential sites which will inform the specific allocation of figures to individual LPAs. The overall strategic site need for Opportunity Area 7 as shown in the table below:

Table 5: Overall Industrial Land Needs 2021-45

	Gross (ha)	Supply (ha)	Residual (ha)	Total (ha)
Strategic Site Needs to be met within Area 7	75-150	66	9-84 (294,000sqm)	84*

*Based on the upper end of the range

Source: C&W HEDNA-WMSESS Alignment Paper 2024

4.5 Development Needs Topic Paper (2025)

4.5.1 A Development Needs Topic Paper has been produced to outline the findings of the various evidence base studies and outline the total employment land need and supply to be met in the Preferred Option Draft. This updates the base date of the requirement to 2024-45 to align with the plan period by subtracting the completions from 2021-24.

4.5.2 The adjustments made to the Strategic Site Need reflect the need to accommodate the completions that have occurred on the committed sites since the 2022 base date of the WMSESS and the more recently consented Padge Hall Farm site. The Topic Paper makes the assumption that the residual requirement of 84ha for Opportunity Area 7 is met in Rugby BC. This brings the total requirement to 217.5ha or 761,250sqm.

4.5.3 Whilst the Development Needs Topic Paper acknowledges that Rugby BC is well placed to meet the residual Strategic Site Needs identified by the WMSESS for Opportunity Area 7, there is some confusion regarding meeting Coventry’s unmet need or the wider regional need beyond Area of Opportunity 7. Para 1.36.7 identifies that: *“It is understood that of its 2021-2041 requirement for industrial land on smaller sites Coventry City Council is unable to meet 45 hectares or 180,000 square metres.”* It also states that if that unmet need were to be picked up in Rugby BC, then it would

increase the residual need to 919,559sqm and gross need to 1,206,546sqm. No conclusion is reached on this matter, however.

4.6 Settlement Hierarchy / Spatial Strategy

4.6.1 The supporting evidence of the Preferred Option Consultation includes a summary of the methodology followed in selecting the sites to meet the strategy of the plan. This consisted of a three stage approach as follows:

- Stage 1 Housing and Economic Land Availability Assessment (HELAA) – a GIS based analysis of sites to identify ‘showstopper’ constraints and unsuitable options.
- Stage 2 detailed site assessment – a more detailed technical analysis of site constraints and opportunities. Narrows the list to reasonable site options for inclusion in the sustainability appraisal.
- Stage 3 Sustainability Appraisal (SA) - The SA combines the ‘bottom up’ site analysis work of stages 1 and 2 with ‘top down’ strategic considerations, including development needs, to generate options for growth scenarios. Those growth scenarios are then appraised in terms of their sustainability and potential for significant environmental effects.

4.6.2 In this regard, it is worth returning to the requirements of Chapter 6 (paragraph 86) of the NPPF:

“Planning policies should:

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period

c) 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; and

e) 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;”

4.6.3 The methodology made available by Rugby BC lacks consideration of the specific requirements of the key criteria that need to be considered when identifying land for strategic employment sites.

4.6.4 In this regard, Paragraph 1.36.13 of the Development Topic Paper repeats the recommendations of the WMSESS in stating that “strategic sites” should meet the following⁴:

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

4.6.5 The site at Wolvey Heath meets all of these criteria and would make a substantial contribution to meeting the strategic employment needs of the Borough and the wider region in addition to the sites that are proposed for allocation in the Preferred Option Consultation.

4.7 Green Belt

4.7.1 Currently, the most up to date evidence on Green Belt in Rugby is contained within the 2015 West Midlands Joint Green Belt Review Study. This was a Stage 1 Green Belt Study which covers Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council. The 2015 Study covers a large geography and is relatively strategic in nature. The criteria for identifying parcels for assessment was to include those around the ‘large built-up areas and ‘main rural villages’. However, it should be recognised that the needs of some industries, such as logistics, may require locations that are not immediately adjacent to a built-up area or village. For example, logistics providers require sites that have good access to the strategic road network and that are not immediately adjacent to residential areas to minimise noise and visual impacts.

4.7.2 As set out in our comments in section 2 of this report, the updated NPPF now places greater emphasis on meeting the needs of a ‘modern economy’, which includes freight and logistics. Paragraph 86c requires that LPAs identify suitable locations for these uses and paragraph 87 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. For storage and distribution operations this includes making provision at a variety of scales and in suitably accessible locations that allow for the efficient and

⁴ WMSESS 2024 Paragraph 14.32 page 211

reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation.

- 4.7.3 With regards to plan making, Paragraph 148 states that where it is necessary to release Green Belt land for development, priority should be given to:

“previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” (NPPF, page 43)

- 4.7.4 Given the age of the Green Belt study, the changes to the NPPF (which include the emphasis on providing for the needs of a modern economy and the addition of ‘Grey Belt’ land) along with the established need for more employment land, it is clear that Rugby Borough Council needs to undertake a new Green Belt Study which addresses these points.

4.8 Wolvey Heath (M69 J1)

- 4.8.1 We have undertaken a high-level desktop assessment of the Richborough’s site and consider that it could meet the definition of ‘Grey Belt’.

- 4.8.2 As already established, the site is located close to Junction 1 of the M69 at its interchange with the A5. The site is located to the south of the junction and bounded by the M69 to the west and Hinckley Road to the east and open fields to the north and south. There are no buildings contained within the red line of the site, which consists of a series of fields currently in agricultural use..

- 4.8.3 As set out above, the definition of Grey Belt includes previously developed land or land which does not strongly contribute to any of purposes (a), (b), or (d) set out in paragraph 143 of the NPPF. Whilst the site is not previously developed, we consider it does not strongly contribute to purposes a, b or d having regard to the Green Belt chapter of PPG as set out in the table below:

Table 6: High level Grey Belt Assessment of Wolvey Heath site

Purpose Ref	Site Assessment
a) to check the unrestricted sprawl of large built-up areas	The site is not adjacent to any large built-up areas. It is close, but not connected, to Hinkley however it plays no role in preventing sprawl due to the presence of the A5 and M69 in between. These roads act as a strong permanent physical feature which could restrict and constrain development.
b) to prevent neighbouring towns merging into one another	The site is not located within a gap between two neighbouring towns. As noted above it is located close to Hinkley however, the gap between Hinkley and Coventry is very large and contains several other smaller settlements within it. It should be noted that this purpose relates only to towns and not small villages. This has been confirmed in a number of recent appeals. In any case, the site does not prevent the merging of settlements of any size.
d) to preserve the setting and special character of historic towns	The site is not close to a historical town and therefore does not meet this purpose.

Source: LSH Analysis

- 4.8.4 In addition to not meeting the purposes above, 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 of the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.
- 4.8.5 Footnote 7 includes habitats sites and/or designated as Sites of Special Scientific Interest; land designated as Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest; and areas at risk of flooding or coastal change. The site does not meet any of the criteria listed in footnote 7.
- 4.8.6 In conclusion, we consider that the Council need to commission an updated Green Belt Study and that Richborough's site at Wolvey Heath should be included for further assessment as a potential grey belt site. In accordance with the recent revisions made to the NPPF, this would place the site behind only previously developed land in the hierarchy of green belt land to be released.

5.0 WIDER COMMENTS ON THE LOCAL PLAN

5.1 Objectives

- 5.1.1 The objectives of the plan are welcomed, but 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.

5.2 Key Diagram

- 5.2.1 The key diagram is understandably focused on the role of Rugby as the principal town in the Borough and the Rugby Urban Area as the main focus for new homes and employment in accordance with the Settlement Hierarchy. However, the diagram gives the impression that Rugby is isolated, when in reality it has close links to Coventry and Warwickshire, the West Midlands and Leicestershire. This is reflected in the Local Plan evidence base and the regional nature of strategic employment sites. At the very least, the diagram should be amended to show the close proximity to Hinkley and Burbage in the North of the Borough.

5.3 Policy S1 Settlement Hierarchy

- 5.3.1 It is acknowledged that the settlement hierarchy gives preference to development close to existing settlements with services and facilities. However, it should be acknowledged that Strategic Employment sites cannot always be located adjacent to settlements as they are reliant upon having close proximity to the strategic road network and meeting the other criteria identified in Para 4.6.4 of this report. At present, the wording of Policy S1 places emphasis on residential development, so consideration should be given to amending the text to provide greater context to the differing locational requirements of employment land.

5.4 Policy S3 Strategy for employment land

- 5.4.1 Whilst Richborough broadly supports the overall strategy for employment land, including the draft allocations set out therein, Policy S3 provides no indication as to whether the levels of employment development included in the Draft LP are to meet Rugby BC's need or to additionally meet the wider

unmet needs of the region. Coventry's unmet needs are recognised in the Development Topic Paper, but no clarity is provided in Policy S3 as to whether these will be met by the proposed allocations.

5.4.2 We note there is little commentary currently accompanying Policies S1 and S3 to properly articulate the spatial strategy of the Plan with regards to employment land.

5.4.3 The supporting text at Paragraph 1.8 recognises the development of large units in recent years – but states that this has reduced supply available to local business wishing to expand. As already stated in Para 5.1.1, Rugby BC needs to recognise its role in supporting the freight and logistics sector, whilst also identifying additional sites that provide the flexibility for a range of employment uses that allow local businesses the ability to expand.

5.5 Policy S7 Employment Allocations

5.5.1 Whilst Richborough broadly supports the draft employment allocations, the findings of this LSH report are that more land should be allocated to complement the existing proposed draft allocations.

5.6 Policy E2 Employment Development

5.6.1 Draft Policy E2 sets out Rugby BC's emerging strategy for employment development. In respect of sites outside of settlement boundaries, development for employment uses will only be permitted where:

- "i. It would not undermine the continuance of an existing viable agricultural use; and
- ii. It would comprise the conversion or redevelopment at a similar scale of a building that has been in existence for at least ten years; or
- iii. It would comprise a proportionate expansion of an existing building in employment use; or
- iv. It would comprise the infilling of a vacant area within a site in employment use."

5.6.2 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 within 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.

- 5.6.3 In line with the revised NPPF, the emerging Local Plan 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.
- 5.6.4 In accordance with the above, LSH consider draft Policy E2 should be revised to include a further criterion as follows:

v. It would meet an identified need that cannot be met through extant allocations

6.0 CONCLUSION AND SUMMARY

- 6.1.1 This report seeks to promote the Land at Wolvey Heath off Junction 1 of the M69 for employment development through Rugby BC's emerging Local Plan. In doing so, it has reviewed the Preferred Option Consultation Draft and the evidence base that sits behind it and establishes the justification for seeking a further employment allocation.
- 6.1.2 The site is located immediately adjacent to the Strategic Road Network within close proximity to Junction 1 of the M69 and its intersection with the A5. This provides connectivity to the rest of Rugby BC and the wider region and is within the Golden Triangle. The site is less than 3km from Hinckley which connects to the rail network throughout the East and West Midlands.
- 6.1.3 The site has no significant planning history, is not located within a Conservation Area and contains no statutorily listed buildings. It is not traversed by any Public Rights of Way Flood and is within Zone 1 of the EA's Flood Map for Planning, where there is a low probability of fluvial flooding.
- 6.1.4 The Development Needs Topic Paper recommends that the Preferred Option Draft provides for...."
...The combined gross industrial need of 1,026,546sqm...In hectares that is 284ha...After existing committed supply the requirement is for 739,559sqm (202.5ha) ..."
- 6.1.5 The sites committed and allocated to meet that need is based on the assumption that the Strategic Site Need for Coventry & Warwickshire (identified in the WMSESS as Area Opportunity 7) will be fully met in Rugby BC (as opposed to being apportioned between the relevant authorities i.e. Coventry, Warwick, Rugby and NBBC.)
- 6.1.6 However, LSH believe the modelling assumptions used to establish the level of need are unreliable and more work is required to establish a more accurate picture of regional need. Based on the existing unrealistic scenario that only 12% of the identified employment need will be to provide additional, rather than replacement floorspace, further work will undoubtedly identify an increased level of need.
- 6.1.7 In this regard, the site at Wolvey Heath will help to meet a proportion of this unmet need. It meets all of the criteria identified in the WMSESS as being key for strategic sites:
- Good connections with the strategic highway network (for road).
 - Sufficiently large and flexible - ideally sites would be a minimum of 25ha and readily over 50ha.
 - Is or can be served from an electricity supply grid with sufficient capacity.

- Is accessible to labour and includes a clear sustainable transport solution for the local road network.
- Is located away from incompatible land-uses.
- The ability to deliver high-bay warehousing.

6.1.8 Whilst the site is located within the Green Belt, LSH consider that the Council need to commission an updated Green Belt Study and that Richborough's site at Wolvey Heath should be included for further assessment as a potential grey belt site. LSH also consider that due to the site's position immediately adjacent to a motorway (M69), it does not contribute to any of the purposes (a), (b), or (d) as set out in paragraph 143 of the NPPF.

6.1.9 Notwithstanding this, the updated NPPF now places greater emphasis on meeting the needs of a 'modern economy', which includes freight and logistics.

6.1.10 Together with the need for allocating more employment land, LSH believe this constitutes a reason for an additional employment allocation at Wolvey Heath.

**Appendix 1 – Copy of response to Rugby BC Local Plan review
Preferred Options consultation questionnaire**

Questionnaire on Rugby Borough Council's Preferred Option Consultation Document

The purpose of this questionnaire is to gather feedback on the 'Preferred Option' Consultation Document produced by Rugby Borough Council.

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

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

The document has been informed by a prior public consultation on key issues and options conducted in October 2023 to February 2024, information submitted by landowners and their agents in response to a call for sites, and a wide range of evidence gathered by the Council's planning team. Feedback gathered through this questionnaire will help shape the document before another public consultation is conducted in January 2026.

Before completing the questionnaire, please review the consultation document and policies map. You may also find it helpful to refer to our FAQ document or consider the accompanying evidence. Hard copies of the consultation document have been deposited at the Borough's libraries, while the rest of the supporting information is available on our website at rugby.gov.uk/localplan

The questionnaire contains a total of 27 questions about the consultation document, and 11 questions about the characteristics of the respondent. Although we encourage respondents to consider the consultation document in a holistic manner, we appreciate that some may wish to skip certain questions and focus only on specific elements that are of particular interest to them.

Please return completed questionnaires to the Council by email to: localplan@rugby.gov.uk, or by post to:

Preferred Option Consultation,
Development Strategy Team,
Rugby Borough Council ,
Town Hall,

Evreux Way,
Rugby,
CV21 2RR

Objectives

The consultation document has six main objectives:

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

Question 1	To what extent do you agree with the selection of these objectives?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 2	What are the reasons for your answer to question 1?
<p>Richborough supports these objectives, and in particular the aim of growing Rugby Borough's economy in sustainable locations.</p> <p>However, greater recognition should be given to the role of the 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, within a four-hour drive of 90% of the British population. Whilst the need to diversify Rugby's economy is acknowledged, the continuing importance of the logistics sector to the employment market should not be lost.</p> <p>The largest business sectors in Rugby are logistics (14.7%) and manufacturing (12.9%) with particular strengths in aerospace and automotive. (NOMIS 2024)</p>	

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

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

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

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

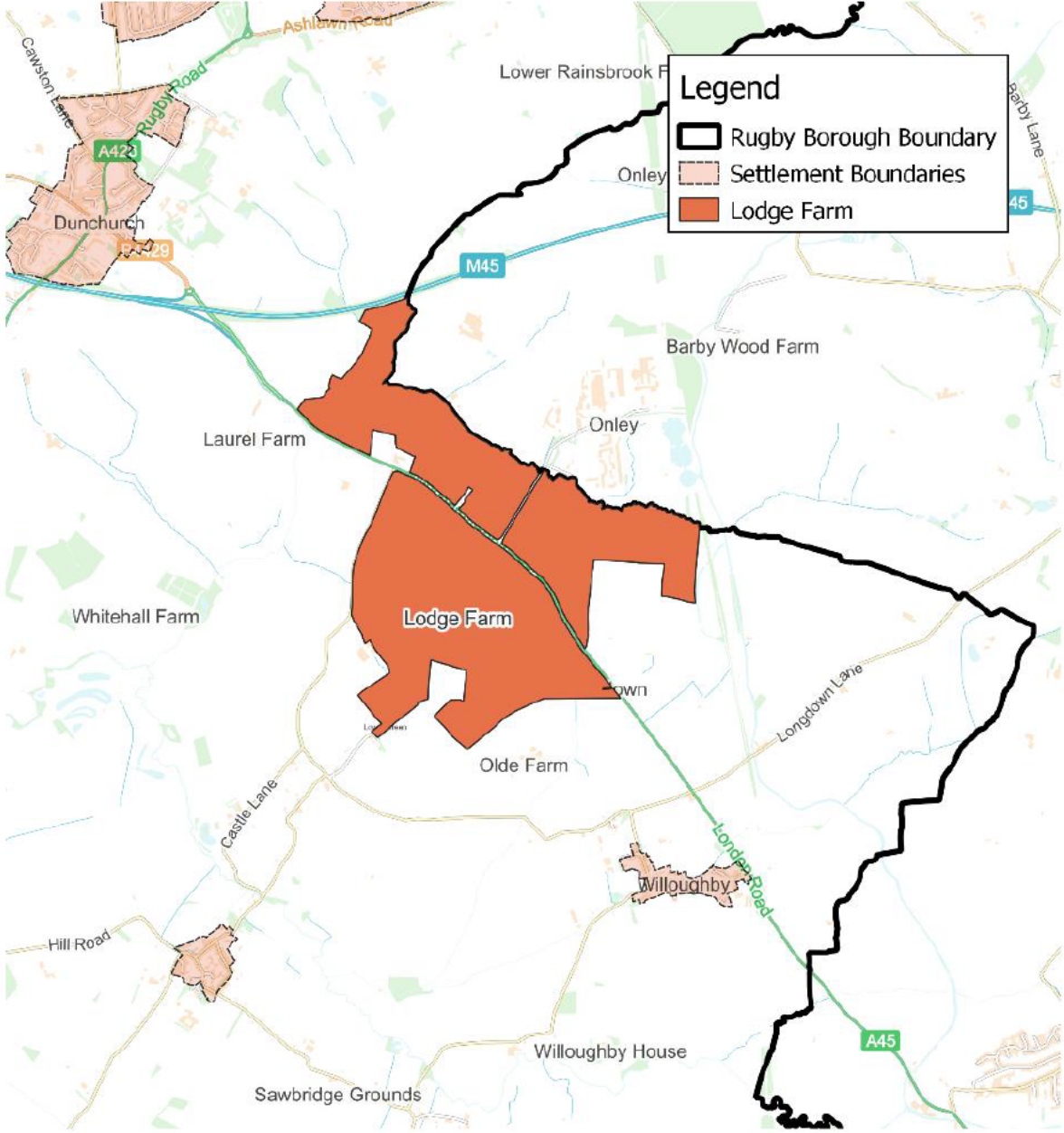
This more dispersed strategy, which avoids allocating very large sites, was chosen for several reasons:

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

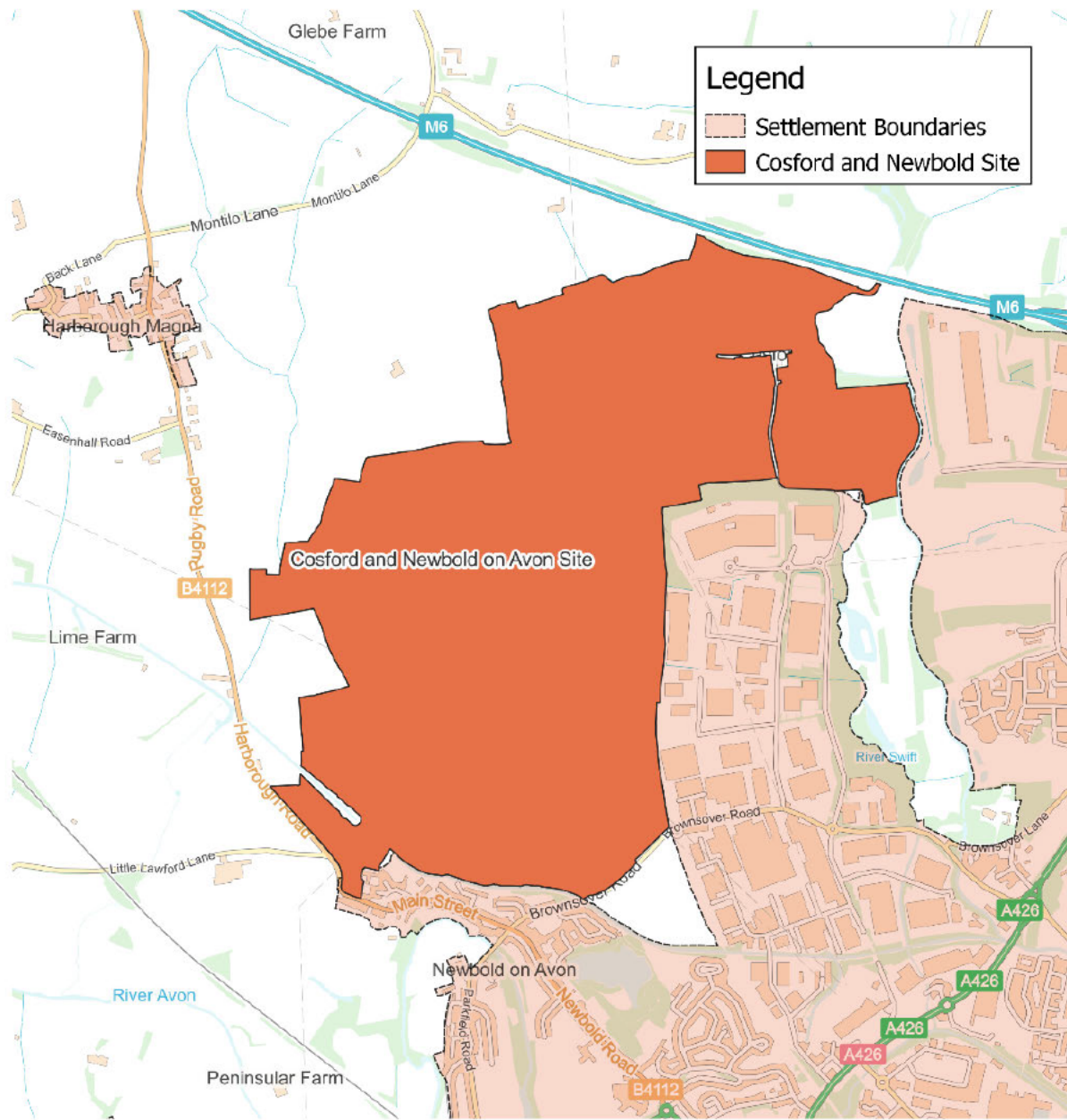
The alternatives to the preferred option are detailed in the interim Sustainability Appraisal Report. The main alternatives would include a further large site, together with somewhat reduced numbers of smaller and medium sites. Based on an assessment of the land which has been put forward to the Council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

The first alternative option would be to allocate land at Lodge Farm, southeast of Dunchurch, for a new village to be built. The estimated range of dwellings to be

delivered here would be between 1,800 and 2,000 homes by 2045, with further homes thereafter.



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



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

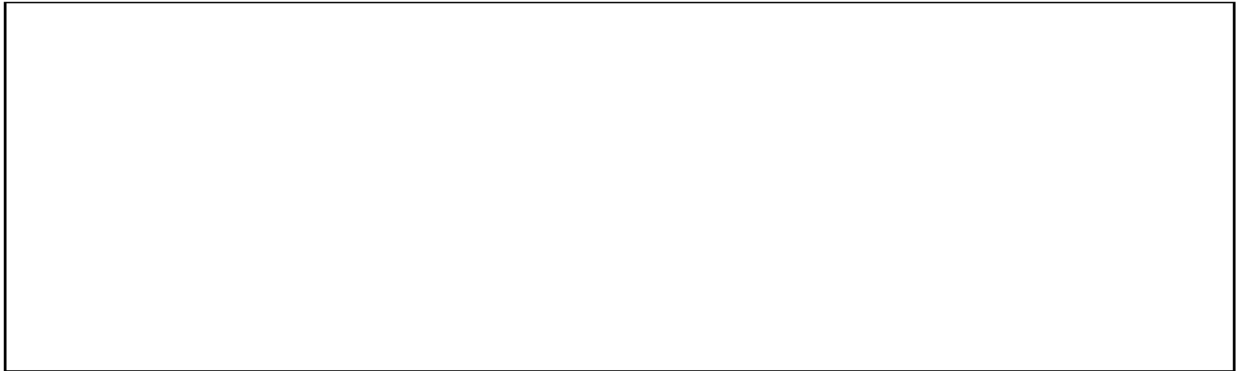
Question 3	To what extent do you agree with the more dispersed overall spatial strategy for new homes?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

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

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

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

Question 6	The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.
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Strategy for employment land and employment allocations (policies S3 and S7)

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

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

In summary, we have selected these sites because:

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

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

Question 7	To what extent do you agree with the strategy for employment land?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 8	What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?
<p>Richborough support the allocations chosen to deliver the employment land strategy.</p> <p>However, Richborough believe that the Employment Need has been underestimated and further allocations are required to meet regional requirements. The reasons for this are outlined in the accompanying Employment Land Statement / written reps. We believe that further work is required to establish a more accurate level of need, particularly in relation to the assessment of floorspace needed to handle projected future freight volumes.</p> <p>One site capable of meeting any shortfall is the land at Wolvey Heath, which comprises approximately 99ha and is capable of providing 200,000 sqm of employment floorspace.</p> <p>Whilst allocation of the site will require the release of Green Belt land, we note the Council's reasoning for the justification for releasing three of the proposed allocations from the Green Belt.</p> <p>As set out in the Cabinet Report, as well as the Sustainability Appraisal (SA), the Council considers that 'exceptional circumstances' exist justifying Green Belt release. One of the reasons given is as follows:</p> <ul style="list-style-type: none"> The need for strategic employment land is regional in nature. The functional economic market area (FEMA) in which Rugby Borough lies is centred on Coventry. Coventry is the main population and economic centre in the FEMA, but given its tightly drawn administrative boundary and limited employment land supply, it cannot meet its needs within its administrative boundaries. Allocating employment land within Rugby Borough near to Coventry provides the most sustainable approach to meeting the identified needs. <p>This equally applies to land at Wolvey Heath. The site is strategically located adjacent to the M69 / A5 providing easy access to Coventry to the south and Hinckley to the North.</p> <p>We note that the Council is in the process of preparing a Green Belt Contribution Study in line with the latest Government guidance on the preparation of such studies published in</p>	

February 2025. This will assess the contribution green belt land within the borough makes to the five green belt purposes defined in the NPPF and identify grey belt land. We support the Council in its efforts to ensure that its evidence base fully aligns with national policy requirements.

However, the most up to date evidence on Green Belt in Rugby is contained within the 2015 West Midlands Joint Green Belt Review Study. This Study covered a large geography and was strategic in nature. Given its age, it fails to consider the emphasis the NPPF now places on meeting the needs of a 'modern economy', including logistics. Paragraph 87 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. For storage and distribution operations this includes making provision 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.

Given the age of the Green Belt study, the changes to the NPPF (which include the emphasis on providing for the needs of a modern economy and the addition of 'Grey Belt' land) along with the established need for more employment land, it is clear that Rugby Borough Council need to undertake a new Green Belt Study which addresses these points.

Although we await the outcome of the Council's Green Belt Study Update, we would like to note that in our view land at Wolvey Heath does not contribute strongly to Green Belt purpose a), b) and d) as outlined below and as such, believe that it meets the NPPF definition of 'Grey Belt':

- The site is not immediately adjacent to any large built-up areas. It is close, but not connected, to Hinkley however plays no role in preventing sprawl due to the presence of the A5 and M69 in-between. These roads act as a strong permanent boundary feature which act to prevent sprawl. It therefore makes no contribution to Green Belt Purpose a).
- The site is not located within a gap between two neighbouring towns. As noted above it is located close to Hinkley, however, the gap between Hinkley and Coventry is large enough and contains several other smaller settlements within it. It should be noted that this purpose relates only to town and not small villages. This has been confirmed in a number of recent appeals. In any case, the site does not prevent the merging of settlements of any size. It is therefore considered that the site makes no contribution to Green Belt Purpose b).
- The site is not close to a historical town and therefore plays no role in preserving the setting and special character of historic towns (Green Belt Purpose d).

As a Grey Belt land, the site would fall to be considered ahead of several others in the hierarchy introduced in the NPPF and behind only previously developed land.

The Council's HELAA Stage 2 Site Assessment Report considered that the site at Wolvey Heath had poor accessibility. However, the site is well located adjacent to the local and strategic road network with proposed improvement to the transport network likely to address any existing congestion. Development on the site would be of sufficient scale to incorporate sustainable transport infrastructure and travel initiatives to link to Hinkley, Coventry and the wider region.

We strongly believe that the land at Wolvey Heath can contribute to the objectives of the Local Plan and help to meet the additional employment land needs that we feel a review of the employment land evidence base will reveal. The site:

- Is of a sufficient size to accommodate up to 200,000 sqm. of employment floorspace including a range of buildings plots to accommodate market demand from those sectors seen as key to contribute towards Rugby's Economic Strategy of creating a high skill high pay economy.
- benefits from excellent proximity to the strategic road network and is of a scale that development could support highway improvements, the provision of pedestrian and cycle links within the scheme and potentially the introduction of a new bus service to connect with existing routes to Hinckley and the wider area.
- offers an opportunity to provide low-density, high-quality buildings set within a managed high-quality landscape environment. This is to include the provision of significant landscape buffers and new green and blue infrastructure
- There are no technical constraints to the site's development that cannot be overcome through innovative design solutions. The site is not affected by any ecology or heritage constraints and is considered to be of low landscape and visual value. Any foul water drainage issues could be fully addressed through the site's layout and detailed design.

Land at Wolvey Heath can help to address employment land needs arising in Coventry providing economic benefits and employment opportunities to both Rugby and Coventry's population and the wider sub-region.

Gypsy and Traveller sites (policy S4)

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

Question 9	To what extent do you agree with policy S4?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

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

Climate

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

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

Question 11	To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

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

Economy

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

- Land within Strategic Employment Sites, sites allocated for employment use development in the plan, and land designated for employment use within made neighbourhood plans, shall be retained for employment purposes. Changes to non-employment uses shall only be permitted where employment uses are proven to be unviable (policy E1).
- Outside the areas mentioned above, development of employment uses shall be permitted within settlement boundaries and in the countryside through conversions of buildings, proportionate expansion of buildings in employment use or infilling within existing employment sites (policy E2).
- Certain uses that support the rural economy (such as agricultural buildings, small-scale tourist accommodation, and garden centres and nurseries) shall be accepted within rural areas, subject to their compliance with other policies including Green Belt policy (policy E3).

Question 13	To what extent do you agree with the document's economic policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 14	What are the reasons for your answer to question 13?
<p>Richborough consider that Policy E2, as currently drafted, is very restrictive and will limit available sites in sustainable and strategic locations coming forward for potential economic development.</p> <p>The draft policy does not reflect the revised NPPF which places significant focus on supporting commercial development within 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.</p> <p>In line with the revised NPPF, the emerging Local Plan 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.</p>	

In accordance with the above, Richborough consider Policy E2 should be revised to include a further criterion as follows:

v. It would meet an identified need that cannot be met through extant allocations

Centres

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

<p>Town Centre The principal centre in the Borough as defined on the policies map. The town centre is the main shopping and leisure location in the authority area serving the needs of those from across the Borough and beyond.</p>	<p>Rugby town centre</p>
<p>District Centres Areas comprising substantial concentrations of units with retail, leisure and community uses that act as secondary locations to the town centre serving large districts of the Borough. They typically include at least one large-format supermarket or superstore which attracts a high volume of visitors, a range of comparison retailers, and community facilities such as a school or community centre.</p>	<p>Houlton, South West Rugby</p>

<p>Local Centres Areas which include a wide range of units with retail, leisure and community uses that serve the day-to-day needs of a local catchment population which is within walking distance. They typically include a convenience store, Post Office, pharmacy, school and a place for community gatherings (community centre, pub, place of worship etc.), and have good public transport connections to the principal Town Centre.</p>	<p>Benn, Bilton, Brownsover, Dunchurch, Hillmorton, Houlton, Eden Park</p>
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The two district centres (Houlton and South West Rugby) and one of the local centres (Eden Park) are yet to be built out, but are designated as per the proposed masterplans for these urban extensions. The other local centres have been chosen based on an assessment of locations nominated by respondents to our prior Issues & Options consultation, and locations identified by Councillors and Council Officers.

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

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

- Support is given for the regeneration of the town centre with specific priorities identified, including the redevelopment of Rugby Central Shopping Centre, a refreshed Market Place square, a new mixed-use hub at Old Market Place, and a new apartment living quarter surrounding Rugby Station (policy C1).
- Permission for development of new main town centre uses (such as retail, leisure, entertainment and office uses) is restricted to the centres identified in the retail hierarchy, except under specific circumstances (policy C2).
- Existing main town centre uses within defined centres are protected (policy C3).
- The provision of commercial, business, service, learning and local community uses within neighbourhood hubs is supported (policy C4).

Question 15	To what extent do you agree with the policies for retail centres?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

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

Environment

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

- Sites designated as being of importance for wildlife shall be protected from adverse effects of development (policy EN1).
- Development shall avoid significant adverse impacts on the character and visual amenity of landscapes (policy EN2).
- A greater degree of protection is afforded to the 'Ironstone Fringe Area of High Landscape Value' centred around Flecknoe in the south of the Borough (policy EN3).
- Most developments shall deliver a net gain in biodiversity of at least 10% and this should be focused on site, close to the site or elsewhere within the borough. (policy EN4).
- All major developments shall increase their canopy cover to at least 20% of the site area, or retain their existing level of canopy cover, if already above 20% (policy EN5).
- Development will be steered towards areas with the lowest probability of flooding (policy EN6).
- Development shall not cause or be affected by unacceptable harm to human health, living conditions or the natural environment through pollution, contamination or instability (policy EN7).
- Any developments within the Air Quality Management Area, or any major developments anywhere in the Borough, must achieve air quality neutral standards and reduce exposure of occupiers to poor air quality caused by traffic (policy EN8).

Question 17	To what extent do you agree with the document's environmental policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

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

Housing

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

- New developments shall contain a mix of housing tenures, types and sizes (policy H1).
- Where ten or more homes are being built, at least 20% shall be affordable housing within the Rugby urban area, and 30% outside the urban area (policy H2).
- New dwellings for rural workers in countryside locations shall be permitted where there is an essential need for workers to live near their place of work and existing accommodation is not available locally (policy H3).
- Small sites for affordable housing shall be permitted on sites adjacent to settlements, including in the Green Belt, where there is a demonstratable need and they comply with other policies (policy H4).
- The size of replacement dwellings outside of settlement boundaries are restricted (policy H5).
- The provision of housing for older people and those with disabilities is supported, and the loss of such housing shall be resisted unless it can be demonstrated that there is no longer a need for the homes (policy H6).

- New minimum space standards, including the provision of private outdoor space, are applied to new homes to ensure they are of an adequate size for future residents (policy H7).
- The number and concentration of Houses in Multiple Occupation (HMOs) are restricted to limit their potential negative effects (policy H8).

Question 19	To what extent do you agree with the document's housing policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

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

Wellbeing

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

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

Question 21	To what extent do you agree with the document's wellbeing policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

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

Design

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

- New development shall create or contribute to well-designed places by complying with ten design principles (policy D1).
- Infill and householder development shall incorporate features of the street scene so that it appears cohesive. Extensions and alterations shall be subject to further restrictions seeking to ensure they are of a high-quality design (policy D2).
- Development shall adhere to principles intended to ensure that landscape design delivers greener spaces that are resilient to climate change, support biodiversity, encourage active travel and support wellbeing (policy D3).
- Development that sustains and enhances the Borough’s heritage assets will be supported and national policy shall be applied when considering proposals which have the potential to affect the significance of a heritage asset (policy D4).
- All developments that create the need for surface water drainage shall include Sustainable Drainage Systems for the management of surface water run-off, unless proven to be inappropriate (policy D5).

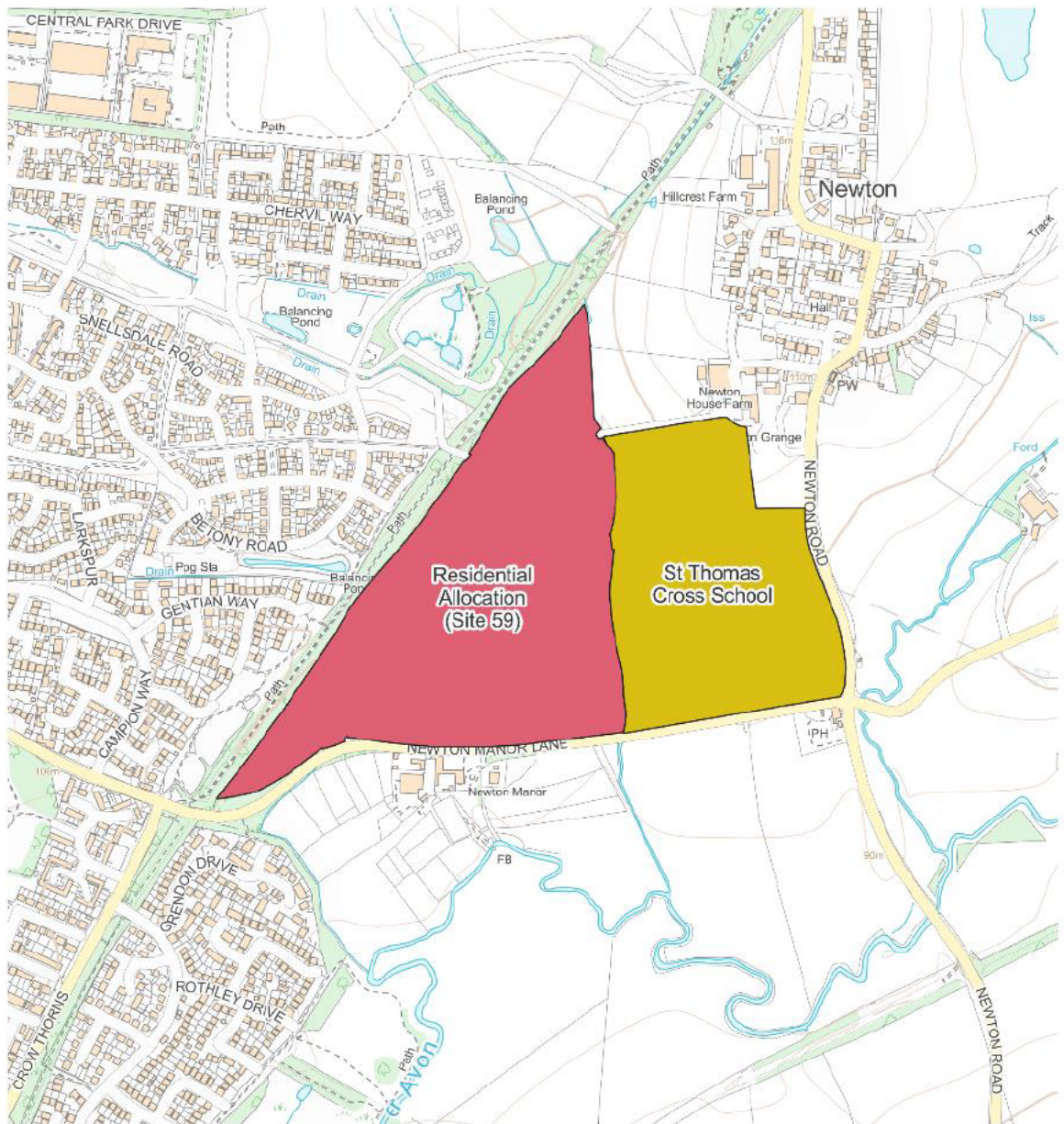
Question 23	To what extent do you agree with the document’s design policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 24	What are the reasons for your answer to question 23?
Richborough supports draft Policies D1-D5 which seek to create well designed new developments.	

Infrastructure

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

- Development shall be designed to promote active travel and public transport use, while ensuring safe access and mitigating adverse impacts on the highway network (policy I1).
- Adequate parking for bicycles and vehicles, including parking to meet the needs of people with disabilities or impaired mobility, shall be provided in accordance with set standards (policy I2).
- New communications infrastructure shall be permitted where it is justified and in accordance with national and local policies, and where opportunities for using existing sites do not exist. All major commercial and residential developments shall include full fibre broadband connections (policy I3).
- Development shall only be permitted where adequate infrastructure exists or will be provided. Such infrastructure may be delivered through planning conditions, planning obligations, or secured public funding (policy I4).
- Development of the new Rugby Parkway rail station is supported, and land is safeguarded for the delivery of the proposed Nuneaton Parkway station (policy I5).
- Land is allocated for a new sixth form secondary school at St Thomas Cross north east of Rugby town (see figure below), to be funded by contributions from all major residential developments in the Borough (policy I6).



Question 25	To what extent do you agree with the document's infrastructure policies?					
Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Do not know	No answer

Question 26	What are the reasons for your answer to question 25?
<p>Richborough fully supports Rugby Borough's approach to ensuring that the right infrastructure is in place to support development.</p>	

Any Other Feedback

Question 27	If there are any other comments you wish to make regarding the consultation document which you have not already given in your preceding answers, please enter them here.
<p>Alongside the answers provided to the consultation questions, please refer to the written representations in respect of the land at Wolvey Heath</p>	