



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	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text" value="Caroline"/>
Last Name	<input type="text"/>	<input type="text" value="Keane"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Senior Associate"/>
Organisation (where relevant)	<input type="text"/>	<input type="text" value="Newmark"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value="caroline.keane@nmrk.com"/>

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

Name or Organisation: Newmark on behalf of Richborough Commercial Limited

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

Paragraph	1.25-1.28	Policy	S3	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

Please refer to our submitted Representations Document for full response relating to Policy S3.

The draft Local Plan is unsound in respect of this policy for the following reasons:

- **Positively prepared** – Policy S3 fails to adopt a strategy for employment land for that will meet Rugby’s objectively assessed needs for local employment in full.
- **Justified** – Policy S3 fails to disaggregate strategic needs of the borough from its local needs; and places complete reliance on large strategic sites to deliver within them a minimal proportion of smaller industrial units without any policy mechanism to ensure such delivery. This is not an appropriate strategy, taking into account reasonable alternatives.
- **Effective** – Policy S3 will not allow local employment needs to be deliverable over the plan period.
- **Consistent with national policy** – Policy S3 is not consistent with the NPPF’s presumption in favour of sustainable development (Paragraph 11) which requires strategic policies, as a minimum to provide for objectively assessed needs. The Policy is also not consistent with Paragraph 86 which sets out that planning policies should “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.” ; or Paragraph 87 of the NPPF which requires “recognise and address the specific locational requirements of different sectors”, including (b) “storage and distribution operations at a variety of scales and in suitably accessible locations.”

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 following changes are required to Policy S3 to ensure that the plan and importantly the policy sets out what the development needs in Rugby are. Currently the proposed policy only identifies what the proposed supply would be.

- A. To meet Rugby Borough’s need and a proportion of the Coventry and Warwickshire FEMA’s need, including unmet needs arising from Coventry, for employment land in the period 2025-2042 the following levels of new employment development will be delivered:
- i. 19,761.3m² of use class E(g)(i) and (ii) office floorspace (approx. 3.95 hectares)
 - ii. ~~1,034,000m² (approx. 287 hectares) of floorspace for use classes B2, E(g) (iii), and B8~~
 - iii. 232,600 m² (approx. 58.15 hectares) of floorspace for use classes B2, E(g) (iii), and B8 to meet need arising in Rugby
 - iv. 791,5252 m² (approx. 284 hectares) of floorspace for use classes B2, E(g) (iii), and B8 to meet need arising within the FEMA
 - v. 10,000 m² (approx. 2.5 hectares) of floorspace for use classes B2, E(g) (iii), and B8 to meet Coventry City Council’s unmet local need.

This is a total of 1,034,000m² (approx. 287 hectares) of floorspace for use classes B2, E(g) (iii), and B8

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

The following Table B within Policy S3 will need to be expanded to include additional rows setting out:

- The quantum of completions
- The quantum of extant supply

Table B will also need to be expanded to include additional columns to identify which of the identified need is being met from that particular source (which is set out in rows).

We also consider that further modifications are necessary to the support text. The following should be inserted before current paragraph 1.25:

- A paragraph explaining that various needs will be met within Rugby Borough. This paragraph should set out what those needs are. A subsequent paragraph that then sets out the Local Needs arising in

Rugby is calculated by add local need for small units (units of less than 9,000m2) and 'big box' need on smaller sties (units of more than 9,000m2) together totals the 58.15ha identified in policy.

Further to the changes as set out to Policy S3, it will be necessary for further land use allocations to be made within the plan to meet all of the identified needs. Therefore sites, such as Richborough Park, capable of delivering small and mid-sized industrial units in locations suitable and attractive to local occupiers, should be allocated.

Without these changes, the Draft Local Plan will continue to replicate the failures of the extant Plan and will not meet the needs of local businesses in Rugby Borough.

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

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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:

Richborough Commercial is a leading strategic land promoter, acting on behalf of the landowner of Richborough Park – M45 Junction 1. Richborough consider it is necessary to participate in the hearing sessions to bring to the discussions the considerable assessment work they have undertaken in respect of the draft Local Plan, its evidence base and employment land supply which, as our representations have demonstrated shows the Local Plan to be unsound.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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

Name or Organisation: Newmark on behalf of Richborough Commercial Limited

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

Paragraph	1.35-1.37	Policy	S7	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

Please refer to our submitted Representations Document for full response relating to Policy S7.

The draft Local Plan is unsound in respect of this policy for the following reasons:

- Positively prepared** – As demonstrated in our representations, even if all committed and allocated small-unit floorspace were delivered in full, the Draft Local Plan would still fail to meet local needs, leaving a residual shortfall of approximately 76,871 sqm for small employment units. This shortfall arises from the Council’s own evidence and demonstrates that Policy S7 should be allocating smaller sites to meet local employment needs. The failure of Policy S7 to do this demonstrates that the Plan is not positively prepared.
- Justified** – Policy S7 currently seeks to meet its identified need for local employment floorspace through the delivery of smaller industrial units within two employment allocations (Coton Park East and Land at Walsgrave Hill). Both of these allocations are large strategic sites, where only a small proportion of smaller employment units is identified to be provided. We do not consider this the most appropriate strategy, when considered against reasonable alternatives, such as allocating available smaller sites which could be dedicated to the delivery of smaller employment uses in the short term.

- **Effective** - Policy S7 will not allow local employment needs to be deliverable over the plan period.
- **Consistent with national policy** – Policy S7 is not consistent with the NPPF’s presumption in favour of sustainable development (Paragraph 11) which requires strategic policies, as a minimum to provide for objectively assessed needs. The Policy is also not consistent with Paragraph 86 which sets out that planning policies should “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.” ; or Paragraph 87 of the NPPF which requires “recognise and address the specific locational requirements of different sectors”, including (b) “storage and distribution operations at a variety of scales and in suitably accessible locations.”

(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.

We consider the following modifications are necessary to make the Local Plan sound:

- Include the Site, (Site 133) ‘Richborough Park M45 Junction 1 as an employment allocation under Policy S7, including employment floorspace of “Circa 31,729 sqm to provide for smaller employment units to meet local employment needs.

Without these changes, the Draft Local Plan will continue to replicate the failures of the extant Plan and will not meet the needs of local businesses in Rugby Borough.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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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:

Richborough Commercial is a leading strategic land promoter, acting on behalf of the landowner of Richborough Park – M45 Junction 1. Richborough consider it is necessary to participate in the hearing sessions to bring to the discussions the considerable assessment work they have undertaken in respect of the draft Local Plan, its evidence base and employment land supply which, as our representations have demonstrated shows the Local Plan to be unsound.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices>

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

Name or Organisation: Newmark on behalf of Richborough Commercial Limited

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

Paragraph	3.1-3.3	Policy	E1	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

Please refer to our submitted Representations Document for full response relating to Policy E1.

The draft Local Plan is unsound in respect of this policy for the following reasons:

- Positively prepared** – Policy E1 seeks to protect employment land. Part B of the policy provides criteria for when applications for non-employment uses of land will be permitted on Strategic Employment Sites, and employment allocations. Considering the Local Plan's failure to meet Rugby's objectively assessed needs, this policy will only compound the existing deficit in employment floorspace. This further emphasises how critical it is for the Local Plan to adopt an employment strategy that as a minimum provides for Rugby's objectively assessed needs in full, but ideally exceeds this need to account for future losses of employment land which are enabled by Policy E1. The Policy is not positively prepared for failing to meet Rugby's objectively assessed needs.
- Justified** – Policy E1 will only compound the existing deficit in the boroughs employment land and as such is not an appropriate strategy.
- Effective** - Policy E1 will not allow local employment needs to be deliverable over the plan period.
- Consistent with national policy** – Policy E1 is not consistent with the NPPF's presumption in favour of sustainable development (Paragraph 11)

which requires strategic policies, as a minimum to provide for objectively assessed needs. The Policy is also not consistent with Paragraph 86 which sets out that planning policies should “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.” ; or Paragraph 87 of the NPPF which requires “recognise and address the specific locational requirements of different sectors”, including (b) “storage and distribution operations at a variety of scales and in suitably accessible locations.” as the NPPF’s presumption in favour of sustainable development requires

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.

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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: Newmark on behalf of Richborough Commercial Limited

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

Paragraph	3.4-3.6	Policy	E2	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	
(2) is Sound	Yes		No	X
(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.

Please refer to our submitted Representations Document for full response relating to Policy E2.

The draft Local Plan is unsound in respect of this policy for the following reasons:

- Positively prepared** – The policy is very restrictive and will limit available sites in sustainable and strategic locations coming forward for potential economic development, particularly where these are located outside of settlement boundaries. Considering the existing deficit in the boroughs employment land the restrictive strategy applied in Policy E2 will only compound Rugby's failure to meet their objectively assessed needs in full.
- Justified** – Policy E2 is too restrictive and will limit the development of sites in sustainable and strategic locations. Given the Council's unmet local employment needs, this is not an appropriate strategy.
- Effective** – We do not consider Policy E2 is flexible enough to respond to economic market demands or unexpected changes in the plans delivery of providing for local employment needs, including the reliance of the provision of smaller units within two large strategic sites. On this basis we do not consider the policy is effective.
- Consistent with national policy** – Policy E2 is not consistent with the NPPF's presumption in favour of sustainable development (Paragraph 11) which requires strategic policies, as a minimum to provide for objectively

assessed needs. The Policy is also not consistent with Paragraph 86 which sets out that planning policies should “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.” ; or Paragraph 87 of the NPPF which requires “recognise and address the specific locational requirements of different sectors”, including (b) “storage and distribution operations at a variety of scales and in suitably accessible locations.” as the NPPF’s presumption in favour of sustainable development requires

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 revised Policy E2 wording should be amended as follows:

- *(E) 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 propionate expansion of an existing building in employment use~~ **It would address an unmet need where the site is readily and regularly accessible by means of transport other than the private car; or***
 - *(iv) It would comprise the infilling of a vacant area within a site in employment use.*

(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)

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:

Richborough Commercial is a leading strategic land promoter, acting on behalf of the landowner of Richborough Park – M45 Junction 1. Richborough consider it is necessary to participate in the hearing sessions to bring to the discussions the considerable assessment work they have undertaken in respect of the draft Local Plan, its evidence base and employment land supply which, as our representations have demonstrated shows the Local Plan to be unsound.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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

Name or Organisation: Newmark on behalf of Richborough Commercial Limited

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

Paragraph	5.8-5.9	Policy	EN4	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	X
(2) is Sound	Yes		No	X
(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.

Please refer to our submitted Representations Document for full response relating to Policy EN4.

Legally Compliant:

- On the basis of Policy EN4 not being considered in the Council's SA Report, we consider the plan is **not legally compliant**.
- Considering that Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority, in preparing a local development document, must have regard to national policies and advice contained in guidance issued by the Secretary of State, we consider that inconsistency with national policy is a fundamental issue with the creation of Policy EN4 and deems the plan **not legally compliant**.

Soundness:

1. Positively Prepared:

- Policy EN4 is in direct conflict with national policy in enabling the delivery of sustainable development in order to meet objectively assessed local employment needs, as evidenced in the emerging Local Plan. Richborough Park – M45 Junction 1 can accommodate this need, and in restricting the development of the Site in a sustainable location, through the Area of Separation, the plan is not positively prepared.

2. Justified

- a. There is no consideration set out in the Areas of Separation Study to evidence that Policy EN4 is the most appropriate strategy when considered against reasonable alternatives, of which none are given.
- b. Policy EN4 is not founded on a robust and credible evidence base. The supporting Areas of Separation Study is based on descriptive considerations against unquantifiable evaluation criteria, where no detail, research or sources of evidence are applied.
- c. The supporting Areas of Separation Study does not take a systematic approach to assessment and the methodology used is not considered robust.
- d. The Council justifies applying an Area of Separation on the basis other statements of relevance in the NPPF and the Local Plan. On the basis that the development plan provides national and local controls on conservation and heritage and enhancement of landscapes and green infrastructure, these are already sufficient to deal with local landscape matters, and as such applying an Area of Separation in the emerging local plan is not justified.
- e. In the absence of any clear purpose for the Area of Separation, it is clear that the Area of Separation seeks the same purposes already defined by Green Belt policy. In recognising that Site (133) is not located within the Green Belt demonstrates that the Site has not previously met the bar for Green Belt land. On this basis, we do not consider that it is justified to create a new policy for substantial areas of open land, which were previously dismissed in the Local Plan as meeting the bar for Green Belt land.

3. Effective

- a. Policy EN4 is very restrictive. In blanketing land where development will only be permitted when it will not have a significant adverse impact on the "effectiveness of an Areas of Separation in protecting the identity and distinctiveness of settlements and preventing coalescence" does not provide any flexibility for sites to be assessed on a case-by case basis in accordance with delivering sustainable development. As such the policy is not effective.
- b. While the policy makes a weak effort at not precluding development within the Areas of Separation, where mitigation measures are incorporated, it is not clear how any mitigation measures could deem any form of development within the blanket designated Area of Separation as acceptable, where the policy is so restrictive and which fails to consider sites for the delivery of sustainable development on a case-by-case basis.

4. Consistent with national policy

- a. The Council's Areas of Separation Study acknowledges that National planning policy and guidance does not make any provisions for areas of separation (or equivalent concepts under different names). On this basis alone, Policy EN4 is not consistent with national policy.
- b. Paragraph 32 of the NPPF (2024) confirms that *"the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."* Policy EN4 is not founded on robust and credible evidence base, and therefore not consistent with national policy.
- c. Paragraph 16(f) of the NPPF sets out that plans should *"serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."* Duplication with other national controls within the NPPF in the form of the new Area of Separation is therefore not considered consistent with national policy.
- d. The Area of Separation Study provides no clear and convincing reasoning to justify the departure from national policy.

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.

In accordance with our response to Question 5 where we have considered the Plan is not legally compliant, or sound (on the basis of being positively prepared, justified, effective, or consistent with national policy, we seek complete removal of the Areas of Separation Policy from the Local Plan.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

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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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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**Rugby Borough Local Plan 2025-2042
Proposed Submission Consultation
Representations on behalf of
Richborough Commercial**

Richborough Park M45 Junction 1

Representations Document



Rugby Borough Local Plan Proposed Submission Consultation 2026: Representations

13 March 2026

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

**Re: Rugby Borough Local Plan 2025-2042 - Proposed Submission Consultation, January 2026:
Representations on behalf of Richborough Commercial – Richborough Park M45 Junction 1**

Dear Sir/Madam

We write to formally submit representations in response to the Proposed Submission Local Plan (Regulation 19) Consultation Document in respect of the Site known as Richborough Park – M45 Junction 1.

On behalf of our client, Richborough Commercial, these representations along with our past responses seek to promote the Site for an employment-led allocation in the new local plan; whilst also responding to the changes made to the Local Plan since the Preferred Option consultation.

Given the Regulation 19 status of the Local Plan, these representations focus on matters of legal compliance and the soundness of the Local Plan. In accordance with Paragraph 36 of the National Planning Policy Framework (December 2024) they set out our considerations in respect of the plan being positively prepared; justified; effective; and consistent with national policy.

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

Yours faithfully,

Caroline Keane
Senior Associate
Newmark Planning and Development

CarolineKeane@nmrk.com
Direct tel. [+44 207 333 6245](tel:+442073336245)
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1. Introduction

- 1.1. This Representations Document has been prepared by Newmark on behalf of our client, Richborough Commercial ('Richborough') in respect of the Site 'Richborough Park – M45 Junction 1' ('the Site').
- 1.2. These representations along with our past responses seek to promote the Site for an employment-led allocation; whilst also responding to the changes made to the Local Plan since the Preferred Option consultation, principally in respect of the new Policy EN4: Area of Separation which affects the Site, in addition to responding to the draft employment policies.
- 1.3. They follow on from previous representations submitted to the Local Plan Review: Issues and Options (Regulation 18) Consultation in October 2023 and the Preferred Options Consultation in May 2025, which included a Vision Document and illustrative masterplan, alongside a suite of technical reports and surveys undertaken by specialist consultants to promote the Site for an employment-led allocation.
- 1.4. Given the Regulation 19 status of the Local Plan, these representations focus on matters of legal compliance and soundness. In accordance with Paragraph 36 of the National Planning Policy Framework ('NPPF') (December 2024), they set out our considerations in respect of the plan being positively prepared; justified; effective; and consistent with national policy.
- 1.5. This submission is accompanied by:
 - The Representations Form for Local Plans;
 - The Employment Land Assessment (March 2026) prepared by LSH; and
 - Landscape Technical Note, prepared by Tyler Grange.
- 1.6. A copy of the representations to the Preferred Options (Regulation 18) Consultation; and Vision Document is also appended separately to this Report.

Richborough Commercial

- 1.7. 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).
- 1.8. 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 17 million sq ft of floorspace for various employment-generating uses, including industrial and logistics, retail, roadside schemes, data centres and mixed-use developments, in a variety of well-connected and sustainable locations.
- 1.9. 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.

1.10. 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.

Structure of Report

1.11. The remaining structure of this report is as follows:

- Chapter 2 – Richborough Park – M45 Junction 1
- Chapter 3 – Planning Policy and Context
- Chapter 4 – Comments on the Local Plan Evidence Base
- Chapter 5 – Comments on the Proposed Submission Local Plan
- Appendix A – Site Plan
- Appendix B – Illustrative employment-led scheme
- Appendix C – Employment Land Assessment, prepared by LSH (*Appended separately to Report*)
- Appendix D – Technical Note, prepared by Tyler Grange (*Appended separately to Report*)
- Appendix E – Copy of Representations to the Preferred Options (Regulation 18) Consultation (*Appended separately to Report*)
- Appendix F – Copy of the Vision Document submitted to the Preferred Options (Regulation 18) Consultation (*Appended separately to Report*)

2. Richborough Park – M45 Junction 1

- 2.1. The Site, known as Richborough Park – M45 Junction 1, shown at **Appendix A** comprises greenfield undeveloped land located to the northeast of the M45/A45 Thurlaston Interchange with the M45 bounding the site along the southern boundary and the B4429 Coventry Road located along the northern boundary. The settlement of Thurlaston is located to the south on the opposite side of the M45. Dunchurch is located further to the east and Rugby is further to the north of the site.
- 2.2. The Site totalling 29.09 acres (11.81 ha) comprises two adjacent parcels separated by Main Street. The larger eastern parcel comprises 19.9 acres (circa 8 ha); and the western parcel comprises 9.19 acres (circa 3.7 ha).
- 2.3. There is no relevant planning history on the Site. It has been assessed by the Council as 'Site 133: Land North of M45' in the updated Stage 2 Site Options Assessment (December 2025) and similarly by AECOM in the updated Sustainability Appraisal (SA) Report (December 2025).
- 2.4. The Site lies adjacent to, but outside of, land allocated for the South West Rugby Sustainable Urban Extension ('SUE'). It is not located within the Green Belt. The Green Belt boundary for this part of the Borough is located further to the west.
- 2.5. The Site is also located adjacent to Symmetry Park, to the north. This is a Tritax development that benefits from planning permission to deliver 2 million sq ft of logistics floorspace. The development is currently under construction and includes completed industrial units. Symmetry Park sits outside of the SUE, and its planning permission was standalone from the SUE allocation and aspirations.
- 2.6. Phase 1 of Symmetry Park has delivered 1 million sq ft of logistics space to Iron Mountain. The remaining balance of the site forms Phase 2 and has the capability to offer bespoke design and build facilities ranging between 100,000 sq ft (9,290 sqm) and 1 million sq ft (92,903 sqm) to meet an occupation date of 2026. Albeit, we note that Policy S3 of the Preferred Submission Local Plan identifies Phase 2 for the delivery of 60,000 sqm (645,835 sq ft) of employment land.
- 2.7. The wider area, within which Rugby is situated, is known as the 'Golden Triangle' for logistics and is an established key distribution and manufacturing location.
- 2.8. In addition to this Representations Document, this submission is accompanied by the Representations Form for Local Plans also is supported by an Employment Land Assessment (March 2026), prepared by LSH, and Landscape Technical Note to the Area of Separation, prepared by Tyler Grange.
- 2.9. Of note, representations made to the Preferred Options Consultation in May 2025 (**Appendix C**), which included a Vision Document and illustrative masterplan (**Appendix D**), alongside a suite of technical reports and surveys undertaken by specialist consultants (which can be provided upon request) to promote the Site for an employment-led allocation are still relevant. The suite of technical reports and surveys demonstrate that there are no significant constraints on the site that cannot be mitigated or overcome. In all respects, the Site is a deliverable employment opportunity that can create new employment opportunities in the short-term.

Opportunity for the site to meet local need for employment land

- 2.10. Development at the Site would help to directly address the identified void both for available smaller sites but also sites capable of delivering smaller unit sizes required by local businesses.
- 2.11. In line with Richborough's preference to deliver small to mid-box employment units at the Site to align with the recognised local employment need in the emerging Local Plan, we attach at **Appendix B** a refined illustrative employment only scheme to deliver small to mid-box, comprising 31,729 sqm (341,513 sq ft) of employment floorspace, which has been informed by the suite of technical studies.

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- 2.12. Notwithstanding the scheme shown at **Appendix B**, the four masterplan options previously presented at the Preferred Options stage (**Appendix D**) demonstrate the flexibility of the Site to respond to changing market demands, including for different commercial uses. This flexibility could prove to be useful as the Local Plan progresses, for example, when recognising that local businesses require both smaller and larger industrial units; and should the Council find itself in the position of needing to allocate additional land and/or indeed allocate a more diverse range of sites to accommodate a mix of future occupiers.
- 2.13. As such, we invite the Council to consider the evidence submitted under this Regulation 19 consultation addressing matters of legal compliance and soundness of the Local Plan; whilst also acknowledging our broader Regulation 18 submission when forming a view on the suitability of the Site to accommodate development.
- 2.14. Recognising the Site as an excellent opportunity to deliver employment-led development on the Site, it is important to recap on the Site's unique set of locational benefits given its position directly adjacent to:
- The M45/A45 Thurlaston Interchange;
 - The South West Rugby Strategic Site which, under the Preferred Options Consultation Document, is allocated for around 4,000 dwellings and circa 130,000 sqm (1,399,308 sq ft) of employment (non-office) floorspace for Phase 2 of the development; and
 - The permitted Symmetry Park development, of which Phase 1 has delivered 1 million sq ft (92,903 sqm) of logistics space.
- 2.15. As previously mentioned, the Site sits outside of the Green Belt and is located within the logistics 'Golden Triangle' with strong road frontage in a prominent strategic location on the motorway network.
- 2.16. Whilst the Site currently sits outside of the Rugby Urban Area, the South West Strategic Site allocation and the ongoing development of Symmetry Park will result in an urban transformation of this area. In light of this changing context, we consider that the Site could be brought forward within the new Local Plan to provide a complementary allocation to meet local economic needs, which would in turn align with the existing and future infrastructure being delivered in this location. It is also important to emphasise the clear change in direction of travel in national planning policy through the draft NPPF, which strengthens the presumption in favour of sustainable development, including on sites outside of settlement boundaries, and places a much stronger focus on economic development.
- 2.17. The Site's allocation will help address the current under provision in the emerging Local Plan.

Benefits of the proposed employment-led development of the Site

- 2.18. Of note when considering the benefits that will be deliverable as part of an employment-led development of the Site, the draft NPPF Policy E2 confirms that "*substantial weight*" should be given to "*the economic benefits of proposals for commercial development which allow businesses to invest, expand and adapt; especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy, support improvements in freight and logistics and/or reflect proposals for Industrial Strategy Zones and AI Growth Zones*".
- 2.19. Reflecting the above, this Chapter sets out the economic, social and environmental benefits.

ECONOMIC BENEFITS

- 2.20. The Site provides opportunities for flexible employment floorspace, meeting a range of business needs and providing economic benefits, including Business Rates, that are necessary to help the Council deliver the objectives of its Local Plan and its Economic Strategy for Rugby.

2.21. In this regard, and to better illustrate the benefits that could be accrued, a high-level Economic Benefit Assessment has been carried out by LSH. The assessment quantifies the economic uplifts of the proposed employment development of the site in terms of jobs growth, business rates and gain in local productivity (measured in Gross Value Added (GVA)).

2.22. This captures the quantified economic uplifts as follows:

- **Total Job Creation: 1,055 – 1,823 Full Time Equivalent (FTE)**
 - Direct Jobs: 620 – 1,215 FTE
 - Indirect Jobs: 248 – 365 FTE
 - Induced Jobs: 170 – 243 FTE
- **Total GVA: £49.4m - £83.5m**
 - Direct GVA: 25.7m - £50.3m
 - Indirect GVA: £13.6m – 19.9m
 - Induced GVA: £10.1m - £13.3m
- **Business Rates: £2.1m p/a**

SOCIAL BENEFITS

2.23. Some of the potential social benefits include:

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

ENVIRONMENTAL BENEFITS

2.24. Some of the potential social benefits include:

- Delivering a considered landscape strategy which will cultivate the natural screening to the Site but also provide intentional landscape infrastructure.

The protection and enhancement of existing features of the site that add value, including mature trees, hedgerows.

3. Planning Policy Context

National Planning Policy Framework (December 2024)

- 3.1. The NPPF (December 2024) places much more significant focus on supporting commercial development with various sectors, including industrial and logistics, giving more prominence for their crucial role in driving the economy.
- 3.2. Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
- a) *'all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
 - b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*
- 3.3. Chapter 6 of the NPPF sets out the Government's strategy to building a strong, competitive economy. Paragraph 85 states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. In doing this, the NPPF specifically sets out that planning policies should pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics, as well as being flexible enough to accommodate needs not anticipated in the plan and enabling a rapid response to changes in economic circumstances (Paragraph 86).
- 3.4. Recognising and addressing the specific locational requirements of different sectors is also central to the NPPF (Paragraph 87). This includes making provision for storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation, in addition to the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.
- 3.5. In assessing the Proposed Submission (Regulation 19) Local Plan, Paragraph 36 of the NPPF sets out that Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Draft National Policy Framework (December 2025)

- 3.6. On 16 December 2025, the Government published a revised NPPF for consultation until 10 March 2026. The revised NPPF is a comprehensive re-write of the existing NPPF and signals a fundamental reset of national policy. A final version of the draft NPPF 2025 is expected to be in Summer 2026.
- 3.7. Whilst not directly relevant in the examination of this Local Plan, it contains draft National Development Management Policies ('NPPF') which explain how development proposals will be assessed. Crucially, paragraph 2 of Annex 2 states that *“Development plan policies which are in any way inconsistent with the national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework”*. As will become apparent later in these representations, this could have very significant practical implications upon the determination of planning applications in Rugby Borough. In short, some of the draft policies set out in this Regulation 19 consultation are, as currently written, inconsistent with the draft NPPF (December 2025). As such, we respectfully request that this be taken into account by the examining Inspector(s) to avoid any unnecessary future appeals.
- 3.8. **In particular, Policy S5: Principle of development outside settlements** provides a framework which lists certain forms of development that *should* be approved outside settlements, unless the benefits of doing so would be substantially outweighed by any adverse effects. Included as part of the list of acceptable developments outside of settlements is development which would address an evidenced unmet need, especially where the development would be well related to an existing settlement and be of a scale which can be accommodated, considering the existing or proposed availability of infrastructure; or comprise major development for storage and distribution purposes which accords with policy E3.
- 3.9. **In addition, Policy E2: Meeting the need for business land and premises** confirms that **substantial weight** should be given to *“the economic benefits of proposals for commercial development which allow businesses to invest, expand and adapt; especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy, support improvements in freight and logistics and/or reflect proposals for Industrial Strategy Zones and AI Growth Zones;*
- 3.10. Furthermore, Policy E2 confirms that where a development proposal is required to demonstrate whether an unmet need exist (including to demonstrate compliance with Policy S5) consideration should be given to whether:
- a. *“Market signals indicate an undersupply of specific types of land or premises, taking into account the anticipated catchment area for the type of development proposed, the changing needs of different sectors and the availability of existing land and buildings; or*
 - b. *A development proposal’s specific locational requirements are met by existing allocations in the development plan. This includes, but is not limited to, situations where:*
 - i. *clusters or networks of businesses need to grow (such as clusters of knowledge and data driven, creative or high technology industries and associated facilities and infrastructure); or*
 - ii. *the availability of infrastructure (such as adequate grid connections or water and wastewater capacity) makes certain locations particularly important, including opportunities to co-locate large-scale generators and users of power (such as data centres); or*
 - iii. *proposals would meet a local, regional or national need for the provision of new, expanded or upgraded facilities that would result in more efficient, reliable or sustainable handling of goods (whether for their receipt, storage, processing, interchange or distribution).”*

3.11. **Policy E3: Freight and logistics** provides a dedicated national decision making policy to support the effective and efficient movement of goods. In doing so the draft NPPF seeks that development proposals for freight and logistics and associated infrastructure should:

- a. *“Have good access to transport networks (including via sustainable transport modes where possible) appropriate to the type of development;*
- b. *Be sited and designed to limit environmental impacts (such as through the co-location or intensification of facilities to limit vehicle movements, and sensitive building design and landscaping). The impact on local residents or other neighbouring uses should be acceptable, taking into account proposed mitigation, especially where night-time activity will be required; and*
- c. *Provide sufficient and secure parking for lorries or other vehicles to cater for the anticipated use.”*

4. Comments on the Local Plan Evidence Base

4.1. The Regulation 19 Local Plan is supported by a suite of evidence base documents. This section seeks to respond to some of the relevant strategic evidence documents in considering an employment-led development at the Site.

DOCUMENT	SUMMARY OF EVIDENCE	OUR RESPONSE
Policy EN4 Area of Separation Evidence Base		
<p>Area of Separation Study Report (November 2025)</p>	<p>The Study supports Policy EN4, which introduces an Area of Separation between Dunchurch and Thurlaston, including the Site (Site 133).</p> <p>The Study considers <i>“Should development occur within the areas that separate these villages from the town, there is a risk that the existing degree of separation will be diminished, or that settlements will eventually coalesce. Therefore, as part of the emerging local plan, the Council’s Development Strategy team wish to consider whether a policy can be introduced which provides some protection against this risk while not compromising the other aims of the plan.”</i></p> <p>The Study bases for assessment is on evaluation criteria comprising: settlement identity; physical and visual separation; and urbanizing influences.</p> <p>In assessing the Site (Site 133) the Study considers:</p> <ul style="list-style-type: none"> <i>“The development either site 18 or 133 (both of which are promoted for employment purposes) would significantly diminish the degree of separation between Thurlaston and Rugby.”</i> <i>“Site 133 is within c. 90 metres of the village’s northern boundary at its nearest point. At present, intervisibility between the village and the site is mostly obscured by vegetation, however, buildings constructed for employment use would be clearly visible from the bridge that provides the only vehicular access point into the village, and may be visible from certain vantage points within the settlement boundary too. The urbanising effect of this would have a detrimental impact on the village’s identity and diminish the sense of arrival and departure through a settlement gap.”</i> 	<p>Chapter 5 of the Report sets out our full response to the Policy and Area of Separation Study, in summary:</p> <ul style="list-style-type: none"> The Policy has no regard and is not consistent with national planning policy; The Policy is not founded on a robust and credible evidence base; The Areas of Separation Study does not take a systematic approach to assessment, and the methodology used is not considered robust; The Policy duplicates policy controls already provided in the development plan and national planning policy; The Policy seeks the same purposes already defined by Green Belt policy. In recognising that Site (133) is not located within the Green Belt, this demonstrates that the Site has not previously met the bar for Green Belt land. The Policy is very restrictive. In blanketing a substantial area of land where development will <i>only</i> be permitted when it will not have a significant adverse impact on the <i>“effectiveness of an Area of Separation in protecting the identity and distinctiveness of settlements and preventing coalescence”</i> does not provide any flexibility for sites to be assessed on a case-by case basis in accordance with delivering sustainable development. It is not clear how any mitigation measures could deem any form of development within the blanket designated Area of Separation as acceptable, where the policy is so restrictive and which fails to consider sites for the delivery of sustainable development on a case-by-case basis.

DOCUMENT	SUMMARY OF EVIDENCE	OUR RESPONSE
Strategic Assessments		
<p>Sustainability Appraisal (SA) (December 2025)</p>	<p>The aim of this SA is to consider the effects of the emerging plan and alternatives while also providing a view to minimise adverse effects and maximise the positive impacts. This SA sets out the significantly high need for employment land which has been accounted for as an established need within the borough.</p> <p>The report notes that the Site (133) lies outside the Green Belt and considers whether it could be allocated instead of Walsgrave Hill, which is within the Green Belt and has been confirmed as mostly not grey belt. The SA concludes that the location of Site 133 away from Coventry is a major factor weighing against its allocation. The SA also raises concern around Site 133 in-combination impacts with committed growth at SW Rugby.</p> <p>The Report considers additional employment omission sites previously discussed in the interim SA Report, but states these are sequentially less preferable than the sites appraised in December 2025. Replacing Walsgrave Hill (which the Plan seeks to allocate) with the two Thurlaston sites (Site 18 and Site 133) would result in a lower overall growth scenario, and is not the Council's preferred growth approach.</p> <p>The report concludes that the two Thurlaston sites together would deliver significantly less employment land than any of the other variable site options.</p>	<p>It is noted that the SA concludes that the two Thurlaston sites together would deliver significantly less employment land than any of the other variable site options considered. However, as these representations demonstrate, even if all of the committed sites are fully developed and the proposed allocations of Coton Park East, and Land at Walsgrave Hill provide a proportion of small units as indicated, there is still a deficit of 76,871 sqm (827,433 sq ft) of floorspace for smaller employment units that the Draft Local Plan will fail to meet in its current form.</p> <p>Accordingly, additional sites to deliver smaller employment units are required to meet Rugby's local employment needs.</p> <p>The Site comprises 11.81 ha, i.e. below the 25 ha threshold defined as 'Big box' strategic sites.</p> <p>As these representations set out, the Site provides an excellent opportunity to deliver local economic need.</p>
Site Selection Evidence Base		
<p>Stage 2 Site Options Assessment (December 2025)</p>	<p>This report provides an assessment of the Site in relation to transport, ecology, landscape, heritage, constraints and the opportunities associated with the Site. The key points have been highlighted below:</p> <p><u>Transport:</u> The Site is accessed from the B4429 and has a connectivity score of 38 out of 45. The current level of concern for this site is medium.</p> <p><u>Ecology:</u> There will be no adverse effects on Draycote Meadows SSSI from any development on the site.</p> <p><u>Landscape:</u> The overall landscape sensitivity is medium to low.</p>	<p>This report demonstrates that the Site represents a highly suitable and sustainable location for employment development, with no identified constraints when assessed against key planning considerations, including transport, ecology, landscape, and wider constraints, other than the emerging Area of Separation policy, which we respond to in detail at Chapter 5 of this Report.</p> <p>The considerations of the Assessment identify the Site opportunity for employment uses.</p>

DOCUMENT	SUMMARY OF EVIDENCE	OUR RESPONSE
	<p><u>Other Constraints:</u> The Site is not within the Green Belt, constraints for surface water drainage are low and the site would form part of an Area of Separation.</p> <p><u>Opportunities:</u> Employment</p>	
Landscape Evidence Base		
<p>Landscape Sensitivity Assessments (March 2025)</p>	<p>This report assesses the Site (Site 133) in respect of its landscape sensitivity. Of note, the assessment sets out that:</p> <p>The agricultural character of the site is heavily impinged upon by the man-made influences in close proximity.</p> <p>The site does not feel remote due to the urbanising effects of the warehouses of Symmetry Park. It is not tranquil at all due to the constant noise of traffic from the Coventry Road and M45.</p> <ul style="list-style-type: none"> The site is visible from the grounds of the Dunchurch Baptist Church to the east, and partly visible from some of the dwellings on Coventry Road. Clear views of the site can be gained from Main Street bridge, and there is some limited intervisibility of the site with Thurlaston village. <p>In respect of the overall landscape sensitivity (landscape, visual and value) the assessment concludes that:</p> <p>This is a medium sized site consisting of two arable fields just to the north of Thurlaston. It is enclosed by the M45 to the south and Coventry Road to the north. Sensitivities are only likely to arise from the site's intervisibility with adjacent properties on Coventry Road, and from the natural value of the trees and hedges that enclose the site and from its contribution to the rural setting of Thurlaston.</p>	<p>As evidenced by our own technical analysis of the Site, set out in the Vision Document, we agree with the Council's key conclusion that there are limited landscape sensitivities that would preclude future development opportunities of the Site.</p> <p>Our Landscape Assessment recommends:</p> <ul style="list-style-type: none"> Retaining and enhancing the existing tree and hedgerow network, where possible. Including the replacement planting on-site, where loss occurs, to facilitate access Including a development offset (circa 10-15m) and lower building heights to the south of the Site, to allow for mitigation planting to soften views and prevent skyline intrusion from the south; and Introduce new tree and woodland planting within the southern offset and within a northern boundary landscape buffer to mitigate visual impact at local level and strengthen landscape character. <p>Our assessment concludes that with sensitive design and strategic planting, the Site has the potential to accommodate new development without undue adverse effects on landscape character or views.</p>
Environment Evidence Base		
<p>Ecological Constraints Assessment (March 2025)</p>	<p>This report assesses the Site (Site 133) in respect of ecological constraints. The assessment sets out that:</p> <ul style="list-style-type: none"> There are no LWSs located within or adjacent to the site. There are no habitats of medium to high distinctiveness located within the site. Dense scrub and planted broadleaved woodland are located adjacent to site boundaries. 	<p>The Vision Document includes our ecological assessment of the Site.</p> <p>It concludes that, by following the recommended mitigation measures set out in this assessment, and any mitigation as a result of any further surveys, ecology should not be a constraint to the Proposed Development.</p>

DOCUMENT	SUMMARY OF EVIDENCE	OUR RESPONSE
	<ul style="list-style-type: none"> There are no records of irreplaceable habitat located within, within 50m of the site boundary, or hydrologically linked to the site. 	
Development Needs Evidence Base		
Development Needs Topic Paper (December 2025)	<p>This paper summarises the Council's position on future development needs regarding the strategy for employment land.</p> <p>The paper sets out a significant need for industrial land on smaller sites comprising Class E (g) (iii), B2 and B8 uses which is delivered on sites less than 25 hectares.</p> <p>More specifically, there is a requirement for large units of 9,000 sqm (100,000 sq ft) or more that are located on smaller sites.</p> <p>Approximately 60.8 ha of land is required to meet the need for industrial land on smaller sites. In total, 243,200 sqm (2,617,783 sq ft) of floorspace is needed to meet this demand.</p>	<p>As evidenced in the supporting Employment Land Assessment, even if all of the committed sites and proposed allocations identified in the emerging Local Plan are developed, there is still a deficit of 76,871 sqm (827,433 sq ft) of floorspace for smaller employment units.</p> <p>According, additional sites to deliver smaller employment units are required to meet Rugby's local employment needs.</p> <p>The Site comprises an 11.81 ha, i.e. below the 25 ha threshold defined as 'Big box' strategic sites.</p> <p>As these representations set out, the Site provides an excellent opportunity to deliver local economic need.</p>
Rugby Borough Council Economic Strategy 2025-2035 Consultation Document (March 2025)	<p>Rugby Borough Council launched its new Economic Strategy for consultation in March 2025. The strategy aims to place businesses and people at the heart of the Council's plan for growth, outlining how the economy will develop between 2025 and 2035.</p> <p>Recognising how Rugby works as an economy, the strategy has been split into three core priorities focusing on People, Business and Growth. Each theme has a number of commitments on how the Council, working with its partners, stakeholders, businesses and residents, aims to succeed.</p> <p>Some key areas of the Strategy are highlighted below:</p> <ol style="list-style-type: none"> One of the stated outcomes of the Strategy is "a growing and diverse business base through the provision of employment space to meet demand". The Strategy recognises the potential for the logistics sector to secure skilled jobs to support automation and other technologies but also the barriers that exist in finding skilled workers within the local population. The Council have stated that the strategy will be funded by investing savings from council tax and 	<p>LSH submitted representations on behalf of Richborough Commercial to the public consultation on Rugby's new Economic Strategy which closed on 7 April 2025.</p> <p>We respond below in respect of each of the key areas as summarised in the adjacent column:</p> <ol style="list-style-type: none"> Richborough welcomes the stated outcome of growing a diverse business base. However, achieving this outcome requires a flexible approach to capture the missed opportunities of the recent past. This includes the promotion of sites that provide a range of unit types and sizes to respond to market requirements. Recognition should also be given to sites where there is an opportunity to provide local employment premises close to existing logistics locations which benefit from established infrastructure and a labour pool. Richborough welcomes the Strategy's objective to forge alliances between businesses and education to provide training and giving access to better jobs with better pay. Promotion of the Site (Site No. 133) through the Local Plan process would provide, opportunities for flexible floor space, meet a range of business needs

DOCUMENT	SUMMARY OF EVIDENCE	OUR RESPONSE
	<p>business rates (reserves) and investing Community Infrastructure Levy collected from development.</p> <p>4. The priority to “<i>Developing our business support infrastructure</i>” is identified as key to enabling every business to succeed. The strategy identifies the role of allocations in the Local Plan to ensure the delivery of high quality small to medium-sized industrial space in accessible locations across the borough.</p> <p>5. The strategy recognises the existing barriers faced by local businesses.</p> <p>The Strategy’s economic vision explicitly expresses that a top priority of the emerging Local Plan is “<i>to ensure the delivery of high quality small to medium size industrial space in accessible locations across the borough</i>”.</p>	<p>and provide the economic benefits, including business rates, that are necessary to help the Council deliver its Economic Vision for Rugby.</p> <p>4. While this priority “<i>Developing our business support infrastructure</i>” is welcomed, in order to achieve meaningful progress towards achieving growth of the economy within the 10-year time period of the Strategy, it can’t solely rely on the provision of sites and premises through Local Plan allocations. The plan period covers a longer-term timescale of 2024 to 2045.</p> <p>Therefore, the Economic Strategy should place greater emphasis on facilitating economic growth in the shorter term. This should recognise the ability of sites that are located in sustainable accessible locations, that already benefit from the infrastructure provided by the large-scale investment in the logistics sector that has occurred under the current local plan. By actively encouraging complementary growth in these locations to address local needs, the Strategy will achieve its aim of boosting the economy in the short term with a form of development that will dovetail with the emerging Local Plan without being held up by its differing timescales. One such location is that of the Site promoted in these representations (Site No. 133).</p> <p>5. In recognising the existing barriers faced by local businesses, it is pertinent to assess the supply of employment land that has come forward since the adoption of the Local Plan, where very few small to medium sized units have come forward on new purpose-built land to support such local businesses.</p> <p>Accordingly, the Strategy should look to prioritise the importance of providing new sites, enabling existing local businesses to relocate from unsuitable sites that no longer fit their purpose, to those which are better located, provide high quality premises and are constructed to high sustainability standards.</p> <p>In addition to the promotion of additional employment land, the Economic Strategy should look to prioritise sites that can be developed for a flexible range of employment uses and sizes. The need for ‘grow-on’ space does not necessarily just mean small size units. This would ensure greater alignment with the evidence base behind the emerging Local Plan Regulation 18 consultation, which differentiates a ‘local’ employment need for industrial land on smaller sites of less than 25 hectares in area</p>

DOCUMENT	SUMMARY OF EVIDENCE	OUR RESPONSE
		<p>and a need for industrial land on larger 'strategic' sites.</p> <p>Promotion of the Site for an employment-led allocation, as sought in these representations would help address the aims of Rugby's Economic Strategy.</p>
<p>Coventry & Warwickshire HENDNA – WMSESS Alignment Paper (September 2024)</p>	<p>This paper considers the relationship between employment land need recommendations in the West Midlands Strategic Employment Sites Study (WMSESS) 2023/24 and the Coventry and Warwickshire Housing and Economic Development Needs Assessment (C&W HEDNA) 2022.</p> <p>The WMSESS study and the C&W WMSESS Alignment Paper concludes that there is greater need for local employment land over strategic land in the C&W area, and in particularly in the Rugby BC area.</p>	<p>As set out in these representations, the Alignment Paper (2024) found that no large units have been completed on smaller sites in Rugby BC since 2011 and only 2% (5 ha out of 244 ha) of Coventry & Warwickshire's Non-Strategic Site supply is located in Rugby BC.</p> <p>This highlights a continued lack of provision for smaller employment units that the emerging Local Plan should seek to address.</p>
<p>West Midlands Strategic Employment Sites Study (WMSESS) (2023/24) – (August 2024)</p>	<p>This report covers a study area across 24 authorities in the broad market areas of Greater Birmingham, Coventry and Warwickshire and Staffordshire.</p> <p>The WMSESS (2024) defines Strategic Sites as typically over 25 ha and acknowledges that large units (greater than 9,000 sqm / 100,000 sq ft) can be accommodated on smaller sites.</p> <p>The report concludes that the apportioned need for Area 7, which includes Coventry and Rugby, is an overall indicative need for between 200 – 375 ha of land on additional strategic sites across the Coventry and Warwickshire sub-region.</p> <p>Whilst not identifying specific sites, the report does include both road-based and rail-based Opportunity Areas on plans.</p>	<p>The report provides an assessment of strategic employment sites defined as typically over 25 ha. The Site comprises 11.81 ha and would not be considered a Strategic Site for the purposes of an allocation.</p> <p>Given the size of the Site and the Council's pattern of focusing on allocating larger sites, these representations identify the opportunity for the Site to meet the need for smaller sites.</p> <p>However, the WMSESS does acknowledge that large units (greater than 9,000 sqm / 100,00 sq ft) can be accommodated on smaller sites.</p> <p>The Illustrative masterplan for the Site (Appendix B) demonstrates how the Site can be developed to provide small to mid-box employment units. The four illustrative masterplan options set out within the Vision Document to the Preferred Options (Regulation 18) Consultation (Appendix D) also reflect the Sites ability to provide a flexible range of unit sizes and configurations to demonstrate that the needs of a range of local businesses could be met by development at the Site.</p>

5. Comments on the Proposed Submission Local Plan

5.1. The Chapter provides our comments on the soundness of the following Local Plan sections and policies:

- Objectives and Strategic Priorities;
- Policy S3: Strategy for Employment Land;
- Policy S7: Employment Allocations;
- Policy E1: Employment Land Protection;
- Policy E2: Employment Development; and
- Policy EN4: Area of Separation.

5.2. Our response to the employment related policies (Policy S3; S7; E1; and E2) is supported by the Employment Land Assessment, prepared by LSH (**Appendix C**). Our response to Policy EN4 is supported by the Landscape Technical Note, prepared by Tyler Grange (**Appendix D**).

Objectives and Strategic Priorities

5.3. While the Local Plan sets out five objectives, and seven strategic priorities, we note that it does not set out any overarching Vision for the 17-year plan period which we consider unusual, and contrary to paragraph 15 of the NPPF. Positive Local Plan visions are helpful to act as strategic, long-term blueprints for how an area will evolve, providing a purpose for the plan and guiding strategic direction.

5.4. Notwithstanding this, Objective 1 expresses an ambition to “*Support the diversification and growth of Rugby Borough’s economy in sustainable locations*”. While Richborough support this ambition, we do not consider the Local Plan, as currently drafted, achieves diversification or growth given its failure to meet the quantum of smaller unit floorspace required to meet local employment needs in full; and its failure to allocate smaller sites which can deliver units required for local businesses.

5.5. We also note that “*provision of employment land*” is listed as a strategic priority. However, the strategy proposed by the policies within the emerging Local Plan only prioritises employment land on strategic sites; a strategy that is also relied upon in the adopted Local Plan. As such, the unmet need for local businesses is even more compounded. Furthermore, there is no attempt to disaggregate between strategic and local need requirements to ensure that provision of employment land for local businesses will also be achieved.

5.6. As these representations demonstrate, the development of Richborough Park – M45 Junction 1 would help to directly address the identified void both for available smaller sites but also sites capable of delivering smaller unit sizes required by local businesses.

5.7. We do not consider that either Objective 1 or the provision of employment land strategic priority is achieved within Policy S3, which establishes the Council’s strategy for employment land.

Policy S3: Strategy for Employment Land

- 5.8. Policy S3 sets out the Council's strategy for employment land. The policy lists locations which are earmarked to deliver Class B2, B8 and Eg (iii) uses, and provides the approximate quantum of floorspace to be delivered in each location. The supporting text at Paragraph 1.25 acknowledges that *"delivery in recent years has skewed towards large units with fewer smaller units for SMEs"*, albeit claims to address this through the allocation of *"some"* sites under Policy S7 which will *"require smaller units"*.
- 5.9. As evidenced in the Employment Land Assessment (**Appendix C**), the Council's evidence base identifies a local industrial need of 58.15 hectares over the plan period, of which approximately 25.45 hectares relates specifically to small units below 9,000 sqm. However, existing completions, commitments, and draft allocations provide only a very limited proportion of this requirement, leaving a substantial deficit of 76,871 sqm of floorspace that the Draft Local Plan will fail to meet in its current form, even if all identified supply is delivered. Policy S3 is therefore fundamentally flawed in failing to meet Rugby's objectively assessed needs for local employment. For this failure alone, the policy is not **positively prepared, effective or consistent with the NPPF**.
- 5.10. In recognising the existing barriers faced by local businesses, the Council's emerging Economic Strategy (March 2025) explicitly expresses that a top priority of the emerging Local Plan is *"to ensure the delivery of high quality small to medium size industrial space in accessible locations across the borough"*.
- 5.11. The Council's recognised prioritisation of delivering small to medium sized units is not addressed in Policy S3. Firstly, Policy S3 fails to disaggregate strategic needs of the borough from its local needs; and secondly, the policy places complete reliance on large strategic sites to deliver, within them, a minimal proportion of smaller industrial units without any policy mechanism to ensure such delivery.
- 5.12. Furthermore, the two strategic allocated sites (Coton Park East; and Land at Walsgrave Hill), which are expected to provide employment space in smaller units, are heavily restricted to the very smallest of size bands. Coton Park is allocated to provide smaller units up to only 1,500 sqm in size; and Land at Walsgrave Hill is allocated for smaller unit provision, ranging from 60 sqm up to 1,500 sqm.
- 5.13. The plan's strategy to meeting the borough's need for local employment is therefore undermined by its overly narrow focus, which is contrary to the evidence base which defines local need as units below 9,000 sqm. As such, another fundamental flaw in the plan's employment land strategy is its failure to make any provision for units between 1,500 sqm and 9,000 sqm, which represent a critical grow-on segment for local businesses. This is not an appropriate strategy, and the policy is therefore **not justified**.
- 5.14. It is also critical to consider the Local Plan's required contribution of 2.5 ha to meet Coventry's unmet local need. While the adopted Local Plan had intended for Ansty Park and Prologis Park to meet Coventry's need, both sites are now substantially built out. Given land at Walsgrave Hill is geographically and functionally linked to Coventry and benefits from strategic infrastructure improvements, any small-unit provision at this location is likely to meet Coventry's unmet needs. The consequence of this is further depletion of the plan's ability to provide smaller units to meet the local Rugby's own local employment needs. Without a policy mechanism to protect the need for smaller units, the floorspace intended for small and medium businesses may not be delivered.
- 5.15. Policy S3 demonstrates a weak understanding of the local employment market and fails to align with the Council's own evidence. Indeed, given these failures, we consider that the allocated sites of Coton Park East and Land at Walsgrave Hill are more likely to come forward for the delivery of strategic units only. In the circumstances where there may be some delivery of smaller units on these sites, this is unlikely to be facilitated in the short term, and in the case of Land at Walsgrave Hill, is more likely to meet Coventry's unmet local need, rather than Rugby's.

- 5.16. Reverting to Objective 1 of the Local Plan which seeks to “*Support the diversification and growth of Rugby Borough’s economy in sustainable locations*”, Policy S3 does not allow for such diversification, but rather pursues the same failed strategy applied in the adopted Local Plan, which was unsuccessful in delivering smaller units for local employment needs.
- 5.17. For the reasons set out above, Policy S3 is not consistent with the NPPF which at Paragraph 86 states that planning policies should “*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*”. In addition, Policy S3 does not, as Paragraph 87 of the NPPF requires, “*recognise and address the specific locational requirements of different sectors*”, including (b) “*storage and distribution operations at a variety of scales and in suitably accessible locations*”.
- 5.18. In respect of the draft NPPF (2025), whilst we acknowledge this is not directly relevant in the examination of this Local Plan, we respectfully request the Inspector be aware of the proposed introduction of Policy S5, which would allow development addressing an evidenced unmet need outside of settlement boundaries, which is the case here.
- 5.19. Without a fundamental change to the Council’s strategy for employment land, the emerging Local Plan will fail, as the adopted plan has, to provide small units to meet Rugby’s local employment needs.
- 5.20. The required solution to Policy S3 is to adopt a strategy that disaggregates a required quantum of employment land for local needs; and allocates smaller sites to facilitate the delivery of this need within smaller units. As demonstrated in these representations, Richborough Park – M45 Junction 1 is capable of delivering the exact type of employment floorspace that the emerging Local Plan fails to meet. The site is less than 25 ha and provides an opportunity for the short-term delivery of smaller units within a smaller site, providing approximately 11 ha and circa 31,729 sqm (341,513 sq ft) of local employment floorspace in a sustainable location (as shown in the illustrative scheme at **Appendix B**). This will help Rugby address the current under provision in the emerging Local Plan.

MAIN MODIFICATION

- 5.21. The following changes are required to Policy S3 to ensure that the plan sets out what the development needs in Rugby are. Currently, the proposed wording only identifies what the proposed supply would be.

A. *To meet Rugby Borough’s need and a proportion of the Coventry and Warwickshire FEMA’s need, including unmet needs arising from Coventry, for employment land in the period 2025-2042 the following levels of new employment development will be delivered:*

- i. *19,761.3m2 of use class E(g)(i) and (ii) office floorspace (approx. 3.95 hectares)*
- ii. *~~1,034,000m2 (approx. 287 hectares) of floorspace for use classes B2, E(g) (iii), and B8~~*
- iii. ***232,600 m2 (approx. 58.15 hectares) of floorspace for use classes B2, E(g) (iii), and B8 to meet need arising in Rugby***
- iv. ***791,5252 m2 (approx. 284 hectares) of floorspace for use classes B2, E(g) (iii), and B8 to meet need arising within the FEMA***
- v. ***10,000 m2 (approx. 2.5 hectares) of floorspace for use classes B2, E(g) (iii), and B8 to meet Coventry City Council’s unmet local need.***

This is a total of 1,034,000m2 (approx. 287 hectares) of floorspace for use classes B2, E(g) (iii), and B8

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

- 5.22. The following Table B within Policy S3 will need to be expanded to include additional rows setting out:

- *The quantum of completions*
- *The quantum of extant supply*

5.23. Table B will also need to be expanded to include additional columns to identify which of the identified need is being met from that particular source (which is set out in rows).

5.24. We also consider that further modifications are necessary to the supporting text. The following should be inserted before current paragraph 1.25:

- *A paragraph explaining that various needs will be met within Rugby Borough. This paragraph should set out what those needs are. A subsequent paragraph that then sets out the Local Needs arising in Rugby is calculated by adding local need for small units (units of less than 9,000m²) and 'big box' need on smaller sites (units of more than 9,000m²) together totals the 58.15ha identified in policy.*

5.25. In addition, it will be necessary for further allocations to be made within the plan to meet all of the identified needs. Therefore, sites capable of delivering small and mid-sized industrial units in locations suitable and attractive to local occupiers, such as Richborough Park, should be allocated.

5.26. Without these changes, the Draft Local Plan will continue to replicate the failures of the extant Plan and will not meet the needs of local businesses in Rugby Borough.

Policy S7: Employment Allocations

5.27. The Employment Land Assessment (**Appendix C**) provides a detailed review of Rugby's Local Plan evidence base, including the Development Needs Topic Paper, which identifies a local industrial need of 243,200 sqm and 60.8 ha.

5.28. The emerging Local Plan aims to meet local industrial needs through completions, existing commitments and new allocations.

5.29. Firstly, the combination of total completions on small sites (10,600 sqm) and total commitments (13,429.4 sqm) provides a total of 24,029 sqm of floorspace, which is the equivalent of 6.01 ha. When subtracted from the gross local industrial need figure of 243,200 sqm and 60.8 ha, this leaves a residual need of 219,170.6 sqm and 54.79 ha. This figure should be met through allocations in the Local Plan.

5.30. Policy S7 of the Draft Local Plan identifies five proposed employment allocations to meet Rugby's employment land needs, alongside sites with planning permission. Of the five employment allocations, only two are identified to provide floorspace in smaller units to meet Rugby's local employment land needs:

- **Coton Park East (Site 64):**
 - Coton Park East is a strategic site totalling 35.97 ha.
 - The allocation seeks to provide 115,000 sqm for employment floorspace.
 - Of this, the allocation seeks provision of 4,000 sqm of space in smaller units of up to 1,500 sqm for small and medium sized businesses. These smaller buildings should be located at the southwestern corner of the site to better relate to the scale of existing employment buildings on Central Park Drive and to reduce impact on adjacent homes.
- **Land at Walsgrave Hill (Site 121)**
 - Land at Walsgrave Hill is a strategic site totalling 201.8 ha.
 - The allocation seeks to provide 290,000 sqm for employment floorspace.
 - Of this, the allocation seeks provision of 7,500 sqm of floorspace in small to medium size buildings (with unit sizes ranging from 60 sqm up to 1,500 sqm).

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- 5.31. The provision of employment floorspace in small to medium sized units identified in the Coton Park East and Land at Walsgrave Hill allocations totals only 11,500 sqm for local industrial need. This represents approximately 1.3% of total allocated employment floorspace.
- 5.32. Even if all of the committed sites are fully developed (noting that nearly 50% of committed floorspace is on Site A and Site B at Europark, that has yet to be developed despite being included in the supply for 15 years), and the proposed allocations provide small units as indicated, there is still a deficit of 76,871 sqm of floorspace that the Draft Local Plan will fail to meet in its current form.
- 5.33. In light of this remaining deficit for smaller units, the Local Plan fails to meet Rugby's objectively assessed needs for local employment and is **not positively prepared or effective**.
- 5.34. Compounding this failure, we also have considerable concerns in respect of the two allocated sites' ability to deliver the required provision of smaller units set out in the Local Plan. As the Employment Land Assessment (**Appendix C**) details in full, it is important to note that:
- In the case of **Coton Park East**, the adopted Local Plan also requires the delivery of small units. However, this was not secured in practice, with consent subsequently granted for a single large B8 unit. The emerging Local Plan proposes to repeat this approach on adjacent land, despite a recent marketing assessment demonstrating that the location was not viable for small-unit delivery.
 - Similarly, the allocation at **Walsgrave Hill** is geographically and functionally linked to Coventry and benefits from strategic infrastructure improvements. Any small-unit provision at this location is likely to meet Coventry's unmet needs rather than those of Rugby Borough.
- 5.35. In the absence of robust policy mechanisms, there is no evidential basis to conclude that small units will be delivered on these sites.
- 5.36. In respect of more general concerns, given the identified provision of local employment units being met as a small proportion of large strategic sites, we question the timescales of delivery of these large sites, which by their very nature need more infrastructure and longer delivery timescales, often with local employment needs provided at the back end of development programmes.
- 5.37. Reflecting the above concerns, we do not consider the Local Plan's reliance on large strategic sites to deliver within them a minimal proportion of smaller industrial units is an appropriate strategy which takes into account the reasonable alternatives. It is therefore **not justified**.
- 5.38. The Draft Local Plan's approach to small units is further undermined by its overly narrow focus on units between 60 sqm and 1,500 sqm. The evidence base defines local need as units below 9,000 sqm, yet the Plan makes no provision for units between 1,500 sqm and 9,000 sqm, which represent a critical grow-on segment for local businesses. This demonstrates a weak understanding of the local employment market and fails to align policy with the Council's own evidence.
- 5.39. Finally, we do not consider that Policy S7 is **consistent with national policy** in its failure to apply the presumption in favour of sustainable development (NPPF, Paragraph 11) which sets out that "*strategic policies should, as a minimum, provide for objectively assessed needs*"; or in recognising and addressing the specific locational requirements of different sectors, including making provision for storage and distribution operations at a variety of scales and in suitably accessible location (NPPF, Paragraph 87).

5.40. Therefore, to ensure the delivery of smaller units to meet the Local Plan's deficit for local employment needs, we consider that smaller sites should be allocated, which can deliver dedicated units for local employment needs. Development at Richborough Park – M45 Junction 1 would help to directly address the identified void, both for available smaller sites but also sites capable of delivering smaller unit sizes required by local businesses. This could be dealt with by way of a Main Modification.

5.41. As such, we would draw the Inspector's attention to Richborough's proposals for the site, as described in Section 2 of these representations.

MAIN MODIFICATION

5.42. We consider the following modifications are necessary to make the Local Plan sound:

- Include the Site, (Site 133) 'Richborough Park M45 Junction 1 as an employment allocation under Policy S7, including employment floorspace of "Circa 31,729 sqm to provide for smaller employment units to meet local employment needs".

Policy E1: Employment Land Protection

5.43. While Policy E1 seeks to protect employment land, Part B of the policy provides criteria for when applications for non-employment uses of land will be permitted on Strategic Employment Sites, and employment allocations. The criteria include when the site has been unsuccessfully marketed for employment use for a continuous period of at least 24 months; and when a development appraisal demonstrates that the redevelopment or refurbishment of the site for employment use would not be viable.

5.44. Considering the Local Plan's failure to meet Rugby's objectively assessed needs, this policy will only compound the existing deficit in employment floorspace. This further emphasises how critical it is for the Local Plan to adopt an employment strategy that as a minimum provides for meeting Rugby's objectively assessed needs in full, as the NPPF requires, but ideally should exceed this need to account for future losses of employment land which are enabled by Policy E1.

5.45. In respect of Policy E1, the Local Plan is therefore **not positively prepared** in meeting, as a minimum, Rugby's objectively assessed needs; **not justified** in applying an appropriate strategy; **not effective** in delivering needs over the plan period and is **not consistent with national policy**.

Policy E2: Employment Development

5.46. Policy E2: 'Employment Development' sets out the Council's emerging strategy for employment development in the Borough. The policy only allows for employment development within settlement boundaries. Outside settlement boundaries, development for employment uses will only be permitted under very rigid and restrictive criteria.

5.47. Given the deficit of 76,871 sqm of floorspace for smaller units that the Local Plan will fail to meet in its current form, we consider this policy to be very restrictive, in particular Part E which seeks to limit available sites in otherwise sustainable locations coming forward for economic development. As such the policy is not **positively prepared or effective**.

5.48. Adopted Policy ED3 also includes a similar set of restrictive criteria for such development, albeit one criterion allows for the *"sustainable expansion of an existing group of buildings for business uses where the site is readily and regularly accessible by means of transport other than the private car"*.

5.49. We disagree with emerging Policy E2 in this regard, which applies a more restrictive approach, at Part E iii, which states “*it would comprise a proportionate expansion of an existing building in employment use*”. The approach applied in emerging Policy E2 does not take account of Paragraph 86(e) of the NPPF (December 2024), which seeks planning policies to be flexible enough to accommodate needs not anticipated in the plan. Furthermore, Draft Policy E2, as currently worded, only allows for the expansion of a single existing building which is a far more constricting policy than that applied in adopted Policy ED3. We do not consider this is an appropriate strategy when taking into account reasonable alternatives, and as such do not consider the policy is **justified**.

5.50. Reflecting the comments above, we do not consider Policy E2 is flexible enough to respond to economic market demands or unexpected changes in the plans delivery of providing for local employment needs, including the reliance of the provision of smaller units within two large strategic sites. On this basis we do not consider the policy is **effective**.

5.51. The draft policy does not reflect the NPPF’s significant focus on supporting commercial development with various sectors, including logistics, giving more prominence for their crucial role in driving the economy. In doing this, the NPPF seeks that appropriate sites for commercial development need to be identified, including suitable locations for freight and logistics. The policy is therefore **not consistent with national policy**.

5.52. As previously acknowledged, while the draft NPPF (2025) is not directly relevant in the examination of this Local Plan, we consider the introduction of Policy S5 is significant in allowing certain forms of development to be approved outside settlements, including development that would address an evidenced unmet need and comprise major development for storage and distribution purposes (part 1(j)). In light of the significant practical implications this policy could have upon the determination of planning applications in Rugby Borough, we respectfully request the Inspector’s consideration in this regard.

MAIN MODIFICATION

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

5.54. In accordance with the above, the revised Policy E2 wording should be amended as follows:

- (E) *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*~~ **It would address an unmet need where the site is readily and regularly accessible by means of transport other than the private car; or**
 - (iv) *It would comprise the infilling of a vacant area within a site in employment use.*

Policy EN4: Areas of Separation

5.55. Despite previous representations which have demonstrated the Site’s capability to deliver the exact type of local employment floorspace as identified in the Local Plan as being required, the Proposed Submission Local Plan fails to allocate the Site, and more critically has introduced a new Strategic Policy EN4: ‘Area of Separation’ within which the Site is located. This policy did not form part of Regulation 18 Local Plan consultation and has not been previously evidenced or tested.

5.56. The Policies Map defines a new Area of Separation between Rugby town and the settlements of Clifton upon Dunsmore, Dunchurch and Thurlaston. The Site (133) forms part of the proposed Area of Separation between Dunchurch and Thurlaston. The Site is located within Section C which comprises the largest section of the assessment area, to the west of Dunchurch and north of Thurlaston.

5.57. We **strongly object** to the inclusion of Policy EN4 and, specifically, the Dunchurch and Thurlaston Area of Separation in the Local Plan.

5.58. Our objection to Policy EN4 is based on the following key issues:

- The assessment of the supporting evidence to support Policy EN4;
- Inconsistency with the NPPF;
- Duplication of Development Management Policies; and
- Green Belt Status.

5.59. Also of note, this submission is also supported by a Landscape Assessment of the Area of Separation Landscape Technical Note, prepared by Tyler Grange (**Appendix D**).

ASSESSMENT OF SUPPORTING EVIDENCE TO SUPPORT POLICY EN4: AREAS OF SEPARATION

5.60. Draft Policy EN4 is supported by an Areas of Separation Study, prepared by Rugby Council in November 2025.

5.61. While the Study provides at Paragraph 3.2 the following consideration in respect of applying the Area of Separation policy, the Study does not provide any clear purpose of the Area of Separation which the sites within the area to be designated can be assessed against:

“Should development occur within the areas that separate these villages from the town, there is a risk that the existing degree of separation will be diminished, or that settlements will eventually coalesce. Therefore, as part of the emerging local plan, the Council’s Development Strategy team wish to consider whether a policy can be introduced which provides some protection against this risk while not compromising the other aims of the plan.”

5.62. The Study applies three evaluation aspects to determine the extent to which significant areas of open land between Dunchurch and Thurlaston are designated an Area of Separation:

- Settlement identity – which considers the extent to which Dunchurch and Thurlaston have a distinct character and identity;
- Physical and visual separation – which considers the distance between settlements, the presence of separating features (including those created by topography), and the links that currently exist; and
- Urbanising influences – which considers the presence of existing development within the assessment area

5.63. In summarising the Council assessment against the above criteria, the Dunchurch and Thurlaston Area of Separation is applied based on the following:

- Settlement identity – That Dunchurch and Thurlaston are historic villages with character. Both have conservation areas and contain listed buildings;

- Physical and visual separation – The Study confirms that Thurlaston is currently around 1.6km from the settlement boundary of Rugby at its nearest point (between Main Street and Cawston Lane) and this gap will be significantly changed once the South West Rugby urban extension is built out with Thurlaston c. 350m from the Symmetry Park industrial estate which forms part of the South West Rugby allocation.
- Urbanising influences – The study sets out that the land to the west of Dunchurch and north of Thurlaston (Section C) is primarily occupied by farmland, paddocks, allotment gardens, and areas of low-density housing of a rural or semirural character. However, it does acknowledge there are also significant urbanising influences, including the M45, Coventry Road, and the warehouses of Symmetry Park.

5.64. The Council also touches upon the impact of potential development sites within the proposed Area of Separation. In respect of the Site (Site 133), the study considers at paragraph 7.26 that:

- *“The development either site 18 or 133 (both of which are promoted for employment purposes) would significantly diminish the degree of separation between Thurlaston and Rugby.”*
- *“Site 133 is within c. 90 metres of the village’s northern boundary at its nearest point. At present, intervisibility between the village and the site is mostly obscured by vegetation, however, buildings constructed for employment use would be clearly visible from the bridge that provides the only vehicular access point into the village, and may be visible from certain vantage points within the settlement boundary too. The urbanising effect of this would have a detrimental impact on the village’s identity and diminish the sense of arrival and departure through a settlement gap.”*

5.65. The above descriptive considerations against evaluation aspects of the Study are the only basis for the consideration of the substantial Area of Separation between Dunchurch and Thurlaston. The Study fails to provide any clear definition, detail, or quantifiable measure against the evaluation criteria in order to robustly assess and apply the Area of Separation.

5.66. Furthermore, there is no systematic approach applied to the assessment or breakdown of the substantial study area into parcels. This reduces the clarity and transparency of the assessment of the aspects of each area and also reduces the ability to apply independent assessment to the Areas of Separation Study.

5.67. In accordance with the failures of the methodology to support Policy EN4, the Plan is **not justified or consistent with national policy**.

5.68. The outcome of the Study’s undefined and unquantifiable methodology, which only applies descriptive context, is the designation of a substantial area of land between Dunchurch and Thurlaston for an Area of Separation where Policy EN4 will restrict all development that has a *“significant adverse impact either alone or in combination with other existing or proposed development, on the effectiveness of an Area of Separation in protecting the identity and distinctiveness of settlements and preventing their coalescence”*.

Policy EN4 assessment against up-to-date evidence

5.69. Having concluded that the methodology applied by Rugby Council to the Area of Separation is not considered to be robust, we also note that Paragraph 32 of the NPPF (2024) sets out that *“the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”*.

5.70. In preparing and reviewing plans, the NPPF (2024) also sets out at Paragraph 33 that:

-
- *“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”*

5.71. The Proposed Submission Local Plan is supported by a new Sustainability Appraisal ('SA Report'), published by AECOM in December 2025. In line with the procedures prescribed by the Environmental Assessment of Plans and Programmes ('SEA') Regulations 2004, this document identifies reasonable alternative spatial options.

5.72. We note that, despite Policy EN4's inclusion as a new strategic policy in the Local Plan, it is not assessed in the SA Report, and no reasonable alternatives to its designation have been considered.

5.73. On the basis of Policy EN4 not being considered in the SA Report, we **do not** consider the plan is **legally compliant**.

5.74. Notwithstanding this, using the Council's own evidence base, we summarise below the Stage 2 Site Options Assessment, prepared in December 2025, in respect of the Site:

- **Ecology:**

- There are low ecological constraints at Site 133.
- Site 133 has potential to be taken forward for development subject to demonstrating that there would be no adverse effects upon the SSSI through sensitive site design and the adoption of appropriate mitigation measures.

- **Landscape:**

- The overall landscape sensitivity of the site is Medium/Low.
- This is a medium sized site consisting of two arable fields just to the north of Thurlaston. It is enclosed by the M45 to the south and Coventry Road to the north. Sensitivities are only likely to arise from the site's intervisibility with adjacent properties on Coventry Road, and from the natural value of the trees and hedges that enclose the site and from its contribution to the rural setting of Thurlaston.

- **Heritage:**

- There are no designated heritage assets identified within 50 metres of the site.

- **Opportunities/benefits:**

- Employment

5.75. In accordance with the Council's assessment of the Site (133), we do not consider that there are any constraints against the development of the Site.

5.76. Even when assessing the Site against the Areas of Separation Study evaluation criteria, it is critical to establish that:

- Any development of the Site would not affect any of the aspects of the settlement identity for Thurlaston or Dunchurch;
- Any development of the Site would retain the M45 corridor; therefore, the permanent retention of physical separation between the Site and Thurlaston would not be affected;

- Any development of the Site would retain the permanent separation from the Site and Dunchurch, which is located further east of the Site boundary;
- Any development of the Site would retain the visual separation of the Site and Thurlaston, given the area's topography and the presence of trees and vegetation along the M45. Any visibility of the Site from the bridge crossing the M45 (i.e. outside of the boundaries of Thurlaston village) would be seen in the context of the wider Symmetry Park development;
- Any development on the Site would not be a new element in the landscape as it is already influenced by built form and the urbanising influence of Symmetry Park; and
- Any development on the Site could be sensitively designed and mitigation incorporated into it to integrate views from Main Street.

INCONSISTENCY WITH THE NATIONAL POLICY FRAMEWORK

- 5.77. The Council's own Areas of Separation Study acknowledges that national policy and guidance do not make any provisions for areas of separation (or equivalent concepts under different names).
- 5.78. Considering that Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority, in preparing a local development document, to have regard to national policies and advice contained in guidance issued by the Secretary of State, we consider that inconsistency is a fundamental issue with the creation of Policy EN4 and deems the plan **not legally compliant and therefore unsound**.
- 5.79. As acknowledged by Paragraph 4.5 of the Areas of Separation Study, Paragraph 36 of the NPPF (2024) sets out that local plans must be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. This also deems Rugby's Proposed Submission Local Plan **inconsistent with national policy**.
- 5.80. As we highlighted in Chapter 3 of these representations, national planning policy is undergoing a fundamental reset with the publication of the Draft NPPF in December 2025. Consultation closed on 10th March 2026, and a final version is expected to be published later in 2026.
- 5.81. The draft NPPF (2025) provides a greater tilt in favour of sustainable development, with Policy S5 allowing certain forms of development to be approved outside settlements. With economic growth a core part of the Government's agenda, one form of acceptable development identified within Policy S5 part 1(j) is development that would address an evidenced unmet need and comprise major development for storage and distribution purposes, which accords with policy E3.
- 5.82. Whilst not directly relevant in the examination of this Local Plan, we respectfully request the Inspector be aware that the introduction of the draft NPPF (2025) could have very significant practical implications upon the determination of planning applications in Rugby Borough. This is because the proposed Area of Separation is in direct conflict with the draft NPPF and, specifically, Policy S5.
- 5.83. Paragraph 2 of Annex 2 of the draft NPPF (2025) states that *"Development plan policies which are in any way inconsistent with the national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework"*.
- 5.84. In applying draft Policy S5, this submission and previous representations have demonstrated that the Site can address an evidenced unmet need for local economic needs. As such, it is clear that a future planning application for major storage and distribution purposes on the Site would be supported in principle.
- 5.85. In addition, Chapter 7 of the draft NPPF: Building a strong, effective economy, prioritises long term economic growth.

-
- 5.86. In direct conflict with the substantial Area of Separation, **Policy E2** of the draft NPPF confirms that consideration should be given to a development proposal's specific locational requirements, including the availability of infrastructure and opportunities for co-location to power. **Policy E3** relates to freight and logistics uses, where development proposals should (a) have good access to transport networks (including via sustainable transport modes where possible) appropriate to the type of development; and (b) be sited and designed to limit environmental impacts (such as through the co-location or intensification of facilities to limit vehicle movements, and sensitive building design and landscaping).
- 5.87. In considering the above, the Site's unique set of locational benefits, given its position directly adjacent to the M45/A45 Thurlaston Interchange; the South West Rugby Strategic Site; and the permitted Symmetry Park development, should be key considerations in enabling the delivery of sustainable development in accordance with the NPPF.
- 5.88. Whilst we acknowledge the draft NPPF is not yet adopted, Annex A is critical in confirming that from the moment the Framework is published, as expected by Summer 2026, *"development plan policies which are in any way inconsistent with the national decision making policies in this Framework should be given very limited weight."*
- 5.89. In summary, we consider the Plan **is not positively prepared or consistent with national policy.**

DUPLICATION OF DEVELOPMENT MANAGEMENT POLICES

- 5.90. The Areas of Separation Study seeks to justify the new designation by referencing, at paragraph 4.6, other parts of the NPPF (2024) that they deem as relevant. For example: paragraph 20 relating to conservation and enhancement of the natural built and historic environment; paragraph 135 which seeks to ensure that developments are sympathetic to local character and history; and paragraph 187 which relates to protecting and enhancing valued landscapes.
- 5.91. In assessing draft Policy EN4 against the NPPF (2024), we stress that there is neither a provision for an Area of Separation (or equivalent concepts under different names) in the NPPF, nor any provision for the inclusion of local landscape designations in Local Plans. NPPF Paragraph 187(a) requires the protection and enhancement of *"valued"* landscapes only.
- 5.92. Whilst the Council attempts to justify applying an Area of Separation on this basis, we consider that given the NPPF already provides national controls on conservation and enhancement of landscapes and green infrastructure, these are already sufficient to deal with local landscape matters, and as such, applying an Area of Separation in the emerging local plan is **not justified.**
- 5.93. Similarly, the Areas of Separation Study notes that the adopted Rugby Local Plan (2019) does not contain any policies that are intended to maintain designated Areas of Separation (or equivalent) between the town and nearby villages. The Area of Separation however references Policy NE3: Landscape Protection and Enhancement as a form of justification given this policy seeks to *"guard against the potential for coalescence between existing settlements"* and *"aim to either conserve, enhance or restore important landscape features"*, which, may potentially include landscape features that contribute towards the degree of settlement separation between towns and villages.
- 5.94. Again, given other policies within the adopted NPPF and Rugby Local Plan provide adequate protection of valued landscapes, we consider that designating large areas of open space as an Area of Separation represents a duplication of policy that is overly restrictive and not required, nor **justified.**
- 5.95. We note in respect of Plan-making, Paragraph 16(f) of the NPPF sets out that plans should *"serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)"*. Duplication in the form of the new Area of Separation is therefore **not consistent with national policy.**

GREEN BELT STATUS

- 5.96. The current Green Belt boundary is defined in the Rugby Borough Local Plan 2011-2031 adopted in June 2019.

5.97. The Site, along with all the land subject to the Dunchurch to Thurlaston Area of Separation is not located within the Green Belt.

5.98. Paragraph 143 of the NPPF sets out the five purposes of the Green Belt, as follows:

- 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.

5.99. In comparison, taking the wording of Policy EN4, the Area of Separation seeks to:

- Protect the identity and distinctiveness of settlements; and
- Prevent their coalescence.

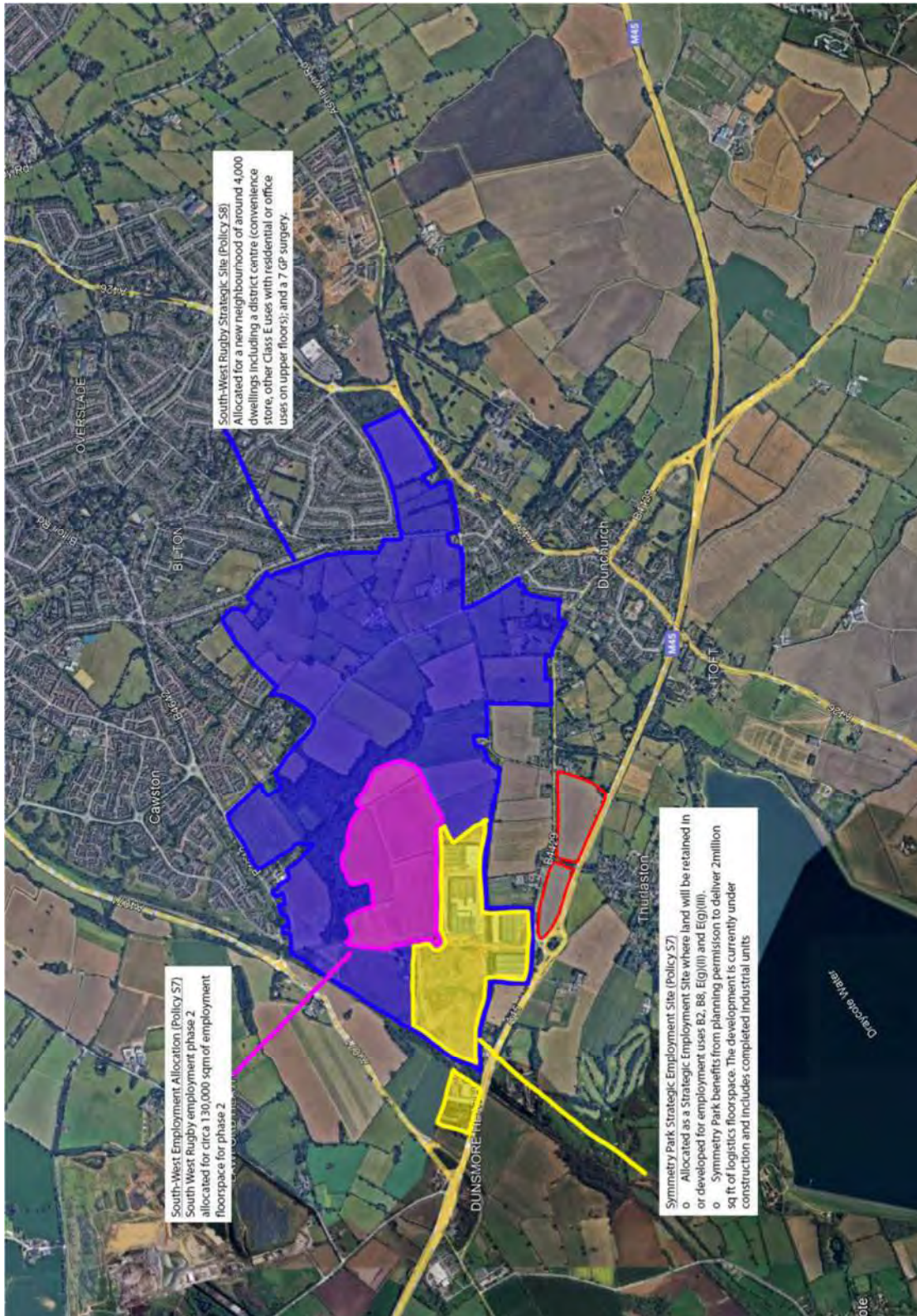
5.100. Furthermore, the policy sets out that developments that diminish physical and visual separation, have an urbanising influence, or which adversely impact settlement identity should be deemed as having an adverse impact on the effectiveness of an Area of Separation.

5.101. In the absence of any clear purpose for the Area of Separation, it is clear that the Area of Separation seeks to apply some of the same purposes already defined by Green Belt policy. However, when the Borough's sites were assessed against the five purposes, the Site (133) did not meet the criteria to be defined as Green Belt land. On this basis, we do not consider that it is **justified, nor consistent with national policy** to create a new policy for substantial areas of open land, which were previously dismissed in the Local Plan as meeting the bar for Green Belt land.

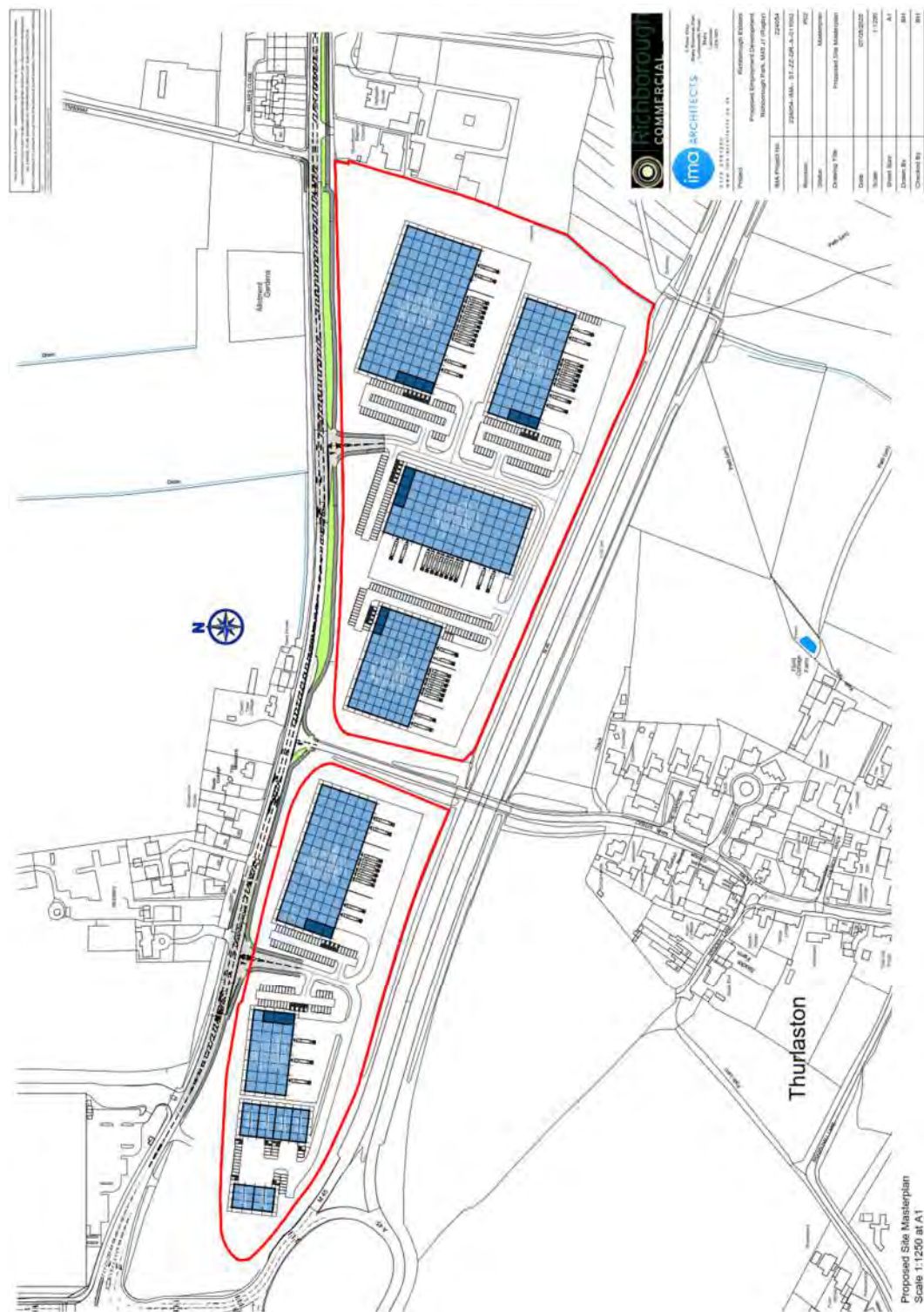
MAIN MODIFICATION

5.102. In accordance with our considerations above, that the Local Plan is not legally compliant, or sound (on the basis of being positively prepared, justified, effective, or consistent with national policy, we seek complete removal of the Area of Separation Policy from the Local Plan.

6. Appendix A: Site Plan



7. Appendix B: Illustrative employment-only masterplan option



8. Appendix C: Employment Land Assessment, prepared by LSH

[A copy of this Appendix is appended separately to this report](#)

9. Appendix D: Technical Note, prepared by Tyler Grange

A copy of this Appendix is appended separately to this report

10. Appendix E: Copy of Representations to the Preferred Options (Regulation 18) Consultation

[A copy of this Appendix is appended separately to this report](#)

11. Appendix F: Copy of the Vision Document submitted to the Preferred Options (Regulation 18) Consultation

[A copy of this Appendix is appended separately to this report](#)

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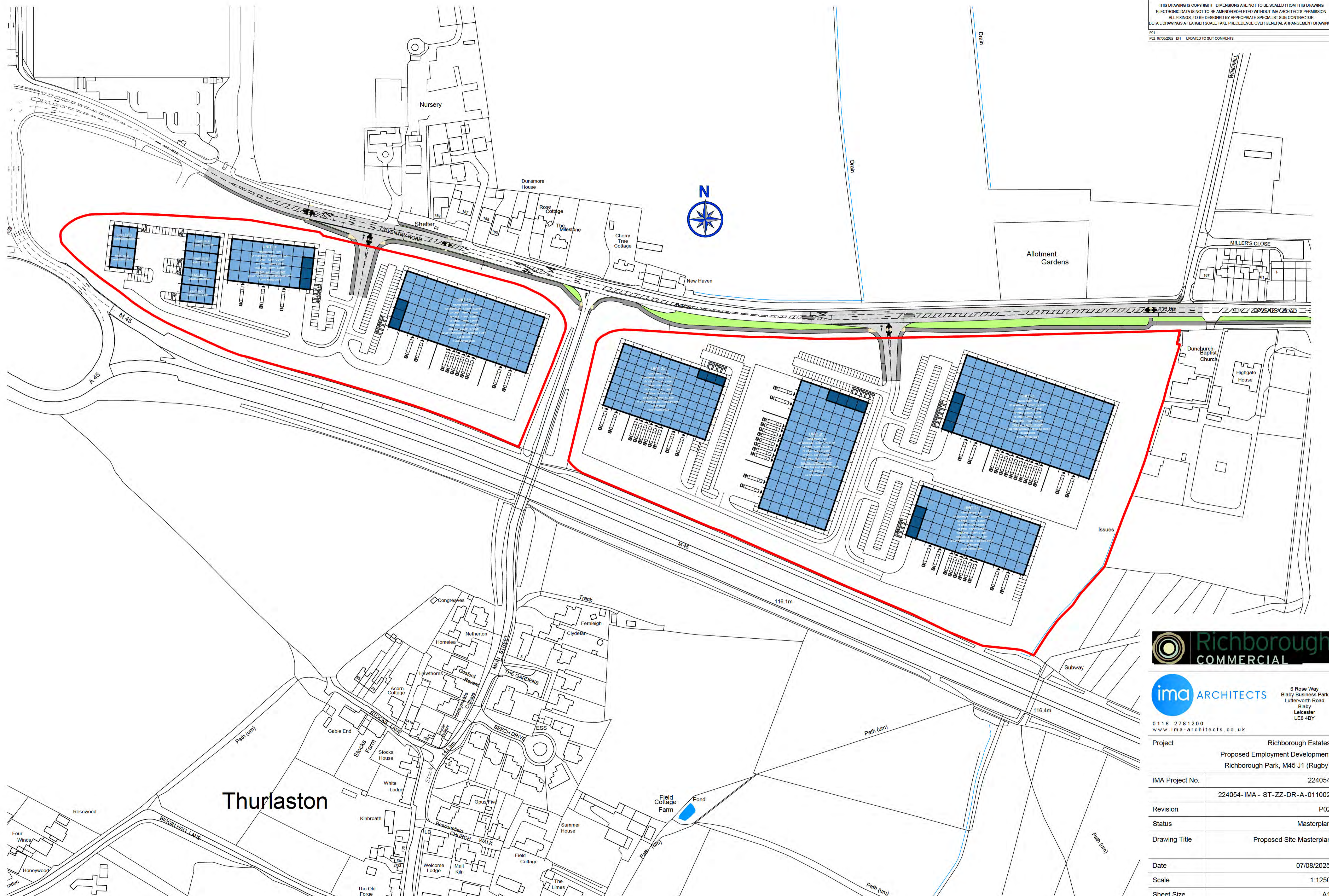
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Revision	P02
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Scale	1:1250
Sheet Size	A1
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Checked By	BH

Proposed Site Masterplan
 Scale 1:1250 at A1

**PLANNING,
REGENERATION +
INFRASTRUCTURE**

**EMPLOYMENT LAND
ASSESSMENT**

RICHBOROUGH PARK, M45
JUNCTION 1, RUGBY

RICHBOROUGH COMMERCIAL
MARCH 2026

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Inspection Date:

Report Issue Date:

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 – LSH Employment Land Supply Review (November 2024)

Appendix 2 – LSH Site Assessment

1.0 INTRODUCTION

1.1 Overview

1.1.1 This Employment Land Assessment has been prepared by Lambert Smith Hampton (LSH) on behalf of Richborough Commercial (Richborough) in support of its promotion of Land at Junction 1 of the M45 near Thurlaston (the Site) for commercial development. The Site is known as Richborough Park M45 Junction 1. The Assessment has been prepared in response to the Rugby Borough Local Plan Proposed Submission Version (Regulation 19) Consultation (Draft LP).

1.1.2 The Site is situated adjacent to the M45/A45 Thurlaston Interchange with the M45 along the southern boundary and the B4429 Coventry Road along the northern boundary. The site lies adjacent to, but outside of, land allocated for the South West Rugby Sustainable Urban Extension (SUE) and is to the south west of Rugby. It is not located within the Green Belt; the Green Belt boundary is located further to the west.

1.1.3 Richborough has an agreement with the landowner to promote the development of the site for commercial uses. The precise mix of uses would be established through a future planning application, but it is considered that the site is suitable for employment and roadside uses comprising retail, drive thru/to, petrol filling station and EV charging.

1.1.4 This section of the report sets the context of the representations. Section 2 summarises the national planning policy and guidance in relation to meeting employment land needs, Section 3 assesses the local plan evidence base, Section 4 reviews the employment land supply with a particular focus on the provision of small employment units to meet local needs, Section 5 explains how Richborough Park can meet the unmet employment land needs of the Draft LP and Section 6 summarises and concludes this report.

1.2 Extant Rugby Borough Council Local Plan

1.2.1 Rugby Borough Council's (Rugby BC) extant Local Plan was adopted in June 2019 and covers the period 2011 to 2031. Policy DS1 established a requirement for 208 hectares (ha) of employment land, including 110 ha to meet Rugby BC's need and a further 98 ha to contribute to Coventry's unmet need.

- 1.2.2 The supporting text to Policy DS1 states that a ‘proportion’ of the supply must meet a qualitative demand for employment sites providing smaller units in the range of 5,000 – 50,000 sq.ft (approx. 465 – 4,650 sqm) for B1c, B2 and ancillary B8 employment uses. Neither the Local Plan nor the evidence base establishes a specific quantity that constitutes a suitable ‘proportion’. More recent studies prepared in support of the emerging plan make a distinction between local and sub-regional, or strategic sites, as those typically over 25 ha and largely dedicated to units of over 9,000 sqm. Therefore, there is clearly a threshold as to what broadly constitutes the difference between local and sub-regional sites, and a more generalised consideration of the size of units that meet local and strategic needs.
- 1.2.3 LSH’s previous review of the Employment Land Supply in the Borough (November 2024 – Appendix 1) showed that since the beginning of the extant plan period (2011), only 7 hectares of land had delivered units of less than 9,000 sqm. This resulted in a total floorspace of approximately 13,500 sqm.
- 1.2.4 One of the sites allocated in the extant Local Plan, Coton Park East (Policy DS7), had a specific policy requirement to meet the qualitative demand for smaller units in the range of 5,000 - 50,000 sq.ft for B1c, B2 and ancillary B8 employment uses¹. Despite this, detailed consent was granted in February 2023 for a single B8 warehousing and logistics building with a Gross Internal Area (‘GIA’) of 26,421 sqm (R22/0551).
- 1.2.5 Our analysis demonstrates a clear failure of the extant Local Plan’s intended approach to providing for smaller units to meet Rugby’s demand. The failure of existing policies to deliver a sufficient supply of land to meet local needs should be addressed within the Draft LP. The proposed Site is capable of meeting this identified need.

1.3 Proposed Submission Version Local Plan Consultation

- 1.3.1 Draft Policy S3: Strategy for Employment Land makes provision for 1,034,243 sqm of B2, E(g)(iii) and B8 floorspace to be delivered over the plan period (2025-2042) through a combination of existing commitments and new allocations. This is to meet a gross industrial need of 1,024,125 sqm (284 ha), equating to a buffer of 0.99%. This consists of 791,525

¹ Policy DS7 and the Coton Park East Masterplan SPD

sqm (226.15 ha) needed on large sites and 232,600 sqm (58.15 ha) on smaller sites². The Development Needs Topic Paper (December 2025) defines large sites as those of more than 25 ha in area, and small sites as those of less than 25 ha.

- 1.3.2 Supporting paragraph 1.25 acknowledges that *“Delivery in recent years has skewed towards large units with fewer smaller units for SMEs. To address this, some site allocations under Policy S7 require smaller units”*³. For context, the definition of large units is those of 9,000 sqm or more of floorspace, and small units as those being less than 9,000 sqm.
- 1.3.3 Draft Policy S7 proposes to allocate the following sites to provide a total of 865,000 sqm of non-office employment uses:

Table 1: Rugby BC Local Plan Proposed Employment Allocations

Site Ref	Site Name	Floorspace	Provision for Small Units
64	Coton Park East	Circa 115,000 sqm	Provision of 4,000 sqm of space in smaller units of up to 1,500 sqm for small and medium sized businesses.
17	South West Rugby employment phase 2	Circa 60,000 sqm	None
14	North of Ansty Park	Circa 75,000 sqm	None
95	Crowner Fields Farm and Home Farm, Ansty	Circa 275,000 sqm	None
121	Land at Walsgrave Hall	Circa 290,000 sqm	Provision of 7,500 sqm of floorspace in small to medium size buildings (with unit sizes ranging from 60 sqm up to 1,500 sqm) to provide space for small and medium sized enterprises
	Total	865,000 sqm	11,500 sqm

Source: Rugby BC Proposed Submission Local Plan

- 1.3.4 The Employment allocations Annex (p.139-147 of the Draft LP) provides further detail regarding the provision of smaller employment units. This is included in the table above and amounts to 11,500sqm of floorspace (1.3% of the total proposed allocated supply).

² Rugby Borough Council Topic Paper: Development Needs (December 2025)

³ Rugby Borough Proposed Submission Local Plan Consultation Document Page 14

This is in addition to the 13,429.4 sqm identified in Policy S3 as commitments (consisting of planning permission on small sites as at 1st April 2025). This gives a total supply of 24,929 sqm of floorspace to provide space for small and medium sized businesses ('SMEs') that wish to expand in Rugby BC.

- 1.3.5 LSH's analysis shows that the need for small units of less than 9,000 sqm over the plan period is 101,800 sqm on approximately 25.45 ha. This leaves a shortfall of 76,871 sqm of floorspace that the Draft LP will fail to meet in its current form, based upon the Council's own evidence.

1.4 Rugby Economic Strategy 2025

- 1.4.1 Rugby BC published its new Economic Strategy (2025-2035) for the Borough in May 2025. The Economic Strategy recognises some of the barriers faced by local businesses, "*..there is very little opportunity to 'grow-on' given existing vacant premises are not the right size, causing them to either stagnate or leave Rugby*" and that "*new employment sites in the current Local Plan have focused on large, high-quality units resulting in a lack of supply of small and grow on space units*"⁴. This is reflected in Objective 1 of the Draft LP, which aims to "*Support the diversification and growth of Rugby Borough's economy in Sustainable locations*"⁵.

1.5 Soundness Issues and Modifications

- 1.5.1 The Draft Local Plan is unsound because it fails to positively prepare for, justify, or effectively deliver the objectively assessed need for local industrial employment land, particularly for units below 9,000 sqm. The Council's own evidence base clearly distinguishes between strategic sites, big-box development on non-strategic sites, and local industrial needs. However, the Plan relies on a single aggregated employment land figure, which masks whether local needs are being met and prevents meaningful monitoring of delivery by type and scale.

⁴ Rugby BC Economic Strategy 2025

⁵ Rugby Borough Proposed Submission Local Plan Consultation Document Page 6

- 1.5.2 The evidence identifies a local industrial need of 58.15 hectares over the plan period, of which approximately 25.45 hectares relates specifically to small units below 9,000 sqm. Existing completions, commitments, and draft allocations provide only a very limited proportion of this requirement, leaving a substantial residual shortfall even if all identified supply is delivered. This shortfall arises directly from the Council's own evidence and demonstrates that the Plan is not positively prepared to meet local employment needs.
- 1.5.3 The Plan also relies heavily on strategic or strategically attractive sites to deliver local employment space, despite clear evidence that this approach has failed historically. Previous requirements for small units have not been secured in practice, and there is no robust policy mechanism to ensure delivery on current allocations. In addition, the Plan adopts an overly narrow definition of small units, focusing on floorspace up to 1,500 sqm and failing to provide for the critical grow-on market between 1,500 sqm and 9,000 sqm, contrary to the evidence base and national policy.
- 1.5.4 To address these deficiencies, main modifications are required. These include introducing a clear Vision and strengthened Strategic Priorities, disaggregating employment land needs within Policy S3, explicitly setting out gross requirements for different types of employment development, strengthening monitoring arrangements, and allocating additional sites capable of delivering small and mid-sized industrial units. Without these changes, the Draft Local Plan will continue to replicate the failures of the extant Plan and will not meet the needs of local businesses in Rugby Borough.

2.0 RELEVANT NATIONAL POLICY

2.1 Introduction

2.1.1 In this section, we summarise relevant national policy and guidance on meeting employment land needs to provide the context for the preparation of Rugby BC's Draft LP. In this policy review, direct quotes are shown in italics, and words in bold are our emphasis.

2.2 National Planning Policy Framework

2.2.1 The National Planning Policy Framework (NPPF), revised in December 2024, sets out the Government's planning policies for England and how these should be applied. The 2024 amendments introduced several key changes to employment land in general and specifically to the logistics sector, which are important both in the preparation of Local Plans and the determination of applications and appeals.

2.2.2 Paragraph 8 states that the purpose of the planning system is to contribute to sustainable development through three overarching objectives. The first of these is:

- "an economic objective – 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 improved productivity; and by identifying and coordinating the provision of infrastructure;"

2.2.3 Paragraph 11 states that "*Plans and decisions should apply a presumption in favour of sustainable development*". Strategic policies should "*provide for objectively assessed needs*". Where policies "*are out-of-date, granting permission unless ... any adverse impacts of doing so would significantly and demonstrably outweigh the benefits*".

2.2.4 Chapter 6 of the Framework is titled: Building a strong, competitive economy. Paragraph 85 states "*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*".

2.2.5 Building on this, paragraph 86(b) requires policies to *“set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”*. Limb (c) states that 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”*. Limb (e) states that policies should *“be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances”*.

2.2.6 Paragraph 87 then sets out the need for policies and decisions to recognise and address the specific locational requirements of different sectors, including:

“b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and

c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience”

2.3 Planning Policy Guidance

2.3.1 The Housing and economic needs assessment chapter of Planning Practice Guidance (‘PPG’) states, in order to determine the type of employment land that is needed:

“Strategic policy-making authorities will need to prepare a robust evidence base to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions.”

(Paragraph: 025 Reference ID: 2a-025-20190220)

2.3.2 In gathering evidence to plan for business uses, PPG states that planning authorities need to liaise closely with the business community, to assess *“evidence of market demand (including the locational and premises requirements of particular types of business)”* (Paragraph: 026 Reference ID: 2a-026-20190220). Developers, property agents and businesses are cited as sources of this data

Assessment of Need

2.3.3 The PPG explains how market signals can be used to forecast future need:

“Strategic policy making authorities will need to develop an idea of future needs based on a range of data which is current and robust, such as:

- *sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand);*
- *demographically derived assessments of current and future local labour supply (labour supply techniques);*
- *analysis based on the past take-up of employment land and property and/or future property market requirements;*
- *consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics.*

Authorities will need to take account of longer-term economic cycles in assessing this data, and consider and plan for the implications of alternative economic scenarios.”

(Paragraph: 027 Reference ID: 2a-027-20190220)

2.3.4 PPG provides specific guidance regarding how authorities should assess need and allocate space for logistics:

*“The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, **as well as contributing to local employment opportunities**, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).*

Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with

other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas.

*...Authorities will also need to assess the extent to which land and policy support is required for other forms of logistics requirements, **including the needs of SMEs and of 'last mile' facilities serving local markets.** A range of up-to-date evidence may have to be considered in establishing the appropriate amount, type and location of provision, including market signals, anticipated changes in the local population and the housing stock as well as the local business base and infrastructure availability."*

(Paragraph: 031 Reference ID: 2a-031-20190722)

- 2.3.5 PPG sets out how authorities can identify the existing stock of employment land and identify the recent pattern of supply and loss:

"A simple typology of employment land by market segment and by sub-areas, where there are distinct property market areas within authorities, can be developed and analysed. This can be supplemented by information on permissions for other uses that have been granted, if available, on sites formerly in employment use."

(Paragraph: 028 Reference ID: 2a-028-20190220)

- 2.3.6 PPG further clarifies how current market demand can be analysed:

"It is important to consider recent employment land take-up and projections (based on past trends) and forecasts (based on future scenarios), and to identify instances where sites have been developed or sought for specialist economic uses. This will help to provide an understanding of the underlying requirements for office, general business and distribution space, and (when compared with the overall stock of employment sites) can form the context for appraising individual sites.

*Analysing supply and demand will allow policy makers to identify **whether there is a mismatch between quantitative and qualitative supply of and demand for employment sites. This will enable an understanding of which market segments are over-supplied to be derived and those which are undersupplied.**"*

(Paragraph: 029 Reference ID: 2a-02920190220)

Assessment of Land

2.3.7 The Housing and economic land availability assessment chapter of PPG requires “*suitability, availability and achievability*” to be assessed to establish whether sites are likely to be developed (Paragraph: 017 Reference ID: 3-017-20190722).

2.3.8 PPG sets out the factors to be considered when assessing the suitability of sites for development:

“A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.

When considering constraints, plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information, such as:

- *national policy;*
- *appropriateness and likely market attractiveness for the type of development proposed;*
- *contribution to regeneration priority areas;*
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.*

Plan-makers need to assess the suitability of identified sites or broad locations for different forms of development where appropriate, taking into account the range of needs for housing, economic and other uses.

When assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome. When using the emerging plan to assess suitability, plan-makers will need to account for potential policy changes or other factors which could

impact the suitability of the site / broad location. For example, an emerging site allocation may enable development to come forward. This will have to be reflected in the assessment of achievability.”

(Paragraph: 018 Reference ID: 3-018-20190722)

2.3.9 PPG explains the factors to be considered when assessing the availability of sites⁶:

“A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.”

(Paragraph: 019 Reference ID: 3-019-20190722)

2.3.10 With regard to achievability, PPG states:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.”

(Paragraph: 020 Reference ID: 3-020-20190722)

2.3.11 PPG also notes that when constraints are identified that impact the suitability, availability, and achievability of sites:

“...the assessment will need to consider what action could be taken to overcome them. Examples of constraints include policies in the National Planning Policy Framework and the adopted or emerging development plan, which may affect the suitability of the site, and unresolved multiple ownerships, ransom strips tenancies

⁶ The section of paragraph: 019 which deals with deliverability has not been referenced as this is applicable to housing sites only.

or operational requirements of landowners, which may affect the availability of the site.”

(Paragraph: 021 Reference ID: 3-021-20190722).

2.4 Draft National Planning Policy Framework

2.4.1 In December 2025, the Ministry of Housing, Communities and Local Government launched a consultation on a revised NPPF and other changes to the planning system. The consultation closed on 10th March 2026. The consultation draft NPPF introduces a set of National Development Management Policies (NDMP). These include the following:

2.4.2 Proposed NDMP E2: Meeting the need for business land and premises states that:

“...1. To support business growth, substantial weight should be given to:

a. The economic benefits of proposals for commercial development which allow businesses to invest, expand and adapt; especially where this would support the economic vision and strategy for the area...”

2. Where a development proposal is required to demonstrate whether an unmet need exists (including to demonstrate compliance with policy S5) consideration should be given to whether:

a. Market signals indicate an undersupply of specific types of land or premises, taking into account the anticipated catchment area for the type of development proposed, the changing needs of different sectors and the availability of existing land and buildings;⁷

2.4.3 It is acknowledged that the proposed revisions to the NPPF and subsequent revised publication will not be the basis for the examination of the Rugby BC Local Plan, however, upon adoption the NDMPs in the NPPF will be a material consideration in the determination of planning applications over and above those policies contained in a Local Plan. For this reason, this should remain a consideration through the preparation and examination of this

⁷ NPPF: draft text for consultation MHCLG, December 2025)

Local Plan given that the Council's published LDS does not anticipate adoption of the Local Plan until June 2027.

3.0 LOCAL PLAN EVIDENCE BASE

3.1 Introduction

3.1.1 In this section, we consider the evidence base documents that are referenced in the Regulation 19 Proposed Submission Draft Local Plan, with particular reference to the justification for smaller employment sites within Rugby.

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

3.2.1 The HEDNA considered the need for employment land across Coventry and Warwickshire (C&W) for the period 2021 to 2041 and 2050 (reflecting the different time periods for local plans under preparation in the sub-region at the time).

3.2.2 General industrial needs are calculated in the HEDNA on a district-by-district basis. Industrial needs are defined as 'All Exc. B1a / Strategic B8'. This is referred to as 'General Industrial' and includes B1b, B1c, B2, and local (non-strategic) B8.

3.2.3 General Industrial needs are calculated using completions data from 2011-2019 set out in Table 9.12 (2021-2041) and Table 9.13 (2021-2050). This is annualised and multiplied by the number of years in the forecasting period. This is then split by percentage of office and strategic B8, with the remainder forming the General Industrial need. This shows the need for 120.4 ha of General Industrial land in Rugby BC for 2021-2041 (Table 9.15).

3.2.4 A margin of flexibility is then added based on five years of gross completions for industrial (paragraph 11.14). For Rugby BC General Industrial, a margin of 30.1 ha is added, which results in a total need for general industrial land in Rugby BC of 150.5 ha (2021-2041) and 218.2 ha (2021-2050).

3.2.5 LSH has several concerns with the modelling undertaken in the HEDNA, which raises questions over the reliability of its conclusions:

- The industrial need is based on completions data. However, the data is incomplete (as acknowledged at paragraph 9.44), which is likely to result in an

inaccurate estimate of future needs. No details are provided of the verification undertaken of the AMR data provided by the individual authorities.

- The forecast is based on completions data for the 2011-2019 period. This ignores more recent trends, which have had a significant impact on industrial needs forecasting.
- The gross completions data for Rugby BC included completions at the sites identified to meet Coventry's unmet need at Ansty Park and Prologis Ryton.

3.2.6 In addition to the General Industrial need, a need was identified for strategic B8 development for 551 ha to 2041 across C&W (rising to 735 ha to 2050). This was based on an estimate of future strategic B8 needs based on a combination of past completions trends (2021-2031) and an estimate of replacement demand and traffic growth (2031-2041 / 2031-2050).

3.2.7 As with the assessment of general industrial need, LSH has several concerns with the methodology used in the HEDNA to calculate future strategic B8 development requirements. This raises questions about the reliability of its conclusions. 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 (2011-2019) and does not provide a robust data source for projecting forward future needs.
- The Completions Trend Scenario is based on completions data from the 2011-2019 period which is not up-to-date and does not capture significant changes within the sector during and post-pandemic.
- There have been considerable changes in the e-commerce sector since 2019 resulting in increased demand for strategic B8 space. Completions data from 2019-2023 show a considerably higher growth rate than seen before the pandemic. The HEDNA addresses this by using the Completions Trend Scenario based on completions data from 2011-2019 for the forecasting period 2021-2031 but this 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 2011-2019

Completions Trend Scenario. This means that the strategic B8 need identified in the HEDNA is actually lower than the completions trend seen over the pre-pandemic period (2011-2019).

- The HEDNA approach neither reflects the wider commercial market dynamics seen within the distribution sector nor does it reflect up-to-date data and evidence. It is therefore not PPG compliant.
- To address these issues, C&W's strategic B8 needs should be based on corrected completions data, drawing upon post as well as pre-pandemic data.

3.2.8 Overall, the HEDNA recommended future employment land needs of 150.5 ha of general industrial land in Rugby BC in 2021-41 and 551 ha of Strategic B8 development across C&W for the same period.

3.3 West Midlands Strategic Employment Sites Study 2024 (WMSESS) and Errata Note (2025)

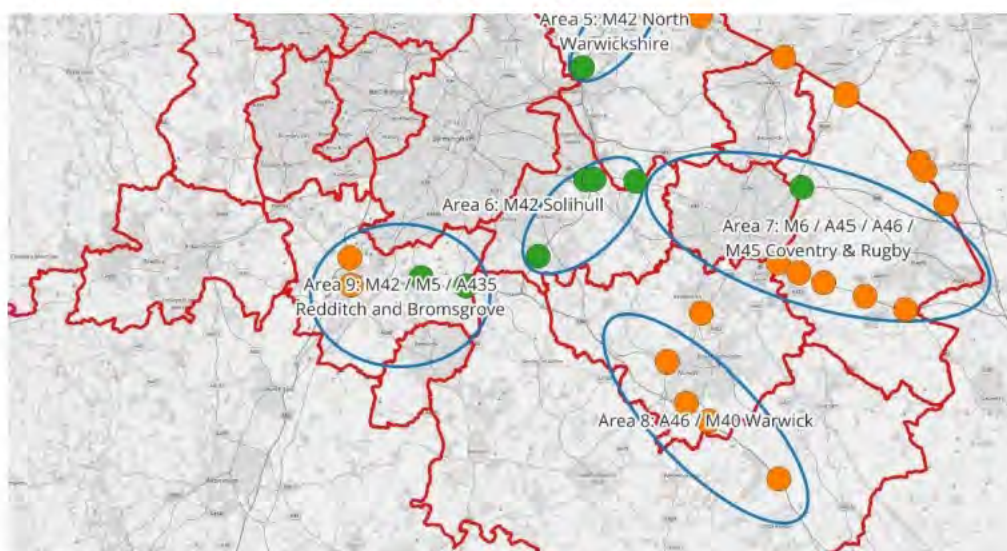
3.3.1 The WMSESS 2024 covers a wider geography than the C&W HEDNA and considers the level of need for Strategic Employment Land for the period 2022-2045. An Errata Note was produced in 2025. Whilst this LSH report is focused on the needs for smaller industrial units, there are several reasons to draw attention to the findings of the WMSESS:

- The WMSESS has relevance to the overall level of employment land in Rugby;
- The WMSESS identifies that Rugby has been and will continue to be an attractive location for Strategic sites of greater than 25 ha in area;
- The extant Local Plan has failed to ensure that smaller units were brought forward;
- That because of this, it is important that local needs are planned for and that sites are not all taken up for meeting strategic needs; and
- This aligns with the Economic Strategy of Rugby.

3.3.2 The WMSESS identified an overall need for road-based strategic sites of 1,555-1,848 ha and a rail need of 365-433 ha. Taking account of existing commitments (as of April 2022), the WMSESS recommended a residual need of 615-977 ha across the West Midlands (548-841 ha road need, 67-135 ha rail need). A number of adjustments were made to the forecast to reflect brownfield recycling opportunities, the presence of small units on strategic sites and the need for 'big box' units (9,000+ sqm) on non-strategic sites.

3.3.3 The study identified 'Areas of Opportunity' for additional strategic employment sites. Area 7 falls within Rugby BC, as can be seen below:

Map 1: Excerpt of WMSESS Road Opportunity Areas



Source: West Midlands Strategic Employment Sites Study 2023/24

3.3.4 Area 7 also incorporates the local authorities of Coventry, Warwick, Rugby and Nuneaton & Bedworth and is focused on the M6 / A45 / A46 / M45 junctions. The recommended provision from the WMSESS being as follows (as updated by the Errata Note):

Table 2: WMSESS Recommendations

Opportunity Area	Type of Site	Indicative Strategic Site Requirement	Indicative Land Need (B8/mixed c.50 ha, B1/B2 c.25 ha)
Area 7: M6 / A45 / A46 / M45 Coventry & Rugby	B8 / Mixed	2-3	100-150 ha
	B2	1-2	25-50 ha
TOTAL			125-200 ha

Source: WMSESS

3.3.5 Importantly, the WMSESS made the distinction between the need for strategic units and strategic sites. The WMSESS addresses the need for 'strategic sites', which it defined as sites of greater than 25 ha in area, rather than needs for employment units of a strategic scale (units of over 9,000 sqm in floor area). The WMSESS also took into account that some

smaller units would be located on strategic sites, but also that big box units can be located on non-strategic sites.

- 3.3.6 Essentially, the WMSESS considered strategic site needs, rather than big box needs. This is an important distinction that moves away from the narrow focus on units of less than 9,000 sqm constituting local need and units of greater than 9,000 sqm constituting strategic need. The market considers both interchangeably, reflecting the need for flexibility in the allocation of employment land.

3.4 The HEDNA-WMSESS Alignment Paper 2024 (Alignment Paper) and Addendum (2025)

- 3.4.1 The 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. An Addendum Report was produced in November 2025.

Strategic Site Need

- 3.4.2 In calculating the need for Strategic Sites (adopting the WMSESS definition of sites of greater than 25 ha in area), the Alignment Paper Addendum identifies a need for between 250-425 ha of land across C&W based on the WMSESS recommendations for each of the three Areas of Opportunity located in C&W for 2022-2045. This figure was pro-rata'd back one year to align with the HEDNA base year of 2021, producing a residual figure of 261-443 ha. 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 **796-978 ha** is produced.

Local Industrial Need

- 3.4.3 The calculation of local industrial need is defined in the Alignment Paper as including all industrial uses (E(g)(iii), B2 and B8), for units smaller than 100,000 sq.ft (9,000 sqm). The gross completions trend engaged in the HEDNA was used, but importantly, updated in the Alignment Paper to include data up to 2023/24. The importance of this is recognised in para 3.9 of the Alignment Paper:

“This extended trend period is appropriate as it captures the impact of the Covid-19 pandemic and other drivers of stronger recent industrial take-up including the growth in e-commerce, increase stock holding requirements and need for modern floorspace with sufficient height and power. However, in taking a 12-year average it recognises the cyclical nature of the property market and some ‘one off’ effects of the pandemic-induced market adjustment.”⁸

- 3.4.4 Monitoring data for 2011/12 – 2023/24 is extrapolated to forecast future local industrial need with the inclusion of a 5-year margin. Assuming a plot ratio of 0.4 ha, the gross need calculated for Rugby BC is 108,200 sqm or **27 ha** for 2021-2041.

Big Box Need on Non-Strategic Sites

- 3.4.5 Building on the adjustment made in the WMSESS to account for some smaller units being located on strategic sites and some big box units being located on non-strategic sites, the Alignment Paper analysed gross completions of big box units across C&W for the period 2011-2024 to identify which were located on non-strategic sites. This produced a total of 244,606 sqm of floorspace, an average of 5.1 ha per annum and **none of the schemes identified were located in Rugby BC**. Extrapolated across 2021-2041 and incorporating a 5-year margin, this indicated a need for 127 ha. This was then apportioned to all C&W authorities based on their proportion of all industrial gross completions, producing a figure of **31.4 ha** for Rugby BC for 2021-2041 (Table 3.8, page 14 of the Apportionment Paper).
- 3.4.6 The combination of Local Industrial Need and Non-Strategic Big Box need provides an overall industrial need for non-strategic sites in Rugby BC of **58.4 ha**.
- 3.4.7 In comparing the results to the HEDNA 2022, the Alignment Paper observes at paragraph 3.23 that *“..By removing big box units from the completions trend and using data up to 2023/24, the general local industrial need overall has been reduced and the balance of need has shifted towards strategic sites which are assumed to support the bulk of demand for both larger B2 and B8 units. The previous HEDNA estimated the need for Strategic B8 (all*

⁸ Alignment Paper 2024 para 3.9, page 11

big box units) whereas WMSESS forecasts the need for both strategic B2 and B8 and focuses on sites rather than units...”.

3.4.8 The Alignment Paper concludes by calculating residual industrial needs by factoring in completions, extant permissions and allocations for 2021-2024. This identified a gross supply of 244 ha across C&W on Non-Strategic Sites for Local Industrial Need. **Only 5 ha of this was identified in Rugby BC.**

3.4.9 With regard to Strategic Sites, once commitments across C&W are factored in (including the Padge Hall Farm site in Rugby), the residual need is considered to be 184-359 ha, with up to 134 ha of this to be met in Opportunity Area 7.

3.4.10 The overall industrial land needs are set out in Table 3 below:

Table 3: Overall Industrial Land Needs

	Gross (ha)	Supply (ha)	Residual (ha)	Total (ha)
Strategic Site Needs to be met within Area 7 2022-2045	125-200	66	59-134	134*
Local Industrial Needs 2021-2041	27	5	53.4	53.4
Big Box Needs on Non-Strategic Sites 2021-2041	31.4			

*Based on the upper end of the range

Source: C&W HEDNA-WMSESS Alignment Paper 2024 and Addendum 2025

3.4.11 It is the Local Industrial Need (2021-2041) for 27 ha that is the main focus of this report.

3.5 Development Needs Topic Paper (December 2025)

3.5.1 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 Draft LP. This updates the base date of the requirement to 2025-2042 to align with the plan period, by pro-rata'ing the 2021-2041 need to 2021-2042 and subtracting the completions from 2021-2025.

3.5.2 The necessary adjustment to the Local Industrial Needs is fairly minimal, highlighting the relatively low level of activity in this sector in Rugby BC. The gross need is adjusted to 60.8 ha or 243,200 sqm, with 28.1 ha to meet Local Industrial Need for units less than 9,000 sqm, and 32.7 ha to provide for Big Box Needs on small sites. Identified completions of 10,600 sqm or 2.65 ha and commitments of 13,429.4 sqm on 3.36 ha are provided in the Development Needs Topic Paper, which further reduces the residual need to 54.79 ha or 219,170.6 sqm. This is highlighted below:

Table 4: Local Industrial Needs 2025-42

	A	B	C	D	E
	Gross Need 2021-2042	Completions 2021-2025	Gross Need 2025-2042 (A-B)	Commitments	Residual Need 2025-2042 (C-D)
Local Industrial Needs	60.8 ha / 243,200 sqm	2.65 ha / 10,600 sqm	58.15 ha / 232,600 sqm	3.36 ha / 13,429.4 sqm	54.79 ha / 219,170.6 sqm

Source: Rugby BC Development Needs Topic Paper

3.5.3 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 assumes that the residual requirement of 134 ha for Opportunity Area 7 is met in Rugby BC. This has been pro-rata'd to 116.5 ha (430,500 sqm) to 2042. This brings the total Strategic Site requirement to 226.15 ha or 791,525 sqm.

3.5.4 The Combined Industrial need is summarised at paragraphs 3.31 and 3.32 of the Development Needs Topic Paper *"...The combined 2025-2042 gross industrial need (on large and smaller sites) is 791,525sqm + 232,600sqm = 1,024,125sqm. In hectares that is 284ha (226.15 + 58.15). 3.32. After existing committed supply the requirement is for 529,882 (310,711m2 + 219,170.6) or 143.56ha (88.77ha + 54.79ha)..."*⁹. To help meet this need, the Draft LP allocates 540,000 sqm as per Table 1 of this report (excluding the commitment at Crouner Fields Farm).

⁹ Rugby BC Topic Paper: Development Needs (Dec 2025) - page 15

3.5.5 The Development Needs Topic Paper also states that Coventry City Council has an unmet need for industrial land on smaller sites of 9 ha or 36,000 sqm for 2021-2041. No explanation is provided as to how this has been calculated. Paragraph 3.36 states that *“...The planned amount of floorspace of 540,000 2025-2042 would exceed the combination of the net Rugby Borough local need and opportunity area 7 strategic need to 2042 (529,882sqm) by just over 10,000sqm. This indicates that the publication Local Plan could in principle contribute 10,000sqm/2.5ha to meeting Coventry City Council’s unmet local industrial land need in addition to meeting the opportunity area 7 strategic need to 2042...”*.

4.0 REVIEW OF EMPLOYMENT LAND SUPPLY

4.1 Introduction

4.1.1 The Development Needs Topic Paper identifies a total need for 1,024,125 sqm of floorspace on approximately 284 ha for B2, E(g)(iii) and B8 uses. This comprises 58.15 ha / 232,600 sqm on smaller sites and 226.15 ha / 791,525 sqm on larger sites. The Draft LP aims to meet this need through completions, existing commitments and new allocations.

4.1.2 This section of the report reviews how the identified employment supply will meet these requirements. It examines the planning history of the existing commitments and assesses the ability of the draft allocations to meet the need for smaller employment units. This report does not review the supply of employment land on larger strategic sites.

4.2 Completions and Supply

4.2.1 The Development Needs Topic Paper includes a table of completions on smaller sites for the period 2021-2025. These equate to a total of 10,600 sqm of floorspace, which the Topic Paper equates to the equivalent of 2.65 ha using a plot ratio of 0.4. For ease of reference, a summary of the completions on smaller sites is provided in the table below:

Table 5: Proposed Submission Local Plan – Known Completions on smaller sites (2021-25)

Site	Ha	Use	Floorspace (sqm)	Description of Development
Britvic Limited	0.68	B2	2,900	Infill extension
Land on West Side of Watling St, Clifton on Dunsmore (Alcohols Ltd)	2.03	B2	1,501	New Unit
Land on West Side of Watling St, Clifton on Dunsmore (Alcohols Ltd)	2.03	B8	895	New Unit
Unit 4, Parkfield Business Park, Rugby	0.32	B8	1,408	New Unit
Unit 17, Europapark, Watling Street	0.25	B8	2,070	Storage Yard
6 Paynes Lane, Rugby	0.19	E, B2 or B8	1,130	c/u of existing Auction House to Office & warehouse.
Parkfield Business Park, Rugby Western Relief Road	0.17	B2 or B8	567	New Storage Building
Unit 32 Webb Ellis Industrial Estate	0.01	B2, B8 & E	129	c/u of two units to B2, B8.
TOTAL			10,600	

Source: Development Needs Topic Paper Appendix 2

4.2.2 The Development Needs Topic Paper also includes details of the commitments on smaller sites (categorised as ‘local’ in Appendix 3 of the Topic Paper), which amount to 13,429.4 sqm of floorspace on the equivalent of 3.36 ha. These are sites that are allocated or have an extant planning permission. They are intended to provide for a range of small to medium-sized premises and are anticipated to be delivered in the early years of the plan period. The table below provides details of the commitments on smaller sites.

Table 6: Review of Rugby BC Local Plan Employment Land – Known Supply

LSH Site Ref	Location	Use	Ha	Floorspace (sqm)	Description of Development	LSH Review of Status
1	Land off Parkfield Road, Rugby	B2 or B8	1.59	4550	Construction of industrial warehouse (B2/ B8) with ancillary E(g)(i) Office space.	Complete
2	Site A, Europark, Watling Street	B8	1.16	3323	Construction of warehouse (B8) with ancillary offices. PP expires in February 2027.	N/S
3	Site B, Europark, Watling Street	B2	0.78	2342	Construction of industrial unit (B2) with ancillary offices. PP expires in February 2027.	N/S
4	Unit 10, Prospect Park, Rugby	E(g)(iii)	0.003	30	Extension of existing business in order to link Units 9, 10 & 11.	Unknown
5	Rear of Lodge Farm, Oxford Road, Ryton-On-Dunsmore, Coventry	B2	1.17	1992	Erection of a commercial production Facility (B2). To be occupied by existing business. PP expires in April 2027.	N/S
6	Unit 3, Imperial Road, Ryton-On-Dunsmore, Coventry	B2	4.88	530.4	Erection of an extension for a temporary Modular Prep & Spray Booth	Complete
7	Britvic Soft Drinks Ltd, Aventine Way, Rugby	B2	0.26	662	Extension to the existing Production Hall within the service yard. Relocation and installation of nitrogen and LPG gas storage facilities including concrete base and retaining walls.	Complete
	TOTAL			13,429.40		

Source: Development Needs Topic Paper Appendix 3

4.2.3 Upon further review, three of these sites have now been completed (Site refs: 1, 6 & 7). Four (Site refs: 1, 2, 3 & 5) will provide new build developments (i.e. excluding demolition and rebuild, or intensification of existing use). The remaining three (Site refs: 4, 6 & 7) are either extensions of existing facilities or intensification of existing uses.

- 4.2.4 Two of the sites, Site A and Site B at Europark off Watling Street (Site refs: 2 & 3), have been proposed for employment development for 15 years and formed part of Rugby BC's Employment Supply for over 10 years. A previous hybrid consent granted in 2015 (R12/2253) led to the construction of a private access road connecting the development sites to the A5. Despite this, and both sites benefiting from outline consent for the construction of two buildings for B2 use, no development has taken place. The site owner is now seeking to speculatively develop both sites, with full consent granted in February 2024 (R23/0409 and R23/0410), which expires in February 2027. Together, these two sites contribute 5,665 sqm (42%) of the total 13,429 sqm small site commitments.
- 4.2.5 The combination of total completions on small sites in Table 5 and total commitments in Table 6 provides a total of 24,029 sqm of floorspace (10,600 + 13,429.40 sqm), which is the equivalent of 6.01 ha. When subtracted from the gross Local Industrial Need figure of 243,200 sqm and 60.8 ha, this leaves a residual need of 219,170.6 sqm and 54.79 ha. This figure should be met through allocations in the Local Plan.

4.3 Proposed Allocations

- 4.3.1 Policy S7 of the Draft LP contains proposed employment allocations to meet Rugby BC's employment land needs, alongside sites with planning permission. In total, the five allocations will contribute 865,000 sqm to the overall employment land target of 1,034,243 sqm. Of the five sites, two are required to provide smaller units to meet the Local Employment Land needs (as highlighted in Table 1). These two sites are reviewed below.

Coton Park East (Draft LP Site Ref 64)

- 4.3.2 Coton Park East is a strategic site of 35.97 ha that is proposed to be allocated to provide approximately 115,000 sqm of employment floorspace. To help meet the evidenced need for small and medium sized businesses, the Draft LP makes provision for 4,000 sqm of floorspace in smaller units of up to 1,500 sqm. The Employment allocations Annex (p.139-140 of the Draft LP) states that *"...These smaller buildings should be located at the southwestern corner of the site to better relate to the scale of existing employment buildings on Central Park Drive and to reduce impact on adjacent homes..."*.

Figure 1: Coton Park East



Source: Rugby BC Draft LP

4.3.3 The site forms part of the land allocated under Policies DS3.1 and DS4.1 in the extant Rugby Local Plan to deliver a Sustainable Urban Extension providing approximately 800 dwellings and 7.5 ha employment development. The employment element is currently being delivered on land to the north of the site and is discussed in paragraph 4.3.5.

4.3.4 In April 2023, the landowner was granted outline planning permission (R20/0787) for the erection of up to 475 dwellings, with land for a Primary School, land for either Secondary School Provision or residential development, with vehicular access off Central Park Drive and Emergency Vehicle Access off Newton Lane, with associated green infrastructure and public open space provision. The permission is extant until 25th April 2026. In January 2024,

the site was put forward by the landowner for employment development in response to the call for sites as part of the Issues and Options consultation¹⁰. The landowner cited a lack of interest from residential developers in acquiring the site and the fact that the site is accessed through an existing industrial area and adjacent to the M6 motorway. The site is now being promoted through the Local Plan by employment developer Panattoni, who are understood to be preparing a planning application.

- 4.3.5 The land immediately to the north of the site was granted detailed planning consent in February 2023 (R22/0551) for a single B8 warehousing and logistics building with a GIA of 26,421 sqm. This development is currently under construction and will form an extension of the Central Park Employment Area. This was granted despite the conflict with Policy DS7 and the Coton Park East Masterplan SPD, which specifically required employment development at this site to meet the qualitative demand for smaller units in the range of 5,000 - 50,000 sq. ft (465 – 4645 sqm), in B1c, B2 and ancillary B8 uses.
- 4.3.6 A previous application by Newlands (the same applicant, ref R20/0272) for up to 23,226 sqm (250,000 sqft) of light industrial, general industrial and storage & distribution floorspace (B1c, B2 and ancillary B8) was granted outline consent in February 2021 on the site. The indicative site layout showed various small units ranging from 15,000 sq. ft to 47,800 sq. ft (1394 – 4,441 sqm). That permission has not been implemented. In justifying the site's development for one single B8 warehouse, the applicant submitted a marketing report dated April 2022 which highlighted that there was no reasonable prospect of the site coming forward for the allocated use after two years of unsuccessful marketing due to various deliverability issues applicable to smaller units. This represents a clear failure of the Local Plan Policy intention to provide for smaller units to meet Rugby's needs.
- 4.3.7 Despite the failure of the extant Local Plan Policy DS7 to provide for smaller units at this location, the Draft LP is now proposing the same Policy requirement at an immediately adjacent site. This is despite a market report produced less than four years ago suggesting that the location is not suitable for small unit delivery. Furthermore, the site's scale and proximity to M6 Junction 1 and within 3 miles of the M1 makes the site a prime location

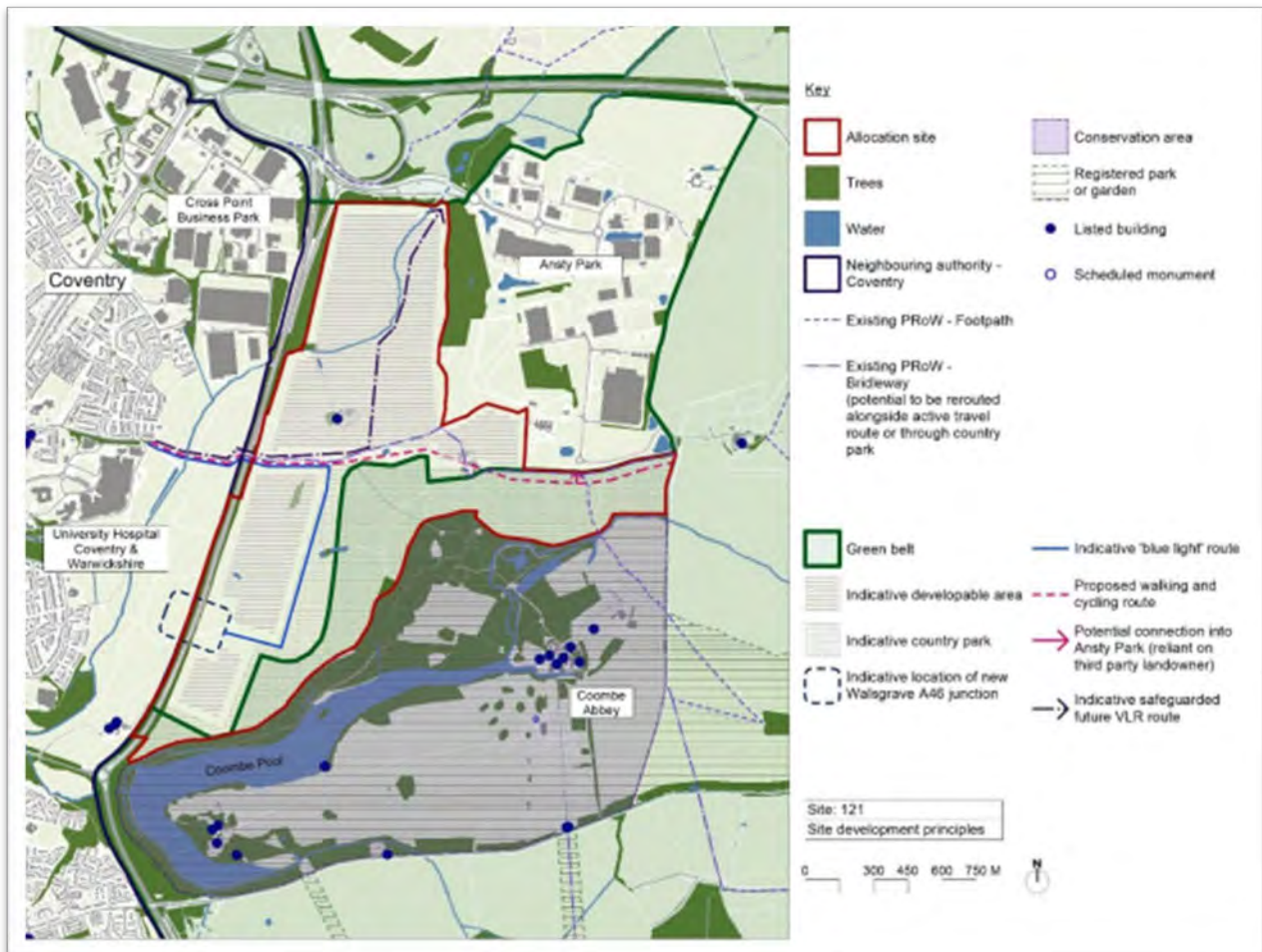
¹⁰ Paragraph 11.13 page 21, Rugby BC Cabinet Agenda 6th January 2026.

for large-scale logistics. With no policy mechanism to protect the need for smaller units, and a recent precedent having been set for not meeting such a requirement on an adjacent site, there is no evidential basis to support the aspiration that 4,000 sqm of floorspace for small and medium sized businesses will be delivered in this location.

Land at Walsgrave Hill (Site Ref 121)

4.3.8 Land at Walsgrave Hill is a strategic site of 201.8 ha that is proposed to be allocated to provide approximately 290,000 sqm of employment floorspace. To help meet the evidenced need for local businesses, the Draft LP makes provision for 7,500 sqm of floorspace in small to medium size buildings (with unit sizes ranging from 60 sqm up to 1,500 sqm) to provide space for small and medium sized enterprises.

Figure 2: Land at Walsgrave Hill



Source: Rugby BC Draft LP

- 4.3.9 As can be seen from Figure 2, the site is located immediately adjacent to the administrative boundary of Coventry. The Employment allocations Annex (p.146-147 of the Draft LP) indicates that the site will be accessed via a new Walsgrave Junction on the A46 and that provision will be made to safeguard the route of a Very Light Rail (VLR) alignment through the development and incorporating a bridge providing access to the University Hospital of Coventry and Warwickshire. The VLR is an aspiration of Coventry City Council, and the aforementioned infrastructure provision will naturally skew the development to its boundary with Coventry. This will be further emphasised by the provision of a 75 ha Country Park 'buffer' on the 'Rugby' side of the allocation.
- 4.3.10 The land to the west of the A46 is a residential allocation in the extant Coventry City Council Local Plan (2011-2031) and is proposed to accommodate 900 dwellings in the Submitted Local Plan Review (2021-2041), which will be examined in March 2026. The development of the site is dependent on the implementation of the new A46 Walsgrave junction. In February 2026, a Development Consent Order was granted for National Highways A46 Coventry Junctions (Walsgrave).
- 4.3.11 Paragraph 11 a) of the NPPF applies a presumption of favour of sustainable development. This includes locating new development close to employment opportunities, shops and services and public transport routes. It therefore follows that the employment allocation at Walsgrave Hill will contribute to meeting any unmet need arising from Coventry City. Paragraph 11 b) of the NPPF provides that plan-making should contain strategic policies that meet the assessed needs of neighbouring areas. Logically therefore, a proportion of Coventry's unmet need could be delivered adjacent to Coventry's boundary. The site will deliver employment land adjacent to residential development and will benefit from the planned infrastructure improvements that can only be delivered as a result of development in Coventry. The provision of small employment units will therefore contribute to meeting Coventry's Local Industrial Need which according to the Development Needs Topic Paper amounts to 9 ha or 36,000 sqm. This would leave no surplus floorspace to meet Rugby BC's needs.

- 4.3.12 Given that the site is already well connected to the wider strategic road network, including Junction 2 of the M6, it is likely to be an attractive location to accommodate further strategic B8 logistics development. This is likely to be exacerbated by the fact that both Ansty Park and Prologis Park, Ryton (which were intended to meet Coventry's unmet need in the extant Rugby LP) are now substantially built out. Without a policy mechanism to protect the need for smaller units, the 7,500 sqm of floorspace intended for small and medium businesses may not be delivered.
- 4.3.13 The Alignment Paper establishes that local employment needs are characterised by smaller units of 9,000 sqm and under. The Draft LP's proposed strategy at providing these types of units through allocated sites is shown to have limitations by our review. In addition to this, the suggested development requirements contained in the Draft LP Annex provide for a very specific segment of 'smaller' units consisting of 60 sqm to 1,500 sqm. There is no provision for units of between 1,500 sqm and 9,000 sqm, which suggests a poor understanding of the needs of the sector.

5.0 RICHBOROUGH PARK

5.1 Overview

5.1.1 Promotion of Richborough Park through the Local Plan process would provide opportunities for flexible floorspace, meet a range of business needs and provide economic benefits, that are necessary to help the Council deliver the Objectives of its Local Plan and its Economic Vision for Rugby. This section of the report sets out the proposal for the site and how it's development will help to meet the employment land needs identified in the previous section.

5.2 Proposal

5.2.1 The proposed site at Richborough Park extends to approximately 11ha and could provide 31,729 - 43,742sqm of floorspace¹¹ to meet a range of employment needs. The intention is to provide a flexible approach which seeks to provide a range of small to mid-box unit sizes, which can assist in accommodating multiple local businesses whilst providing opportunities for growth and expansion. The adjacent Symmetry Park development provides much larger units which would be more aimed at national or international businesses, and the vision for this Site is to provide choice in the market to better cater for the local area.

5.2.2 The following indicative masterplan illustrates a range of units, varying in size from 283 – 7,647 sqm:

¹¹ Using the plot ratios of 0.35 to 0.40 engaged in the Local Plan evidence base

Figure 3: Indicative masterplan



Source: Richborough

5.3 Location

5.3.1 The Site is situated adjacent to the M45/A45 Thurlaston Interchange with the M45 along the southern boundary and the B4429 Coventry Road along the northern boundary. The site is to the south west of Rugby and lies adjacent to, but outside of, land allocated for the South West Rugby Sustainable Urban Extension (SUE), which will deliver 4,000 new homes.

5.3.2 The Site is also located adjacent to Symmetry Park, to the north. This is a Tritax development that benefits from planning permission to deliver up to 186,500 sqm of logistics floorspace. Phase 1 of Symmetry Park has delivered four units providing 90,000 sqm of logistics space to Iron Mountain with unit size ranging from 12,500 to 23,345 sqm. Phase 2 is currently under construction and will provide a further three units to Iron Mountain ranging between 15,800 and 36,300 sqm, with completion expected in 2026.

Symmetry Park is an established key distribution and manufacturing location, and is recognized as a Strategic Employment Site in the Draft Local Plan.

5.3.3 Richborough Park is not located within the Green Belt; the Green Belt boundary is located further to the west. The settlement of Thurlaston is located to the south on the opposite side of the M45, which provides a permanent physical barrier preventing any sense of coalescence. Dunchurch is located further to the east and Rugby is further to the north of the site.

5.3.4 The site's location is close to existing residential areas, and adjacent to an established strategic employment site. It is located on the M45, which is part of the Strategic Road Network. The M45 directly connects Coventry to Rugby, providing access to the M42, M6 and the A46.

5.4 Suitability, Availability, Achievability

5.4.1 The economic objective of the planning system is *"to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity"* (NPPF, see paragraph 2.2.2 of this report).

5.4.2 The Government's Planning Practice Guidance requires local planning authorities to assess the suitability, availability and achievability of sites, including whether the site is economically viable (see paragraphs 2.3.7 to 2.3.11 of this report). This allows a judgement to be made as to whether a site can be delivered within the next five years or developed over a longer period.

5.4.3 To demonstrate that the site is capable of providing sufficient land of the right type in the right place, we have assessed the site against the key qualitative criteria identified in the PPG. The full assessment is included in Appendix 2, with the following table provides a summary.

Table 6: Summary of Suitability, Availability and Achievability

Site	Estimated Net Area (ha)	Suitable	Available	Achievable	Summary
Richborough Park	11	Y	Y	Y	Greenfield site with excellent access to the SRN and local road network. Low flood risk, and no known physical constraints. Immediately available with modest infrastructure required to open up the site. Highly accessible to both Rugby and Coventry and viable location for employment development.

Source: LSH Analysis

5.4.4 Whilst the site at Richborough Park has no planning consent our objective assessment of the site considers that it could be delivered in the short term. This would allow existing and immediate needs arising in the local area to be met.

5.5 Benefits of the Scheme

5.5.1 Promotion of Richborough Park through the Local Plan process would provide opportunities for flexible floorspace, meet a range of business needs and provide economic benefits, including Business Rates, that are necessary to help the Council deliver the Objectives of its Local Plan and its Economic Vision for Rugby.

5.5.2 In this regard, and to better illustrate the benefits that could accrue, a high-level Economic Benefit Assessment has been carried out. The assessment quantifies the economic uplifts of the proposed employment development of the site in terms of jobs growth, business rates and gain in local productivity (measured in Gross Value Added (GVA)). This captures the quantified economic uplifts as follows¹²:

¹² This assessment is high-level and figures may be subject to further adjustment/refinement as the proposals develop. It is based on a total of 43,742sqm (GIA) of floorspace and the range presented includes all units as B8 (lower end) and all units as B2 (upper end) At this time, potential retail uses have not been considered. All figures presented are gross. Business rates are based on nearby rents achieved (predominately B8 use) and benchmarked to 2021 values to calculate rateable value. A more detailed rates assessment would need to be undertaken.

- **Total Job Creation: 1,055 – 1,823 Full Time Equivalent (FTE)**
- Direct Jobs: 620 – 1,215 FTE
- Indirect Jobs: 248 – 365 FTE
- Induced Jobs: 170 – 243 FTE

- **Total GVA: £49.4m - £83.5m**
- Direct GVA: 25.7m - £50.3m
- Indirect GVA: £13.6m – 19.9m
- Induced GVA: £10.1m - £13.3m

- **Business Rates: £2.1m p/a**

5.5.3 The Council have stated that the Economic Strategy for Rugby will be funded by investing savings from Council Tax and Business Rates (reserves) and investing Community Infrastructure Levy (CIL) receipts collected from development. The benefits highlighted above illustrate the contribution Richborough Park could make in this regard.

5.6 Summary

5.6.1 The Draft LP makes reference to the fact that employment land delivery over the last plan period has been heavily skewed towards large units with fewer smaller units for SMEs. The Draft LP evidence base also makes reference to the need to provide mid-sized and smaller industrial areas, more suited to diverse uses and a need for separate allocations for B1c/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector.

5.6.2 The failure to provide smaller units is demonstrated in the Development Needs Topic Paper which shows total commitments and completions (2021-25) of just 24,029.4 sqm on small sites. The Draft LP makes provision for the future supply of 11,500 sqm of floorspace in small units as part of its proposed allocations.

5.6.3 In addition to meeting the needs arising within Rugby, the draft Local Plan seeks to meet un-needs arising from Coventry. The location of the site along the A45 into Coventry, and

nearby bus stops provides access to the SRN and public transport for business access markets in Coventry and workers currently living within the City.

- 5.6.4 Whilst the Council anticipate some smaller units may come forward on the larger allocated sites, evidence demonstrates this has not happened in the past and no new evidence suggests this trend is likely to change. Richborough Park provides an opportunity for a site of approximately 11 ha and 31,729 - 43,742 sqm of floorspace to meet a range of employment and commercial needs in a sustainable location. The site could meet the needs of local businesses currently operating in Rugby as well as businesses currently operating in Coventry but who cannot find suitable premises to move to.
- 5.6.5 The scheme could deliver in excess of 1,800 jobs, generate an economic uplift of £83.5m and generate business rates of £2.1m per annum to be invested in the future of Rugby BC. Development of the site will also help to achieve the objectives of the Draft LP and will align with the Rugby BC Economic Strategy.

6.0 CONCLUSION

6.1 Overview

- 6.1.1 The extant Rugby BC Local Plan recognised a qualitative need to provide smaller employment units to meet the needs of local businesses. Despite this, employment development coming forward post the adoption of the extant plan has failed to provide such units. The various preparation stages of the Draft LP and the Rugby BC Economic Strategy recognise this. Despite the failure of the extant plan to deliver smaller units and there being a clear evidential need, the Draft LP makes provision for just 24,929 sqm of floorspace to provide space for small and medium sized businesses that wish to expand.
- 6.1.2 The Development Needs Topic Paper sets out at paragraph 3.46-3.47 that a combined need for industrial land is identified and that “...*there is no clear basis to identify separate ‘local’ and ‘strategic’ need requirements in local plan policy...*”.
- 6.1.3 Yet, the Topic Paper states that the methodology for calculating the Industrial Land Need is provided in the C&W HEDNA/WMSESS Alignment Paper 2024 (Alignment Paper) and Addendum (November 2025). The Alignment Paper clarifies at paragraph 3.1 that there are three components to the industrial land need. These are as follows:



- 6.1.4 The Alignment Paper then calculates a need for each component. This forms the basis for the level of employment need included in the Development Topic Paper. As such, this clearly provides the basis for separating local and strategic need requirements in local plan policy.
- 6.1.5 The Local Industrial Need includes all industrial and logistics uses (E(g)(iii), B2 and B8), for units smaller than 9,000 sqm. The Big Box Need on Non-Strategic Sites includes units of

more than 9,000 sqm on sites of less than 25 ha. The Alignment Paper combines the need of these two elements to produce a total industrial need on Non-Strategic Sites. The Development Topic Paper pro-rata's this need to align with the plan period of 2025-2042. The methodology used in the Alignment Paper can be adopted to identify the needs of each element as follows:

Table 7: Components of Local Industrial Need

Component	Hectares	Floorspace (sqm)
Local Need for Small Units	25.45	101,800
Big Box Need on Small Sites	32.7	130,800
Gross Need 2025-2042	58.15	232,600

Source: C&W Alignment Paper and LSH Analysis

- 6.1.6 Our review of the Draft LP Employment Land Supply shows that 13,429.4 sqm of floorspace, the equivalent of just 2.65 ha, is provided on committed sites that will provide floorspace for units of less than 9,000 sqm. Nearly 50% of this is on a site that has yet to be developed despite being included in the supply for 15 years.
- 6.1.7 A further 11,500 sqm of floorspace is included in the proposed Draft LP Allocations to provide for small units. Yet, there is no policy mechanism to ensure this comes forward, and there are clear reasons why the two proposed sites will not deliver this quantum, or it will not provide for the needs of businesses in Rugby BC.
- 6.1.8 Even if all of the committed sites are fully developed and the proposed allocations provide small units as indicated, there is still a deficit of 76,871 sqm of floorspace that the Draft LP will fail to meet in its current form. The Plan makes insufficient allocations to meet this need and provides no policy basis for this shortfall to be bridge. The site being promoted by Richborough at Thurlaston provides an opportunity to help fill this policy vacuum by providing employment floorspace of a range of different sizes to meet the identified need in the Draft LP and supporting evidence base.

6.2 Richborough Park

- 6.2.1 Richborough Park will provide a sustainably located flexible employment site, enabling existing businesses to relocate from unsuitable sites that no longer fit their purpose, to one that is better located, and encourage new businesses to invest in Rugby BC due to the close proximity of existing employment development and a skilled labour pool. It will provide high quality premises and be constructed to high sustainability standards, and complement the planned development of the proposed employment sites in the Draft LP. It is not dependent on the implementation of infrastructure and is located in a sustainable location close to the M45.
- 6.2.2 The preferred configuration of the site is capable of providing 31,729 sqm of floorspace across a range of unit sizes from 283 – 7,647 sqm to meet the employment and commercial needs of small and medium sized businesses as demonstrated in the Draft LP evidence base. The site could meet the needs of businesses currently operating in Rugby as well as businesses currently operating in Coventry but who cannot find suitable premises to move to.
- 6.2.3 The scheme could deliver in excess of 1,800 jobs, generate an economic uplift of £83.5m and generate business rates of £2.1m per annum to be invested in the future of Rugby BC. Development of the site will also help to achieve the objectives of the Draft LP and will align with the Rugby BC Economic Strategy.
- 6.2.4 Our objective assessment of the site considers that it could be delivered in the short term and meets the key qualitative criteria identified in PPG. This would allow existing and immediate needs arising in the local area to be met.

6.3 Addressing Soundness Issues

- 6.3.1 The Submitted Draft Local Plan is not sound as it fails to positively prepare for, justify, or effectively deliver the objectively assessed need for local industrial employment land, particularly units below 9,000 sqm, as established in the Council's own evidence base.

- 6.3.2 The C&W HEDNA–WMSESS Alignment Paper (2024) and Addendum (2025), which underpins the Development Needs Topic Paper (December 2025), identifies that industrial land need comprises three distinct components:
- Strategic Site Need (sites over 25 ha);
 - Big Box needs on non-strategic sites (units over 9,000 sqm on sites less than 25 ha); and Local Industrial Need for smaller units (units below 9,000 sqm);
- 6.3.3 Despite these recommendations and a clear distinction between local and strategic employment needs, the Draft LP relies on a single aggregated employment land figure. This obscures whether the specific needs of local businesses are being met and prevents meaningful monitoring of delivery.
- 6.3.4 The Council’s own evidence identifies a Local Industrial Need of 58.15 ha (232,600 sqm) for the plan period 2025–2042 on smaller sites. Within this figure, our analysis demonstrates that the need for small units under 9,000 sqm equates to approximately 25.45 ha (101,800 sqm).
- 6.3.5 Existing completions and commitments provide only 24,029 sqm (approximately 6.01 ha). Draft allocations make provision for only 11,500 sqm, representing approximately 1.3% of total allocated employment floorspace.
- 6.3.6 Even if all committed and allocated small-unit floorspace were delivered in full, the Draft LP would still fail to meet local needs, leaving a residual shortfall of approximately 76,871 sqm for small employment units. This shortfall arises from the Council’s own evidence and demonstrates that the Plan is not positively prepared to meet objectively assessed local employment needs.
- 6.3.7 The Draft LP relies almost entirely on strategic or strategically attractive sites to meet local employment needs, despite clear evidence that this approach has failed historically.
- 6.3.8 At Coton Park East, the extant Local Plan required delivery of small units. However, this was not secured in practice, with consent subsequently granted for a single large B8 unit. The Draft LP proposes to repeat this approach on adjacent land, despite a recent marketing assessment demonstrating that the location was not viable for small-unit delivery.

- 6.3.9 Similarly, the allocation at Walsgrave Hill is geographically and functionally linked to Coventry and benefits from strategic infrastructure improvements. Any small-unit provision at this location is likely to meet Coventry's unmet needs rather than those of Rugby Borough. In the absence of robust policy mechanisms, there is no evidential basis to conclude that small units will be delivered on these sites.
- 6.3.10 The Draft LP's approach to small units is further undermined by its overly narrow focus on units between 60 sqm and 1,500 sqm. The evidence base defines local need as units below 9,000 sqm, yet the Plan makes no provision for units between 1,500 sqm and 9,000 sqm, which represent a critical grow-on segment for local businesses. This demonstrates a weak understanding of the local employment market and fails to align policy with the Council's own evidence.
- 6.3.11 The NPPF requires Local Plans to provide sufficient land of the right type, in the right place, at the right time; to make provision for employment uses at a variety of scales; and to be flexible enough to respond to changing economic circumstances.
- 6.3.12 By failing to identify, allocate, and secure sufficient land specifically for local and small-scale employment needs, the Draft LP is not consistent with national policy and cannot be considered effective.
- 6.3.13 To address these deficiencies, the following main modifications are required to address soundness issues -
- 6.3.14 The Draft LP does not contain a vision. Whilst this part of a Local Plan is not policy, it is important to understand the context in which the Plan is being prepared and how the Council are seeking to address issues and support development. As the Council set out at page 7 of the Draft LP, it is a requirement of the PCPA Act 2024 for Local Plans to identify strategic priorities the development and use of land within the Plan area. From an employment and economic perspective the key points the vision in this Local Plan should be acknowledging are; Rugby's role within the wider West Midlands and Coventry and Warwickshire economy, its attractiveness to strategic employment premises and a past

failure to support local needs being met. Further to this the relationship to Coventry and in particular the agreement to take unmet Employment Need arising from Coventry should be established. This will then provide a clear link and rationale for the Council's Objective 1 – Support the diversification and growth of Rugby Borough's economy in sustainable locations.

- 6.3.15 Following from this suggested Modification to include a vision, is the necessity to expand the Strategic Priorities identified within the Draft LP. Page 7 contains a brief schedule of the priorities, with the associated policies listed alongside them. It is considered that the Strategic Priority of Provision of Employment Land, even for a strategic priority is too brief and vague. The strategic priority should acknowledge the Council's own evidence base and wider strategy. Therefore we proposed this part of the Plan should be modified to:

*“Provision of Employment Land to meet Strategic Employment Needs
Provision of Employment Land to meet Local Needs”*

- 6.3.16 Following this, it is necessary for policy to set out the actual gross needs for employment land arising in Rugby. Currently Policy S3 only sets out what the supply is. Furthermore, employment need should be disaggregated, explicitly distinguishing between Strategic Need, Local Need for units under 9,000 sqm, and Big box units on non-strategic sites. Therefore a series of modifications to Policy S3 Strategy for Employment Land and the supporting text is required. Additionally, we would recommend that the office space requirements are revised so the level of need is expressed in the Plan on a consistent basis as a gross amount.
- 6.3.17 Currently the proposed policy only identifies what the proposed supply would be. The following changes are required to ensure that the plan and importantly the policy sets out what the development needs in Rugby are as follows (proposed changes in bold):

S3 Strategy for Employment Land

A. To meet Rugby Borough's need and a proportion of the Coventry and Warwickshire FEMA's need, including unmet needs arising from Coventry, for employment land in the period 2025-2042 the following levels of new employment development will be delivered:

i. 19,761.3m² of use class E(g)(i) and (ii) office floorspace (approx. 3.95 hectares)

ii. 232,600 m² (approx. 58.15 hectares) of floorspace for use classes B2, E(g) (iii), and B8 to meet need arising in Rugby

iii. 791,5252 m² (approx. 284 hectares) of floorspace for use classes B2, E(g) (iii), and B8 to meet need arising within the FEMA

iv. 10,000 m² (approx. 2.5 hectares) of floorspace for use classes B2, E(g) (iii), and B8 to meet Coventry City Council's unmet local need.

This is a total of 1,034,000m² (approx. 287 hectares) of floorspace for use classes B2, E(g) (iii), and B8

ii. 1,034,000m² (approx. 287 hectares) of floorspace for use classes B2, E(g) (iii), and B8

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

6.3.18 Table B within Policy S3 will need to be expanded to include additional rows setting out:

The quantum of completions

The quantum of extant supply

6.3.19 Table B will also need to be expanded to include additional columns to identify which of the identified need is being met from that particular source (which is set out in rows).

6.3.20 We consider that further modifications are necessary to the supporting text too. The following should be inserted before current paragraph 1.25:

A paragraph explaining that various needs will be met within Rugby Borough. This paragraph should set out what those needs are. A subsequent paragraph that then sets out the Local Needs arising in Rugby is calculated by add local need for small units (units of less than 9,000m2) and 'big box' need on smaller sites (units of more than 9,000m2) together totals the 58.15ha identified in policy.

6.3.21 Further to the changes as set out to Policy S3, it will be necessary for further land use allocations to be made within the plan to meet all of the identified needs. Therefore sites, such as Richborough Park, capable of delivering small and mid-sized industrial units in locations suitable and attractive to local occupiers, should be allocated.

6.3.22 Without these changes, the Draft Local Plan will continue to replicate the failures of the extant Plan and will not meet the needs of local businesses in Rugby Borough.

APPENDIX 1

**PLANNING,
REGENERATION +
INFRASTRUCTURE**

**EMPLOYMENT LAND
SUPPLY REVIEW**

LAND AT A45 / COVENTRY
ROAD JUNCTION, RUGBY

RICHBOROUGH
NOVEMBER 2024

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Inspection Date:

Report Issue Date:

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 – Addendum to Report

1.0 INTRODUCTION

1.1 Overview

- 1.1.1 This review of employment sites in Rugby Borough Council seeks to confirm the quantity of employment land delivered on sites allocated to meet 'local' needs arising from Rugby for employment land and also those allocated to meet unmet regional needs for Coventry. The review has assessed the planning history of permissions granted and delivered on these sites to ascertain the land uses and floor space quantum, and it has also assessed the qualitative aspects of supply to determine if local needs are being met.
- 1.1.2 This follows on from a Stage 1 assessment of Rugby Borough's employment need and supply evidence base, plus commentary from the Council around their most recent Local Plan consultation. This suggested that sites identified through the extant plan, whilst delivering a quantum of employment, did not meet the qualitative expectations of the Plan's evidence base. Therefore, this may present an opportunity to promote land in Rugby for units which have a floorspace aligned to meeting the definition of 'local' employment needs.

1.2 Rugby Borough Council Local Plan

- 1.2.1 Rugby Borough Council's Local Plan was adopted in June 2019 and covers the period 2011 to 2031. Policy DS1 sets the Overall Development Needs for the Borough and establishes a requirement for 208 ha of employment land to be delivered in the plan period, 110 ha to meet Rugby's need and a further 98 ha to contribute to Coventry's unmet need.
- 1.2.2 In addition to the quantitative need of 110 ha to meet Rugby's employment land need, the supporting text to Policy DS1 Local Plan states that a 'proportion' of the supply must meet a qualitative demand for employment sites providing smaller units in the range of 5,000 – 50,000 sq.ft (approx. 465 – 4650 sqm) in B1c, B2 and ancillary B8 employment uses. As supporting text, this is not a policy requirement, but the Local Plan (or any of the studies in the evidence base) does not establish a specific quantity that constitutes a suitable 'proportion'. More recent studies prepared as part of the Council's evidence base for its Local Plan review makes a distinction between local and sub-regional, or strategic sites, at around 9,000m². Therefore, whilst there is no specific floorspace distinction as what constitutes a small unit, there is clearly a threshold as to what broadly constitutes the difference between local and sub-regional sites.

- 1.2.3 The Local Plan identifies a combination of completions (in the plan period), planning permissions and new allocations to meet the employment land target. These are summarized in the table below which has been extracted from Rugby BC's Local Plan.

Table 1: Employment completions, supply and allocations to meet Rugby's need

Site	Gross Site Area (ha)	Employment Type
COMPLETIONS		
Central Park	6.46	B1/B2/B8
Rugby Gateway	35.7	B8
TOTAL	42.16	
SUPPLY		
Central Park	3.69	B1/B2/B8
Somers Road	0.7	B1/B2/B8
Paynes Lane	2.2	B1/B2/B8
Europark	0.4	B2/B8
Europark Extension	2.93	B2/B8
Shilton Industrial Estate	0.5	B1/B2/B8
Land West of A5, CV23 0AJ	3.2	B2/B8
TOTAL	13.62	
ALLOCATIONS		
Coton Park East	7.5	B1 / B2 / B8
South West Rugby	35	B8
Rugby Radio Station	16	B1 / B2 / B8
TOTAL	58.5	
OVERALL TOTAL	114.28	

Source: Rugby BC Local Plan (2011-2031).

- 1.2.4 In addition to the sites above, the Local Plan identifies an additional two sites to meet Coventry's unmet needs, as per the table below:

Table 2: Completions and Supply to meet Coventry's unmet needs

Site	Gross Site Area (ha)
COMPLETIONS & SUPPLY	
Ansty Park	41
Former Peugeot Site, Ryton	57
TOTAL	98

Source: Rugby BC Local Plan (2011-31)

- 1.2.5 These sites are reviewed in the following chapter to confirm the quantity of employment land delivered on sites allocated for employment land meeting needs for Coventry and separately sites allocated to meet 'local' needs arising from Rugby.

2.0 REVIEW OF EXTANT ALLOCATIONS

2.1 Introduction

2.1.1 Our review of the sites intended to meet the employment land requirements of Rugby, and the agreed unmet needs of Coventry has examined the planning history to confirm the quantity of employment land delivered and the qualitative aspect of the permissions granted to ascertain the types of employment uses in light of the distinction made between local and sub-regional sites.

2.2 Completions and Supply

2.2.1 The completions data included in the Rugby LP is defined as sites completed since 2011 to the point of plan adoption in June 2019. Further review of the two sites included shows that the units completed are not considered to meet the definition of smaller units included in the LP. It is therefore questionable as to whether the inclusion of the total 42.16ha is meeting Rugby's need or would be classified as meeting a sub-regional need. A summary of the review is provided in the table below:

Table 3: Review of Rugby BC Local Plan Employment Land – Known Completions

COMPLETIONS			LSH REVIEW		
Site	Ha	Use	Description	Completed	Floorspace sqm (if known)
Central Park	6.46	B1/B2/B8	Zone B (1.5ha) – Can't trace this but assumed to have been completed	Yes	
			Zone C Plot 1 - Single building (B2 and B8) on 3.27ha site	Yes	13,974
			Zone C Plot 3 - Single building (B2 and B8) on 2.4ha site	Yes	11,170
Rugby Gateway	35.7	B8	Zones 1-5 consists of 5 large B8 units	Yes	25,808.42
					16,710.63
					17,799.13
					22,237.95
TOTAL	42.16				

Source: Rugby BC Local Plan (2011-31)

2.2.2 The sites included in the Rugby LP as future supply are those which had an extant permission at the point of plan adoption. These provided for a range of small to medium-sized premises with planning consent and anticipated to be delivered in the early years of the plan period.

2.2.3 Upon further review, these sites have largely come forward as anticipated. A total of 3 of the sites have provided new build developments (i.e. not demolition and rebuild, or intensification of existing use). Of these, the Central

Park scheme has delivered a single unit that provides a total floorspace of nearly 15,000 sqm and is not considered to meet the definition of smaller units included in the LP.

Table 4: Review of Rugby BC Local Plan Employment Land – Known Supply

SUPPLY			LSH REVIEW		
Site	Ha	Use	Description	Completed	Floorspace (sqm) (if known)
Central Park	3.69	B1/B2/B8	Zone C Plot 2 – Single B2 & B8 building on 3.92ha site	Yes	14,685
Somers Road	0.7	B1/B2/B8	Intensification of existing Ind Estate on 0.7ha site	Yes	
Paynes Lane	2.2	B1/B2/B8	Redevelopment of existing employment land for 5 replacement buildings on 2.5ha site	Yes	777.3
					972
					1149
					2097
		1331			
Europark	0.4	B2/B8	Demolition of existing warehouse and offices and erection of new warehouse building, ancillary offices and associated car parking.	Yes	4,098.84
Europark Extension	2.93	B2/B8	Unit A consists of warehouse (B8) with ancillary offices and associated parking	No – Not commenced.	3323.1
			Unit B industrial unit (B2) with ancillary offices and associated parking	Consented in 2024	2341.98
Shilton Ind Estate	0.5	B1/B2/B8	Fully consented for small extension to existing industrial unit on 0.5 ha site.	Yes	344.5
Land West of A5, CV23 0AJ	3.2	B2/B8	Erection of three buildings and use of site for purposes of an alcohol distillery and hydrocarbon warehouse (B2 & B8) and office building (B1a) on 2ha site.	Yes	1,492
					809
					1,768
TOTAL	13.62				

Source: Rugby BC Local Plan (2011-31)

2.3 Allocations

- 2.3.1 Policy DS4 of the Local Plan contains new employment sites that were allocated to meet Rugby BC’s employment land needs. The three sites were allocated to contribute 58ha towards the overall total supply of 114.28ha and employment land target of 110ha.
- 2.3.2 Our review finds that approximately 41ha of the 58ha of allocations has been completed to date (or is near completion), with the large majority of this located at South West Rugby. This takes the form of B8 employment use (warehousing and logistics) as intended as part of Policy DS8: South West Rugby. This consists of 7 units, 4 of which have been completed and let as a Phase 1 to the development. These range in size from 12,488 sqm to 36,663 sqm. A second phase consisting of 3 more large units (15,812 sqm – 36,296 sqm) is near completion. The size of units provided are considered to be of too large a footprint to meet the qualitative need for small

to medium-sized units identified in the Local Plan, or even in the revised definition of the most recent Employment Needs study.

- 2.3.3 Of the other two allocations, detailed consent was granted in February 2023 at Coton Park East for a single B8 warehousing and logistics building with a GIA of 26,421 sqm. This was granted, despite the conflict with Policy DS7 and the Coton Park East Masterplan SPD which specifically require employment development at this site to meet the qualitative demand for smaller units in the range of 5,000 - 50,000 sq.ft, in B1c, B2 and ancillary B8 employment uses. A previous outline consent was granted in February 2021 for the erection of several smaller industrial, storage and distribution units (for B1c, B2 and B8) on the site. That permission has not been implemented and it is the applicant’s intention for the larger unit to replace the consented smaller units. This represents a clear failure of the intended LP intention to provide for smaller units to meet Rugby’s demand.
- 2.3.4 The final allocation at Rugby Radio Station, outline consent was granted in June 2017 for an urban extension to Rugby including 31ha for B1, B2 and B8 (up to 106,000sq.m) employment space. The LP allocated 16ha of employment land in the South East of the site, with the balance to be delivered in the mixed use parts of the site. To date, work is near completion on a commercial unit providing total floorspace of 11,505.6 sqm comprising of offices (Use Class B1), assembly areas associated with light industry (Use Class B1), storage and distribution facilities (Use Class B8) on a 3ha site. The only completed scheme within the dedicated employment land is a David Lloyd Fitness Centre. This represents a D class use of 4,287 sqm on a site of approximately 2ha within the 16ha allocated for B1, B2 & B8 employment and was granted consent despite the policy conflict with ED1: loss of employment land of the LP.
- 2.3.5 The findings are summarized in the table below:

Table 5: Review of Rugby BC Local Plan Employment Land – Allocations

ALLOCATIONS			LSH REVIEW		
	Ha	Use	Description	Completed	Floorspace (sqm) (if known)
Coton Park East	7.5	B1/B2/B8	Fully Consented in Feb 2023 for single B8 building on 8.61ha	N – Not started	26,421
South West Rugby	35	B8	4 Units built and occupied by Iron Mountain	Yes	12,488
					17,304.3
					36,663.2
					23344.8
			3 Units near completion and available	Yes – Due to complete Q4 2024	36,296
					31,407
					15,812
Rugby Radio Station	16	B1/B2/B8	Outline consent for B1, B2 B8 on 31ha in 2017		
			Reserved matters consent in Mar2023 for B1&B8 on 3ha of site.	Yes – near completion	11,557.3
			Full Consent for D class Fitness Centre on 2ha of land allocated for employment.	Yes	4,287
TOTAL	58.5				

Source: Rugby BC Local Plan (2011-31)

2.4 Coventry's Unmet Need

2.4.1 The Rugby LP indicates that two strategic sites will provide for the sub regional requirements resulting from a shortfall of provision in Coventry. The two sites identified were at or near completion at the time of the LP adoption. Whilst there is some crossover between the sites identified as Ansty Park and Rolls Royce, Ansty, the review of completions since the beginning of the Plan period shows that these sites are delivering against their role of providing sub regional employment facilities to fulfil the needs of the wider region.

Table 6: Review of Rugby BC Local Plan Employment Land – Regional Sites

SUPPLY AND COMMITMENTS			
Site	Ha	Use	LSH Notes
Ansty Park	41	B1, B2 & B8	Previous LSH Analysis of take up on this site accounts for 46ha Site consists of a range of unit sizes of floorspace between 10,700 sqm and 40,400 sqm.
Former Peugeot Site, Ryton	57	B1, B2 & B8	Previous LSH Analysis shows take up on this site of 46ha Site consists of 9 units providing a range of floorspace of between 12,500 sqm and 31,000 sqm
TOTAL	98		

Source: Rugby BC Local Plan (2011-31)

2.4.2 Whilst there is a mix of unit sizes on the Ansty Park site, the more recent development (i.e. in the Plan Period) has been for larger logistic units. This includes the recently completed extension incorporating 4 detached B8 Units.

2.5 Summary

2.5.1 Our review of Rugby BC's Employment Land Supply shows that there has been a consistent uptake of larger units delivering B2 and B8 uses, in excess of the Local Plan's definition of small to medium. The two sites indicated to provide 98ha for the sub regional needs of Coventry were largely complete on adoption of the Local Plan and have continued to fulfil their expected role since then. This includes the extension of Ansty Park to include the former Rolls Royce site.

2.5.2 The total supply of sites indicated to meet Rugby BC's needs provide 114.28ha to meet the need of 110 ha. Of this, our review shows that 90.85ha is complete. However, 42.16ha of this figure represents sites that had already been completed within the Plan Period and were known completions at the point the Local Plan was adopted, leaving a total of 48.69ha that we consider have been completed since the adoption of the Local Plan.

2.5.3 This is shown in the table below:

Table 7: Summary of completed sites in LP Employment land supply and against local threshold

	Site Area (ha)	Completions (ha)	Site Area providing units less than 9,000 sqm (ha)	Site Area providing units greater than 9,000 sqm (ha)
Known Completions	42.16	42.16	0	42.16
Known Supply	13.62	10.69	7	3.69
Allocations	58.5	38	0	38
TOTALS	114.28	90.85	7	83.85

Source: LSH Analysis

- 2.5.4 We then consider the number of completions against the qualitative demand for small to medium sized units expressed in the Local Plan. This is considered to represent the local need of Rugby BC. The quantum expressed in Policy DS1 of the LP is of units in the range 5,000 to 50,000 sq ft. More recent evidence prepared to support the Local Plan Review suggests a larger threshold of 9,000 sqm.
- 2.5.5 If we use this more generous threshold of 9,000 sqm, then our analysis shows only 7ha of employment land has delivered units to meet local needs since the start of the plan period. The remainder, 83.85ha has provided larger units that contribute to a wider regional demand. Most alarmingly, none of the known completions included at the point of LP adoption provided local need, and to date, none of the allocated sites have delivered floorspace to meet this threshold. This includes the allocated site at Coton Park East that had a specific Policy requirement to meet such a need.
- 2.5.6 Our analysis shows that since the beginning of the plan period, the following four sites have delivered employment land that by Rugby BC's own definition is considered to be strategic in size and fulfilling a regional, rather than local, need:
- Central Park
 - Rugby Gateway
 - SW Rugby
 - Rugby Radio Station
- 2.5.7 All four sites are characterized by their proximity to the Strategic Road Network with Central Park and Rugby Gateway located immediately adjacent to Junction 1 of the M6, SW Rugby on the intersection of the A45 and M45 and the Rugby Radio Station site within close proximity of Junction 18 of the M1.
- 2.5.8 Central Park, Rugby Gateway and Rugby Radio Station are all located immediately next to or adjacent to existing employment areas. All four sites are located on the edge of the Rugby BC urban area and within close proximity to existing residential areas. In all cases, new residential development is either allocated or proposed as part of strategic masterplans. The employment land at Central Park, Rugby Gateway and SW Rugby has all been developed ahead of further proposed residential development. This suggests that proximity to the road network is more of a determining factor in the type of employment land that has been developed than access to the local market of Rugby BC.

2.6 Supply v Need

2.6.1 Since the start of the plan period, LSH analysis shows that a total of 188.85 ha of employment land has been delivered against the established need of 208 ha. This is summarized below:

Table 8 Summary of Need and Completions

	Need (ha)	Completions (ha)	Completions providing units of 5,000- 50,000 sq ft
Rugby's Need	110	90.85	7
Coventry's Unmet Need	98	98	0
TOTALS	208	188.85	7

Source: LSH Analysis

2.6.2 Of the total completions, only 7ha has delivered units to meet the qualitative threshold of 5,000 – 50,000 sq ft, which the Local Plan and its evidence base states there is a need for to meet the accommodation needs of small and medium sized businesses. Of the 5 sites that have contributed to meeting the qualitative demand, 4 are characterized by being existing established employment sites where development has either been a redevelopment of existing land or premises or intensification/extension to an existing unit.

3.0 LOSS OF EMPLOYMENT LAND

- 3.1.1 Having reviewed the provision of employment land to meet the total employment supply expressed in the Local Plan, this section looks briefly at the loss of employment land in the plan period.
- 3.1.2 Policy DC1 of the Local Plan seeks to protect the existing employment land in the Borough for B1(a), B1(b), B1(c), B2 and B8 uses. If a proposal is received that a site is proven to be no longer viable for employment uses, a proposal for change of use to a non B-use class may be considered acceptable provided that six policy tests are met to indicate that there is no reasonable prospect of the site being used for employment purposes and/or that an alternative land use would support sustainable local communities.
- 3.1.3 Since the Local Plan’s adoption, Rugby BC’s Annual Monitoring Report have been reviewed to reveal the following losses have been accrued where the policy requirement of DC1 are considered to have been met:

Table 9: Loss of Employment Land

Year	Employment Land Lost	Use
2019-20	6,196.18sqm	B1
2020-21	26.64sqm	B1
2021-22	No Losses Recorded	
2022-23	1105sqm	B2
Total	7,327.82 sqm	

Source: Rugby BC AMR 2019-23

- 3.1.4 Whilst the above quantum is considered to be fairly minimal, the review of the employment land supply in the previous section demonstrated that a site of approximately 2 hectares has been granted consent for non-B employment use within land allocated for such a use as highlighted below:
- Rugby Radio Station - Granted 01/09/2020 – Erection of David Lloyd Fitness Centre. D class use represented loss of B class employment land (Floorspace of 4,287 sqm on site of approx 2ha, within the 16ha allocation). It was acknowledged that the proposal conflicted with policy ED1, however through the planning balance exercise it was determined that the benefits were judged to outweigh a departure from the development plan.
- 3.1.5 Whilst the total loss of employment land highlighted above is considered relatively small, it should be considered in the context that our review of completions finds only a total of 7ha of employment land has delivered units to meet local need.

4.0 CONCLUSION

- 4.1.1 Our review of Rugby BC's Employment Land Supply shows that since the beginning of the plan period, the provision of large B class units has consistently met the regional requirement emanating from Coventry's unmet need. The majority of land at Ansty Park and Ryton had been developed by the time Rugby BC's Local Plan had been adopted, with a further phase at Rolls Royce, Ansty having since been developed to fulfil the same regional role.
- 4.1.2 The analysis of local supply has shown that only 7ha of employment land has delivered units of less than 9,000 sqm against an established need for 110ha throughout the plan period. Over the same period, there is a clear pattern of large units being delivered on local sites in Rugby.
- 4.1.3 The ability of unimplemented land on the allocated sites in the LP to improve the supply of smaller units has been compromised by the granting of consent for a larger strategic unit on the 7.5ha site at Coton Park East and 3ha site at Rugby Radio Station, and the loss of 2ha from the employment land supply at the same site to a D class use. This leaves only 11ha of undeveloped land at Rugby Radio Station, but to date, no further proposals have been consented.
- 4.1.4 This shows that there is a need for further sites to be put forward to help meet the qualitative local needs of Rugby BC, as was inferred in the recent issues and options local plan consultation.
- 4.1.5 This evidence also identifies that a significant quantum of land has come forward to deliver 'strategic' sized units, which may be used by the LPA to view larger floor spaces applications negatively.
- 4.1.6 As indicated in Table 7, 90.85ha of Rugby BC's need has been met overall. Of which, 83.85ha has delivered sites over 9,000 sqm and 7ha has delivered sites under 9,000 sqm. Therefore, consideration should be given to whether the qualitative elements of the evidence base, expressed in the supporting text of Policy DS1 have been achieved when bearing in mind the thresholds given to larger sites.

APPENDIX 1 – ADDENDUM TO MAIN REPORT

During our meeting on 12th November 2024 a discussion took place on elements of the report. As an alternative to updating larger sections of the report, these queries are set out below and answered here.

1.0 Para 2.5.2 – is it legitimate to discount completions at the point of adoption, if these still took place during the plan period?

- The Rugby BC Local Plan correctly identifies the completions that have taken place within the plan period (i.e. since 2011) and includes these in its employment land supply.
- The point being made in the LSH review is that none of the completions in the period 2011-17 met the qualitative need for providing smaller units to meet local employment needs. Subsequent to the adoption of the LP in 2019 and the publication of the GL Hearn Report in 2015 which identified the qualitative need for smaller B class units, none of the allocated sites have met this need.

2.0 Para 2.5.5 – whilst the LP hasn't defined the qualitative 'proportion' for meeting local needs, then is there anything in the evidence that supports what an appropriate proportion should have been? 7ha / 8% of 90.85ha (or indeed 6% of 110ha) is still "a proportion", however small.

- The qualitative need to provide smaller units to meet local employment need is based on the GL Hearn Report (Employment Land Study, 2015).
- Amongst its recommendations the ELS stated that...*In qualitative terms, there is a gap in provision of sites capable of accommodating industrial units up to 1,850 sqm in particular, and some industrial/distribution uses of up to 5,000 sqm. New allocations should particularly focus on addressing these needs. We consider that this would best be delivered through allocating a number of smaller employment sites focused on meeting local needs, rather than large tracks of land which are more likely to attract larger B8 occupiers.*
- The ELS also sought to draw a distinction between sites meeting local employment needs and those meeting a wider strategic role. The LP failed to follow this through into policy, therefore this is likely to have led to some confusion over the precise nature of the scale and type of employment use to be delivered on land within its employment supply.

3.0 Is there a robust unit threshold for defining local needs? Para 1.2.2 says the LP said units of 5,000-50,000 sqft but later studies supporting the LP review have said 9,000 sqm (essentially 100,000 sqft). This is confirmed at 2.5.4 and 2.5.5.

- The Local Plan states 5,000 – 50,000 sqft (465-4650 sqm), which is based on the GL Hearn Report (Employment Land Study 2015) which identified a gap in supply of such sites, and in particular, sites capable of accommodating 5,000 – 20,000 sqft (465-1850 sqm). The ELS recommended that the Council allocate a number of additional sites of between 2-4ha for this purpose without quantifying a specific amount for such provision. Given its age, the 2015 study should no longer be relied upon for these thresholds.

- The Coventry and Warwickshire HEDNA (Iceni, November 2022) refers to *'large-scale B8 warehousing units (defined as over 9,000 sqm / 100,000 sqft)'*.
- The West Midlands Strategic Employment Sites Study 2023/24 (Mace Ltd, with Iceni Projects Ltd, Knight Frank and MDS Transmodal, August 2024) refers to *'buildings where the total warehouse floor space (as defined) is greater than 9,000 square metres has been identified and extracted from MDST's database. This is broadly equivalent to buildings around 100,000 sqft or larger, the logistics industry's recognised definition of a large-scale distribution centre (aka large-shed or 'big-box')'*.

4.0 Acknowledging this is an outline, would it undermine the strategy if our indicative layout showed units above this threshold (e.g. >100,000 sqft)? Putting it another way, how many larger units or what proportion of the total floorspace could be justified to meet 'larger than local' needs on the site?

- As discussed, it may be that larger units could be justified, if it can be demonstrated that local businesses are in need of larger sites for expansion. This could possibly be achieved off the back of letters of reliance or feedback from Chamber of Commerce for example?

5.0 What if the indicative layout showed a 'large' unit(s) with dotted internal subdividing walls to show potential for multi-let?

- All of the above would require a narrative to justify the need for greater flexibility that would allow the proposals to respond to market conditions.
- The Local Plan Inspector requested amendments to the wording of the Local Plan to allow for greater flexibility – The inspector observed that *'Planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.'* The Inspector cited the NPPF (Paragraph 122(b)) referring to *'decisions needed to reflect changes in the demand for land', 'where the local planning authority considers there to be no reasonable prospect of an application coming forward'*.
- It is acknowledged that the Inspector's concerns related to allocated employment sites but the principle remains the same.

6.0 Would having a prospective occupier for a 'large' unit(s) on board change anything?

- The ability to demonstrate a prospective occupier would help to demonstrate the deliverability of any planning proposal. This strategy was used to justify the change of approach at the allocated site at Coton Park East. The application was accompanied by a marketing report that demonstrated the marketing of the site for smaller units over a period of 2 years, described the constraints of delivering such units and outlined the high level of demand (and shortage of suitable land) for larger B8 units in Rugby and surrounding area.

- In that case, the applicant had experienced interest from current employers within Rugby, seeking additional warehouse space. The planning statement submitted with the application highlighted the particular circumstances:
 - The site's location relative to the M6 (Junction 1) and the strong economic geography of the site that sits on the motorway network at the very heart of the 'Golden Triangle of Logistics', has been the principal factor driving market interest in the site.
 - One occupier has shown interest in the proposed unit, and they are currently located on Castle Mound Way. They wish to remain within the Borough to retain their existing employee base, utilise their existing supply chains and ensure they can accommodate the growing needs of their business in an efficient manner. A letter of intent to move their operations was sent to the LPA to support the application.
- Despite interest from a prospective occupier, the proposed development would also need to be addressed on its own merits, as there is no guarantee that the company will occupy the new premises.

7.0 Would providing an element of roadside-retail on the site undermine the employment land strategy at all?

- Rugby BC have already demonstrated their willingness to consider development proposals that would otherwise be considered to be out of accord with their Employment Land Strategy if it can be demonstrated that the benefits of the proposal outweigh the departure from the Local Plan.
- This is the case with the application for a David Lloyd Fitness Centre as part of the employment land allocation at Rugby Radio Station. In that case, the applicant sought to justify the proposed use by setting out a robust economic case demonstrating the proposal's potential to generate the equivalent number of jobs as other employment uses.
- The applicant also highlighted the support of Invest in Warwickshire noting that the type and nature of the proposed development would significantly improve the appeal of the wider employment land allocation for business users. Further, the development would be located at the edge of the site adjacent to a main distributor road and roundabout and would provide an attractive gateway for the allocated employment land. Critically, it is argued that it could help unlock and bring forward development on the wider site for B1, B2 and B8 employment uses. In that sense the proposal could serve to act as a catalyst for delivering the remaining allocated employment land.
- A proposal for retail outside of Rugby Town Centre would need to be justified against Policy TC2 of the Local Plan which states that...

"all proposals for retail, office or leisure uses on sites not within Rugby Town Centre in excess of 500sq.m gross floor space must be accompanied by an impact assessment. This assessment must meet the requirement of national policy and established best practice. It should demonstrate that the proposal would not harm the vitality or viability of any nearby centre."

8.0 Appreciate the roadside-retail/employment split would be a commercial decision but is there anything else (employment land-wise) which would lead us to cap the amount/proportion of roadside-retail?

- There is nothing in the employment land evidence base that provides further insight into the amount of land to be provided as ancillary to a wider employment function.

9.0 How much land remains available to meet 'local' needs? Is it just the 11 ha at Rugby Radio Station mentioned at 4.1.3?

- The remaining land (11ha) at Rugby Radio Station is the only land identified in the Local Plan that could provide further units to meet Rugby's qualitative employment needs.
- The 2015 Employment Land Study, which informed the adopted Local Plan employment strategy, suggested the employment land safeguarded as part of the allocation could accommodate medium sized units with ancillary B8 to meet the qualitative need. However, this wasn't reflected in the LP Policy, and there is nothing to indicate that the remaining land will deliver small to medium sized units.
- Further analysis showing delays or any other reasons why this site has not come forward at the pace anticipated may be helpful in demonstrating the benefits of the proposed development at Land at A45/Coventry Rd Junction.

10.0 To what extent do we need to be cognisant of competing potential sites in the LP review?

- Whilst there is a need to be aware of other potential sites that could contribute to the employment supply as part of the LP review, there are, at present, no evidence base documents available that relate to future supply.
- The extant LP undertook a Call for Sites in 2014 and 2016 and considered that all but one of the additional sites proposed were located within Green Belt and it was not considered at the time that exceptional circumstances existed to release Green Belt land where sufficient land was already in the supply to meet identified needs.

11.0 How successful are 'qualitative' arguments in persuading LPAs / Inspectors to grant permission on unallocated sites?

- In LSH's experience, using both a qualitative and quantitative assessment of need is beneficial, a purely numbers based approach isn't always that effective.

APPENDIX 2

Suitability, Availability & Achievability Assessment of Richborough Park

SUITABILITY - PLANNING FACTORS			SUITABILITY - MARKET FACTORS							AVAILABILITY FACTORS				ACHIEVABILITY FACTORS			SUMMARY
Habitat	Landscape	Heritage	Access to Strategic Road Network	Local Road Access	Greenfield / Brownfield	Immediately Available / Requires preparation	Site Characteristics & Physical Constraints	Flood Risk	Quality of Infrastructure	Landowner/ Developer	Ownership Factors	Planning Consent	Deliverable	Barriers to Development	Market Attractiveness	Viability of developing employment	Summary
Draycote Meadows SSSI located considerable distance to the SW of the site.	No constraints.	No constraints.	Very Good < 2km from SRN	Good. Wide roads suitable for HGVs avoid housing areas. New access would be provided off the B4429.	Greenfield	Immediately Available	Level, regular shaped site currently used as arable fields, with easy access. Two development plots seperated by Main Street.	Not considered to be at risk of fluvial or pluvial flooding.	Vacant site with frontage to main road. Will require new access, and upgrade of existing infrastructure to plot.	Promoter - Richborough.	Promoted for a range of employment uses.	N/A	Not currently allocated and no planning consent.	Modest infrastructure required including new access.	Main road location on edge of urban area and screened from sensitive uses. Would suit a range of businesses	Viable location for B2/B8	Suitable. Available. Achievable.

Technical Note



Richborough Park, M45 Junction 1

March 2026



**Tyler
Grange**

TG Report No. 17699_R0X_DH

Project No:	Report No.	Date	Revision
17699	R02	March 2026	-

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Section 1: Introduction

- 1.1. This Technical Note has been prepared by Tyler Grange (TG) on behalf of Richborough Limited.
- 1.2. The purpose of this a desk based technical note is a review of the proposed policy EN4 Areas of Separation (referred to as the Policy) within the Rugby Borough Council (RBC) Proposed Submission Local Plan Consultation (Regulation 19) document¹. This review is undertaken from a landscape and visual perspective and is not a policy analysis on compliance assessment.
- 1.3. This technical note includes a review of the Policy itself, aspects of the local plan evidence base and how the Policy relates to 'Richborough Park, M45 Junction 1' (referred to as the Site) being promoted by Richborough Limited as part of the local plan process. The Site is located in between Coventry Road (to the north) and the M45 (to the south) and comprises two arable fields separated in a north-south direction by Main Road. Its location is shown in Figure 1.

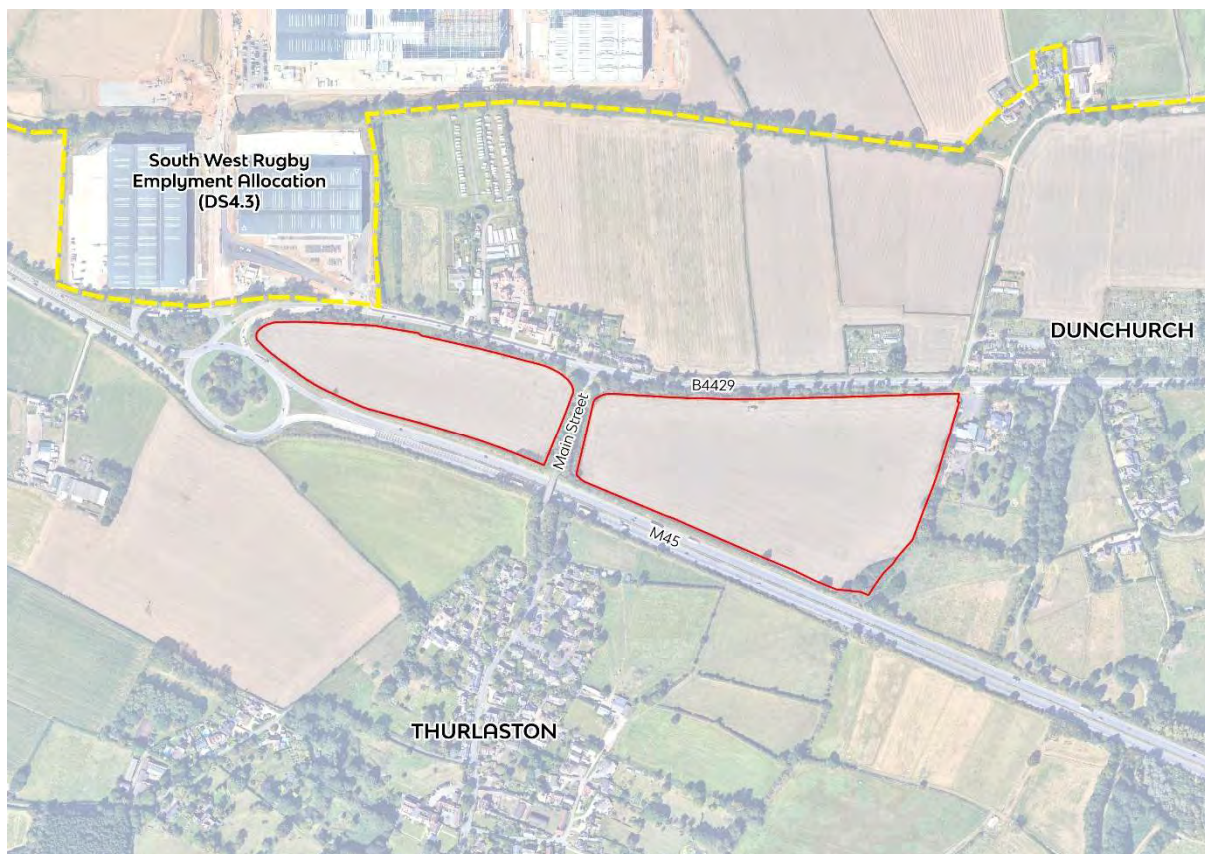


Figure 1: Site Location/Context (Google Earth 2025)

¹ [Rugby Borough Local Plan 2025- 2042, Proposed submission version, January 2026](#)



Section 2: Review of the EN4 Area of Separation Policy

2.1. The proposed Policy area is defined on the Policies Map² and covers the areas around Rugby town and the settlements of Clifton upon Dunsmore, Dunchurch and Thurlaston. The Site specifically falls within the 'Rugby – Dunchurch and Thurlaston' area discussed within the Policy. The extent of which is shown in Figure 2 below:

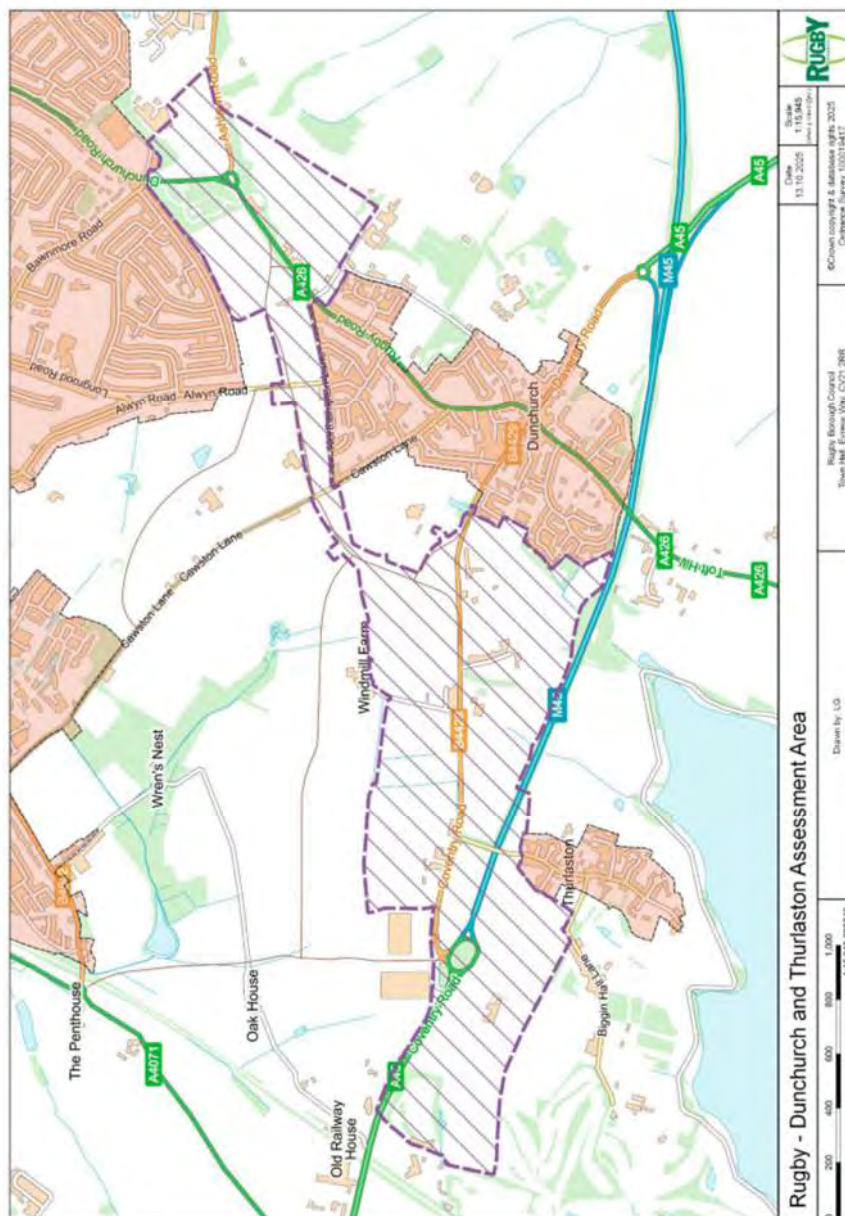


Figure 2. Extent of Rugby – Dunchurch and Thurlaston assessment area

² Policies map



- 2.2. The Policy does not clearly state the purposes of the Area of Separation (AoS).
- 2.3. The Policy does not describe how it relates to national policy within the National Planning Policy Framework (NPPF)³. This includes principles such as protected landscapes or Green Belt described within the NPPF.
- 2.4. The Policy does not appear to protect the landscape of the areas surrounding the settlement for their inherent quality or value, but rather for their spatial function:

“B. Development will only be permitted in these areas when it will not have a significant adverse impact, either alone or in combination with other existing or proposed development, on the effectiveness of an Area of Separation in protecting the identity and distinctiveness of settlements and preventing their coalescence.

C. Developments that diminish physical and visual separation, have an urbanising influence, or which adversely impact settlement identity should be deemed as having an adverse impact on the effectiveness of an Area of Separation”.

- 2.5. It is noted that the Policy does not preclude development which can be mitigated:

“D. Applicants proposing development that may have an adverse impact on an Area of Separation must demonstrate that they have considered this impact and have incorporated appropriate mitigatory measures into their proposal.”

- 2.6. In landscape and visual terms, the Policy seems to imply that, as long as any development can demonstrate that it does not diminish the sense of separation or adversely affect the settlement identity, it could be permitted in regard to the Policy. However, given the nature of built form, it is difficult to understand how any development could be constructed anywhere within the area covered by the Policy, without diminishing the physical separation to some degree. However, sensitive site design and mitigation could limit the loss of visual separation.

³ [National Planning Policy Framework](#)



Section 3: Review of Area of Separation Policy Evidence Base

- 3.1. The Policy is supported by the Areas of Separation Study Report (November 2025)⁴ (referred to as the Study Report) produced by RBC.
- 3.2. The Study Report notes that:

“No national guidance exists for assessing areas of separation, and no such studies have been undertaken for the Borough in recent history that can be reproduced and updated.”
- 3.3. As AoS Policy does not relate to national planning policy, it could be assumed it is lower in the hierarchy in policy terms in relation to other landscape and spatial policy including Green Belt, National Parks, National Landscapes or Valued Landscapes.
- 3.4. As there is no national guidance in relation to AoS, the Study Report draws upon methodologies used in other Local Planning Authorities (LPA). This includes studies in support of other emerging local plans in Harborough District Council⁵ and North West Leicestershire District Council⁶ (referred to as the Example Studies). The LUC Example Study more closely aligns with the approach taken by the Study Report, i.e. spatially led, whilst the Landscape Partnership Example Study methodology takes a more landscape-led approach.
- 3.5. At the time of writing this technical note, the two local plans that the Example Studies form the evidence base of, have not been adopted.
- 3.6. Both the Example Studies undertaken by the other LPAs were produced by independent environmental consultancies. The authors are clearly identified, and this provides a level of certainty they were produced by experienced and qualified individuals. The Study Report does not clearly identify the authors’ experience or qualifications. This reduces its robustness when compared to the Example Studies.
- 3.7. The three aspects of assessment are listed and described within the Study Report; settlement identity, physical and visual separation and urbanising influences. However, the relative effectiveness of these aspects (i.e. highly effective through to not very effective) is not defined or detailed with the Study Report. Also, the relative importance of each of these aspects is not discussed or quantified within the Study Report.
- 3.8. The Study Report does not take a systematic approach to assessment or break down each area considered into parcels / fields, as per the Landscape Partnership Example Study.
- 3.9. The Study Report does not clearly state the purposes of the Area of Separation.

⁴ [Areas of Separation Study Report](#)

⁵ [LUC \(2024\) Areas of Separation: Review of existing and potential areas](#)

⁶ [The Landscape Partnership \(2022\) Area of Separation Study: Coalville Urban Area](#)



3.10. The methodology used within the Study Report is not considered to be robust. It lacks clarity and transparency and as such allows for little detailed independent assessment. This is due to:

- It does not clearly state the purposes of the AoS. Without this it is not possible to understand how the areas covered by the Policy relate to the purpose of the Policy;
- It is not based on a recognised national methodology (as there is none) and instead uses aspects of other studies. The Study Report predominantly takes a spatial analysis approach rather than a landscape led one. Neither of the Example Studies form part of approved local plans;
- It provides no details on the qualifications and experience of its authors;
- The relative effectiveness (i.e. highly effective through to not very effective) of the three aspects of assessment (Settlement Identity, Physical and Visual Separation and Urbanising Influences), are not clearly defined or detailed;
- The relative importance of each of the aspects of assessment (Settlement Identity, Physical and Visual Separation and Urbanising Influences), is not discussed or quantified; and
- It does not take a systematic approach to assessment or break down each area considered into parcels.



Section 4: Review of Site Specific Analysis

- 4.1. The Study Report breaks the 'Rugby – Dunchurch and Thurlaston' area down into three areas: A, B and C. This Site sits within Area C, which is between the west of Dunchurch and north of Thurlaston. The Rainstock Valley development area (shown as the yellow dash on Figure 1) forms the northern boundary of Area C of the 'Rugby – Dunchurch and Thurlaston' area. As shown in Figure 3, the Site sits to the north of Thurlaston on the opposite side of the M45 (133 on Figure 3 below). The Study Report does not illustrate which areas it considers to A, B or C within the document, and instead relies upon a written description.

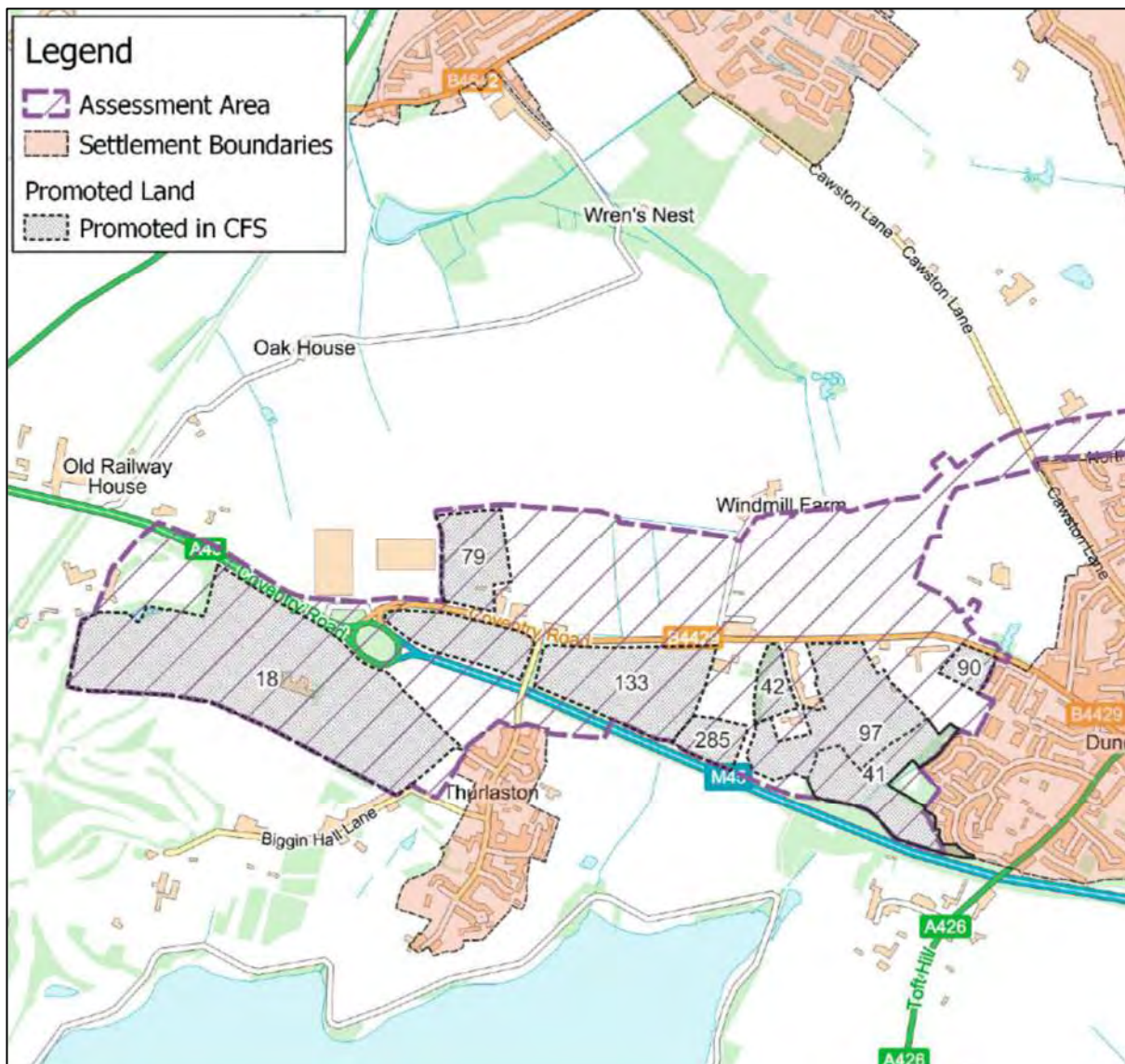


Figure 3: Extract from The Study Report illustrating the location of the Site (133).

- 4.2. Any development on the Site would not affect the historic core of the Dunchurch or Thurlaston, which are identified as being important to their settlement identity as described in the Study Report.



- 4.3. The Study Report notes about the following in regard to the physical and visual separation of the gap between Thurlaston and Rugby that:

“main physical features separating the village from the town are the M45, Coventry Road, and Cawston Spinney”

“no intervisibility between Thurlaston and Rugby town. Given the area’s topography, and the presence of trees and vegetation along the M45 and Coventry Road which act to screen the village, it is expected that most of the South West Rugby urban extension will not be visible from the village either. However, immediately upon exiting the village along Main Street, or via the public right of way that connects Stocks Lane to Biggin Hall Lane, the warehouses of Symmetry Park are prominent in views to the northwest”

- 4.4. Any development on the Site would retain the M45 corridor between the Site and the settlement of Thurlaston. This corridor is key to maintain the sense of separation, particularly preventing intervisibility between Thurlaston and development to the north of the corridor. It also acts as a physical boundary between Thurlaston and the Site. Cawston Spinney will be integrated into the Rainstock Valley development whether development was taken forward on the Site or not. The land to the north of the Coventry Road outside of the South West Rugby urban extension to the east of Symmetry Park, would remain open whilst the area to the south would be built form, if development was taken forward on the Site.

- 4.5. The Study Report also notes about the urbanising influences of the gap between Thurlaston and Rugby that:

“However, there are also significant urbanising influences, including the M45, Coventry Road, and the warehouses of Symmetry Park.”

“There is a reasonably clear sense of departure and arrival when travelling between Thurlaston and Dunchurch enhanced by the enclosure of the northern part of Main Street and much of Coventry Road by open countryside”

- 4.6. It also notes the key characteristics of settlement gap to be:

“The open countryside that encloses Main Street, Thurlaston, which is particularly important for maintaining a rural setting on the approach to the village.”

- 4.7. Any development of the Site would not introduce a new element in the landscape of this area with the Study Report noting that it is influenced by the M45 corridor and the built form of Symmetry Park. The Study Report notes the open countryside of the Site is important, particularly on Main Street along the approach to Thurlaston. Much of Main Streets is enclosed by vegetation. This, along with the vegetation along the southern boundary of the Site, heavily filters views of the Site, particularly in the summer months. Any development on the Site could increase the level of vegetation, maintaining the vegetated corridor approach to Thurlaston.

- 4.8. As part of the Study Report, the impact of any potential site allocations, committed development, or undecided planning applications on the assessment area are considered. In the Study Report the Site is listed as Site 133. The Site is not covered by any designations in the Study Report. The Study Report notes that:



"Site 133 is within c. 90 metres of the village's northern boundary at its nearest point. At present, intervisibility between the village and the site is mostly obscured by vegetation, however, buildings constructed for employment use would be clearly visible from the bridge that provides the only vehicular access point into the village, and may be visible from certain vantage points within the settlement boundary too. The urbanising effect of this would have a detrimental impact on the village's identity and diminish the sense of arrival and departure through a settlement gap."

- 4.9. The Study report appears to place a large emphasis on the bridge crossing the M45 and approach to Thurlaston along Main Street. This section of Main Street rises in level on an ever-rising embankment from the junction with Coventry Road to the north, to the bridge over the M45 to the south. It is lined on both sides by trees along with areas of shrubs and hedgerow. There are glimpses of the Site through this vegetation along Main Street, with slightly wider views of the Site from the bridge.
- 4.10. It is considered that the Site could be developed whilst maintaining the sense of separation between Thurlaston and Rugby by reason of:
- Any development on the Site would not affect the historic core of the Dunchurch or Thurlaston, which are identified as being important to their settlement identity as described in the Study Report;
 - Any development on the Site would retain the M45 corridor which is a key feature in maintaining the physical and visual separation of the settlements;
 - Any development on the Site would not be a new element in the landscape as it is already influenced by built form and the urbanising influence of Symmetry Park; and
 - Any development on the Site could be sensitively designed by offsetting built form from Main Street. Whilst also increasing the level of vegetation along the road and the southern boundary of the Site. This would maintain the vegetated corridor transition to and from the settlement along the road. Which is one of the key characteristics of settlement gap identified within the Study Report.



Section 5: Review of Landscape Sensitivity Evidence Base

- 5.1. The RBC landscape studies do not form part of the evidence for the Policy, as they relate to the proposed landscape policies of EN2 and EN3. However, as landscape and spatial separation are complementary subjects. A review has been undertaken to understand how they relate, and how consistent they are with each other.
- 5.2. RBC has undertaken numerous landscape studies as part of its evidence base for its new local plan which currently include:
- Landscape Character Assessment (January 2025);
 - Addendum for Strategic Site Options: Post-mitigation assessments (December 2025);
 - Rugby Borough Council Landscape Sensitivity Assessments (March 2025);
 - Landscape Sensitivity Assessment of Strategic Site Options (March 2025);
 - Rainsbrook Valley Landscape Sensitivity Assessment (December 2025);
 - South-West Rugby Landscape Sensitivity Assessment (April 2017);
 - The area of South West Rugby Landscape sensitivity assessment (January 2026); and
 - Landscape Sensitivity Assessment of Small Sites (December 2025).
- 5.3. Part of the Landscape Character Assessment (January 2025) considers the existence of any areas of locally strong landscape character which might be considered to be valued landscapes. The landscape character area that the Site sits within was not found to be a valued landscape as defined by the National Planning Policy Framework paragraph 187. IT is noted that the current consultation version of the NPPF no longer references valued landscapes.
- 5.4. The Site was considered as part of the Landscape Sensitivity Assessment of Strategic Site Options (March 2025) report (Site 133). The report's assessment was on a site-by-site basis rather than covering larger areas of the landscape. Overall Site 133 was considered to have a medium / low sensitivity to development, with the following comments made:
- "This is a medium sized site consisting of two arable fields just to the north of Thurlaston. It is enclosed by the M45 to the south and Coventry Road to the north. Sensitivities are only likely to arise from the site's intervisibility with adjacent properties on Coventry Road, and from the natural value of the trees and hedges that enclose the site and from its contribution to the rural setting of Thurlaston."*
- 5.5. The level of sensitivity definitions are not provided within the Landscape Sensitivity Assessment of Strategic Site Options (March 2025) report undertaken by RBC, therefore it is not considered robust. However, it is noted that the work was undertaken at the same time



as the work undertaken by Lepus consulting on the Landscape Sensitivity Assessment of Strategic Site Options (March 2025). This report provided the following definition for medium / low sensitivity to development:

“Landscape and/or visual characteristics of the assessment unit are resilient and of low susceptibility to change and/or its values are medium/low or low and it can accommodate the relevant type of development in many situations without significant character change or adverse effects. Thresholds for significant change are high.”

- 5.6. The following mitigation potential was identified within the Landscape Sensitivity Assessment of Strategic Site Options (March 2025):

“Maintain the existing trees, shrubs and hedges around the boundaries. Improve the screening of the site from properties of Coventry Road and the village of Thurlaston.”

- 5.7. The Landscape Sensitivity Assessment of Strategic Site Options (March 2025) report concludes that development could be considered on the Site with appropriate mitigation. This contradicts the Study Report which deemed the Site not suitable for development due to the effect it would have on the sense of separation between settlements.

- 5.8. An older report the South-West Rugby Landscape Sensitivity Assessment (April 2017) also covers the Site. The report considers wider areas as assessment units, with the Site falling into Zone 21d which covers an area of land to the north and west of Thurlaston. The report found that Zone 21d had a High sensitivity to commercial development and concluded that:

“This zone is typical of Plateau Farmlands owing to its general openness, large geometric fields with closely cropped hawthorn hedgerows and surviving mature hedgerow oaks. Due to the zone’s strong rural character and the degree of separation currently afforded between Rugby and Thurlaston, commercial development within this zone is therefore inappropriate.”

- 5.9. High sensitivity within the report is defined as:

“Landscape and / or visual characteristics of the zone are very vulnerable to change and / or its intrinsic values are high and the zone is unable to accommodate the relevant type of development without significant character change or adverse effects. Thresholds for significant change are very low.”

- 5.10. This directly contradicts the Landscape Sensitivity Assessment of Strategic Site Options (March 2025) report. This difference in opinion may be partially down to the methodology used and the way that the parcels considered in each report are different scales. It should also be noted that South-West Rugby Landscape Sensitivity Assessment (April 2017) do not identify any land within its study area that was anything other than High sensitivity to commercial development.



Section 6: Summary

- 6.1. The Policy does not clearly state the purposes of the Area of Separation (AoS). Without this it is not possible to understand how the areas covered by the Policy relate to the purpose of the Policy.
- 6.2. The Policy does not describe how it relates to national policy within the National Planning Policy Framework.
- 6.3. As AoS Policy does not relate to national planning policy, it could be assumed it is lower in the hierarchy in policy terms in relation to other landscape and spatial policy including Green Belt, National Parks, National Landscapes or Valued Landscapes.
- 6.4. Although the policy mentions mitigation, it is difficult to understand how any development could be constructed anywhere within the area covered by the Policy, without diminishing the physical separation to some degree. However, sensitive site design and mitigation could limit the loss of visual separation and overall sense of separation.
- 6.5. The methodology used within the Study Report is not based on any national guidance, as there is none. It lacks clarity and transparency and as such allows for little detailed independent assessment. It is not considered robust.
- 6.6. The landscape character area that the Site sits within, is not designated for its landscape value or quality.
- 6.7. The Landscape Sensitivity Assessment of Strategic Site Options (March 2025) report considers that development could be considered on the Site with appropriate mitigation. This contradicts the Study Report.
- 6.8. Any development on the Site could be sensitively designed by offsetting built from Main Street. Whilst also increasing the level of vegetation along the road and the southern boundary of the Site. This would maintain the vegetated corridor transition to and from the settlement along the road. Which is one of the key characteristics of settlement gap identified within the Study Report).





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

Richborough Park M45 Junction 1

Representations Document



Rugby Borough Local Plan Preferred Option Consultation 2025: Representations

19 May 2025

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

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

Dear Sir/Madam

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

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

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

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

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

Yours faithfully,

Julia Chowings
Partner
Newmark Planning and Development

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Mobile [+44 7919 111299](tel:+447919111299)

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1. Richborough Commercial

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

2. Site Location and Context

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

SECTION 2: SITE LOCATION AND CONTEXT

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

3. Planning Policy Context

National Planning Policy Framework (December 2024)

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

SECTION 3: PLANNING POLICY CONTEXT

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

Emerging Local Plan: Preferred Option Consultation

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

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

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

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

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

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

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

3.15. Additional details of the adjacent allocation include:

The district centre will comprise:

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

Development of the site shall deliver:

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

SECTION 3: PLANNING POLICY CONTEXT

LOCAL PLAN EVIDENCE BASE

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

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

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

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

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

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

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

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

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

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

Options for future development on the Site

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

THE ILLUSTRATIVE MASTERPLAN OPTIONS INCLUDE:

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

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

Opportunity for Local Employment Uses

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

OPPORTUNITY FOR THE SITE TO MEET LOCAL NEED

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

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

OPPORTUNITY FOR THE SITE TO MEET LOCAL NEED: KEY CONCLUSIONS

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

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

Opportunity for Other Employment-generating Uses

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

PROPOSED MIX OF USES AT THE SITE

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

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

OPERATOR DEMAND

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

OBJECTIVELY ASSESSED NEED SUMMARY

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

SEQUENTIAL APPROACH SUMMARY

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

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

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

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

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

TOWN CENTRE IMPACT SUMMARY

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

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

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

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

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

OTHER EMPLOYMENT-GENERATING USES: KEY CONCLUSIONS

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

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

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

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

Economic Benefits

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

Social Benefits

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

Environmental Benefits

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

6. Response to Rugby's Preferred Options Consultation

Response to the Preferred Options Consultation Questionnaire

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

OBJECTIVES

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

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

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

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

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

SECTION 6: RESPONSE TO RUGBY'S PREFERRED OPTIONS CONSULTATION

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

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

What we are asking the Council to consider:

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

STRATEGY FOR EMPLOYMENT LAND AND EMPLOYMENT ALLOCATIONS

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

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

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

6.11. **Response:** Disagree.

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

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

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

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

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

SECTION 6: RESPONSE TO RUGBY'S PREFERRED OPTIONS CONSULTATION

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

What we are asking the Council to consider:

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

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

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

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

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

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

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

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

SECTION 6: RESPONSE TO RUGBY'S PREFERRED OPTIONS CONSULTATION

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

ECONOMY

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

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

- 6.26. **Response:** Disagree.

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

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

SECTION 6: RESPONSE TO RUGBY'S PREFERRED OPTIONS CONSULTATION

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

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

What we are asking the Council to consider:

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

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

CENTRES

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

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

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

6.36. **Response:** Disagree.

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

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

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

SECTION 6: RESPONSE TO RUGBY'S PREFERRED OPTIONS CONSULTATION

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

What we are asking the Council to consider:

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

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

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

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

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

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

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Richborough Park, M45 Junction 1



Executive Summary

- 0.1 This Vision Document is formally submitted in response to the Preferred Option (Regulation 18) Consultation Document in respect of Richborough Park M45 Junction 1 ('the Site'). This Vision Document has been prepared by the project design team to support the Representations Document, prepared by Newmark.
- 0.2 **These representations seek to promote the Site for an employment-led allocation in the emerging Rugby Local Plan.**
- 0.3 An allocation is sought to support local employment need and is based on the work undertaken by Richborough Commercial and its specialist consultants.
- 0.4 The representations highlight the opportunity of the Site to meet the Council's requirements, as evidenced in its emerging Local Plan and evidence base, for smaller employment sites. As currently drafted, the Draft Plan does not address how local needs will be met; or indeed include any proposed allocations to meet this local need.
- 0.5 In parallel, the emerging Local Plan and evidence base identifies the barriers faced by local businesses where there is "very little opportunity to 'grow-on' as the vacant premises are not the right size, causing them to either stagnate or leave Rugby" (Rugby's Economic Strategy 2025-2035). The issues faced by local businesses in Rugby are exacerbated by the pattern of supply of employment land that has come forward since the adoption of the extant Local Plan, where very few small to medium-sized units have been delivered.
- 0.6 The Site can deliver the exact type of employment floorspace that the emerging Local Plan identifies as being required. Whilst the Site can help meet the local economic need for smaller units, we are also cognisant that local businesses require both smaller and larger units. The site is approximately 11.81 ha and as such, it provides an excellent opportunity to deliver industrial and logistics uses in a mix of unit configurations, from 'small' to 'mid' (<9,000 sqm) and 'big box' (>9,000 sqm) creating up to 34,620 sqm of floorspace in a sustainable location.
- 0.7 There is also a strong opportunity to provide some complementary retail and roadside uses, through a flexible approach to future development of the Site.
- 0.8 This Vision Document is supported by a suite of technical reports and surveys undertaken by specialist consultants to support the allocation of the Site. Taking this due diligence into account, this Vision Document presents an illustrative masterplan, showing four potential options for the Site.
- 0.9 The options include bringing forward the Site either in its entirety as an employment site (Class B2; B8; and E(g)(ii)&(iii) uses); or capitalising on the opportunity for the western parcel, directly adjacent to the M45/A45 Thurlaston Interchange, and the South West Rugby Sustainable Urban Extension including the Tritax development opposite, to come forward for complementary retail and roadside (Class E) uses. These include a foodstore, drive-thru/to units, petrol filling station and EV charging uses to support the current and future needs of the area.
- 0.10 As such, we invite the Council to consider the evidence submitted within and appended to this Vision Document and Newmark's Representations Document when forming a view on the suitability of the site to accommodate development. We welcome the opportunity to engage with Rugby Borough Council in respect of the emerging Local Plan in due course.



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 - 4.12 Landscape
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 - 4.14 Minerals
 - 4.15 Utilities
 - 5 Illustrative Masterplan & Vision
 - 6 Deliverability & Benefits
- Appendices (submitted separately)

Prepared by IMA Architects on behalf of Richborough Commercial

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1 Introduction

- 1.1 This document has been prepared by IMA Architects to support Richborough Commercial with the promotion of a site known as Richborough Park, M45 Junction 1 (The Site), which is sought to be brought forwards in the emerging local plan for an employment led allocation.
- 1.2 This Vision Document has been prepared to demonstrate that the Site, located adjacent to the M45/A45 Thurlaston Interchange provides an opportunity to meet Ruby's local economic needs.
- 1.3 The Site in its entirety within the redline shown in this document (page 6) is all within the control of Richborough, with the site falling over two parcels of land.
- 1.4 The land is suitable to accommodate a significant amount of employment floorspace to address local business needs and provide good quality places of work for people in the surrounding area. In addition, the Site potentially enables some retail including drive thru/to, petrol filling station and EV charging hub provision.
- 1.5 The promotion of the Site for an employment led allocation has been informed by our assessment of the Council's requirements for local economic need. A range of technical reports and surveys have also been undertaken to date by Richborough, together with select detailed assessments the multi-disciplinary design team have informed our understanding of the constraints and opportunities.
- 1.6 An illustrative masterplan (with multiple options) illustrates a flexible design response to the findings of the Site assessment work. This demonstrates the site could bring forward a high quality, employment and/or commercial development set within areas of green infrastructure. As such, we invite the Council to consider the evidence submitted within and appended to this Vision Document when forming a view on the suitability of the site to accommodate the development.

The Vision Document:

Site & Context

- A summary of the site in context, including its wider strategic positioning and surroundings.

Planning Context

- An assessment of the Site for an employment led allocation in the context of the emerging Local Plan, and supporting evidence base.

Technical Considerations

- Summary of the key technical and environmental considerations that have informed the illustrative masterplan options.

Illustrative Masterplan & Vision

- Underpinned by an overarching vision for the site, the presentation of multiple options within the Illustrative Masterplan demonstrates a flexible approach to how the site could be brought forward for development.

Deliverability & Benefits

- Details how the delivery of the proposed development is available with good prospects to bring the Site forward for development within the plan period.

About Richborough

- 1.7 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.
- 1.8 It is a founding member of the Land, Planning and Development Federation (LPDF) and a proud member of the British Property Federation (BPF).
- 1.9 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.
- 1.10 As testament to this, it is currently promoting over 15 million sq ft of floorspace for various employment-generating uses, including industrial and logistics, retail, roadside schemes, data centres and mixed-use developments, in a variety of well-connected and sustainable locations.
- 1.11 Richborough oversees the entire planning process from start to finish. It identifies suitable opportunities, undertakes technical surveys, designs masterplans, promotes sites through local plans, secures outline planning permission and sells consented land to developer partners.
- 1.12 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.
- 1.13 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.

South-West Employment Allocation (Policy S7)
South West Rugby employment phase 2
allocated for circa 130,000 sqm of employment
floorspace for phase 2

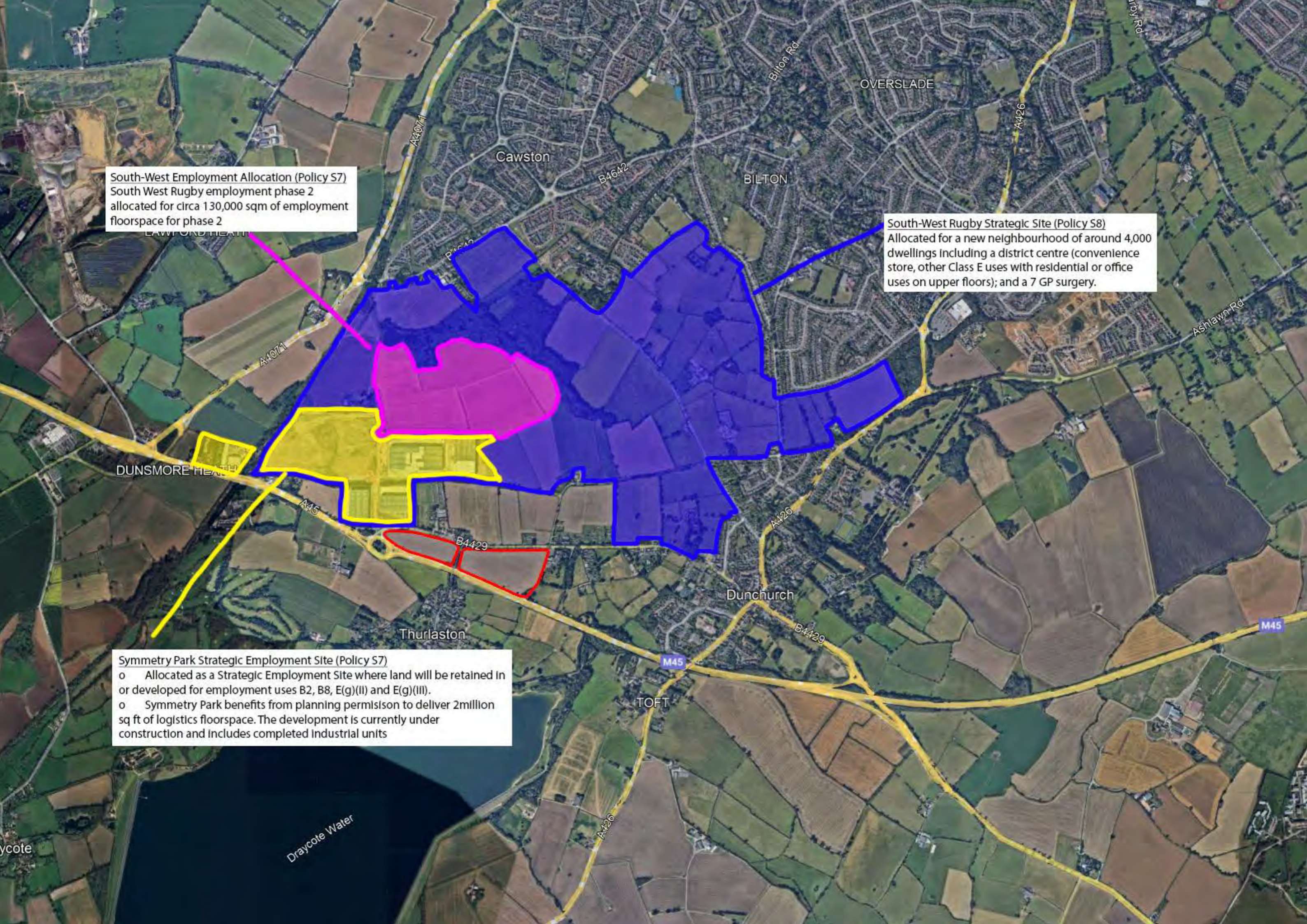
South-West Rugby Strategic Site (Policy S8)
Allocated for a new neighbourhood of around 4,000
dwellings including a district centre (convenience
store, other Class E uses with residential or office
uses on upper floors); and a 7 GP surgery.

DUNSMORE HEATH

Symmetry Park Strategic Employment Site (Policy S7)
o Allocated as a Strategic Employment Site where land will be retained in
or developed for employment uses B2, B8, E(g)(II) and E(g)(III).
o Symmetry Park benefits from planning permission to deliver 2million
sq ft of logistics floorspace. The development is currently under
construction and includes completed Industrial units

ycote

Draycote Water



2 Site & Context

- 2.1 The site is located adjacent to the M45/A45 Thurlaston Interchange, north of the village of Thurlaston in Rugby, and located to the south of the existing Coventry Road. The site being put forward as part of this proposal is split into two parts, with a western part measuring 9.19 Acres and an eastern part measuring 19.9 Acres, giving a total of 29.09 Acres.
- 2.2 The site is located in a semi-urban area, with both parcels of land classified as agricultural land and are generally flat in their nature.
- 2.3 The boundary to the north of the site is Coventry Road, which is a two lane carriageway linking the M45 to further villages to the east. The road contains grass verges on both sides, with landscape screening to the south of this road separating the road from the site, seeking to provide good levels of screening from the public highway.
- 2.4 The site lies adjacent to the South West Rugby Strategic Site and Symmetry Park development for Tritax, to the north. The Tritax development benefits from planning permission to deliver 2million sq ft of logistics floorspace. The development is currently under construction and includes completed industrial and logistics units. Also north of Coventry Road contains some residential dwellings, including those which form part of a recent development and further agricultural land.
- 2.5 The south of the site contains the M45, which is dual carriageway split by a central reservation, before the village of Thurlaston. The northern boundary of the village is circa 100 metres away from the development but the village benefits from a large landscape buffer which will provide a significant amount of screening from the village to the proposed site. Draycote Water is located to the south of Thurlaston.
- 2.6 Access into the village of Thurlaston splits the two parcels of land, with Main Street linking Coventry Road over the M45 and into the village.
- 2.7 The eastern parcel of the site is bounded to the east by dwellings and a Baptist Church before the village of Dunchurch a bit further east.
- 2.8 The western edge of the site contains the A45/M45 roundabout, with works currently being carried out to this roundabout in conjunction with the nearby Tritax development, which will seek to enhance this roundabout further together with the re-alignment of Coventry Road.
- 2.9 The site is located to the south-west of the town of Rugby, approximately 5 miles away by car. Rugby is a market town with links by rail, mainly to London Euston and also Birmingham. The close proximity of Rugby helps to demonstrate the sustainable location of this site.
- 2.10 In summary it is considered that the Site provides significant locational benefits with access to nearby existing and planned infrastructure to deliver a complementary employment led allocation.



3

Planning Context

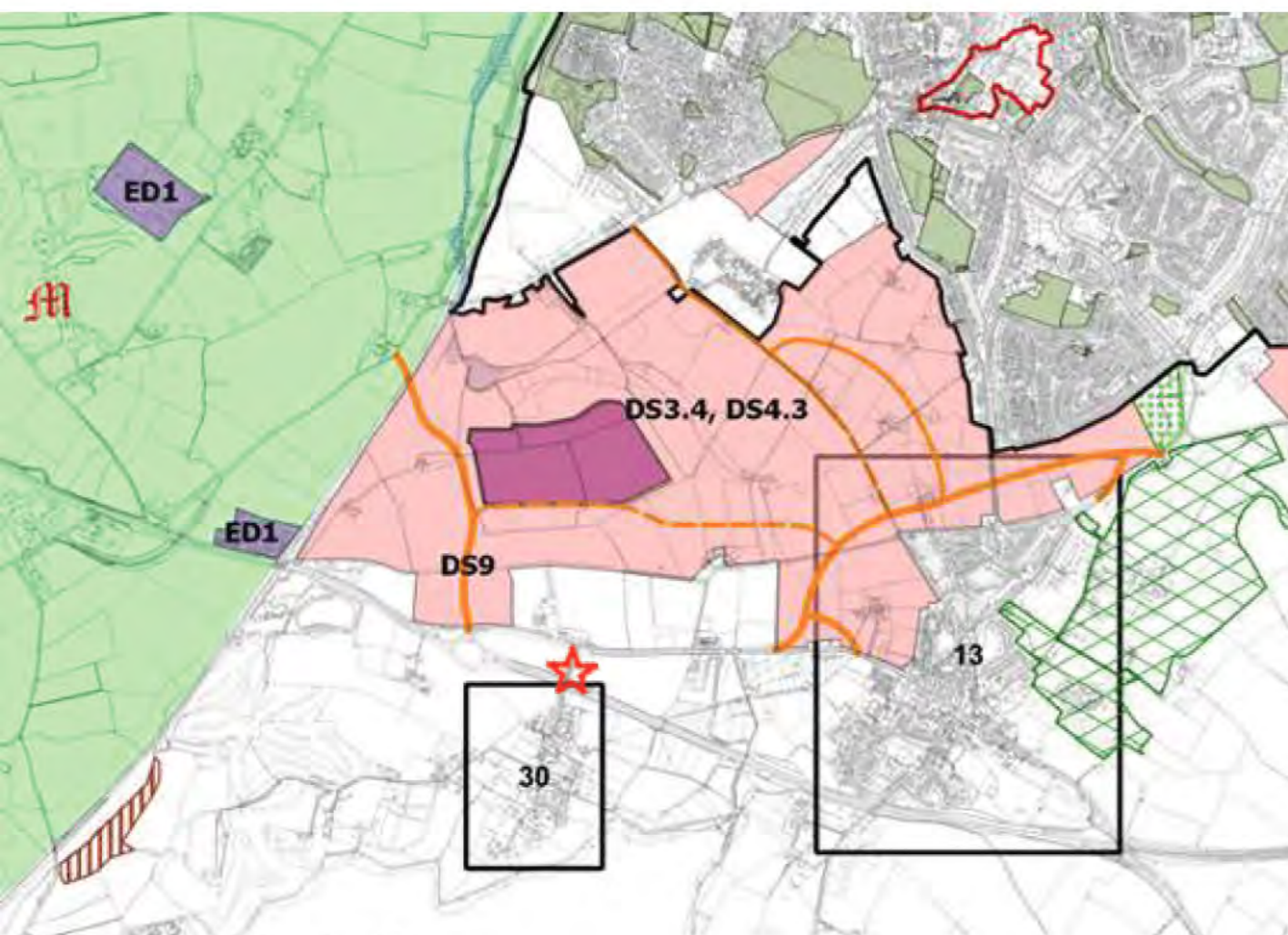
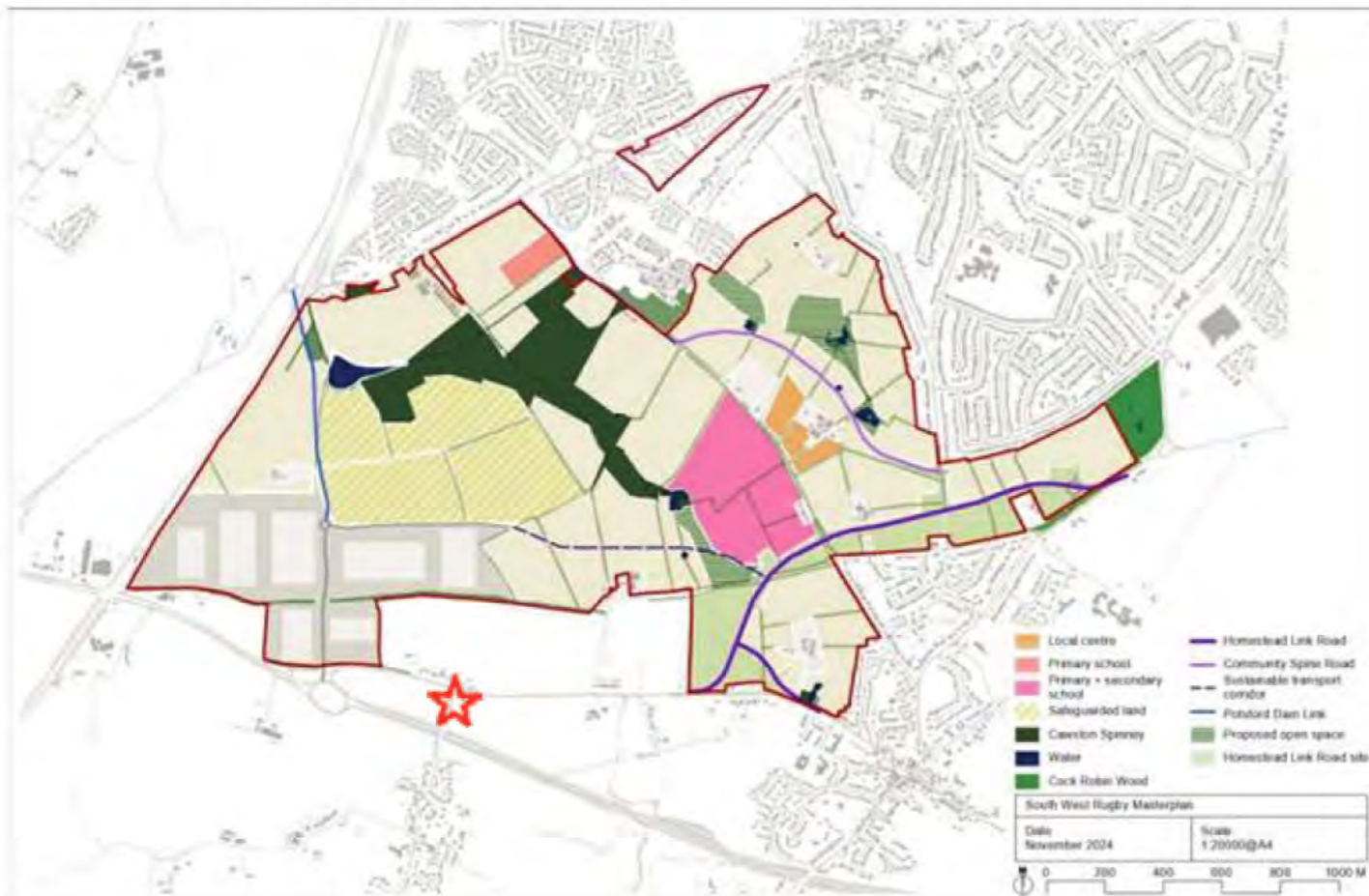


Figure 2: South West Rugby Masterplan



Adopted Development Plan

- 3.1 Rugby Borough Council's Development Plan comprises:
 - The Local Plan 2011-2031 (adopted June 2019);
 - Policies Map 2011-2031 (adopted June 2019).
- 3.2 The adopted Local Plan, alongside the Policies Map sets out strategic and detailed development management policies for the development of the Borough.
- 3.3 Policy GP2 establishes the settlement hierarchy for the Borough, where the main focus for all development will be within Rugby town's existing boundaries and as part of allocated Sustainable Urban Extensions; followed by permitting development within the existing boundaries of all Main Rural Settlements and on allocated sites.
- 3.4 Policies encourage the effective re-use of land that has been previously developed. Policy DS1: 'Overall Development Needs' requires 12,400 additional homes (including 2,800 to contribute to Coventry's unmet needs) along with 208 hectares of employment land (including 98 hectares to contribute to Coventry's unmet needs).
- 3.5 Under Rugby's adopted Local Plan, the Site is not covered by any site-specific allocations and lies outside of the Rugby Urban Area settlement boundary.
- 3.6 Policy ED3: 'Employment Development Outside Rugby Urban Area' states that, with the exception of sites allocated for employment purposes in the Local Plan, or with a current B use class, employment development will only be permitted outside the Rugby Urban Area in certain circumstances; where it is a conversion of a building; redevelopment, at a similar scale, of an existing building or vacant part of an employment site; sustainable expansion of an existing group of buildings where they are accessible by non-car means; and ancillary use to existing rural employment.
- 3.7 Policy ED2 considers Employment Development within Rugby's Urban Area boundary. This policy is more positive in permitting new employment development, subject to compliance with other policies in the Plan.
- 3.8 The Site is located adjacent to, but outside of, land allocated for a Sustainable Urban Extension (SUE) for South West Rugby (SWR SUE). The SWR SUE covers a wide area and seeks to provide for 5,000 homes (allocated under Policy DS3.4: 'Residential Allocations'), and 35ha of employment land (allocated under Policy DS4.3: 'Employment Allocations'). Given the extent of development permitted, this allocation will result in an urban transformation of this area, including both built development and the provision of sustainable transport infrastructure. Policy DS8: 'South West Rugby' provides further details for the adjacent allocated urban extension, including the provision for a new, mixed use district centre. Policy DS9 is also of relevance as this allocates the Southwest Rugby Spine Road to support and enable the delivery of the SWR allocation.
- 3.9 An extract from the adopted Policies Map is provided to the top left with the site marked by a red star.
- 3.10 As referred to in Policy DS8, Rugby Borough Council has subsequently prepared a South West Rugby Masterplan SPD (adopted 11 December 2024). This SPD includes a Masterplan as shown to the bottom left. The location of the Site is south of the allocation shown again by a red star.



2. Opportunity to meet Local Employment Needs

- 3.17 As currently drafted, the Draft Plan does not address how the specific identified need for smaller sites, which could accommodate mid-sized and smaller industrial and logistics units, will be met; or indeed include any proposed allocations to meet this local need.
- 3.18 The emerging Local Plan's evidence base highlights the pattern of supply of employment land that has come forward since the adoption of the extant Local Plan, where very few small to medium sized units have come forward on new purpose-built land to support local businesses. To address this, the Preferred Option Consultation Document makes provision for the supply of 26,012 sqm of floorspace to provide space for small and medium sized businesses that wish to expand.
- 3.19 It is considered that the employment need has been underestimated on the basis that there is no clarification within the Draft Plan as to whether Coventry City's unmet needs for smaller sites will be provided for and if so, how. If this were to be accommodated in Rugby Borough Council, the unmet need for smaller sites would increase to 445,296 sqm (111 ha).
- 3.20 The Site can deliver the exact type of employment floorspace that the emerging Local Plan identifies as being required. Whilst the Site can help meet the local economic need for smaller units, we are also cognisant that local businesses require both smaller and larger units. The site is approximately 11.81 ha and as such, it provides an excellent opportunity to deliver industrial and logistics uses in a mix of unit configurations, from 'small' to 'mid' (<9,000 sqm) and 'big box' (>9,000 sqm) creating up to 34,620 sqm of floorspace in a sustainable location.
- 3.21 In parallel, the Economic Strategy also recognises the barriers faced by local businesses where there is "very little opportunity to 'grow-on' as the vacant premises are not the right size, causing them to either stagnate or leave Rugby". The issues faced by local businesses in Rugby are exacerbated by the pattern of supply of employment land that has come forward since the adoption of the extant Local Plan, where very few small to medium-sized units have been delivered. Development at the Site would help to directly address the identified void for available sites capable of delivering different unit sizes required by local businesses. The four illustrative masterplan options presented later in this Vision Document provide a flexible range of larger and smaller industrial unit sizes to respond to these needs.
- 3.22 The evidence set out in the Interim SA Report (March 2025) considers that on balance it is considered appropriate to progress a further employment site option to the southwest of Rugby, in the vicinity of the A45/A4071 junction. The report goes on to identify the Site (referred to in the Council's evidence as 'Site 133') for consideration for an additional employment site

3. Opportunity to meet Roadside Retail Uses

- 3.23 The emerging Local Plan provides for very significant levels of future housing growth but does not propose any substantial main food shopping retail provision to support the additional population. In respect of this, consideration should be given to the proposed retail and roadside uses at the Site, given this area is currently poorly served in respect of grocery retail and larger scale food & beverage outlets. The Site is exceptionally well connected in terms of its proximity to the strategic highway network and in respect of existing and proposed residential and employment uses.

4. Environmental, Heritage and Landscape Considerations

- 3.24 The Site does not include any environmental designations. It contains no designated heritage assets and is not within a Conservation Area. In addition, the Site does not lie within or adjacent to any national or local landscape designations.
- 3.25 Development of the Site is capable of delivering a considered landscape strategy which will cultivate the natural screening to the Site but also provide intentional landscape infrastructure. The protection and enhancement of existing features of the site that add value, including mature trees, and hedgerows would also be ensured



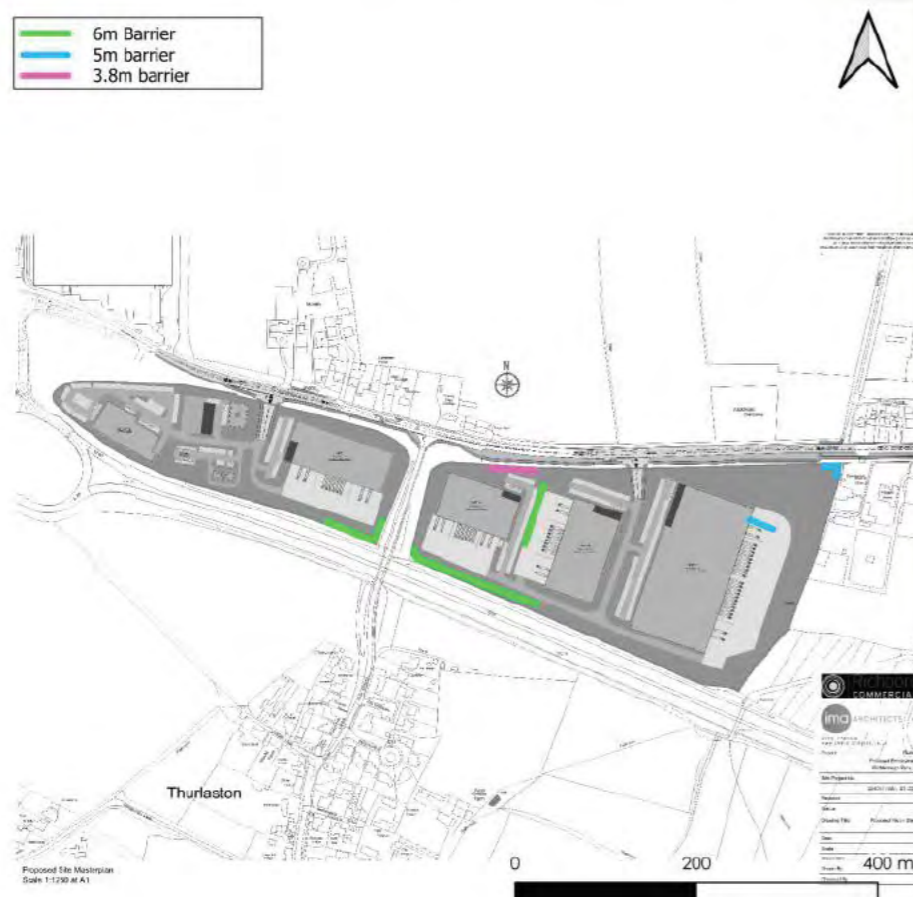
4 Technical Considerations

- 4.1 An illustrative masterplan, set out at Section 5.2 of this document, offers a number of flexible options for the Site. All options have been underpinned by detailed technical analysis. This has culminated in the most suitable layouts to enhance the sustainability and job creation credentials of the development. It has demonstrated that a development could be sensitively brought forward which responds to the Site and respects the character and appearance of the surrounding area.
- 4.2 This section sets out a summary of the environmental and technical considerations. Full technical assessments for each discipline are provided in the appendices to this Vision Document. This detailed analysis seeks to act as a framework and assist Rugby Borough Council in their full assessment of the Site in progressing the Local Plan towards the Regulation 19 stage.



4.1 Acoustics

- 4.1.1 An Acoustics Technical Note has been undertaken by BWB and is appended to this Vision Document.
- 4.1.2 This assessment has been undertaken based on the results of the baseline noise survey carried out at the site directly to the north. The assessment has been undertaken in accordance with current standards and guidance.
- 4.1.3 A BS4142 assessment has been undertaken to assess the impact of the proposed development onto the nearest sensitive receptors based on a 'worst-case' layout. It has been demonstrated that on-Site operational activity is likely to result in a low impact during daytime periods.
- 4.1.4 The night-time BS4142 assessment resulted in up to a significant adverse impact. Potential mitigation measures have been recommended that would reduce the impact to low during night-time periods.
- 4.1.5 Additional commentary and advice has also been provided regarding the possible site layout options.
- 4.1.6 It is considered that with appropriate mitigation in place, the site is suitable for its intended use from a noise perspective.
- 4.1.7 Further details are provided in the appended Acoustics Technical Note.



4.2

Agricultural Land

- 4.2.1 An Agricultural Land Classification has been undertaken by Land Research Associates and is appended to this Vision Document
- 4.2.2 British Geological Survey 1:50,000 scale information records the geology of the site as Dunsmore Gravel over Charmouth Mudstone Formation.
- 4.2.3 The National Soil Map (published at 1:250,000 scale)¹ shows the land as within the Arrow Association, mainly comprising deep permeable coarse loamy soils, variably affected by groundwater
- 4.2.4 A detailed soils and agricultural quality survey was carried out in April 2025 in accordance with Ministry of Agriculture, Fisheries and Food (MAFF) (1988) guidelines². It was based on observations at intersects of a 100 m grid, giving a density of one observation per hectare.
- 4.2.5 To assist in assessing land quality, MAFF developed a method for classifying agricultural land by grade according to the extent to which physical or chemical characteristics impose long-term limitations on agricultural use for food production. The MAFF Agricultural Land Classification (ALC) system classifies land into five grades numbered 1 to 5, with grade 3 divided into two subgrades (3a and 3b). The system was devised and introduced in the 1960s and revised in 1988
- 4.2.6 The site has coarse loamy soils giving land of Grade 2 and Subgrade 3a agricultural quality, limited by stoniness and droughtiness.
- 4.2.7 Further details are provided in the appended Agricultural Quality Report.

4.3

Air Quality

- 4.3.1 An Air Quality Technical Note has been undertaken by BWB and is appended to this Vision Document.
- 4.3.2 The Site is located within the Rugby AQMA which was declared by RBC for potential exceedances of the current air quality objective for NO₂.
- 4.3.3 Pollutant concentrations were predicted across the Site for the assessment year 2023. NO₂, PM₁₀ and PM_{2.5} concentrations were predicted to be below the current relevant air quality objectives for England across the Site. Furthermore PM_{2.5} concentrations were predicted to be below the interim target, to be achieved by 2028. Predicted concentrations exceeded the future annual mean objective, to be achieved by 2040 at the western boundary, however as the results present 2023 concentrations, predicted concentrations across the Site are expected to be lower in future years, as vehicle emissions and background emissions are expected to decline. It is worth noting that the currently proposed employment led scheme is not sensitive to the annual mean air quality objectives.
- 4.3.4 Based on the assessment results, the Site is considered suitable for the proposed employment led use.
- 4.3.5 It is recommended that as part of any planning application, a detailed air quality assessment is undertaken to consider the impacts on existing sensitive receptors in the vicinity of the Site during both the construction and operational phases of the proposed development. Mitigation measures during the construction phase and operational phase should be provided where necessary.
- 4.3.6 Further details are provided in the appended Air Quality Technical Note.

4.4 Arboriculture

- 4.4.1 An Arboricultural Constraints Assessment has been undertaken by BWB and is appended to this Vision Document.
- 4.4.2 The desktop review and site survey identified no trees within a Conservation Area; no ancient woodland; no veteran trees; no trees within a Community Forest; and, with the exception of boundary hedgerows, no Habitats of Principal Importance including Deciduous Woodland, and Traditional Orchard, and Wood Pasture and Parkland.
- 4.4.3 Rugby Borough Council have yet to confirm the presence of Tree Preservation Orders (TPO) on Site. In the event that there may be the presence of TPOs, they should not influence decisions on tree retention and removal beyond BS 5837 tree quality categorisation.
- 4.4.4 The priorities for trees within a proposed development on this site should include:
 - Retention of high and moderate quality (Category A & B) individual trees and groups along the site peripheries as they provide valuable natural screening, landscape connectivity and amenity value. The Category A and B Individual trees located along the northern boundary of the site should be retained with suitable stand-off from any future access points proposed from Coventry Road.
 - Provision of sufficient stand-offs from structures to avoid pressure to encroach within Root Protection Areas or the requirement to prune or remove trees post-construction
- 4.4.5 Further details are provided in the appended Arboricultural Constraints Assessment.



4.5 Ecology

4.5.1 A Preliminary Ecological Appraisal and Biodiversity Net Gain Statement have been undertaken by BWB and are appended to this Vision Document.

Baseline

4.5.2 The Site comprises two agricultural fields, predominantly containing cereal crop of low ecological value. Both fields were bound by native hedgerow and strips of other neutral grassland. Some of the hedgerows also contain trees and a bank/ditch. The eastern land parcel also contains four individual trees, a patch of willow scrub and an area of other broadleaved woodland. The scrub and woodland area provide the most biodiverse habitats on-Site, and the hedgerows with boundary grassland are ecologically valuable.

4.5.3 No notable faunal species were found during the Site survey. There is potential for foraging and commuting bats to utilise the linear habitats (hedgerow and bordering grassland) on-Site. Badger and hedgehog may occasionally cross the Site.

Design and Mitigation Considerations

4.5.4 The willow scrub and woodland area should be retained as part of the Proposed Development. The hedgerows and individual trees should be retained as much as possible in the design of the Proposed Development. If hedgerow removal is proposed, seasonal bat transect surveys should be undertaken to assess the level of foraging/commuting activity along the hedgerows on-Site. The results will inform any necessary mitigation, which is likely to extend to a sympathetic lighting design.

4.5.5 Any trees proposed for removal should be subject to a ground level tree assessment (GLTA) with aerial inspections to assess for any bat roosting features. Should bat roosting features be found, then a suite of aerial inspections or bat emergence surveys will be required for planning.

4.5.6 Tree and hedgerow pruning/removal should be undertaken outside of the nesting bird season (October to February). A nesting bird check survey will be required prior to removal within the nesting season and, depending on the crop present, prior to crop removal/ground clearance.

4.5.7 During the construction phase, good working practices with respect to mammals should be followed. This includes any trenches to be left with a ramp or sloping end, and any pipes over 200mm diameter to be capped off at night.

4.5.8 The baseline biodiversity value of the site is as follows:

- Habitat units: 25.49
- Hedgerow units: 12.80

4.5.9 In terms of achieving a 10% biodiversity net gain at the Site, the total number of units will be required:

- Habitat units: 28.04
- Hedgerow units: 9.97

4.5.10 Moreover, by avoiding the loss of medium and high distinctiveness habitats (scrub, trees, grassland, woodland, hedgerows) the trading rules will be satisfied.

4.5.11 Overall, by following the mitigation measures as outlined above and any mitigation as a result of any further surveys, as well as the retention of the ecologically valuable habitats on-Site, ecology should not be a constraint to the Proposed Development.

4.5.12 Further details are provided in the appended Preliminary Ecological Appraisal and Biodiversity Net Gain Statement.



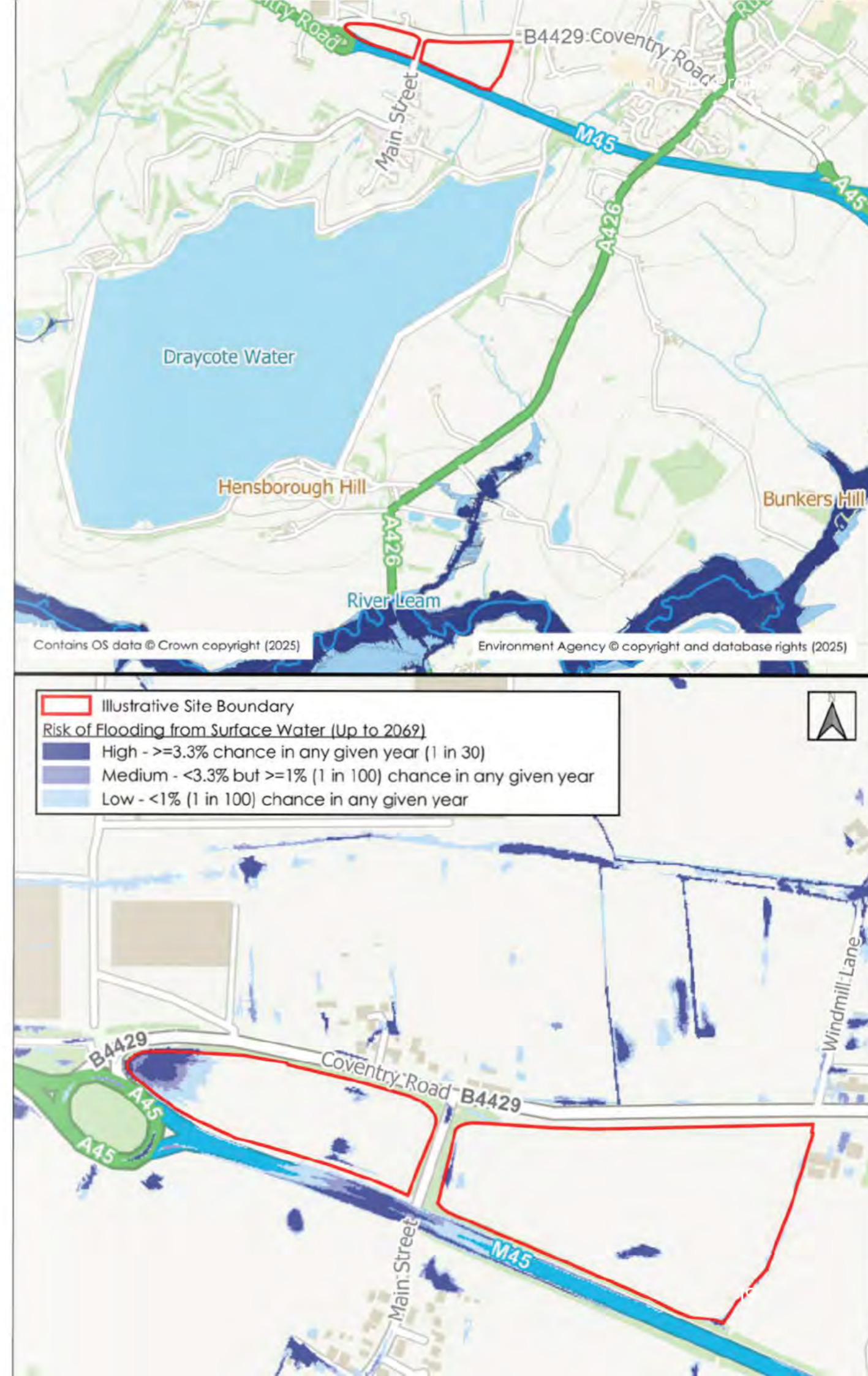
4.6 Energy & Sustainability

- 4.6.1 An Energy and Sustainable Building Vision Statement has been undertaken by BWB and is appended to this Vision Document
- 4.6.2 The Proposed Development will follow the relevant national and local policies, including Approved Part L Volume 2 (2021), National Policy Planning Framework and Rugby Borough Council Local Plan, to ensure the highest standards of sustainable design and construction are achieved.
- 4.6.3 Energy Strategy
The Proposed Development will follow the energy hierarchy outlined in Rugby Borough Council's Climate Change & Sustainable Design and Construction SPD (2023), prioritising the principles of 'Be Lean', 'Be Clean', and 'Be Green', in that order.
- 4.6.4 Be Lean: The envelope and services will be specified in accordance with Part L (2021) of the Building Regulations to ensure energy consumption via space heating and cooling is reduced. The Proposed Development should incorporate a combination of passive and active design strategies to meet local and national carbon target. Strategies include high performance insulated building fabric, enhanced air tightness, energy efficient LED lighting and mechanical ventilation.
- 4.6.5 Be Clean: A feasibility study on connecting to a district heating network was conducted. Results show that there is a planned/existing district heat networks (Symmetry Park Energy Centre) within 500m of the site. Connecting to the Symmetry Park Energy Centre could substantially reduce the Proposed Development's carbon emissions, however the viability of connection would need to be further evaluated, to confirm spare capacity and carbon savings. The feasibility of a new site wide heat network has also been considered. However, due to the uncertainty around end-user energy demand and given the outline status of the application, this option has not been pursued further at this stage.
- 4.6.6 Be Green: The feasibility assessment of renewable energy generation concluded that the most suitable on-site renewable technologies for the Proposed Development are Solar Photovoltaic, Solar Thermal, Air Source Heat Pumps, and Waste Heat recovery. The selection of the specific technology or combination of technologies, in line with the recommendations of the feasibility study, will be confirmed at the Reserved Matters stage and through detailed energy modelling in accordance with Part L (2021) of the Building Regulations.
- 4.6.7 Sustainable Design, Construction and Operation
The Proposed Development will aim to achieve a BREEAM rating of 'Very Good', which corresponds to a score of 55.00% or higher under the BREEAM UK New Construction scheme. Achieving a 'Very Good' rating demonstrates a commitment to sustainable development and aligns with both national and local planning policy objectives, including those of Rugby Borough Council.
- 4.6.8 The BREEAM assessment process is structured around several key categories which includes Management, Health and Wellbeing, Energy, Transport, Water, Materials, Waste, Land Use and Ecology, Pollution and Innovation.
- 4.6.9 In addition to the BREEAM environmental performance targets outlined above, the Proposed Development will register with the Considerate Constructors Scheme (CCS) and will aim to achieve a satisfactory score across all key categories.
- 4.6.10 Further details are provided in the appended Energy and Sustainable Building Vision Statement.

4.7

Flood Risk & Drainage

- 4.7.1 A Flood Risk and Drainage Technical Note has been undertaken by BWB and is appended to this Vision Document.
- 4.7.2 **Flood Risk**
The site is shown to be located entirely within Flood Zone 1, which is land defined as having a low probability of flooding from rivers or sea. The nearest Environment Agency (EA) Flood Zone extents are located approximately 1km north of the site attributed to an Unnamed Ordinary Watercourse (UOW). A review of EA 1m Light Detection and Ranging (LiDAR) data suggests the intervening topography between the site and the Flood Zones is raised by approximately 16m
- 4.7.3 An UOW has been surveyed and is mapped on the eastern boundary of the site. Due to the small catchment size, this is not represented within the EA Flood Map for Planning. The EA Risk of Flooding from Surface Water mapping (top right) can sometimes be used as a proxy to identify the flood extents associated with ordinary watercourses. The mapping shows the flood extents to remain within channel and hence there is not expected to be any fluvial risk to the site.
- 4.7.4 The site is largely at a very low probability of flooding from surface water. The mapping (bottom right) identifies a series of isolated low to high probability areas across the site. As these all originate within the site, and do not form a surface water flow route, they will be dealt with by the proposed drainage for the development and are not expected to present any risk.
- 4.7.5 The site has been assessed against a range of other sources including canals, tidal, groundwater, sewers, reservoirs and large waterbodies. These are considered to pose a low or minimal risk to the site and are not considered to present any significant barriers to development at the site.
- 4.7.6 A Flood Risk Assessment will be produced to support the planning application for the proposed development.
- 4.7.7 **Sustainable Surface Water Drainage**
An appropriate Surface Water Management Strategy which complies with the latest local and national advice will be implemented across the development. The proposed Surface Water Management Strategy will use Sustainable Drainage Systems (SuDS) which aim to reduce the impact of development by replicating the natural runoff regime in a sustainable, cost-effective manner whilst protecting water quality and reducing pollution.
- 4.7.8 The surface water strategy will aim to attenuate any increase in surface water runoff generated by the proposed development such that there will be no increase in flood risk downstream. In accordance with the natural runoff regime, surface water will be discharged from the site to the existing UOW at the greenfield Mean Annual Floor (QBAR) rate on the eastern boundary of the site.
- 4.7.9 A Sustainable Drainage Statement will be produced to support the planning application for the proposed development.
- 4.7.10 **Foul Water Strategy**
Foul water will be disposed of separately to surface water, with a connection made to the local public sewers. As is typical with development of this nature, the developer will work with the sewer operator to ensure that any necessary reinforcement works to the downstream infrastructure are in place prior to occupation of each phase.
- 4.7.11 Further details are provided in the appended Flood Risk and Drainage Technical Note.



4.8

Ground Conditions

4.8.1 BWB Consulting Ltd (BWB) was instructed by Richborough (the Client) to provide geo-environmental commentary for inclusion within a Vision Document designed to help promote the site for a commercial development.

4.8.2 The below text is based on a review of publicly available information.

Geo-Environmental Summary

4.8.3 The site comprises two agricultural fields separated by Main Road orientated north to south through the centre of site. The site appears relatively flat at c. 118m above Ordnance Datum.

4.8.4 Historical mapping indicates that the site has remained undeveloped, greenfield land utilised for agricultural purposes. A small pond is shown within a hollow at the south eastern boundary on the earliest plans. The surrounding area has also remained relatively rural with sparse residential housing to the north, east and south.

4.8.5 The site is underlain by superficial sands and gravels of the Dunsmore Gravel Formation, with Alluvium mapped in the south east corner of site. The underlying bedrock comprises the Charmouth Mudstone Formation. The site is not located within a coal mining area, as designated by the Mining Remediation Authority.

4.8.6 The Dunsmore Gravel Formation could potentially support SUDS drainage dependent on groundwater levels at the site.

4.8.7 The site is located within an area at low risk from unexploded ordnance from World War Two bombing.

4.8.8 Based on the publicly available information reviewed, it is considered unlikely that significant environmental or geotechnical constraints exist at the site in the context of the proposed commercial development.

4.9 Health

- 4.9.1 A Health Technical Note has been prepared by BWB and is appended to this Vision Document.
- 4.9.2 The current baseline across the Site and neighbouring areas using recognised health statistics and indicators. This analysis incorporated local deprivation rankings, public health data, and planning policy priorities. It identifies a mixed picture of health and wellbeing in the area, with both strengths to build upon and vulnerabilities to address.
- 4.9.3 Key Findings:
- Moderate baseline health: The area currently performs well in 10 out of 16 indicators but ranks poorly for crime and barriers to housing and services.
 - Health inequalities: Local data shows significant health disparities—life expectancy for men is nearly 10 years lower in the most deprived areas of Rugby compared to the least deprived.
 - Lifestyle challenges: Rugby has higher than average levels of excess weight in adults and lower physical activity levels, pointing to an urgent need to design environments that support healthier choices.
 - Local strengths: Educational attainment and employment indicators are strong in several neighbouring areas, providing a solid foundation to build inclusive, opportunity-led growth.
- 4.9.4 The Proposed Development has the potential to significantly uplift local health outcomes and reduce existing inequalities by:
- Creating an Active Environment: Embedding green infrastructure, walking and cycling routes, and recreation space to encourage everyday physical activity and support mental wellbeing.
 - Fostering Safer, More Connected Communities: Designing out crime through safe layouts, natural surveillance, and lighting—contributing to reduced anti-social behaviour and improved community confidence.
 - Enhancing Access to Opportunity: Supporting local employment during construction and operation.
 - Promoting Sustainable Transport & Clean Air: Prioritising low-emission vehicles and public transport connections to reduce air pollution, noise, and carbon emissions in line with Local Plan Policy HS5.
- 4.9.5 This development will act as a catalyst for positive health outcomes—helping to reduce inequalities, support community cohesion, and deliver lasting wellbeing benefits. By working with local partners and aligning with planning policy, we aim to create a place where people feel healthier, safer, and more connected. The opportunity is not just to build, but to build better—for health, for equity, and for the future of Rugby.
- 4.9.6 Further details are provided in the Health Technical Note



4.10 Heritage

- 4.10.1 An initial Heritage Statement has been undertaken by BWB and is appended to this Vision Document
- 4.10.2 The Site contains no designated heritage assets and is not within a Conservation Area. There are no Scheduled Monuments within 1km of the Site. The nearest Conservation Areas are Thurlaston Conservation Area, located approximately 75m to the south of the M45 (120m from Site) and the Dunchurch Conservation Area located over 500m from the Site boundary to the east.
- 4.10.3 The Site contains a number of non-designated heritage assets on the Warwickshire Historic Environment Record related to possible sub-surface archaeological remains. To the west of Main Street, the site contains cropmarks of possible archaeological origin (MWA3096) interpreted as enclosures or square barrows. In west of the Site are cropmarks MWA3096, MWA5371 and MWA3097 tentatively interpreted as enclosure or rings ditches and MWA3092, the site of a former post-mill.
- 4.10.4 In assessing the proposed development against Policy EN2 and Policy D4 of the Preferred Options Consultation document, it is considered that there will be no direct impact on any designated heritage asset, including Conservation Areas. Due to distancing, intervening built form, topography and screening, there will be no significant impact on the setting of the Thurlaston Conservation Area or the Dunchurch Conservation Area.
- 4.10.5 A full desk based assessment will support any forthcoming application and will assess the setting and significance of built heritage assets, both designated and non-designated assets, within a defined study area. A geophysical survey would be the first step in understanding the significance of archaeological remains in line with Policy D4.
- 4.10.6 Any additional surveys or mitigation that may be required to mitigate the effect of development will be agreed with statutory and non-statutory consultees as required, to ensure any future development will comply with both local and national policy related to heritage.
- 4.10.7 Further details are provided in the appended initial Heritage Statement.

4.11 Highways

- 4.11.1 Vehicular access to the two parcels of land are proposed via new priority-controlled ghost-island T-junctions off the B4429 Coventry Road. The access junctions will provide appropriate road widths and visibility for drivers in line with guidance set out in the Warwickshire Design Guide and section 5 of DMRB CD 123.
- 4.11.2 To the west/northwest of the site, the shared route will connect to the consented shared provision that forms part of the Tritax Symmetry Park development, and subsequently connects to the proposed South West Rugby development.
- 4.11.3 To the east of the site, the proposed shared pedestrian and cycle route will connect to National Cycle Network (NCN) Route 41, upgrading the section along the southern side of the B4429 Coventry Road and also upgrading the existing splitter island to facilitate safe crossing of the main road.
- 4.11.4 A connection is also proposed to the shared pedestrian and cycle network that is being delivered as part of the South West Rugby Link Road Phase 1, providing excellent pedestrian and cycle connectivity between the site and Rugby/Dunchurch.
- 4.11.5 It proposed that the speed limit along the site frontage will be reduced to 40mph via TRO, in line with the proposed speed limit at the Tritax Symmetry Park development to the west, and the existing speed limit to the east as Coventry Road enters the village of Dunchurch. Safe and suitable access can be achieved for all modes of travel.
- 4.11.6 The impact of the development proposals across the local highways network will be considered as part of the Transport Assessment work, and any requirement for mitigation will be discussed and agreed with Warwickshire County Council and National Highways at the appropriate time.
- 4.11.7 It is worth noting that the development proposals may also include some retail and roadside uses which could be utilised by employees and would be within a very short distance from nearby residents and employees on the Tritax development, with access available through the existing footway / cycleway network in the vicinity of the site, and to which the site connects and proposes the improvements set out above.
- 4.11.8 In respect of cycling, the development parcels will be well connected to surrounding villages, as well as to the residential areas of south and central Rugby, including Cawston, Bilton and Overslade.
- 4.11.9 Existing bus stops are located on the Coventry Road immediately adjacent to the development site, providing access to the number 25 bus service that runs between Rugby and Coventry, which provides five buses per day in each direction, including during peak hours. As such, the service offers a viable option for commuters. As part of the development proposals we would expect to deliver new bus shelters on the Coventry Road with real time information to encourage public transport use and support the viability of local services.
- 4.11.10 During the planning process, opportunities to improve the sustainable travel credentials of the site will be considered and set out within the Travel Plan. This will look to promote sustainable travel options as a realistic option for employees of the site.



4.12 Landscape

4.12.1 Tyler Grange have undertaken a Landscape and Visual Technical Note, which is appended to this Vision Document.

4.12.2 Designations

- The Site does not lie within or adjacent to any national or local landscape designations. Nearby heritage designations include Thurlaston Conservation Area, which is located approximately 100m south.

4.12.3 Landscape Character

- The Site is located within Regional Character Area (RCA) - Dunsmore and Landscape Character Type (LCT) - 'Plateau Farmlands', described as 'A simple, often heavily wooded, farmed landscape, typically confined to low plateau summits'. The Landscape Assessment of the Borough of Rugby (Sensitivity and Condition Study) 2006 assesses the 'Plateau Farmlands' to be of moderate overall sensitivity.
- The Site is in keeping with the RCA and LCT; made up of two large, flat arable fields, which are bound and contained by mature native hedgerows and trees which align the B4429, Main Street and the M45. The landscape surrounding the Site is gently rolling. The Site is influenced by built form including residential dwellings, units of Symmetry Park and the South West Rugby Spine Road.

4.12.4 Visual Context

- The Site is well-contained, with views limited by built form, mature tree belts and woodland blocks, gently rolling topography, and its tree-lined road setting. No Public Rights of Way (PRoW) are present within the Site, but a network of PRoW pass to the north and south, connecting Thurlaston, Dunchurch and Draycote Water.
- A Site visit was undertaken in April 2025. Views into the Site from the north and north-west are limited to glimpses, filtered by intervening mature vegetation alongside the northern and western boundaries. North, beyond Coventry Road, recently constructed units of Symmetry Park (and the South West Rugby Employment Allocation) limit availability of views.
- From the south, vegetation limits views towards the Site from publicly accessible areas of Thurlaston (and its Conservation Area) and footpaths extending north-west and east from the settlement. The downward sloping landform to the south of Thurlaston, combined with mature vegetation of the settlement and M45, limits views of the Site from footpaths associated with Draycote Water, however the windmill within Thurlaston is visible on the skyline.

4.12.5 Landscape and Visual Recommendations

- Retain and enhance the existing tree and hedgerow network, where possible. Include replacement planting on-site, where loss occurs to facilitate access;
- Include a development offset (circa 10-15m) and lower building heights to the south of the Site, to allow for mitigation planting to soften views and prevent skyline intrusion from the south; and
- Introduce new tree and woodland planting within the southern offset and within a northern boundary landscape buffer to mitigate visual impact at local level and strengthen landscape character.

4.12.6 With sensitive design and strategic planting, the Site has potential to accommodate new development without undue adverse effects on landscape character or views

4.13 Lighting

- 4.13.1 The Site Lighting Strategy will adopt a forward-looking, energy efficient approach which aims to strike a balance between two key considerations: ensuring that the site is provided with adequate lighting for safety and functionality, while simultaneously minimising obtrusive light (light pollution) to preserve the surrounding environment and reduce any adverse impacts on the local community, road users, and wildlife.
- 4.13.2 Minimising obtrusive light: Site lighting will be designed to demonstrate compliance with light pollution limits set out in the Institute of Lighting Professionals (ILP) Guidance notes for the reduction of obtrusive light (GN01/21).
- 4.13.3 Safety and functionality: Site lighting will be designed to meet performance requirements set out in BS EN 12464-2 Lighting of outdoor workplaces (2024), and Society of Light and Lighting (SLL) Lighting Guides, without over lighting.
- 4.13.4 Energy Efficient: Site lighting will incorporate latest generation LED light source technology, designed to emit directional light which will minimise energy consumption, “waste” light, and obtrusive light.
- 4.13.5 Ecologically Sensitive: The Lighting Strategy will be produced in close collaboration with the appointed Ecologist. Sensitive areas will be recorded, with implementation of appropriate mitigation measures.
- 4.13.6 Lighting Controls: A practical light controls system will be employed, designed to ensure lighting is operational only when required.
- 4.13.7 Construction Phase Lighting: Best practice recommendations for lighting shall be incorporated into a Construction Environmental Management Plan (CEMP), designed to minimise obtrusive light.
- 4.13.8 Further details are provided in the appended External Lighting Technical Note.



4.14 Minerals

- 4.14.1 A Mineral Assessment Note has been prepared by Heatons and is appended to this Vision Document.
- 4.14.2 The Site is entirely situated within a Mineral Safeguarding Area for sand and gravel as defined within Warwickshire County Council's Minerals Local Plan (MLP). The Mineral Safeguarding Area for sand and gravel covers the majority of the Borough of Rugby.
- 4.14.3 The British Geological Survey (BGS) online geology viewer (BGS Geology Viewer) identifies that the site is underlain by sand and gravel. Despite this, the site is not within, or adjacent to any allocation for sand and gravel extraction as per the Warwickshire Minerals Local Plan.
- 4.14.4 Policy MCS 5 of the Warwickshire MLP seeks to safeguard Warwickshire's resources and existing mineral sites against "needless sterilisation by non-minerals development". Policy DM 10 of the MLP sets out that non-minerals development in mineral safeguarding areas will only be permitted if (inter alia): there is evidence that clearly demonstrates that the mineral is not valuable or potential value; or if it would be inappropriate to extract mineral resources at that location.
- 4.14.5 It is Heatons view that the latter is engaged as the size of the site (circa 12 hectares) greatly reduces the potential viability of the site as a sand and gravel quarry. Importantly, the site comprises two parcels of land bisected by a public highway which further reduces the potential working area for extraction. Such a small extraction area would be unattractive for a mineral operator as the economic costs accrued from extraction activities would greatly outweigh any rewards.
- 4.14.6 Furthermore, the site is constrained by the presence of permanent receptors on adjoining land which would be particularly sensitive to the presence of mineral extraction. Receptors include residential properties and Dunchurch Baptist Church.
- 4.14.7 Even through the implementation of best practice measures to reduce adverse impacts on off-site receptors, extraction operations would inevitably lead to a degree of impact on amenity. In Heatons view these impacts would likely be unacceptable with regard to protection of amenity and would conflict with other policies of the development plan.
- 4.14.8 Increasing stand-offs from nearby sensitive receptors would even further reduce the size of any potential extraction area, further constraining the feasibility of the site for mineral extraction.
- 4.14.9 Therefore, the introduction of permanent non-minerals development to the site will not result in the sterilisation of workable sand and gravel resources, as the site is severely constrained for mineral extraction. It is not considered that mineral extraction could be undertaken without conflict with several policies of the development plan taken as a whole.
- 4.14.10 Further details are provided in the appended Mineral Assessment Note.

4.15 Utilities

- 4.15.1 The site and its surrounds are well served by a mature utilities infrastructure. A network of high voltage (HV) overhead lines, clean water mains, sewer and telecoms ducts are shown to run in close proximity to the site. It is envisaged that the site will be able to connect to the local HV infrastructure, with substations required onsite to distribute supplies to each plot. Openreach have infrastructure adjacent to the site boundary, which should be capable of supplying resilient superfast broadband for a commercial development of this nature. Clean water supplies can be connected to the Severn Trent Water mains located to the north of the site boundary.
- 4.15.2 There are 11kV overhead lines that's run within the development footprint and they will be diverted underground to remove any clashes with the masterplan. There are no further utilities within the development footprint, so no additional diversions will be required



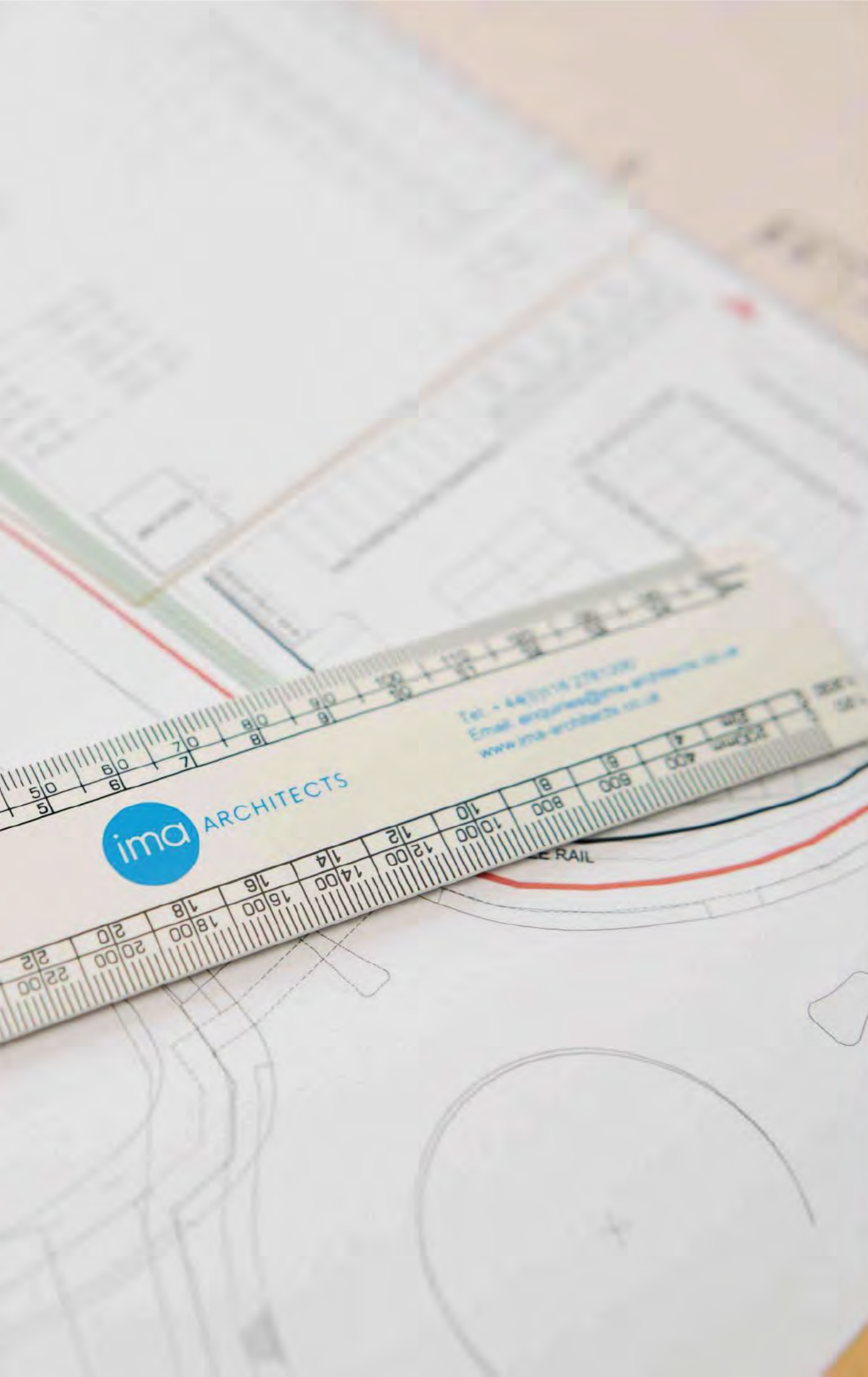
5

Illustrative Masterplan & Vision

- 5.0.1 The site provides an excellent opportunity to deliver an employment led scheme, with the potential to deliver complementary retail and roadside uses. The nature, and size, of the site, gives a real opportunity for smaller business to prosper in the area, with the recent development nearby being more aimed at larger, national operators.
- 5.0.2 The vision responds to the requirements of the area, focusing on the current and future needs of the area in order to ensure a scheme is being put forwards which takes into account those requirements and delivers an appropriate scheme.

A combination of best practice design guidance and technical site assessments have been used to establish the following broad design principles illustrated within the illustrative masterplan options:

- The vehicular access points would be from Coventry Road, and have been positioned in the most appropriate location from a safety and access point of view.
- A landscape-led approach seeks to retain existing landscape elements such as trees and hedgerows, whilst also providing a significant amount of new landscaping to the site to provide screening where required.
- The scheme will deliver opportunities for smaller businesses who are locally based, not just larger units for national operators.



5.1

Vision

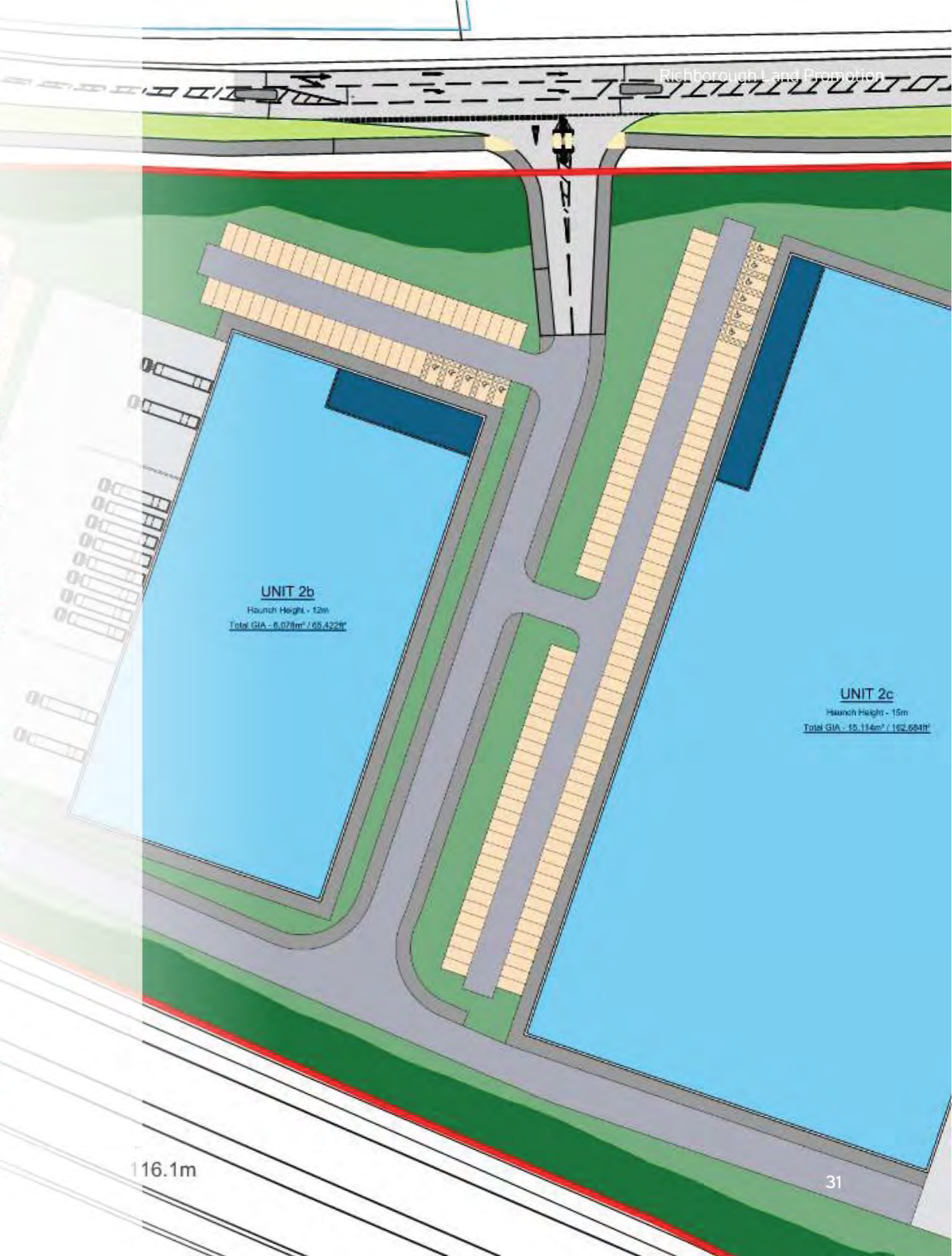
- 5.1.1 The vision for the Site seeks to align with Rugby's Economic Vision as set out in their emerging Economic Strategy (2025) and is driven by the opportunity to deliver employment led development within a sustainable location which will help the Council in meeting local employment needs. Rugby's economic vision explicitly expresses that a top priority of the emerging Local Plan is "to ensure the delivery of high quality small to medium size industrial space in accessible locations across the borough". The promotion of Richborough Park, M45 Junction 1, as considered in these representations, will help deliver this overarching vision for the Council.
- 5.1.2 Echoing the aims of Rugby's Economic Strategy, the Site represents an opportunity to meet the needs of Rugby's growing businesses so that they can retain and grow within the Borough. The site would provide a number of skilled job opportunities across all age ranges, including part-time and full-time opportunities, providing a real diversity in the type and range of jobs being provided.
- 5.1.3 Rugby Borough Council acknowledges the existing barriers for new employment sites to gain access to local workforce. The Site's locational benefits adjacent to the wider South West Rugby Strategic Site, which seeks to deliver 4,000 new homes, directly enables access to a labour pool of local employees. Development of the Site, with a focus on local businesses, will also act as a complementary offer to the adjacent Strategic Employment Site of Symmetry Park; and the employment allocation within the South West Rugby Strategic Site. This in turn would align complementary growth of the Site with the existing and future infrastructure being delivered as part of the planned sustainable urban extension in this location and delivery of the Symmetry Park.
- 5.1.4 The design of an employment led development would be that of the highest quality, ensuring strong accessibility and connectivity into the wider area, along with ensuring a landscape led approach to the design to preserve and enhance the local landscaping.
- 5.1.5 At the heart of the vision for the Site is a considered landscape strategy which will cultivate the natural screening to the Site but also provide intentional landscape infrastructure.
- 5.1.6 The building designs would ultimately seek to provide a vibrant, sustainable and attractive design, bridging the industrial and future urbanised context to the north of the Site; with the more rural nature of the area south of the M45, to ensure a scheme that seeks to integrate with its surrounding sites, buildings and use classes.
- 5.1.7 The intention is to provide a flexible approach which seeks to provide a range of larger and smaller unit sizes, which can assist in accommodating multiple local business models whilst providing opportunities for growth and expansion. The adjacent Symmetry Park development provides much larger units which would be more aimed at national or international businesses, and the vision for this Site is to provide something different to better cater for the local area.
- 5.1.8 The potential for the delivery of retail and roadside uses would further assist the current and future needs of the nearby area by providing amenity for residents and passing vehicle traffic using the connectivity of the A45 and M45 junction; and the local employment workforce which could be generated at the Site, alongside the adjacent South West Rugby employment allocation and Symmetry Park.
- 5.1.9 Energy consumption and the provision of low carbon technologies would heavily feature in future designs, to ensure that the buildings built would seek to be as energy efficient as possible and reduce CO2 emissions as far as is practical.



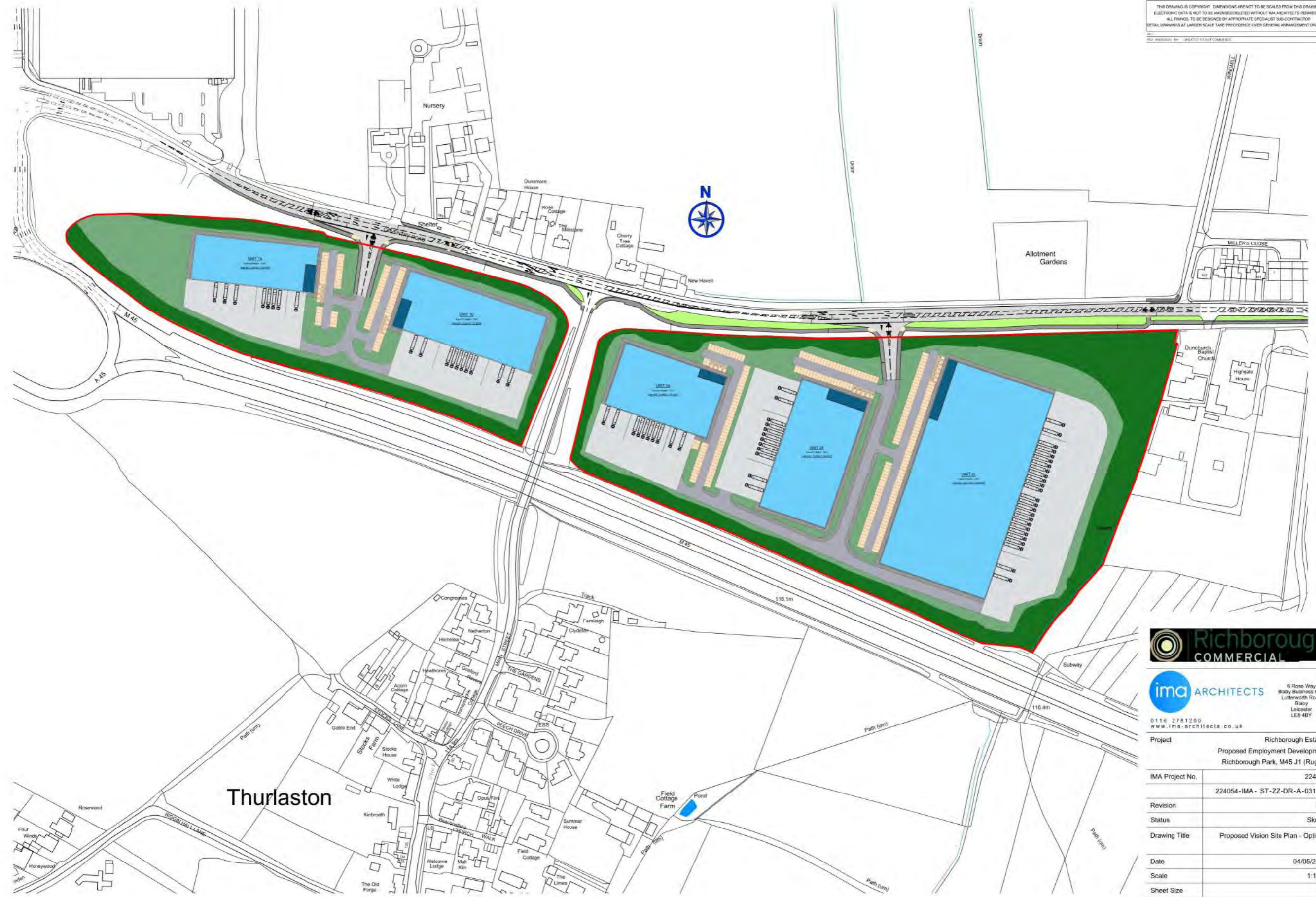


5.2 Masterplan Options

- 5.2.1 Ultimately the site can deliver an employment led scheme in a number of different ways. At this stage four flexible masterplan options have been prepared to facilitate further engagement with the Council towards an allocation of the Site in the emerging Local Plan.
- 5.2.2 The primary use of the employment site will be to deliver a mix of industrial and logistics units, falling under use classes E(g)(ii)(iii), B2 & B8. These are seen as the key components and use classes for an employment site such as this.
- 5.2.3 The nature, size and shape of the Site lends itself nicely to delivering industrial and logistics units of differing sizes, with a potential mid box scheme to be delivered (options 1 & 3); but also a smaller unit scheme (options 2 & 4) which could enable smaller start-up businesses to locate to the Site. Being cognisant that local businesses require both smaller and larger industrial units, the masterplan options seek the required flexibility to cater for local need. At this stage both of these potential options have been demonstrated to provide a mix of unit sizes.
- 5.2.4 In recognising the opportunity for the Site to also provide some complementary Class E retail and roadside uses, options 3 & 4 have incorporated this offer at the closest point to the M45 J1 roundabout to seek benefit from passing vehicle trade. It is felt that a retail store would work well in this location, along with drive thru/to units, petrol filling station and EV charging hub.
- 5.2.5 In summary, the options comprise:
- Option 1 - Full industrial and logistics scheme with larger 'mid' to 'big box' units on the eastern parcel
 - » Total GIA - 34,620sqm / 372,635sqft
 - Option 2 - Full industrial and logistics scheme but with smaller 'small' to 'mid box' units across the site
 - » Total GIA - 29,527sqm / 317,825sqft
 - Option 3 - Roadside / retail scheme to the left-hand side of the western plot with larger 'mid' to 'big box' industrial and logistics units to the rest
 - » Retail GIA - 2,793sqm / 30,063sqft
 - » Industrial GIA - 30,950sqm / 333,143sqft
 - » Total GIA - 33,743sqm / 363,206sqft
 - Option 4 - Roadside / retail scheme to the left-hand side of the western plot with smaller 'small' to 'mid box' industrial and logistics units to the rest
 - » Retail GIA - 2,793sqm / 30,063sqft
 - » Industrial GIA - 27,610sqm / 297,191sqft
 - » Total GIA - 30,403sqm / 327,254sqft
- 5.2.6 We invite the Council to consider the evidence submitted within and appended to this Vision Document when forming a view on the suitability of the site to accommodate development.



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Project	Richborough Estates Proposed Employment Development Richborough Park, M45 J1 (Rugby)
IMA Project No.	224054
	224054-IMA- ST-ZZ-DR-A-031110
Revision	P02
Status	Sketch
Drawing Title	Proposed Vision Site Plan - Option 1
Date	04/05/2025
Scale	1:1250
Sheet Size	A1
Drawn By	BH
Checked By	BH

Proposed Site Masterplan
 Scale 1:1250 at A1

Illustrative Masterplan - Option 1 (Full industrial and logistics scheme with larger 'mid' to 'big box' units on the eastern parcel)

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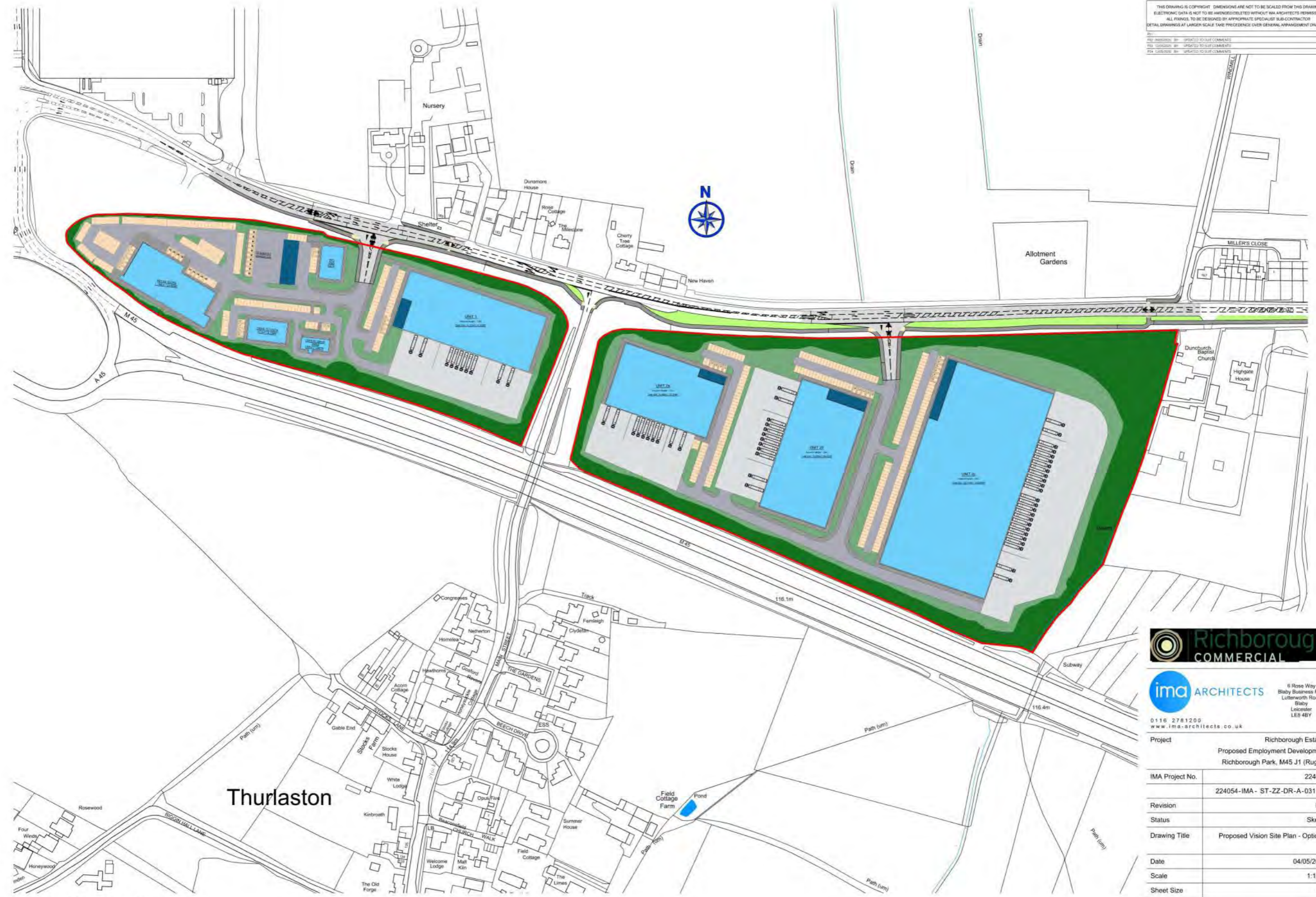
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Project	Richborough Estates Proposed Employment Development Richborough Park, M45 J1 (Rugby)
IMA Project No.	224054 224054-IMA-ST-ZZ-DR-A-031111
Revision	P02
Status	Sketch
Drawing Title	Proposed Vision Site Plan - Option 2
Date	04/05/2025
Scale	1:1250
Sheet Size	A1
Drawn By	BH
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Proposed Site Masterplan
 Scale 1:1250 at A1

Illustrative Masterplan - Option 2 (Full industrial and logistics scheme but with smaller 'small' to 'mid box' units across the site)

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IMA Project No.	224054
	224054-IMA- ST-ZZ-DR-A-031112
Revision	P04
Status	Sketch
Drawing Title	Proposed Vision Site Plan - Option 3
Date	04/05/2025
Scale	1:1250
Sheet Size	A1
Drawn By	BH
Checked By	BH

Proposed Site Masterplan
 Scale 1:1250 at A1

Illustrative Masterplan - Option 3 (Roadside / retail scheme to the left-hand side of the western plot with larger 'mid' to 'big box' industrial and logistics units to the rest)

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IMA Project No.	224054
	224054-IMA - ST-ZZ-DR-A-031113
Revision	PD4
Status	Sketch
Drawing Title	Proposed Vision Site Plan - Option 4
Date	04/05/2025
Scale	1:1250
Sheet Size	A1
Drawn By	BH
Checked By	BH

Proposed Site Masterplan
 Scale 1:1250 at A1

Illustrative Masterplan - Option 4 (Roadside / retail scheme to the left-hand side of the western plot with smaller 'small' to 'mid box' industrial and logistics units to the rest)

6 Deliverability & Benefits

- 6.1 The Site offers an excellent opportunity to provide a significant number of jobs for the area, whilst also providing a scheme which is sustainable and landscape led.
- 6.2 The site is in a highly sustainable location due to the existing infrastructure links which provide access to the site, along with the nearby services to the site by virtue of the close proximity of a number of villages and the larger town of Rugby. The site will assist the supported growth of all of these places due to the creation of a significant number of jobs at various levels.
- 6.3 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet varying needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic time frame.
- 6.4 Richborough are fully committed to the site and consider it can be brought forward immediately on adoption of the Local Plan to provide the required growth and job creation for the Borough. With regards to the three tests, these are analysed below.

Is it Available?

- 6.5 Richborough has control over the entire site and is hugely experienced with an extensive track record in delivering a diverse range of high-quality developments across the UK.

Is it Suitable?

- 6.6 The site is entirely suitable for employment / retail development for the following reasons:
- It is sustainably located with excellent transport links and existing infrastructure in its immediate vicinity.
 - There are a range of local community services and facilities within the local area which would greatly supplement the employment use of the site
 - There are no technical constraints that would prevent the proposed development from coming forward.
 - There is a recent employment / commercial development under construction in close proximity to the site, demonstrating that the area is perfectly suited to a use such as this.

Is it Achievable?

- 6.7 The illustrative masterplan and vision demonstrates how the scheme reacts to its environmental constraints and opportunities, delivering a landscape-led solution which enhances the site's characteristics. The technical assessments undertaken demonstrate there are no constraints which would prevent the proposed development from coming forward. Best practice mitigation measures have been designed into the scheme at an early stage to secure the principles of the site's development. Richborough intends to deliver to the market a scheme to enhance / provide job opportunities in the area.

Key Benefits:

- 6.8 The allocation of the site will support new employment opportunities in an appropriate location and ensure that a quantity, quality and mix is provided to support the economic growth of the Borough. The proposed development will deliver a suite of benefits which fall within the three pillars of sustainable development including:

Economic Benefits

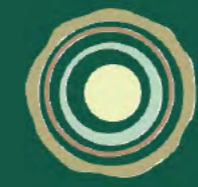
- 6.9 The Site provides opportunities for flexible employment floorspace, meeting a range of business needs and providing economic benefits, including Business Rates, that are necessary to help the Council deliver the objectives of its Local Plan and its Economic Strategy for Rugby.
- 6.10 In this regard,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

Social Benefits

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

Environmental Benefits

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



Richborough
20th Anniversary



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