

## Representation Form for Local Plans

	<b>Local Plan</b> Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
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**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 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto: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.*

Title	Mr	Mr
First Name	Jonathan	Will
Last Name	Dawes	Whitelock
Job Title (where relevant)		Associate Director
Organisation (where relevant)	Tritax Big Box Developments Ltd (TBBD)	Frampton Town Planning Ltd
Address Line 1		Oriel House
Line 2		42 North Bar
Line 3		Banbury
Line 4		Oxfordshire
Post Code		OX16 0TH
Telephone Number		

E-mail Address

[will.whitelock@framptons-planning.com](mailto:will.whitelock@framptons-planning.com)

(where relevant)

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

Name or Organisation:

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	Policy S3 Strategy for employment land, Policy S7 Employment Allocations and Annex: Development Site Allocations	Policies Map	<input type="text"/>
Site ID	17 South West Rugby employment phase 2				

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

No

(2) is Sound

Yes

No

(3) complies with the Duty to co-operate

Yes

No

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

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

Please refer to the accompanying written representations.

Whilst TBBD support the site's proposed allocation under draft Policy S2 and Policy S7 (Employment Allocations), they object to the proposed reduction in employment floorspace, the increase in the area required for the Country Park and the resultant changes to the "indicative development area" shown in the Annex to the Plan on the basis of the following:

- The reduction in the employment floorspace requirement for South West Rugby employment phase 2 has not been robustly justified in terms of the evidence base with regard to how the Council is meeting its employment land needs.
- The development principles for the proposed allocation of South West Rugby employment phase 2 are not evidence-led in terms of the requirements for the Country Park which acts as a buffer between the development zone and the adjacent Cawston Woodlands and Cawston Spinney to the north and east. As a matter of fact, there is no evidence in the updated landscape and ecological assessments supporting the emerging Plan to suggest that a buffer to Cawston Woodlands in excess of 15 metres is required. Indeed, the Council's current thinking in terms of the buffer requirements to Cawston Spinney and Cawston Woodlands is completely at odds with the Council's previous assessments, in consideration of the fact that:
  - Policy DS8: South West Rugby of the Rugby Borough Council Local Plan (2011-2031) adopted in June 2019 requires a Woodland Management Plan setting out how woodland within the boundaries of the allocation, in particular Cawston Spinney, will be protected from potential adverse impacts of new development, *'including details of a buffer in accordance with Natural England's standing advice on Ancient Woodland and Veteran Trees.'*
  - The South West Rugby Masterplan Supplementary Planning Document (Amended adoption version – readopted 11 December 2024) advises (at paragraph 9.5) that *'Natural England's standing advice requires a minimum buffer zone of 15 metres around ancient woodland to avoid root damage and where assessment shows other impacts are likely to extend beyond this distance, a larger buffer zone may be needed. An arboricultural survey will need to be submitted with any planning application which incorporates or is in close proximity to Cawston Spinney which defines and justifies the buffer zone to be implemented'*
  - This is reiterated in the South West Rugby Design Code Supplementary Planning Document (adopted on 9 July 2025) which states (at paragraph NA.17) that *'the ancient woodland of Cawston Spinney must be protected by a buffer of at least 15m. The buffer should increase if arboricultural impact assessments indicate this is necessary.'*
  - No reference was made to a buffer within the Preferred Options Consultation in 2025. The Stage 2 Site Options Assessment (March 2025) and the Ecological Constraints Assessment (March 2025) identify the location of ancient woodland adjacent to the northern site boundary requires *"careful mitigation measures"* and that the overall landscape sensitivity of the site is Low. The Annex to the Preferred Options version of the Plan showed an *"indicative development area"* much closer to Cawston Spinney and Cawston Woodlands.

It is hence concluded that the plan has not been 'positively prepared' and will not be effective in meeting the employment land need on the basis of the evidence.

(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 cooperate 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 the absence of any evidence to justify a reduction in the employment floorspace for South West Rugby employment phase 2 and to require a larger Country Park/buffer to Cawston Woodlands in excess of 15 metres, the development requirements for the site should reflect the Council's previous assessments and adopted policy documents for South West Rugby – which was reflected in the Preferred Options Consultation document in 2025.

(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.

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TBBD have a legal right to appear before and be heard by the inspector at a hearing as they have made a comment (a 'representation') on the 'Regulation 19' plan.

**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.

9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.



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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	Policy S8 South West Rugby	Policies Map	
Site ID	17 South West Rugby employment phase 2				

4. Do you consider the Local Plan:

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

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

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

Please refer to the accompanying written representations.

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

Local Plan Paragraph		Local Plan Policy	Policy S9 South West Rugby spine road network	Policies Map	
Site ID	17 South West Rugby employment phase 2				

4. Do you consider the Local Plan:

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

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	Policy CL1 Net Zero Buildings	Policies Map	
Site ID	17 South West Rugby employment phase 2				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	✓
(2) is Sound	Yes		No	✓
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It is considered that Policy CL1 should reflect national policy requirements for reducing carbon emissions and as such, the policy is considered to be surplus to requirements and should be deleted.

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Local Plan Paragraph		Local Plan Policy	Policy EN6 Canopy Cover	Policies Map	
Site ID	17 South West Rugby employment phase 2				

4. Do you consider the Local Plan:

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Whilst species are in decline TBBD would suggest that it is not for new development to address the impact of other industries, it is considered that the supporting documents provided a lack of suitable justification of the local need for a 20% canopy cover

policy. It is also considered that this is not a necessary policy requirement and can be controlled through the Development Management process.

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

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	Policy D1 Well-designed places	Policies Map	
Site ID	17 South West Rugby employment phase 2				

4. Do you consider the Local Plan:

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The reference to the Design Code in the supporting text to the policy is noted but TBBD have submitted objections to the draft Design Code for South West Rugby which is overly prescriptive. It is submitted that the policy text in Policy D1 will be more than adequate to ensure 'well designed places' and the reference to local design codes should be removed from the supporting text.

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### Summary of Rep 563: Tritax Big Box Developments

N.B. This is a summary produced by a planning officer not the consultee.

S3 is unsound because there are numerous methodological issues and inconsistencies in the manner in which the Council intends to provide employment land:

- Estimated demand is greatly reduced in the 2024 Alignment Paper relative to the 2022 HEDNA without clear explanation.
- Certain sites appear to be double counted in the Council's supply calculations (Padge Hall Farm and another small site which are equivalent to 66 ha).
- The Council removed a 20% supply buffer previously intended to provide supply flexibility within the employment land portfolio, which significantly increases the risk that Rugby will not meet its needs.
- The contribution expected from Rugby towards Coventry's unmet employment land needs has been significantly reduced through successive iterations of the evidence base.
- Many of the available sites comprising the potential supply have restrictions on their use or the size of units which will limit their capacity to deliver strategic industrial and logistics premises.
- The vast majority of supply that has capacity to deliver strategic industrial and logistics premises are the same sites that will also need to meet local need comprising non-strategic premises, thus potentially crowding out strategic units.
- Savills' assessment of demand and supply for strategic industrial and logistics premises (greater than 100,000 sq.ft), suggests that Rugby has an overall deficit of about 54ha and is at risk of a supply shortfall unless additional allocations are made.

S3 could be made sound by allocating Site 17 for 130,000sqm as was proposed at the Preferred Option consultation stage.

S7 and the development requirements for Site 17 are unsound because:

- The reduction in floorspace from 130,000sqm at Reg 18 to 60,000sqm at Reg 19 has not been robustly justified in terms of the evidence base with regard to how the Council is meeting its employment land needs.
- The need for an increase in the buffer zone to Cawston Spinney is not supported by technical evidence and is at odds with the Council's previous assessments. No evidence is presented which suggests that a buffer in excess of 15m is required from either an ecological or landscape perspective.
- Reducing the floorspace at Site 17 does not represent an efficient use of land and means that the plan is failing to exhaust sustainably located non-Green Belt options, contrary to national policy.
- The plan has not been 'positively prepared' and will not be effective in meeting the employment land need on the basis of the evidence.

S7 could be made sound by allocating Site 17 for 130,000sqm as was proposed at the Preferred Option consultation stage.

S8 is unsound because criterion E refers to the South West Design Code which is considered to be an unsound SPD.

S9 is unsound because the viability of the South West Rugby Spine Road Network is undermined by the reduction of the floorspace allocated at Site 17. The policy could be made sound by returning Site 17 to the level of floorspace specified at the Preferred Option stage (130,000sqm).

CL1 is unsound because the policy is inconsistent with national policy and the Council has not properly considered the impact on viability or the deliverability of development. The policy should be deleted.

EN6 is unsound because the policy is overly onerous and lacks sufficient evidential justification.

D1 is unsound because it makes reference to local design codes, one of which is the SWR Design Code, which is considered to be overly prescriptive. The policy could be made sound by deleting the reference to local design codes.



**TOWN AND COUNTRY PLANNING ACT 1990**

**RUGBY BOROUGH LOCAL PLAN 2025 - 2042  
PROPOSED SUBMISSION LOCAL PLAN CONSULTATION (REGULATION 19)  
JANUARY 2026**

**REPRESENTATIONS ON BEHALF OF  
TRITAX BIG BOX DEVELOPMENTS**

**SOUTH WEST RUGBY PHASE 2 (SITE ALLOCATION REF. 17)**

**MARCH 2026  
OUR REF: PF/10598**

## CONTENTS

<b>1.0</b>	South West Rugby employment phase 2	3
<b>2.0</b>	Policy S3 Strategy for employment land, Policy S7 Employment Allocations and Annex: Development Site Allocations	8
<b>3.0</b>	Policy S8 South West Rugby	20
<b>4.0</b>	Policy S9 South West Rugby spine road network	21
<b>5.0</b>	Policy CL1 Net Zero Buildings	22
<b>6.0</b>	Policy EN6 Canopy Cover	24
<b>7.0</b>	Policy D1 Well-designed places	25
<b>8.0</b>	Conclusions	26
Appendix 1	Red Line Plan (Dwg. 13-216-SGP-STE-XX-DR-A-111005)	
Appendix 2	Market Assessment and Review of Draft Local Plan, prepared by Savills Economics	
Appendix 3	Illustrative Masterplan and Parameters Plan accompanying planning application reference R25/0896	
Appendix 4	Warwickshire County Council – Ecology consultation response dated 01/12/2025	
Appendix 5	Representations in respect of Landscape circumstances, prepared by EDP	

## 1.0 SOUTH WEST RUGBY EMPLOYMENT PHASE 2

- 1.1 This submission is made on behalf of Tritax Big Box Developments (TBBD), in relation to their interests at South West Rugby employment phase 2 site (Site Ref. 17). TBBD welcome the opportunity to be involved in the preparation of the Rugby Borough Local Plan, and it is within this context that they wish to make representations to the Proposed Submission Local Plan Consultation.
- 1.2 On behalf of TBBD, representations have previously been submitted to the Rugby Local Plan Review Issues and Options Consultation (Regulation 18) in February 2024 and the Preferred Options Consultation (Regulation 18) in March 2025.
- 1.3 The Site is shown outlined in red on the Phase 2 – Red Line Plan (Dwg. 13-216-SGP-STE-XX-DR-A-111005) included at **Appendix 1**. It is located in the centre of the South West Rugby allocation in the adopted Rugby Local Plan (2019) under Policy DS8 for a new neighbourhood of around 5,000 dwellings and 35 hectares of B8 employment land. TBBD support the continued allocation for 3,505 homes in the South West Rugby allocation as set out in Policy S2 Strategy for Homes.
- 1.4 The South West Rugby employment phase 2 site is currently identified in the Policies Map to the adopted Local Plan as ‘Safeguarded Land,’ with paragraph 4.61 stating:

*‘The site is a long term commitment for the Council in meeting the growth needs of the Borough and will continue to be built out beyond the life of this Local Plan. Once built, it will create a new community within Rugby and it is thus important for the Borough Council and developers of the site to do this to the highest standard possible. An essential element of this is sustainability and the balance of housing to jobs, and as such there is the potential for the growth targets of housing and employment to be revisited as a result of changing demands for the Borough as it moves beyond the 2031 period. **As such an area of land is safeguarded within the South West Rugby allocation, as identified in the Policies Map to assist in meeting the Borough’s development needs beyond 2031.**’*

- 1.5 TBBD therefore support the continued phase 2 site’s proposed employment allocation under draft Policy S7 Employment Allocations, but do not agree with the proposed reduction in quantum of floorspace now proposed, and can see no clear or compelling evidence for the change in approach taken by the Council. There is a compelling case to support the allocation of the South West Rugby Employment Phase 2 Land by reason of:
- The allocation of the site for logistics will address a specific national, regional and local need for logistics floorspace and will help build a strong and competitive economy. The development will create a significant number of jobs across a wide range of skill sets.
  - The allocation of the site for logistics would contribute substantially to the national policy imperative, expressed in paragraphs 85 and 87 of the NPPF, to promote and support a strong competitive economy, particularly with regard to the need for storage and distribution facilities, at a variety of scales, in accessible locations.

- Rugby Borough Council’s evidence base for the emerging plan identifies a significant need to allocate more employment land (albeit we do not consider the Plan currently provides for the Council’s full objectively assessed need).
- The site is not Green Belt, and its future development potential is already explicitly acknowledged in the adopted Local Plan through its identified safeguarded status.
- TBBD has the knowledge and proven expertise to deliver the high-quality scheme at the scale proposed. Indeed, Phase 1 of Symmetry Park Rugby has been successful in attracting tenants to date with Iron Mountain taking the first 5 units, and the remaining 2 buildings that have recently been completed subject to positive ongoing occupier discussions.
- With its unrivalled occupier base, TBBD has had a number of strong enquiries for buildings of a quantum that cannot be delivered within Phase 1, that have had to locate elsewhere due to the lack of available land within Rugby – the allocation of the Safeguarded land would provide the ability to capture this investment.
- The development would form a logical and obvious extension to the adjoining successful Symmetry Park, Rugby (Phase 1) employment development where, due to ongoing occupier discussions, and the buoyancy of the Industrial and Logistics market, there will shortly be no remaining B8 Logistics space.
- The development would deliver employment to help meet the Borough’s employment needs benefiting from the strategic location of the site and its proximity to the M45/A45.
- The development would be undertaken to the same high-level of environmental and energy efficient standards delivered at Phase 1.
- The development would deliver the remaining highways infrastructure for the wider South West Rugby allocation – the Potsford Dam link - prior to the construction of any significant quantum of planned residential development.
- Removing the financial burden of the delivery of the Potsford Dam Link by applying it solely to the Safeguarded Land would reduce the infrastructure burden across every remaining planned housing in South West Rugby by c.£2,000 per plot.
- There is the potential for the Safeguarded Land to offer further Section 106 and CIL contributions to further assist with the residential viability and deliverability of the South West Rugby Allocation which has been stalled to date, despite the involvement of Homes England.
- The development would deliver substantial areas of new open space, and enhanced biodiversity credentials, including through the provision of an enhanced publicly accessible park and buffer alongside Cawston Spinney.
- The development would assist in contributing to the wider infrastructure costs and delivery of the South West Rugby allocation.

1.6 The Annex to the Plan entitled ‘Development Site Allocations’ provides details for the development site allocations under Policy S7. The policy states that the development of the allocated sites shall accord with the development principles set out in the annex, which should be read as if it is incorporated into the policy text.

1.7 For Site ID: 17 South West Rugby employment phase 2 it states that the allocation is for ‘*circa 60,000m<sup>2</sup> for employment use.*’ This is a substantial reduction in floorspace of more than 50%/some 70,000 sqm (from 130,000 sqm to 60,000 sqm) since the Preferred Options Consultation in 2025. The reason for this

change appears to be due to an increased requirement for the country park alongside Cawston Spinney along the northern site boundary, which has increased to 23 hectares from 8.6 hectares in the Preferred Options Consultation. The result is that the “*indicative development area*” shown in the Annex to the Plan has reduced in scale and has changed to a linear (square) shape, as opposed to following the shape of Cawston Spinney with an appropriate buffer, as previously illustrated in the Preferred Options Consultation document.

1.8 At this Submission Local Plan Consultation stage (Reg. 19), the Representation Form asks respondents three key questions:

- Is the plan legally compliant? Does it comply with relevant legislation and regulations in the way it has been prepared and in its content?
- Is the plan ‘sound’? Has the plan been ‘positively prepared’? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with the latest regional and national planning policy?
- Does the plan comply with the ‘Duty to Cooperate’? Has the Council engaged constructively, actively and on an ongoing basis with neighbouring authorities and other prescribed bodies during the preparation of the plan?

1.9 Whilst TBBD support the site’s proposed allocation under draft Policy S7 (Employment Allocations), they object to the proposed reduction in employment floorspace, the increase in the area required for the Country Park and the resultant changes to the “*indicative development area*” shown in the Annex to the Plan on the basis of the following:

- The reduction in the employment floorspace requirement for South West Rugby employment phase 2 has not been robustly justified in terms of the evidence base with regard to how the Council is meeting its employment land needs.
- The development principles for the proposed allocation of South West Rugby employment phase 2 are not evidence-led in terms of the requirements for the Country Park which acts as a buffer between the development zone and the adjacent Cawston Woodlands and Cawston Spinney to the north and east. As a matter of fact, there is no evidence in the updated landscape and ecological assessments supporting the emerging Plan to suggest that a buffer to Cawston Woodlands in excess of 15 metres is required. Indeed, the Council’s current thinking in terms of the buffer requirements to Cawston Spinney and Cawston Woodlands is completely at odds with the Council’s previous assessments, in consideration of the fact that:
  - Policy DS8: South West Rugby of the Rugby Borough Council Local Plan (2011-2031) adopted in June 2019 requires a Woodland Management Plan setting out how woodland within the boundaries of the allocation, in particular Cawston Spinney, will be protected from potential adverse impacts of new development, ‘*including details of a buffer in accordance with Natural England’s standing advice on Ancient Woodland and Veteran Trees.*’

- The South West Rugby Masterplan Supplementary Planning Document (Amended adoption version – readopted 11 December 2024) advises (at paragraph 9.5) that *‘Natural England’s standing advice requires a minimum buffer zone of 15 metres around ancient woodland to avoid root damage and where assessment shows other impacts are likely to extend beyond this distance, a larger buffer zone may be needed. An arboricultural survey will need to be submitted with any planning application which incorporates or is in close proximity to Cawston Spinney which defines and justifies the buffer zone to be implemented’*
- This is reiterated in the South West Rugby Design Code Supplementary Planning Document (adopted on 9 July 2025) which states (at paragraph NA.17) that *‘the ancient woodland of Cawston Spinney must be protected by a buffer of at least 15m. The buffer should increase if arboricultural impact assessments indicate this is necessary.’*
- No reference was made to a buffer within the Preferred Options Consultation in 2025. The Stage 2 Site Options Assessment (March 2025) and the Ecological Constraints Assessment (March 2025) identify the location of ancient woodland adjacent to the northern site boundary requires *“careful mitigation measures”* and that the overall landscape sensitivity of the site is Low. The Annex to the Preferred Options version of the Plan showed an *“indicative development area”* much closer to Cawston Spinney and Cawston Woodlands.

1.10 It is hence concluded that the plan has not been ‘positively prepared’ and will not be effective in meeting the employment land need on the basis of the evidence.

1.11 The following sections of these representations respond to the policies and evidence base documents listed below and provide further analysis on the soundness of the Proposed Submission Local Plan:

### **Policies**

- Policy S3 Strategy for employment land
- Policy S7 Employment allocation
- Annex: Development Site Allocations
- Policy S8 South West Rugby
- Policy S9 South West Rugby spine road network
- Policy CL1 Net Zero buildings
- Policy EN6 Canopy Cover
- Policy D1 Well-designed places

### **Documents**

- Development Needs Topic Paper (December 2025)
- Ecological Constraints Assessment (October 2025)
- HEDNA-WMSESS Alignment Paper Addendum (November 2025)
- Homes-Jobs Alignment Paper (December 2025)

- Housing and Economic Land Availability Assessment (HELAA) (December 2025)
- Housing and Economic Land Availability (HELAA) Addendum (October 2025)
- Stage 2 Site Assessment Report (December 2025)
- Sustainability Appraisal (SA) of the Rugby Borough Local Plan (December 2025)
- The Area of South West Rugby Landscape Sensitivity Assessment (January 2026)
- Updated Housing Needs Evidence (September 2025)

## 2.0 POLICY S3 STRATEGY FOR EMPLOYMENT LAND, POLICY S7 EMPLOYMENT ALLOCATIONS AND ANNEX: DEVELOPMENT SITE ALLOCATIONS

2.1 The Council's strategy to meet Rugby Borough's need for employment land in the period 2025-2042 under Policy S3 'Strategy for employment land' is to deliver the following levels of new employment development:

- 19,761.3m<sup>2</sup> of use class E(g)(i) and (ii) office floorspace (approx. 3.95 hectares)
- 1,034,000m<sup>2</sup> (approx. 287 hectares) of floorspace for use classes B2, E(g)(iii), and B8

2.2 New floorspace in use classes B2, B8 and E(g)(iii) will be delivered in the following locations:

- Prospero Ansty and Ansty Park (26,663 sqm)
- Coton Park east of Castle Mound (26,421 sqm)
- Padge Hall Farm (137,730 sqm)
- Houlton remaining employment land (15,000 sqm)
- Employment permissions on small sites as at 1 April 2025 (13,429.4 sqm)
- New allocations under Policy S7, comprising:
  - Crowner Fields Farm, Ansty (275,000 sqm)
  - Coton Park east (115,000 sqm)
  - South West Rugby phase 2 (60,000 sqm)
  - Ansty Park north (75,000 sqm)
  - Land at Walsgrave Hill (290,000 sqm)

2.3 The approximate floorspace capacity for South West Rugby phase 2 for the period 2025-2042 is stated as 60,000m<sup>2</sup>. As has been established, this is a substantial reduction in floorspace of some 70,000 sqm (from 130,000 sqm to 60,000 sqm) since the Preferred Options Consultation in 2025.

2.4 Policy S7 'Employment allocations' states that the development of the sites shall accord with the development principles set out in the development site allocations annex. For Site ID: 17 South West Rugby employment phase 2, the Annex: Development Site Allocations requires:

- *'The creation of a wooded circa 23 hectare publicly accessible country park alongside Cawston Spinney to include footpaths linking to existing routes and provided east-west connectivity along the northern site boundary.'*

2.5 At the Preferred Options stage, the requirement for the Country Park was 8.6 hectares. As a consequence of the significant increase in the area for the Country Park, the size, shape and capacity of the "indicative development area" shown on the accompanying 'site development principles' drawing in the Annex has changed significantly, as illustrated in Figure 1 below.

**Figure 1: Changes to the site development principles in the Annex to the emerging Local Plan**

Preferred Options (2025) development site principles

<b>Site ID:</b> 17	<b>Site name:</b> South West Rugby employment phase 2
<b>Site area:</b> 40.70ha	<b>Allocation:</b> circa 130,000m <sup>2</sup> of floorspace for employment use
<p><b>Development requirements:</b></p> <ul style="list-style-type: none"> <li>• Creation of a wooded circa 8.6ha publicly accessible country park alongside Cawston Spinney to include footpaths linking to existing routes and providing east-west connectivity along the northern site boundary.</li> <li>• Provision of overnight lorry parking facilities sufficient to cater for the anticipated use of the units.</li> <li>• Provision of tree lining to the Potsford Dam Link and Sustainable Transport Corridor.</li> <li>• To accord with the South West Rugby Design Code SPD.</li> <li>• Delivery of the northern section of the Potsford Dam Link (see Policy S9).</li> <li>• The existing Public Rights of Way (PROW) must be maintained, and the design of the development must ensure they are pleasant to use. Wherever possible PROW should be routed through public open space, be segregated from roads, and be well overlooked. PROW should be maintained on their existing lines, with diversions only occurring where this is not practicable. PROW should be accessible to as many people as possible, including those who are disabled or less mobile.</li> </ul>	

Proposed Submission Local Plan (2026) development site principles

<b>Site ID:</b> 17	<b>Site name:</b> South West Rugby employment phase 2
<b>Site area:</b> 40.70ha	<b>Allocation:</b> circa 60,000m <sup>2</sup> of floorspace for employment use
<p><b>Development requirements:</b></p> <ul style="list-style-type: none"> <li>• Creation of a wooded circa 23ha publicly accessible country park alongside Cawston Spinney to include footpaths linking to existing routes and providing east-west connectivity along the northern site boundary.</li> <li>• Provision of overnight lorry parking facilities sufficient to cater for the anticipated use of the units.</li> <li>• Provision of tree lining to the Potsford Dam Link and Sustainable Transport Corridor.</li> <li>• To accord with the South West Rugby Design Code SPD.</li> <li>• Contributions to the strategic infrastructure costs identified in Appendix K of the South West Rugby Masterplan SPD.</li> <li>• The existing Public Rights of Way (PROW) must be maintained, and the design of the development must ensure they are pleasant to use. Wherever possible PROW should be routed through public open space, be segregated from roads, and be well overlooked. PROW should be maintained on their existing lines, with diversions only occurring where this is not practicable. PROW should be accessible to as many people as possible, including those who are disabled or less mobile.</li> </ul>	
<ul style="list-style-type: none"> <li>• Pedestrian and cycle network improvements identified in Appendix K of the South West Rugby Masterplan SPD.</li> </ul>	

2.6 A potential explanation for this change is explained in the Sustainability Appraisal (SA) of the Rugby Borough Local Plan (December 2025) which states (at Paragraph 9.8.2):

*‘With regards to South West Rugby Employment Phase 2, whilst it is an existing reserve site, there is a need to balance: A) a desire to deliver employment land in well-linked location and support the viability of the wider South West Rugby development; with B) biodiversity and landscape constraints, including relating to adjacent Cawston Spinney.’*

2.7 These matters are addressed in turn below.

### **Need for Employment Land**

2.8 The need for large industrial sites is calculated based on the methodology set out in the West Midlands Strategic Employment Sites Study (WMSESS) August 2024. The WMSESS does not identify need for larger industrial sites based on individual local authority areas. Instead, the projected future West Midlands need is apportioned to “opportunity areas” which correspond to groups of junctions on the main motorway and A-road network. This is because large-scale industrial uses would need to be located close to these junctions.

2.9 The opportunity area that encompasses part of Rugby Borough is “Area 7: M6/ A45/ A46 / M45 Coventry and Rugby”. South West Rugby employment phase 2 would deliver employment to help meet the Borough’s employment needs benefiting from its strategic location in proximity to the M45/A45.

2.10 We are supportive of this approach which aligns with the National Planning Policy Framework, with Paragraph 87 stating:

*‘Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.’*

2.11 At Paragraph 87 of the Framework, the onus is placed on Local Authorities to make sure that, through both planning policies and decisions, provision is made for B8 and B2 uses. There is an urgent need for more land for B8 and B2 uses in the interests of UK and regional growth policy.

2.12 Furthermore, the economic objectives of sustainable development (NPPF paragraph 8) states that the planning system needs to be responsive by ensuring sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improve productivity.

2.13 The Development Needs Topic Paper (December 2025) for the Proposed Submission Local Plan for Rugby sets out a new plan period: 2025 to 2042. It adjusts earlier demand figures to reflect the updated plan period. As a result, local demand need in Rugby is 60.8 ha and strategic demand is 116.5ha.

2.14 The paper identifies a combined industrial need between local and strategic sites of 284ha once completions and commitments are accounted for. The paper states that only 9ha of Coventry’s own need cannot be met. This is a decrease of 80% compared to the Preferred Options consultation in 2025 but is not explained.

- 2.15 The latest calculations on employment land remove a 20% buffer of supply over demand compared to the previous Development Needs Topic Paper dated March 2025. It suggests that the figure for strategic land already contains a buffer because it is at the higher end of a range. It also states that the identified supply is controlled by developers that have a good track record of delivery and that nearly half of the identified supply is permitted. However, developers’ priorities can change and financial difficulties can arise which may affect delivery. This begs the question why a buffer was included in the evidence base for the Preferred Options consultation but is now not needed. To fail to plan for the full objectively assessed employment need of an area is clearly flawed, and is contrary to the Government’s stated number one mission of delivering economic growth.
- 2.16 One justification for removing the buffer provided in the Development Needs Topic Paper is that by 2033 a new plan for a unitary authority including Rugby “will” have been adopted and will provide an opportunity to consider whether further supply is required.
- 2.17 A statutory consultation is currently open until 26 March 2026 to inform an assessment by the Secretary of State of the merits of the proposals for:
- a. One unitary council for the whole of the area of Warwickshire comprising the current areas of North Warwickshire, Nuneaton and Bedworth, Rugby, Stratford-on-Avon and Warwick; or
  - b. Two unitary councils comprising the current areas of:
    - North unitary authority: North Warwickshire, Nuneaton & Bedworth, and Rugby
    - South unitary authority: Stratford-on-Avon, and Warwick
- 2.18 It is considered unlikely that a unitary plan will be produced in this relatively short timeframe to 2033. No decision has yet been made on the merits of having a unitary council and which authorities this would involve. In the case of Buckinghamshire, a unitary authority was formed in 2020 and nearly six years later it still hasn’t produced a new local plan. As above, no clear justification has been set out for ‘kicking the can down the road’ in terms of not meeting their full objectively assessed employment need.
- 2.19 In light of these changes to the Council’s approach for assessing the demand and supply of employment land, TBBD has commissioned Savills Economics to review the relevant policy context, assess market signals within the relevant property management area, and compare the Council’s assessment of employment land demand with Savills’ own assessment based on the Savills Supressed Demand Model. A copy of the report entitled ‘Market Assessment and Review of Draft Local Plan’ is included at **Appendix 2**.
- 2.20 Savills’ review of the Council’s evidence base identifies a number of methodological issues and inconsistencies that create uncertainty in the manner in which the Council intends to provide employment land to meet its needs for premises greater than 100,000 sq ft, as follows:
- Changes introduced in the 2024 Alignment Paper significantly reduce estimated local employment and demand compared with the earlier 2022 HEDNA, without clear explanation.
  - Certain sites appear to be double counted within the Council’s supply calculations – comprising Pudge Hall Farm and another small site which are equivalent to 66 ha.

- The Council removed a 20% supply buffer previously intended to provide supply flexibility within the employment land portfolio. It is considered that the removal of the buffer significantly increases the risk that Rugby will not meet its needs.
- The contribution expected from Rugby towards Coventry’s unmet employment land needs has been significantly reduced through successive iterations of the evidence base
- Many of the available sites comprising the potential supply have restrictions on their use or the size of units which will limit their capacity to deliver strategic industrial and logistics premises.
- The vast majority of supply that has capacity to deliver strategic industrial and logistics premises are the same sites that will also need to meet local need comprising non-strategic premises, thus potentially crowding out strategic units.

2.21 Savills’ assessment of demand and supply for strategic industrial and logistics premises (greater than 100,000 sq.ft) in the property market area is presented in Table 8.1 of their report (copied below):

**Table 8.1 C&W PMA Balance of Demand and Supply for Strategic I&L Use Over 17-Year Period**

Demand/Supply	ha
Savills assessment of I&L demand (ha)	(727.1)
Savills review of supply of I&L land (ha)	
<i>Sites with planning permission</i>	150.6
<i>Sites allocated but without planning permission</i>	35.3
Total supply	185.9
Balance of demand vs supply (ha)	(541.2)
Symmetry Park Rugby Phase 2 (Subject Site)	40.7
Savills review of supply of I&L land (ha)	
<i>Other draft allocation sites<sup>6</sup> (547.6ha discounted by 20%)</i>	438.1
Balance of demand vs supply (ha)	(62.4)

Source: Savills 2026

2.22 A summary of demand and supply for strategic I&L in Rugby is presented in Table 8.2 (copied below):

**Table 8.2 Rugby Balance of Demand and Supply for Strategic I&L Use Over 17-Year Period**

Demand/Supply	ha
Savills assessment of I&L demand (ha)	(230.4)
Savills review of supply of I&L land (ha)	
<i>Sites with planning permission</i>	31.2
<i>Sites allocated but without planning permission</i>	0
Total supply	31.2
Balance of demand vs supply (ha)	(199.2)
Symmetry Park Rugby Phase 2 (Subject Site)	40.7
Savills review of supply of I&L land (ha)	
<i>Other draft allocation sites<sup>7</sup> (181.1ha discounted by 20%)</i>	144.9
Balance of demand vs supply (ha)	(13.6)

Source: Savills 2026

2.23 The table shows that Rugby has an overall deficit of about 54ha and is therefore at risk of a supply shortfall unless additional allocations in Rugby are made. Even if the draft allocations are adopted as well as the Subject Site, there is still a risk of a deficit. However, it would significantly reduce it.

2.24 Accordingly, Savills conclude:

*‘8.1.9 Given the wider context of the PMA and the attractive characteristics of the Proposed Development site, there is a compelling case for allocating some of the wider demand to Symmetry Park Rugby Phase 2 – a proven commercial location, in a highly sustainable location outside of the Green Belt.*

*8.1.10 In summary, the current supply of permitted sites and allocations is insufficient to ensure that demand for strategic I&L premises is met. There are a range of draft allocations that could meaningfully contribute towards the deficit although there is a degree of uncertainty about their deliverability, their commercial attractiveness, and whether they are available to meet particular needs given that a number of the sites have restrictions as to the use and size of units. Therefore we have conservatively applied a 20% discount to them based on Savills experience.*

*8.1.11 The Proposed Development is on a site of about 40.7ha with a floorspace capacity of about 1.3m sq.ft. There is considerable need for the Subject Site as originally intended.’*

2.25 It is submitted, therefore, that the reduction in the employment floorspace requirement (comprising c. 70,000 sqm) for South West Rugby employment phase 2 since the Preferred Options Consultation in 2025, has not been robustly justified in terms of the evidence base with regard to how the Council is

meeting its employment land needs. The reduction in the site capacity/floorspace is not supported by the market evidence as a matter of fact.

### Ecology and Biodiversity

2.26 The Council’s assessment of the ecological constraints for the site is summarised in the Stage 2 Site Options Assessment (December 2025) as follows:

*‘There are medium ecological constraints at Site 17. Site 17 has potential to be taken forward for development subject to demonstrating that there would be no adverse effects upon Draycote Meadows SSSI through sensitive site design and the adoption of appropriate mitigation measures. The location of ancient woodland adjacent to the northern site boundary requires careful mitigation measures to ensure the habitat is not adversely impacted by hydrological, air quality, urbanisation and recreation effects.’*

2.27 The principal evidence base document supporting the draft Plan in terms of ecology/biodiversity comprises the Ecological Constraints Assessment (October 2025). This report undertakes an assessment of ecological constraints for a number of sites which are being considered as part of the stage 2 site assessment. For Site 17: South West of Rugby Safeguarded Land it states under the heading ‘Potential Impact’:

*‘10.3.1 Proposed employment development at Site 17 has the potential to impact the following designated sites.*

- *Cawston Woodlands LWS*
- *Draycote Meadows SSSI*
- *River Avon and Tributaries LWS*

*10.3.2 Ancient woodland is located adjacent to the site. Ancient woodland is vulnerable to changes in air quality, surface water quality and hydrological regime. Indirect impacts may include recreational disturbance. Ancient woodlands often support species of birds, bats, mammals and invertebrates. These species may be affected by development impacts associated with employment development such as lighting, noise and visual disturbance. Warwickshire’s LBAP for woodland aims to expand and restore ancient woodland currently in unfavourable condition to favourable or recovering.’*

2.28 As the Council will be aware, a planning application for South West Rugby employment phase 2 was submitted in October 2025. The planning application is registered under the reference R25/0896 with the following description of development:

Hybrid planning application for:

*‘Full planning application for the erection of one Use Class B8 (Warehousing and Distribution) unit, with ancillary Use E(G)(i) (offices) with associated infrastructure including vehicle parking and service areas (including lorry parking), sustainable drainage provision, gate house, sprinkler tanks, pump houses, gas and electricity*

*substations. Earthwork and plateauing of the wider development site including the formation of bunds. Completion of the Sustainable Transport Corridor connection to adjacent land to the east and the creation of the Potford Dam link to the A4701 roundabout including associated landscaping and infrastructure, bridge to Cawston Greenway and including the creation of the Cawston Landscape Park.*

*Outline planning application for Use Class B8 (Warehousing and Distribution) units with ancillary Use Class (G)(i) (offices) with associated site infrastructure including vehicle parking and service areas (including lorry parking), energy centre, landscaping, sustainable drainage system. All matters reserved expect means of access.'*

- 2.29 The application is accompanied by an Environment Statement which has been informed by a Baseline Ecology Report, Biodiversity Net Gain Assessment and DEFRA BNG Metric. The development of the site is considered to have no adverse effect on statutory designated sites. The Site is located over 1.5km from Draycote Meadows SSSI, designated for grassland and butterflies. The SSSI is separated from the Site by the A45/M45 and Symmetry Park Phase 1 of the South West Rugby Allocation which is built/under construction. There are no direct/indirect receptor pathways between the Site/Potford Dam Link Road and the SSSI and as such the potential for adverse effects as a result of the development are considered to be negligible. The Site is situated within the Impact Risk Zone (IRZ) around the SSSI but does not meet the threshold for mandatory consultation with Natural England and is unlikely to be materially affected.
- 2.30 As part of the development proposals, it is proposed to create minimum of a 15-metre buffer between the Development Zone and Cawston Woodland LWS in order to protect the area of semi-natural deciduous woodland and the habitat associated with it. This 15m buffer is in accordance with Natural England's Standing advice in relation to ancient woodland, which requires that ancient woodlands are buffered from new developments by at least 15m. In some areas, the submitted Parameters Plan and Illustrative Masterplan (included at **Appendix 3**) exceed 15 metres and incorporate structural planting and open space as additional buffering. The arrangement of open space would ensure that the ancient woodland is safeguarded.
- 2.31 Warwickshire County Council - Ecology commented on the application proposals on 1<sup>st</sup> December 2025. A copy of the consultation response is included at **Appendix 4**. Whilst the detailed comments request further clarification regarding specific soft landscaping proposals and the suitability of proposed culverting of a section of the Avon tributary, no objections have been raised in relation to the proposed 15m buffer mitigation measure to ensure the habitat within the ancient woodland adjacent to the northern site is not adversely impacted.
- 2.32 It has been demonstrated as part of the planning application that biodiversity is enhanced and the development of the site would not prejudice any protected species in accordance with Paragraph 193 of the Framework.
- 2.33 It is hence concluded that the amendments to the development principles for South West Rugby employment phase 2 between the Preferred Options consultation and the Proposed Submission Local Plan – specifically, the increase in the area required for the County Park and the subsequent reduction

in the “indicative development area” - is not formed on the basis of the ecological evidence base as a matter of fact. There is no evidence to suggest that a buffer to Cawston Woodlands in excess of 15 metres is required from an ecological perspective. Therefore, it is considered entirely appropriate that the precise requirements for the proposed buffer is a matter to be considered at planning application stage following detailed assessment of the impacts, as currently required under Policy DS8: South West Rugby of the adopted Rugby Borough Council Local Plan (2011-2031).

## Landscape

- 2.34 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by TBBD to review the landscape evidence supporting the Proposed Submission Local Plan, comprising ‘The area of South West Rugby, Landscape Sensitivity Assessment’ (LSA) (January 2026) undertaken by Node on behalf of Rugby Borough Council.
- 2.35 A copy of EDP’s report entitled ‘Representations in respect of Landscape circumstances’ is included at **Appendix 5**. Attention is drawn to paragraph 1.10 which states:

‘It appears that the reduction in the quantum of floorspace within the Site allocation was set out prior to the issue of the LSA, and that the “*indicative development area*” shown in the Annex: Development Site Allocations to the Plan is not evidence-led as it does not follow the conclusions of the LSA. This is supported by the reference within the Stage 2 Site Options Assessment (December 2025) which states that (with EDP emphasis) “*Mitigations proposed in the illustrative masterplan include management and retention of mature hedgerows and trees, new areas of shrubs, trees and wildflowers **within a 15m woodland buffer in the north of the site.**”*’

- 2.36 It is hence concluded that there is no evidence from a landscape perspective to justify the shape, size and capacity of the indicative development area as shown in the Annex to the Proposed Submission Local Plan. While the Sustainability Appraisal (December 2025) states that ‘*detailed consideration has been given to the scale of employment land versus the scale of greenspace as a buffer to Cawston Spinney*’, there is no evidence base document that justifies a larger buffer and the Stage 2 Site Options Assessment is clear in that a 15-metre woodland buffer in the north of the site is considered to comprise sufficient mitigation. As set out in Section 1 of these Representations, the Council’s current thinking in terms of the size of the Country Park and the buffer requirements to Cawston Spinney and Cawston Woodlands is completely at odds with the Council’s previous assessments, in consideration of the fact that:

- Policy DS8: South West Rugby of the Rugby Borough Council Local Plan (2011-2031) adopted in June 2019 requires a Woodland Management Plan setting out how woodland within the boundaries of the allocation, in particular Cawston Spinney, will be protected from potential adverse impacts of new development, ‘*including details of a buffer in accordance with Natural England’s standing advice on Ancient Woodland and Veteran Trees.*’
- The South West Rugby Masterplan Supplementary Planning Document (Amended adoption version – readopted 11 December 2024) advises (at paragraph 9.5) that ‘*Natural England’s*

*standing advice requires a minimum buffer zone of 15 metres around ancient woodland to avoid root damage and where assessment shows other impacts are likely to extend beyond this distance, a larger buffer zone may be needed. An arboricultural survey will need to be submitted with any planning application which incorporates or is in close proximity to Cawston Spinney which defines and justifies the buffer zone to be implemented.'*

- This is reiterated in the South West Rugby Design Code Supplementary Planning Document (adopted on 9 July 2025) which states (at paragraph NA.17) that *'the ancient woodland of Cawston Spinney must be protected by a buffer of at least 15m. The buffer should increase if arboricultural and impact assessments indicate this is necessary.'*
- No reference was made to a buffer within the Preferred Options Consultation in 2025. The Stage 2 Site Options Assessment (March 2025) and the Ecological Constraints Assessment (March 2025) identify the location of ancient woodland adjacent to the northern site boundary requires "careful mitigation measures" and that the overall landscape sensitivity of the site is Low. The Annex to the Preferred Options version of the Plan showed an "indicative development area" much closer to Cawston Spinney and Cawston Woodlands.

2.37 It is hence concluded that the changes to the site's development requirements as drafted in the Proposed Submission Local Plan (Policies S3, S7 and Annex: Development Site Allocations) are unfounded and unsupported by any technical evidence.

2.38 With regard to EDP's review of the Landscape Sensitivity Assessment, EDP conclude that although there are features of higher value within the local context, most notably Cawston Spinney, it is considered that the value and susceptibility of the site itself is low, leading to an overall low sensitivity.

2.39 The Site does not lie within, or contain, any nationally or locally designated landscapes and it does not represent, in a perceptual or physical sense, a landscape of any great importance or distinct character.

2.40 EDP conclude:

*'4.2 It is clear that, overall, while Cawston Spinney itself provides a strong contribution to landscape value, there is limited evidence provided as to why land beyond the woodland edge to the south, is considered to meet the same criteria. Though the LSA acknowledges that there may be areas of higher landscape value adjacent to the woodland edge, there is little evidence provided as to why this judgement of landscape value should extend as far as the boundaries of the defined character area, where land is privately owned arable land with strong visual associations with adjacent logistics-built form. **Though there are features of higher value within the local context most notably Cawston Spinney, EDP consider the value and susceptibility of the Site itself, to be low, leading to an overall low sensitivity.***

*4.3 EDP's review shows that, though the LSA post-dates the drafting of the Council's Proposed Submission Local Plan (Reg 19), there is a notable correspondence between defined character areas and policy extents. Sensitivity boundaries appear to correspond closely with indicative built development extents within policy which, as set out above, were determined prior to the*

*publication of the LSA. While such alignment is not inherently inappropriate, there is limited evidence within the LSA to demonstrate that these boundaries are independently derived from landscape character analysis rather than reflecting allocation geometry or policy-defined edges. Where assessment units mirror planning boundaries without clear landscape justification, there is a risk that the sensitivity framework may be influenced, or perceived to be influenced, by policy structuring rather than intrinsic landscape characteristics.*

*4.4 EDP’s judgement of landscape and visual sensitivity is aligned with those published character assessments prior to the issue of the LSA, not all of which have been reviewed by the LSA. Essentially, the LSA is an outlier in this case. **Though there are features of higher value within the local context, most notably Cawston Spinney, EDP concur with the findings of the RBC Landscape Sensitivity Assessment (March, 2025) and consider the value and susceptibility of the Site itself to be low, leading to an overall low sensitivity. [Our emphasis]***

### Other considerations

- 2.41 There are no other constraints identified within the evidence base supporting the Proposed Submission Local Plan that would have a bearing on the buffer requirements between the development zone and the LWS. The Stage 2 Site Options Assessment (December 2025) concludes:

*‘The site has previously been safeguarded for development. The site is not within the Green Belt. Medium ecological and landscape constraints could be mitigated by design and layout.’*

- 2.42 Out of the five proposed employment allocations – three are located in the Green Belt. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.
- 2.43 Whilst TBBD acknowledge that there are exceptional circumstances to release land from the Green Belt in order to meet the significant identified need for employment development, Paragraph 147 of the Framework makes clear that before concluding that exceptional circumstances exist, the strategic policy-making authority should be able to demonstrate *‘that it has examined fully all other reasonable options for meeting its identified need for development.’* This will be assessed through the examination of its strategic policies, which will take into account whether the strategy *‘makes as much use as possible of suitable brownfield and underutilised land’* and *‘optimises the density of development in line with the policies in chapter 11 of the Framework.’*
- 2.44 Chapter 11 of the Framework advocates an approach to development that makes efficient use of land. The level of development on sites should be maximised without compromising the quality of the development or the character and local distinctiveness of the area.
- 2.45 Despite South West Rugby employment phase 2 comprising one of two non-Green Belt employment allocations in the emerging Local Plan, it is the only employment site that has seen a reduction in the site capacity/floorspace figures since the Preferred Options Consultation.

- 2.46 As has been established, the development principles in the Annex to the Plan with regard to South West Rugby employment phase 2 are not evidence-led in terms of the requirements for the Country Park and the width of the buffer between the development zone and Cawston Woodland LWS. There is no evidence to suggest that a buffer in excess of 15 metres is required from both an ecological and landscape perspective. As such, the approximate site capacity/floorspace figure for South West Rugby phase 2 (60,000 sqm) under Policy S3 and Policy S7 is unfounded and fails to demonstrate an efficient use of land. The development requirement needs to provide for flexibility and not be overly prescriptive as per the current drafting.
- 2.47 In our submission, restricting the developable area for South West Rugby employment phase 2 is a wasted opportunity to deliver employment to help meet the Borough's identified employment needs, benefiting from the strategic location of the site and its proximity to the M45/A45. The development would form a logical and obvious extension to the adjoining, successful Symmetry Park, Rugby (Phase 1) employment development. The site being a non-Green Belt site and being identified for development in the adopted Local Plan as 'safeguarded land', should be the Council's first choice for employment development, and its full development potential maximised.

### **3.0 POLICY S8 SOUTH WEST RUGBY**

- 3.1 The policy text for Policy S8 'South West Rugby' has been retained from the Preferred Options Consultation in 2025.
  
- 3.2 TBBD support Policy S8 South West Rugby. However, we note criterion E makes reference to the South West Rugby Design Code. TBBD have set out significant concerns to the Council in its consultation document on the Design Code SPD and in its current form consider it should not be adopted.

#### **4.0 POLICY S9 SOUTH WEST RUGBY SPINE ROAD NETWORK**

- 4.1 The policy text for Policy S9 'South West Rugby spine road network' has been retained from the Preferred Options Consultation in 2025.
- 4.2 The estate road running east-west through the southern part of the allocation site forms part of the Sustainable Transport Corridor identified in Policy DS9 'South West Rugby Spine Road Network' in the currently adopted Local Plan. The estate road running north-south through the site forms part of the Potsford Dam Link.
- 4.3 Homes England have taken the lead on delivery of the Homestead Link Road amongst the residential parties of South West Rugby, with a resolution to grant secured in March 2024. The remaining section of land to deliver the preferred connection of the Potsford Dam Link into the A4071 Roundabout was controlled by a private landowner and Railway Paths, both parties outside of the South West Rugby allocation.
- 4.4 TBBD have now secured all necessary land to deliver the remaining highways infrastructure (the Potsford Dam Link), but the funding for this can only be released by the full potential of the Safeguarded Land coming forward for development.
- 4.5 The allocation of the site for employment would ensure the delivery of the full highways infrastructure for the wider South West Rugby allocation prior to the construction of any significant quantum of planned residential development.
- 4.6 Removing the financial burden of the delivery of the Potsford Dam Link by applying it solely to the Safeguarded Land would reduce the infrastructure burden across every remaining planned housing in South West Rugby by c.£2,000 per plot.
- 4.7 There is the potential for the Phase 2 land to offer further Section 106 contributions to further assist with the residential viability and deliverability of the wider South West Rugby Allocation.
- 4.8 TBBD therefore support Policy S9 South West Rugby Spine Road Network, but without the increased Policy S7 site allocation for Site ID 17, there are real question marks over its delivery, which in turn raises questions of the delivery of the South West Rugby allocation as a whole.

## 5.0 POLICY CL1 NET ZERO BUILDINGS

- 5.1 The policy text for Policy CL1 ‘Net Zero Buildings’ has largely been retained from the Preferred Options Consultation in 2025, save for some additional text under part A(iv) of the policy which allows for some flexibility if buildings are unable to generate at least the same amount of renewable energy on-site as the electricity they demand over the course of a year. In such a circumstance, part iv requires evidence demonstrating why a reduced amount is proposed and what design steps have been taken to strive to achieve this policy’s stated target. This is welcomed.
- 5.2 However, TBBD do not support Policy CL1. The proposed policy position would require all new development to demonstrate net zero operational carbon on-site. Whilst TBBD would agree with the Council that there is a need to act to reduce carbon emissions, TBBD would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the emerging Future Buildings Standard (FBH).
- 5.3 The expected national policy requirement would require a 31% saving, compared to the carbon Target Emissions Rate (TER) set by Building Regulations Part L 2021, which would be a consistent target across non-domestic building types. The local authority requirements for industrial buildings would go beyond this national requirement, which is deemed sufficient in national terms to meet the UK’s net zero commitments.
- 5.4 Any targets on Part L improvement should be applied to developer delivery only, as often schemes will be delivered on a speculative nature, and future occupier energy performance would be unknown (with a wide variety of possible uses in industrial buildings particularly, the energy use of occupiers would be too varied to estimate).
- 5.5 Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the Borough, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.
- 5.6 However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the Written Ministerial Statement (WMS) published on the 13th of December 2023 titled “Planning – Local Energy Efficiency Standards Update”.
- 5.7 The approach proposed by the Council is based on energy use, and is inconsistent with the approach set out in the WMS and as such is unsound.
- 5.8 The WMS is extant policy, in force and advises against exceeding national policies. It is something Local Plans and Planning Authorities must take into account (See NPPF para 6). The Ministerial Statement clearly states:

*“The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures...”*

- 5.9 While TBBD do not consider the policy to be consistent with national policy we are also concerned that the Council has not properly considered the impact on viability or the deliverability of development. The Council will need to ensure the costs and deliverability of this policy are fully and robustly tested, and there is currently no evidence of this.
- 5.10 While TBBD understands the desire for LPAs to go further current policy recognises that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building performance against those technical standards. Indeed, this has long been the case in planning policy with paragraph 164b of the NPPF (December 2024) stating that *“Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards”*.
- 5.11 It is hence considered that Policy CL1 should reflect national policy requirements for reducing carbon emissions and as such, the policy is considered to be surplus to requirements and should be deleted.

## 6.0 POLICY EN6 CANOPY COVER

6.1 The policy text for Policy EN6 ‘Canopy Cover’ (previously Policy EN5) has largely been retained from the Preferred Options Consultation in 2025, save for an amendment to criterion A as follows:

*A. All major development, excluding change of use and development in Rugby town centre, shall increase the post-development canopy cover to at least 20% of the site area (excluding areas of the site that are high or very high distinctiveness habitats) **unless such requirement is demonstrated to be incompatible with delivering biodiversity net gain requirements on site.** [our emphasis]*

6.2 This additional text is welcomed but TBBD continue to consider this requirement to be overly onerous and unjustified.

6.3 TBBD does not disagree with the broad thrust that the UK has seen a significant loss in woodland and understand the benefits of increasing canopy cover. However, it is important to recognise that in recent years new employment development has not been the driver of declining woodland. The main drivers of declining biodiversity in England, as outlined in the State of Nature Report 2023 (State of Nature Partnership, 2023), are identified as being *“Intensive management of agricultural land, largely driven by policies and incentives since World War II, has been identified as the most significant factor driving species’ population change in the UK”*.

6.4 Whilst species are in decline TBBD would suggest that it is not for new development to address the impact of other industries, it is considered that the supporting documents provided a lack of suitable justification of the local need for a 20% canopy cover policy. It is also considered that this is not a necessary policy requirement and can be controlled through the Development Management process.

## **7.0 POLICY D1 WELL-DESIGNED PLACES**

- 7.1 The policy text for Policy D1 'Well-designed places' has been retained from the Preferred Options Consultation in 2025.
- 7.2 The reference to the Design Code in the supporting text to the policy is noted but TBBD have submitted objections to the draft Design Code for South West Rugby which is overly prescriptive. It is submitted that the policy text in Policy D1 will be more than adequate to ensure 'well designed places' and the reference to local design codes should be removed from the supporting text.

## 8.0 CONCLUSIONS

- 8.1 The suitability of the promotion site for employment development is established in the Policies Map to the adopted Rugby Local Plan (2019) which identifies it as ‘Safeguarded Land’ to assist in meeting the Borough’s development needs beyond 2031.
- 8.2 The way in which the site’s constraints and parameters have been assessed, particularly in relation to the ancient woodland located along the northern site boundary, has been consistent in the Council’s previous policy documents in relation to South West Rugby. It is clear that within Policy DS8: South West Rugby of the Rugby Borough Council Local Plan (2011-2031) (adopted 2019), the South West Rugby Masterplan SPD (2024), the South West Rugby Design Code SPD (2025) and even the Preferred Options Consultation on the emerging plan in 2025; a requirement to provide a buffer of at least 15 metres (in accordance with Natural England’s standing advice) is considered necessary in order to protect Cawston Spinney from potential adverse impacts of new development. It is only the Proposed Submission Local Plan Consultation that has suggested a buffer and Country Park that is far in excess of 15 metres, which we conclude has not been robustly justified in terms of the evidence base supporting the emerging plan, including the Council’s assessment of employment land needs, ecological and landscape studies.
- 8.3 As safeguarded land under the adopted Local Plan, and as a non-Green Belt site, it is right that it has been considered when assessing where best to meet the identified need in the emerging Local Plan to make additional employment land provision. However, Savills’ analysis of the employment land demand and supply position has demonstrated that there is considerable need for the site as originally intended with a floorspace of c. 130,000 sqm.
- 8.4 The allocation of the site for employment would ensure the delivery of the full highways infrastructure for the wider South West Rugby allocation prior to the construction of any significant quantum of planned residential development. TBBD have now secured all necessary land to deliver the remaining highways infrastructure (the Potsford Dam Link), but the funding for this can only be released by the full potential of the Safeguarded Land coming forward for development.
- 8.5 The site is situated within a sustainable location. It is well related to the local highway network with the A4071 accessing onto the strategic network (M45/A45), providing opportunities to travel further afield and to nearby centres of employment, including Coventry and Northampton, underpinning the locational strengths of the site and its appeal to this expanding business sector. TBBD has the knowledge, proven expertise and track record to deliver a high-quality scheme at the scale proposed.
- 8.6 The pursuit of sustainable development has three dimensions. This proposed allocation will contribute to the:
1. Economic dimension:
    - The Proposed Development will help address a substantial and growing need for new logistics floorspace at the national, regional and local level
    - Indirect investment in local construction companies;

- Capital Investment into the economy;
- The Proposed Development's construction to the economy Gross Value Added (GVA) of £18.3 million per annum (construction stage) and £33.4 million per annum (associated with operational activities)
- The Proposed Development will generate annual business rates of £2.7 million which can be invested in local services and infrastructure;
- The development will also deliver CIL monies

## 2. Social dimension:

- The construction of the Proposed Development is anticipated to create a net addition of 535 jobs for residents (per year of construction);
- The operation of the Proposed Development is expected to create up to 1,175 gross on site jobs;
- Creation of a range of skilled and unskilled jobs;
- Public Open space provision (Country Park)
- Improvements to cycle routes to enable/encourage staff to cycle to work to assist in maintaining good levels of health of the workforce;
- Provision of cycle parking and showers to enable/encourage staff to cycle to work to assist in maintaining good levels of health of the workforce.

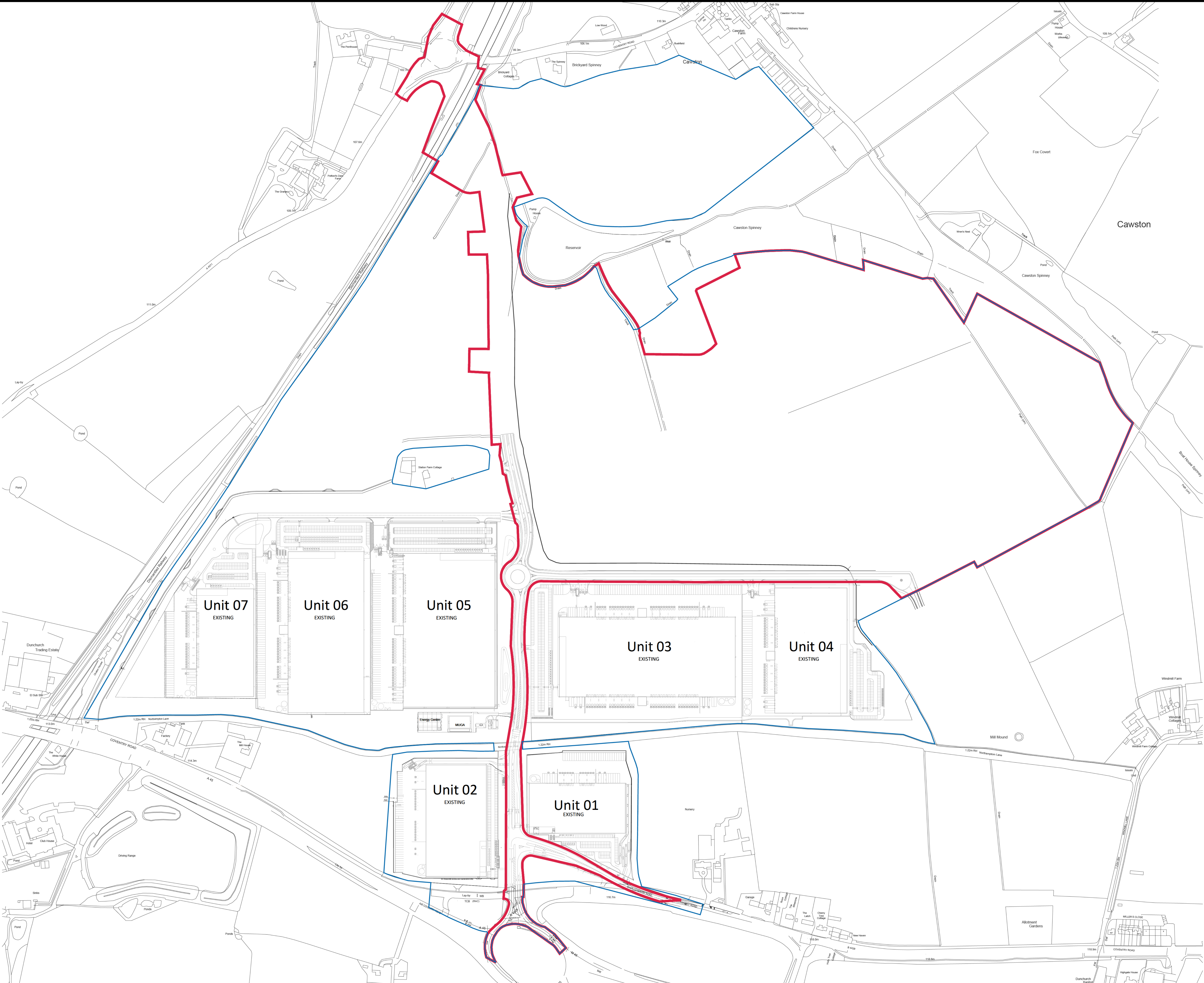
## 3. Environmental dimension:

- Improved infrastructure to reduce the impact of trips generations, reduce the impact of traffic on the local highway, and reduce pollution;
- Delivery of the Potford Dam Link (reducing the infrastructure cost burden to the residential proposals in the South West Rugby allocation)
- Improved cycle infrastructure: internal and provision of shared pedestrian/cycle path;
- Car and cycle parking that is consistent with Council standards and guidance;
- Operating a Travel Plan that will encourage employees to make use of more sustainable modes of transport when travelling to/from the Site, including increased bus provisions;
- Provision of a net gain in biodiversity. The parameters plan ensures that some of the Site will be devoted to open space, some of which will be managed for biodiversity purposes and some of which will be open space including a park trail and amenity areas;
- The Proposed Development is resilient to climate change, through for example use of SuDS and being built to high sustainability standards;
- Including SuDS will ensure that the Site will manage its surface water drainage in a sustainable manner;
- The proposals will be delivered to 'net zero carbon in construction' to accord with the UK Green Building Council's definition;
- The proposals will target a rating of BREEAM 'Excellent';
- The incorporation of substantial on-site renewable energy generation through solar PV coverage on the roof, and
- Provision of Electric Vehicle charging points for staff and visitors.

- 8.7 There are no environmental or technical constraints that will prevent a site allocation being deliverable.
- 8.8 It is submitted that the planning advantage in the overall public interest lies firmly in favour of allocating the site for employment development as part of a mix of planning allocations to deliver jobs and economic growth needed in the Borough.

**Appendix 1 Red Line Plan (Dwg. 13-216-SGP-STE-XX-DR-A-111005)**

Rev	Date	Iss. By	App. By	Description
P01	22.03.24	HA	RS	Title approved
P02	27.02.25	HA	RS	Red Line area amended
P03	12.09.25	HA	RS	Red Line area amended Drawing Status changed to Planning



- Legend
- Proposed Application Site Boundary
  - Ownership Boundary
  - Existing development

Red Line area = 46.362 Ha (114.561 Acres)  
 Unit 8 site area = 7.84Ha (19.375Ac)  
 Outline Application area = 23.678Ha (58.5Ac)

Do not scale from this drawing for purposes other than the planning application.  
 Red Line boundary based on OS Data and NOT confirmed as the legal boundary.  
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**Appendix 2    Market Assessment and Review of Draft Local Plan, prepared by Savills  
Economics**

# Symmetry Park Rugby Phase 2

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Market Assessment and Review of Draft Local Plan

March 2026



## Table of Contents

<b>Executive Summary</b> .....	<b>3</b>
<b>1 Introduction</b> .....	<b>6</b>
1.1 Overview and Summary .....	6
1.2 Structure.....	6
1.3 Reader Note.....	7
<b>2 Subject Site and the Proposed Development</b> .....	<b>8</b>
2.1 Site Context .....	8
2.2 Existing and Proposed Development .....	9
<b>3 Defining a Property Market Area</b> .....	<b>11</b>
3.1 The Local Authority Approach: FEMA .....	11
3.2 PMAs .....	12
3.3 Relationship Between Rugby and the Wider C&W PMA .....	12
<b>4 Policy and Evidence Base Review</b> .....	<b>14</b>
4.1 National Planning Policy .....	14
4.2 Local Planning Policy and Evidence Base.....	17
4.3 Conclusion .....	25
<b>5 I&amp;L Market Signals</b> .....	<b>27</b>
5.1 Summary: A Strong and Supply-Constrained Market.....	27
5.2 Availability is Below the Market Equilibrium .....	28
5.3 Demand has been Meeting Rapidly-Growing Supply .....	29
5.4 Strong Rental Growth.....	30
5.5 The PMA Requires More Strategic I&L Units .....	31
5.6 Conclusion .....	33
<b>6 Estimate of Future Demand</b> .....	<b>34</b>
6.1 Savills Estimates of Future Demand .....	34
6.2 Comparison of the FEMA-Level Demand for Strategic Land with the 2022 HEDNA.....	38
6.3 Demand Apportioned to Rugby .....	40
6.4 Comparison of Rugby-Level Demand with the Council’s Latest Evidence Base.....	41
6.5 Need in Neighbouring Sub-Regional Areas .....	42
6.6 Conclusion .....	43
<b>7 Review of Supply</b> .....	<b>44</b>

# Symmetry Park Rugby Phase 2

Market Assessment and Review of Draft Local Plan

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7.1	Approach .....	44
7.2	Building Supply .....	45
7.3	Land Supply .....	46
7.4	Pipeline Supply .....	48
7.5	Draft Allocations .....	49
7.6	Supply Summary .....	51
<b>8</b>	<b>Balance of Supply and Demand .....</b>	<b>53</b>
8.1	Supply Compared with Demand.....	53
<b>9</b>	<b>Summary and Recommendations .....</b>	<b>56</b>

## Executive Summary

This report has been prepared by Savills Economics on behalf of Tritax Big Box Developments (TBBD) to support representations submitted in response to Rugby Borough Council's emerging Local Plan (Regulation 19 Draft, January 2026). The report assesses the extent to which Symmetry Park Rugby Phase 2 (South West Rugby Employment Phase 2), the Subject Site, is needed to ensure that the Council is able to meet its need for strategic I&L employment land that can accommodate premises greater than 100,000 sq.ft.

The Subject Site is approximately 40.7ha. Regulation 19 Draft Local Plan (January 2026) proposes to allocate approximately 60,000 sq.m (646,000 sq.ft) of employment floorspace to the Subject Site (this is approximately equivalent to 17ha of land.) This represents a significant reduction compared with the 130,000 sq.m (1.4m sq.ft) allocation (approximately 37ha of land) proposed in the earlier Regulation 19 Draft Local Plan (March 2025). This change has occurred alongside a series of revisions to the Council's employment land evidence base.

This report therefore reviews the relevant policy context, assesses market signals within the relevant property market area, and compares the Council's assessment of employment land demand with Savills own assessment based on the Savills Supressed Demand Model.

Property market evidence indicates that the industrial and logistics (I&L) market across Rugby and the wider Coventry and Warwickshire property market area (PMA) has been strong and supply-constrained for a sustained period. Availability rates have generally remained below the market equilibrium benchmark of around 8%; rental growth has significantly outpaced inflation; and leasing activity has kept pace with the considerable level of new development.

Our analysis of future demand indicates that the scale of I&L land needed is significant within the PMA and Rugby in particular. It reflects continued growth in this prime, nationally significant logistics location; structural changes in supply chain management; ongoing demand for large modern distribution facilities; and historic constraints on the supply of employment land.

Our review of the Council's evidence base identifies a number of methodological issues and inconsistencies that introduce uncertainty into the manner in which the council intends to provide employment land to meet its needs for premises greater than 100,000 sq.ft. In particular:

- Changes introduced in the 2024 Alignment Paper significantly reduce estimated local employment land demand compared with the earlier 2022 HEDNA, without clear explanation.
- Certain sites appear to have been double-counted within the Council's supply calculations.
- The Council removed a 20% supply buffer previously intended to provide supply flexibility within the employment land portfolio.
- The contribution expected from Rugby towards Coventry's unmet employment land needs has been significantly reduced through successive iterations of the evidence base.
- Many of the available sites comprising the potential supply have restrictions on their use or the size of the units which will limit their capacity to delivery strategic I&L premises.
- The vast majority of supply that has capacity to delivery strategic I&L premises are the same

sites that will also need to meet local need comprising non-strategic premises, thus potentially crowding out strategic units.

Savills own assessment of the balance of supply and demand shows there is a high degree of uncertainty around the current supply of I&L sites that can accommodate premises greater than 100,000 sq.ft to meet the identified need both in the FEMA and in Rugby. Indeed, the supply assessment demonstrates that there are just a handful of strategic sites in the FEMA with the required characteristics which positions them to meet the ongoing need for strategic I&L premises. Most of the supply comprises sites poised to deliver smaller scale premises or are not considered prime. This is detailed in our supply review.

Table E1 sets out our assessment of the balance of supply and demand for strategic sites in the PMA. Based on our estimate of demand (727ha) and of supply, we estimate there to be a deficit of about 103ha. Whilst we fully account for sites with planning permission or which are allocated, we have discounted draft allocations because of the various risks to their delivery; the need for a buffer or contingency; and the need for additional capacity for the end of the plan period. The Subject Site's full allocation (equivalent to 40.7ha) would contribute meaningfully to the deficit.

**Table E1 PMA Balance of Demand and Supply for Strategic I&L Use Over 17-Year Period**

Demand/Supply	ha
Savills assessment of I&L demand (ha)	(727.1)
Savills review of supply of I&L land (ha)	
<i>Sites with planning permission</i>	150.6
<i>Sites allocated but without planning permission</i>	35.3
Total supply	185.9
<b>Balance of demand vs supply (ha)</b>	<b>(541.2)</b>
Symmetry Park Rugby Phase 2 (Subject Site)	40.7
Savills review of supply of I&L land (ha)	
<i>Other draft allocation sites<sup>1</sup> (547.6ha discounted by 20%)</i>	438.1
<b>Balance of demand vs supply (ha)</b>	<b>(62.4)</b>

Source: Savills 2026

<sup>1</sup> Not including the Subject Site, which is listed separately.

Table E2 sets out the same analysis for Rugby where we estimate the deficit to be about 54ha and the Subject Site significantly contributing to overcoming the supply gap.

**Table E2 Rugby Balance of Demand and Supply for Strategic I&L Use Over 17-Year Period**

Demand/Supply	ha
Savills assessment of I&L demand (ha)	(230.4)
Savills review of supply of I&L land (ha)	
<i>Sites with planning permission</i>	31.2
<i>Sites allocated but without planning permission</i>	0
Total supply	31.2
<b>Balance of demand vs supply (ha)</b>	<b>(199.2)</b>
Symmetry Park Rugby Phase 2 (Subject Site)	40.7
Savills review of supply of I&L land (ha)	
<i>Other draft allocation sites<sup>2</sup> Site (181.1ha discounted by 20%)</i>	144.9
<b>Balance of demand vs supply (ha)</b>	<b>(13.6)</b>

Source: Savills 2026

Against this context, the full, original allocation of Symmetry Park Rugby Phase 2 for 130,000 sq.m represents a suitable and deliverable way for the Council to ensure it can meet a reasonable estimate of the need for strategic I&L logistics activity. The Site benefits from access to the strategic road network and sits within the Midlands’ established logistics corridor. An extension of the draft allocation would be the most efficient and commercially attractive manner in which the Council can ensure sufficient strategic employment need over the period of the draft local plan.

The findings of this report is there is a robust case for maintaining the larger allocation consistent with earlier versions of the emerging local plan on the basis of the market evidence.

<sup>2</sup> Not including the Subject Site, which is listed separately.

## 1 Introduction

### 1.1 Overview and Summary

- 1.1.1 The purpose of this report is to provide a market assessment to support representations submitted on behalf of Tritax Big Box Developments (TBBD) in relation to the emerging Local Plan prepared by Rugby Borough Council. The report presents the proposed development for South West Rugby Employment Phase 2 ('the Subject Site'), also known as Symmetry Park Rugby Phase 2, and reviews the evidence base underpinning the latest Regulation 19 Draft Local Plan.
- 1.1.2 The Regulation 19 Draft Local Plan (January 2026) proposes to allocate approximately 60,000 sq.m of employment floorspace at the Subject Site. This is a significant reduction compared with the 130,000 sq.m allocation proposed in the earlier Regulation 19 Draft Local Plan (March 2025). The reduction in the scale of the allocation raises questions as to whether the Council has sufficiently justified this change.
- 1.1.3 The report reviews the relevant planning policy context and evidence base, examines market signals within the relevant functional economic market area (FEMA) / property market area (PMA), and assesses the balance of future supply and demand for industrial and logistics (I&L) floorspace. The assessment focuses on the Coventry and Warwickshire sub-regional market (the FEMA/PMA), which reflects the functional geography used in the Coventry and Warwickshire Housing and Economic Development Needs Assessment (2022 HEDNA). It is considered the most appropriate market area for assessing demand for strategic logistics premises.

### 1.2 Structure

- 1.2.1 The structure of this report is based around the following chapters:
- **Chapter 1 – Introduction** sets out the purpose and structure of the report;
  - **Chapter 2 – Subject Site and Proposed Development** summarises key information about the Proposed Development;
  - **Chapter 3 – Defining a PMA** used for analysis of property market data;
  - **Chapter 4 – Review of Policy and Evidence Base** examines relevant policies and evidence base documents associated with the PMA;
  - **Chapter 5 – I&L Market Signals** examines the characteristics of the I&L market within the PMA and considers whether the market is supply or demand constrained;
  - **Chapter 6 – Estimate of Future Demand** provides our calculations for future I&L land demand in the wider PMA and compares this against the demand stated in the Rugby Borough Local Plan 2025-2042 Proposed Submission Version (Regulation 19) (January 2026);

- **Chapter 7 – Review of Supply** summarises the current and future supply of I&L sites across Coventry and Warwickshire, alongside Rugby Borough Council’s assessment of local supply;
- **Chapter 8 – Balance of Supply and Demand** estimates the amount of supply available to meet current demand and anticipated demand over the short and medium-term;
- **Chapter 9 – Summary and Recommendations** summarises the key findings of the analysis and sets out the overall conclusions of the report.

### 1.3 Reader Note

- 1.3.1 When we refer to the I&L sector, we mean Light Industrial (formerly B1c use class now part of Class E), General Industry (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require warehouses and factories (including ancillary offices) and associated yard spaces.
- 1.3.2 These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England. In order to gather relevant property market demand and supply data for the I&L sector, we used Savills proprietary data along with CoStar data covering light industrial, industrial and logistics uses.

## 2 Subject Site and the Proposed Development

### Introduction and Key Conclusions

#### Section Aim

- This section describes the Subject Site's locational context and the Proposed Development.

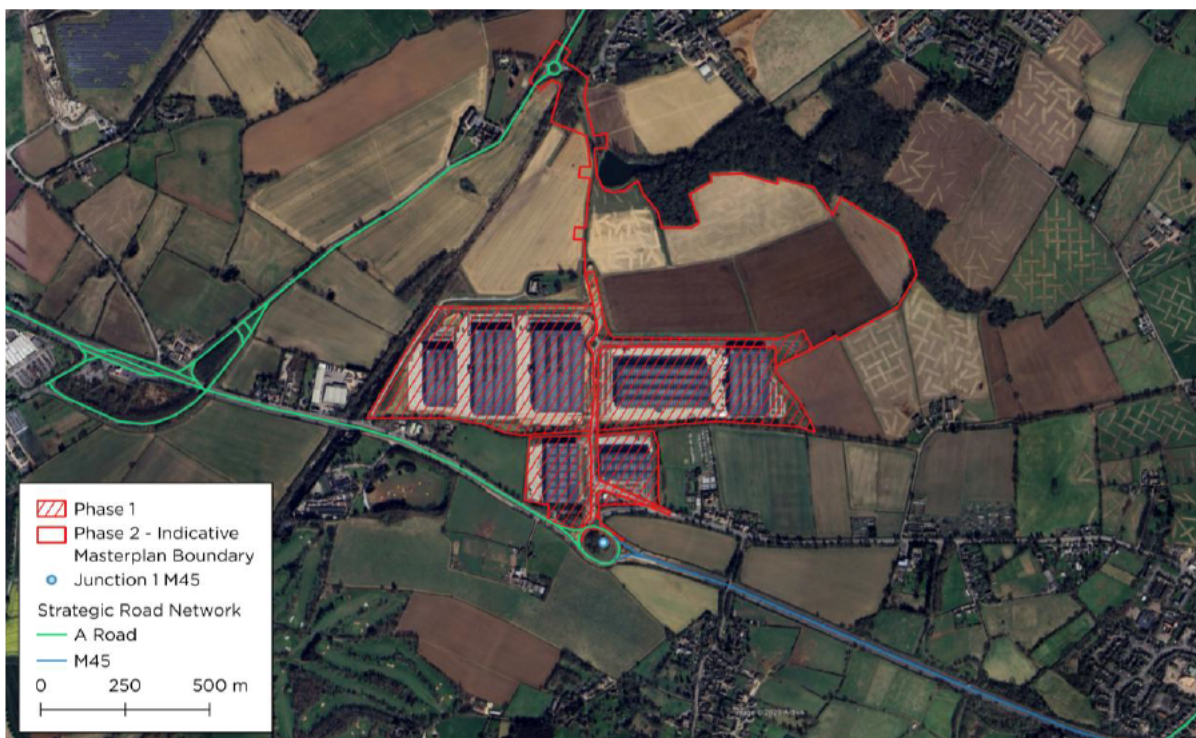
#### Key Conclusions

- The Subject Site benefits from the excellent connectivity to the strategic road network, including the M45 and A45, which connect to the southbound M1 to the east.
- The Proposed Development comprises logistics development totalling circa 1.4m sq.ft (GIA) with ancillary office space.

### 2.1 Site Context

2.1.1 The Subject Site comprises South West Rugby Employment Phase 2 (Symmetry Park), a strategic allocation within the emerging Rugby local plan. The Subject Site extends to circa 40.7 hectares and is currently predominantly in agricultural use. It lies within the local authority of Rugby Borough Council, approximately 0.6 miles south of Rugby Town Centre, and adjacent to the existing Symmetry Park Rugby (Phase 1) development. **Figure 2.1** shows the location of the Subject Site.

Figure 2.1 Subject Site Location



Source: Savills, 2026

- 2.1.2 The Site benefits from strong strategic connectivity. It is served by a link road connecting to the Thurlaston Interchange (Junction 1 of the M45 and A45), located approximately 0.4 miles to the south of the Site. The M45 provides direct access to the M1 (Junction 17) to the east, enabling connectivity to the wider strategic network. The A45 forms part of the National Highways Strategic Road Network, providing connections to key destinations to the west, including Coventry and Birmingham.
- 2.1.3 The Site is located within the Midlands' established strategic logistics corridor, often referred to as the 'Golden Triangle', which provides access to a significant proportion of the UK population within a four-hour drive time. This area is recognised as one of the UK's most important locations for strategic distribution and logistics activity.
- 2.1.4 Based on the Regulation 19 Draft Local Plan (January 2026), the Site is allocated to deliver approximately 60,000 sq.m (646,000 sq.ft) of employment floorspace (this is approximately equivalent to 17ha of land). This represents a significant reduction compared with the 130,000 sq.m (1.4m sq.ft) allocation (which is approximately 37ha of land) proposed in the earlier Regulation 19 Draft Local Plan (March 2025).
- 2.1.5 Key development requirements for the Site include the delivery of a 23ha country park adjacent to Cawston Spinney (increased from 8.6 ha at Preferred Options stage), improvements to pedestrian and cycle connectivity, provision of overnight lorry parking, and the incorporation of landscape and tree planting along the Potsford Dam Link and Sustainable Transport Corridor.

## 2.2 Existing and Proposed Development

2.2.1 Figure 2.2 shows the illustrative masterplan for Phase 2 of Symmetry Park, Rugby.

Figure 2.2 Symmetry Park, Rugby – Phase 2 Illustrative Masterplan



Source: SGP Architects, 2026.

# Symmetry Park Rugby Phase 2



## Market Assessment and Review of Draft Local Plan

- 2.2.2 Outline planning consent (R16/2569) for Phase 1 of Symmetry Park was granted in 2020 for up to 186,500 sq.m (2m sq.ft) of B8 logistics floorspace. Phase 1 has since delivered seven units and has attracted a range of occupiers, including a major pre-let of Units 1-5 to Iron Mountain. Unit 6 (338,000 sq.ft) and Unit 7 (170,000 sq.ft) are currently available to let.
- 2.2.3 Phase 2, which is currently being promoted for employment use, has the potential to deliver up to 1.4m sq.ft of logistics, warehouse and industrial space.
- 2.2.4 Based on the latest illustrative masterplan, Phase 2 comprises four units (Unit 8, 9, 10 and 11) with ancillary office space and supporting infrastructure. The units range in size from approximately 215,000 sq.ft to 576,000 sq.ft (GIA) and together provide a total of around 1,390,500 sq.ft of floorspace (GIA).
- 2.2.5 A schedule of floor areas by unit is shown in **Table 2.1** below.

**Table 2.1 Symmetry Park, Rugby Schedule of Accommodation**

Units	GIA (sq.ft)
Unit 8	302,380
Unit 9	575,868
Unit 10	213,414
Unit 11	298,797
<b>Total</b>	<b>1,390,459</b>

Source: SGP Architects, 2026

## 3 Defining a Property Market Area

### Introduction and Key Conclusions

#### Section Aim

- Before we can consider market demand and supply signals, we first need to define an appropriate Property Market Area (PMA). The PMA needs to be relevant to the Subject Site, namely it is the broad 'area of search' the Site sits within that prospective I&L occupiers will consider when looking to lease space. The PMA includes the main competitor locations to the Subject Site for attracting this occupier demand.

#### Key Conclusions

- We conclude that the most relevant PMA to use is a wider Coventry & Warwickshire (C&W) area which the council considers to be its functional economic market area (FEMA).

### 3.1 The Local Authority Approach: FEMA

- 3.1.1 In order to define an appropriate PMA for the Subject Site, we first consider Rugby Borough Council's employment evidence to see if the Council has defined an appropriate Functional Economic Market Area (FEMA). A FEMA is effectively a collection of administrative areas which share economic linkages as defined by travel to work patterns, housing market areas, shared infrastructure, labour skills, etc. Where appropriate, we look to use the Council defined FEMA as a proxy for the PMA for I&L uses.
- 3.1.2 The Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (2022) reviews the definition of FEMA based on previous research and updated market data. This includes the 'core sub-region' functional geography mentioned in the Rugby Employment Land Study (2015) and the Functional Economic Geography of the Coventry, Solihull and Warwickshire Sub-Region (2010) ('Topic Paper').
- 3.1.3 The 'core sub-region' comprises the local authorities of Nuneaton and Bedworth, Coventry, Rugby, Warwick, southern North Warwickshire and most of Stratford-on-Avon. Parts of North Warwickshire and Stratford-on-Avon are more closely related to economic areas to the west. The HEDNA and the Topic Paper identify that the core sub-region exhibits a high level of self-containment in commuting patterns.
- 3.1.4 However, both the 2022 HEDNA and the Topic Paper consider the 'best-fit' FEMA as the local authority boundaries of Coventry and Warwickshire Local Enterprise Partnership (LEP), albeit the core sub-region cannot fit onto this boundary. The Coventry and Warwickshire LEP comprises the local authorities of Coventry, North Warwickshire, Nuneaton and Bedworth, Rugby, Stratford-on-Avon, and Warwick.
- 3.1.5 The HEDNA reports that 71% of internal migration is contained within the sub-region, indicating a strong level of functional integration. While there are some differences

between the northern and southern parts of the sub-region regarding house prices and economic structure, both areas maintain strong economic and commuting links with Coventry, which functions as a key hub for the wider sub-region.

### 3.2 PMAs

3.2.1 We consulted with Savills agents to establish a view on the geographical area most relevant to the market within which the Subject Site operates. This identified two geographical levels: the local and wider PMAs.

3.2.2 At the local level, the agents consider the PMA to largely comprise Rugby Borough. However, this market is primarily relevant to smaller-scale industrial development. Given the nature and scale of the proposed occupiers at Symmetry Park, Rugby, this local PMA is not considered the most appropriate geography for the purposes of this assessment.

3.2.3 Given the potential scale and strategic location of the Subject Site, occupier demand is likely to be drawn from larger logistics operators. These occupiers typically operate extensive supply chains, often covering catchments of up to four hours' drive time or more, and require large modern premises, which are often in limited supply. As a result, they tend to consider a much wider geographic search area when identifying suitable sites or buildings to meet their operational needs.

3.2.4 For these reasons, we consider it necessary to focus on a larger PMA that captures this market dynamic instead of just considering Rugby alone. The agents largely agree with the conclusions of HEDNA in that Coventry and Warwickshire LEP is a good approximation of the relevant sub-regional market.

3.2.5 We broadly agree with the Council's FEMA. The Coventry and Warwickshire (C&W) LEP economic geography forms the 'sub-regional' PMA when assessing strategic warehousing needs. This FEMA-led approach is consistent with Paragraph 19 of Planning Practice Guidance<sup>3</sup>.

3.2.6 However, there are some drawbacks to using the C&W PMA. In particular, it does not capture sites located along the M1 corridor to the east of the A5 which follows the North-East boundary of the C&W area. These nearby locations (such as Magna Park, Logicor Park, DIRFT) will offer a degree of competition to developments in Rugby. However, they are also under pressure to accommodate the needs of their own market and economic areas. On balance, we have focused our analysis on the C&W PMA, while recognising the wider context of supply along the M1 corridor.

3.2.7 The sub-regional PMA and local PMA are presented in **Figure 3.1** below.

### 3.3 Relationship Between Rugby and the Wider C&W PMA

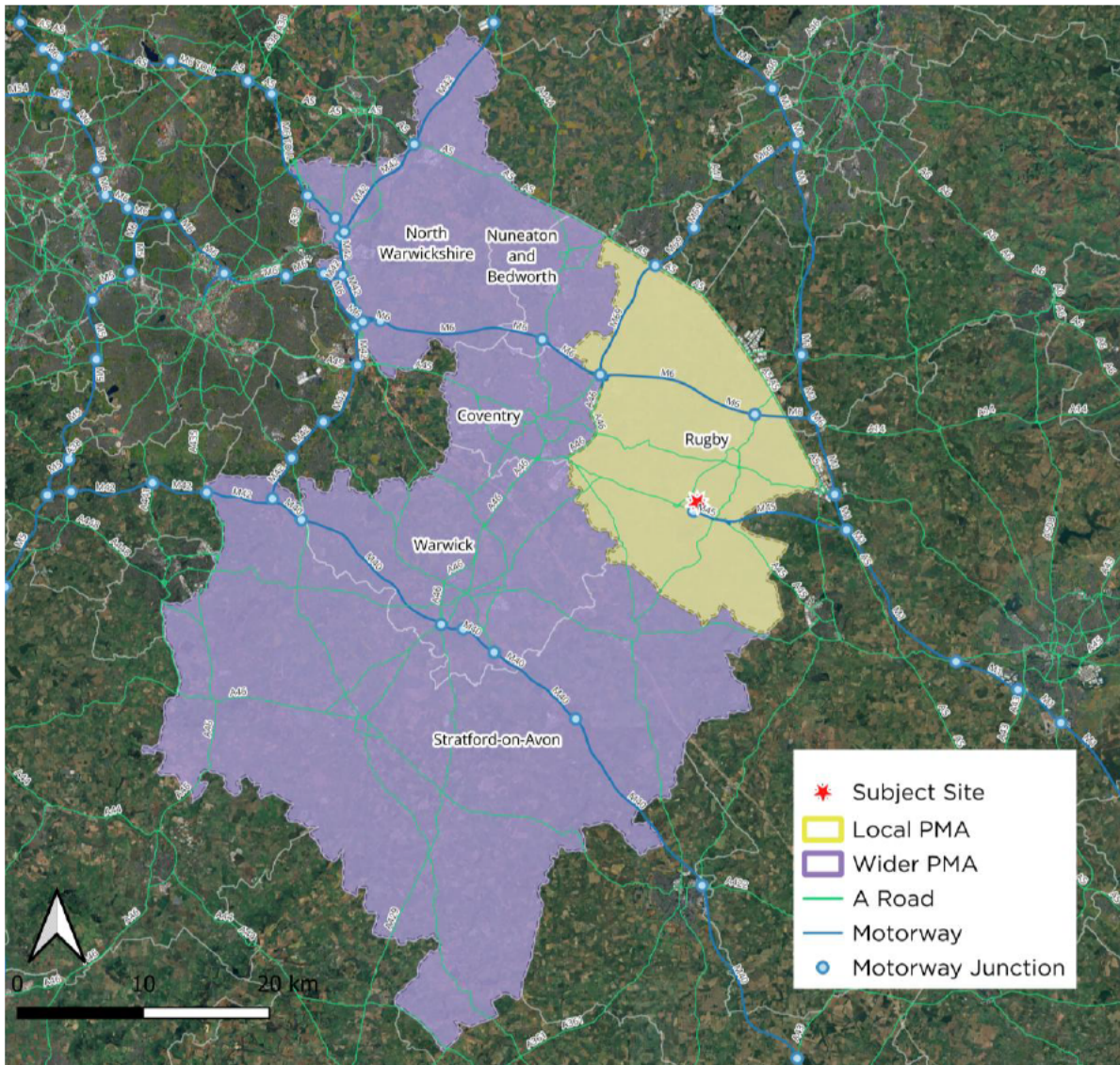
3.3.1 The purpose of defining a PMA is to identify the geographic area within which sites may come forward to meet market demand. Subject to individual site characteristics, from a market perspective it is generally less important where sites are located within the PMA, provided that demand across the PMA can be accommodated. As a result, at a local

<sup>3</sup> Paragraph: 019 Reference ID: 61-019-20190315

authority level, such as Rugby, future supply does not necessarily need to mirror the pattern of historic development. Supply may be more or less concentrated in particular sub-areas of the PMA than has historically been the case. Historic development patterns should therefore not be treated as a direct determinant of where future allocations should be located. To assume a direct alignment between past development and future allocations would implicitly pre-determine how demand should be distributed.

3.3.2 In subsequent sections we assess the overall level of demand, and how this compares with supply. We recognise that, provided demand is met, the ultimate decision on where to distribute supply is a local authority decision, taking into account all relevant factors. For the purposes of this assessment, we illustrate how future demand within the PMA could be apportioned to Rugby based on historic development and take-up patterns. This approach is used purely for illustrative purposes and should not be interpreted as representing the level of demand that must be accommodated within Rugby itself.

**Figure 3.1 Sub-Regional and Local PMA**



Source: Savills (2026).

## 4 Policy and Evidence Base Review

### Introduction and Key Conclusions

#### Section Aim

- This section reviews the relevant policies and evidence base documents associated with the PMA. Our review focuses on the future demand estimates for employment land and floorspace and how this compares to current and proposed allocations, and Symmetry Park, Rugby in particular.

#### Key Conclusions

- Our review identifies a number of risks in the council's approach to meeting its employment land requirement across a series of evidence base documents.
- Some of the assumptions, decisions or change in approach used to demonstrate how the identified need will be met appear to be insufficiently justified, not fully explained or potentially erroneous within the supporting evidence base.
- The key concerns are around changes brought about by the 2024 Alignment Paper; how certain sites are treated as sources of supply; the council's approach to meeting the need in Coventry; and the reduction in the supply buffer which ensures supply flexibility.
- The council recognises the risk in this approach but states that these issues can be revisited through planmaking under a new unitary authority. However, we are sceptical that such a review will be done in a timely manner.
- The key concerns arising from our review are detailed in the body of this section and the conclusion.

### 4.1 National Planning Policy

#### *Adopted NPPF (December 2024)*

- 4.1.1 The latest version of the National Planning Policy Framework (NPPF) was published in December 2024 and subsequently amended in February 2025. It sets out the government's planning policies for England and how these policies should be applied.
- 4.1.2 The purpose of the NPPF is to contribute to the achievement of sustainable development via three overarching objectives: economic, social and environmental. The 'economic objective' (paragraph 8a) is 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'*.
- 4.1.3 The NPPF places significant weight on supporting sustainable economic growth and ensuring that sufficient land is available to meet the needs of different sectors of the economy, including I&L uses. Paragraphs 85 to 87 requires planning policies and decisions to support economic growth and productivity, stating:

*'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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity.'*

- 4.1.4 Paragraph 87 states *'planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for storage and distribution operations at a variety of scales and in suitably accessible locations.'*
- 4.1.5 The NPPF paragraph 31 also specifically references the I&L sector that *'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.'*
- 4.1.6 Our demand-supply analysis considers market signals and builds on historic take-up trends by considering future forecasts of market growth drivers such as suppressed demand. This is considered to be an NPPF-compliant methodology.

### **Draft NPPF (December 2025)**

- 4.1.7 The Government published a consultation draft of a revised NPPF in December 2025, with the intention that a final version will be adopted following consultation. This makes clear that economic growth is the number one mission of this government. The draft continues to emphasise the importance of ensuring that sufficient land is available to support economic growth, including logistics development. For example, paragraph 16 states:

*'...the planning system has three overarching objectives in providing for the homes, commercial development, facilities and infrastructure which society needs. [...]*

*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; ....' (pages 4-5)*

- 4.1.8 Policy S5 Principle of Development Outside Settlements states:

*'Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework: [...]*

*Development which would address an evidenced unmet need [...] and where the*

*development would:*

*ii. comprise major development for storage and distribution purposes which accords with policy E3.’ (page 24. Policy E3 relates to locational requirements of freight and logistics)*

4.1.9 It introduces significant provisions under Policies E1-E3 and S5 to support economic growth and modern logistics.

4.1.10 Policy E1 Providing the Conditions for Long Term Economic Growth states:

*‘To support business investment and employment, development plans should, at the most appropriate level: [...]*

*Allocate sites to implement the economic vision and strategy and meet existing and anticipated needs over the plan period, paying particular regard to facilitating development to meet the needs of a modern economy (including sites and premises which are flexible and adaptable) and the specific locational requirements of different sectors. This includes, where a need exists or is anticipated, 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 (including ‘last mile’ deliveries), transport innovation and decarbonisation’ (page 39)*

4.1.11 Policy E2 Meeting the Need for Business Land and Premises states:

*‘To support business growth, 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;’ (page 40)*

4.1.12 Policy E3 Freight and Logistics states:

*‘To support the effective and efficient movement of goods, development proposals for freight and logistics uses 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.’*

## 4.2 Local Planning Policy and Evidence Base

4.2.1 This subsection reviews both the relevant planning policy framework and supporting evidence base. A considerable body of analysis has been produced by the Council as successive versions of the emerging Local Plan have been published. The evidence base is characterised by significant changes in the estimated level of employment land demand and the approach taken to meeting this need. The following Rugby and sub-regional documents are particularly relevant to the Proposed Development:

- Coventry and Warwickshire Employment Land Memorandum of Understanding (MoU) (2016)
- Rugby Local Plan 2011-2031 (2019)
- South West Rugby Masterplan Supplementary Planning Document (SPD) (2021 and 2024)
- West Midlands Strategic Employment Sites Study (2021)
- Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (2022)
- Coventry and Warwickshire Employment Land Report (2023)
- Rugby Local Plan Review Issues and Options (Regulation 18) (October 2023)
- HEDNA-WMSESS Alignment Paper (November 2024)
- Development Needs Topic Paper (March 2025)
- Preferred Option (Regulation 19) (March 2025)
- Development Needs Topic Paper (December 2025)
- Proposed Submission Version (Regulation 19) (January 2026)

### ***Coventry and Warwickshire Employment Land Memorandum of Understanding ('MOU') (2016)***

4.2.2 The C&W Employment Land MoU sets out the agreed position of local authorities within C&W to redistribute employment land requirements to address the shortfall in supply in Coventry.

4.2.3 The MoU identifies a shortfall of 241 hectares of employment land in Coventry, of which 45 hectares is to be redistributed to Rugby. This informs the quantum of employment land required within Rugby to contribute towards Coventry's unmet employment land needs, and therefore influences the overall employment land requirement identified in the Rugby Local Plan<sup>4</sup>.

### ***Rugby Local Plan 2011-2031 (Adopted 2019)***

4.2.4 The Rugby Borough Council Local Plan 2011-2031 ('Rugby Local Plan') sets out the Council's spatial vision to deliver sustainable growth.

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<sup>4</sup> This approach is in line with our assessment of how to treat sub-areas within PMAs, as outlined in our previous section.

- 4.2.5 Policy DS1 identifies an overall employment land need of 208 ha over the plan period (2011 to 2031). This comprises 98 ha of land to contribute to Coventry’s unmet needs and 110 ha to meet the local needs in Rugby.
- 4.2.6 The 98 ha of land contributing to Coventry’s unmet needs is spread across two major employment sites near Coventry: Prologis Ryton and Ansty Park. This is higher than the 45 ha stated in the 2016 C&W Employment Land MoU but considered beneficial to the sub-regional economic growth.
- 4.2.7 The 110 ha employment land need in Rugby is derived from the mid-point of the recommended range (96-128 ha) in a 2015 evidence base document.
- 4.2.8 **Table 4.1** summarises the components contributing to the employment land target in Rugby. This includes three new allocations totalling 58.5 ha in size. In total, 114 ha of land is identified to meet Rugby’s needs.

**Table 4.1 Supply to Meet the Rugby Local Plan Employment Land Target (Gross)**

Component of Rugby Local Plan (2019) Case	Area (ha)
Completions between 2011 and the adoption of Rugby Local Plan	42.16
Supply (Strategically significant employment sites; Core Strategy allocations)	13.62
Three new allocations in the Rugby Local Plan (Policy DS4.1-DS4.3)	58.50
<b>Total</b>	<b>114.28</b>

*Source: Rugby Borough Council Local Plan 2011-2031 (2019), p.26-27*

- 4.2.9 Policy DS4: Employment Allocations sets out the three new employment land allocations including South West Rugby.
- 4.2.10 Policy DS8: South West Rugby and Policy DS9: South West Rugby Spine Road Network are directly relevant to the Proposed Development. Phase 1 of Symmetry Park Rugby is part of the South West Rugby allocation. The policies state that the South West Rugby employment land allocation should accommodate 35 ha of employment land for B8 uses, associated onsite services and facilities, and a comprehensive sustainable transport provision, including a spine road. The delivery should be informed by the South West Rugby Masterplan SPD (‘SW Rugby SPD’).
- 4.2.11 The local plan identifies South West Rugby as a long-term commitment and does not expect the site to be delivered through one overarching outline permission.

***South West Rugby Masterplan Supplementary Planning Document (2021, 2024)***

- 4.2.12 The South West Rugby SPD was initially published in 2021. It defined the boundary of the South West Rugby employment allocation. This is shown in **Figure 4.1**.
- 4.2.13 Phase 1 of Symmetry Park Rugby represents the permitted development as part of the

# Symmetry Park Rugby Phase 2

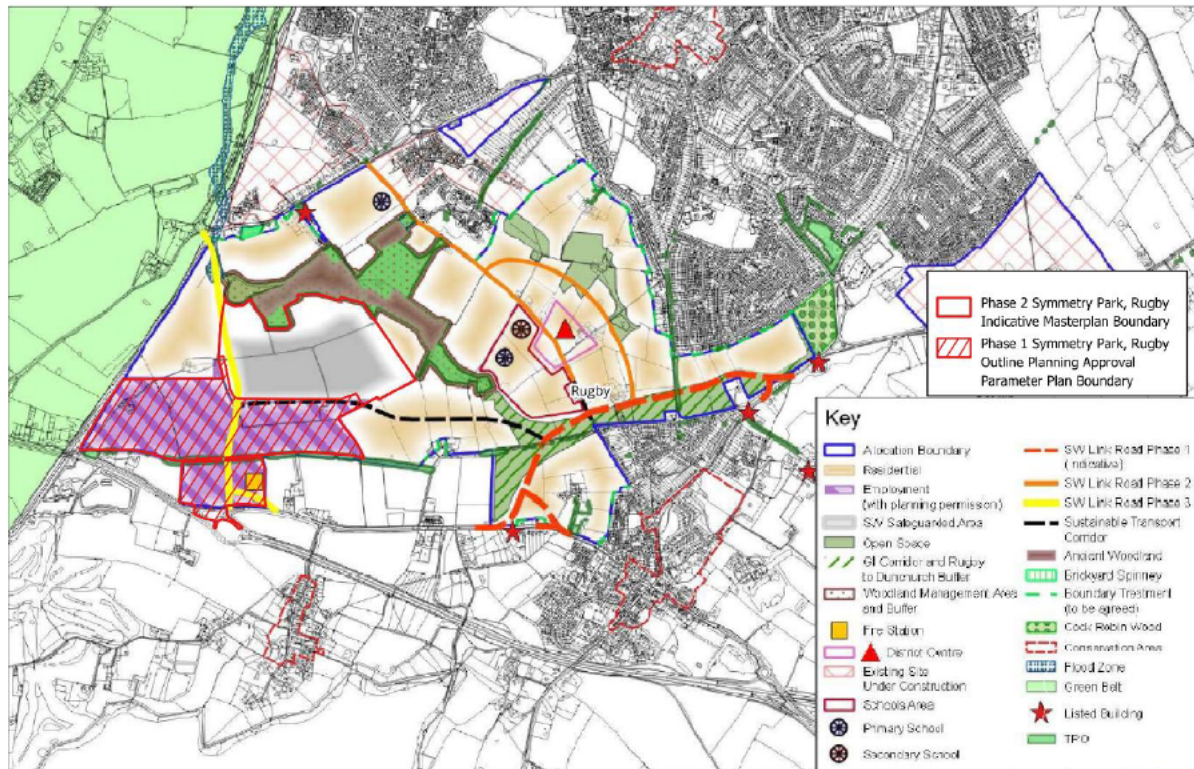
## Market Assessment and Review of Draft Local Plan



employment allocation. Phase 2 is categorised as ‘safeguarded land’.

4.2.14 The latest version of the South West Rugby Masterplan SPD was adopted in 2024. It did not make any changes to the status of the employment land.

**Figure 4.1 South West Rugby Masterplan SPD Map**



Source: Rugby Borough Council South West Rugby Masterplan SPD (Consultation Version) (2024) (Boundary of Symmetry Park, Rugby Phases 1 and 2 added by Savills)

### **West Midlands Strategic Employment Sites Study (‘WMSESS’) (2021)**

4.2.15 The WMSESS provides a schedule of the existing and potential supply of strategic employment sites in the region. The availability and capacity of these locations are subjected to availability tests. The study applies a 25-hectare threshold for the identification of strategic sites.

4.2.16 The WMSESS finds that the current supply of allocated and committed employment land represents a maximum of about 7.4 years supply.

### **Coventry and Warwickshire HEDNA (2022)**

4.2.17 The 2022 HEDNA estimates employment land needs of local authorities in Coventry and Warwickshire.

4.2.18 The report uses three models to forecast I&L demand: labour demand, floorspace trends, and completion trends. The report uses a size threshold of 9,000 sq.m to distinguish between strategic and non-strategic industrial premises.

4.2.19 The following considerations inform the preferred scenarios for the different I&L

categories:

- For industrial and non-strategic warehousing, the report identifies completion trends as the preferred forecast model.
- For strategic warehousing, the report uses completions trend for forecasting demand in the first ten years (2021 to 2031) to reflect a stronger demand potential in the short term. For the 2031 to 2041/50 period, it prefers the mid-point between low and high replacement scenarios in the traffic growth and replacement demand modelling to reflect a slower growth potential in the longer term.

4.2.20 Table 4.2 summarises the preferred scenarios that include some margin adjustments.

**Table 4.2 HEDNA Gross Employment Land Need (2021-2041/50)**

Type of Employment Land	Preferred Model(s)	Market	Land need 2021 to 2041 (ha)	Land need 2021 to 2050 ha
Industrial and smaller warehouses (up to 9,000 sq.m floor area) (gross)	Completions trend model	Rugby	151	218
Strategic warehouses (over 9,000 sq.m in floor area) (gross)	Completions trend model (2021 to 2031)	Coventry and Warwickshire	551	735
	Traffic growth and replacement demand model (2031 to 2041/50)			

Source: HEDNA, page 236.

4.2.21 Over the 2021 to 2041 timeframe, the demand estimate for industrial and smaller warehouses is 151 ha. This is able to be met by floorspace completions and identified supply. Therefore there is no residual net need. (Completions and supply data are taken from the Council’s Annual Monitoring Report. We did not review the document.) Over the 2021 to 2050 timeframe, the estimated demand of 218 ha is not met by completions and identified supply. The net need is 40.3 ha and new land needs to be found.

4.2.22 The supply-demand analysis was not undertaken for the strategic warehouse category.

**Coventry and Warwickshire Employment Land Report (2023)**

4.2.23 Coventry and Warwickshire Employment Land Report (2023) states:

*Land has been taken up more quickly than anticipated because Coventry and*

*Warwickshire's economy has been more successful and buoyant than was predicted since the last Local Plans were drawn up.*

4.2.24 There is only 96 ha of 'oven-ready' employment land available and only one site of strategic scale.

***Rugby Borough Local Plan Issues and Options (Regulation 18) (October 2023)***

4.2.25 The Rugby Borough Local Plan Issues and Options set out the issues and context of employment land in Rugby.

4.2.26 The document uses the 2022 HEDNA as the basis for its employment land needs. **Table 4.3** and **Figure 4.2** summarise the future employment land needs associated with Rugby identified in the 2022 HEDNA. The analysis does not include strategic warehousing.

**Table 4.3 Industrial and Non-Strategic Warehousing Demand and Supply in Rugby**

	Land area (ha) (2021 to 2041)	Land area (ha) (2021 to 2050)
Demand (from 2022 HEDNA)	150.5	218.2
Completions (since 2021)	32.7	32.7
Total supply	145.3	145.3
Supply to be identified	N/A	40.29

*Source: Rugby Borough Local Plan Issues and Options (2023), p.15.*

4.2.27 With regard to the additional requirement for strategic employment land, the document acknowledges that Rugby is an attractive location for warehousing. It is in the Golden Triangle and therefore benefits from a central location for national distribution networks and from excellent road/rail infrastructure. This makes it commercially attractive.

4.2.28 The document identifies the Subject Site (Phase 2 Symmetry Park Rugby) as one of eight indicative locations with the potential to be brought forward as a strategic employment site. The Subject Site is referred to as 'Safeguarded land within the South West Rugby allocation'.

4.2.29 Rugby's share of the sub-regional strategic warehousing requirement is not set out in the document. However, paragraph 3.32 states that Rugby is expected to contribute towards wider requirements.

***HEDNA-WMSESS Alignment Paper ('Alignment Paper') (November 2024)***

4.2.30 This document seeks to reconcile two previous evidence base documents, the 2022 HEDNA and the WMSESS. It uses the 2022 HEDNA for local I&L need and the WMSESS for strategic warehousing need.

4.2.31 The document maintains the same timeframe as the 2023 Reg 18 but changes the data series used in the 2022 HEDNA (by adding four additional years of data) to forecast local I&L demand. This dramatically reduces the level of local I&L need between 2021 and 2050 from 218ha to 74ha. This dramatic change is not recognised or explained in the Alignment

Paper. Local need in Rugby for 2021 to 2041/2050 therefore reduces to between 56 ha and 74 ha respectively.

4.2.32 The document identifies total strategic need of between 75ha to 150ha for Rugby. But then nets off the permission for Padge Hill Farm (and another small site) which are equivalent to 66 ha. Therefore strategic need is reduced to 84ha. However, whilst reducing the level of demand for strategic I&L, Padge Hill Farm is then used as part of supply again in the March 2025 Development Needs Topic Paper. This appears to indicate that the Council has double counted Padge Hill Farm as contributing towards Rugby's supply.

### ***Development Needs Topic Paper (March 2025) ('March 2025 DNTP')***

4.2.33 The March 2025 DNTP sets out that the plan period for the new emerging local plan as 2024 to 2045. It adjusts earlier demand figures to reflect the updated local plan period. As a result, local need in Rugby is 68ha and strategic need is 84ha.

4.2.34 The paper identifies a combined industrial need between local and strategic sites of 284ha (1.0m sq.m) once completions and commitments are accounted for.

4.2.35 The paper says that 45ha of Coventry's own need can't be met and considers that gross need would be 1.2m sq.m (329ha) if Rugby meets it.

4.2.36 The paper sets out the types of sites that are needed in Rugby to meet its need:

- 1-2 larger B8/mixed sites of 50ha
- 1-2 smaller B2/B1 sites of about 25ha

4.2.37 It says that the larger B8 sites have been granted permission at Padge Hall Farm and Frasers Campus (Crowners Field Farm) and therefore aren't required.

### ***Rugby Borough Local Plan Preferred Option (Reg 19) (March 2025) ('March 2025 Reg 19')***

4.2.38 This document is supported by the Development Needs Topic Paper (March 2025). The new draft plan period has required the employment land data to be adjusted.

4.2.39 The document identifies demand for 1,026,546 sq.m or 284ha for both small and large sites. It identifies commitments of 286,987 sq.m and proposes new allocations of 945,000 sq.m including subject site (130,000 sq.m). This is shown in **Table 4.4**.

4.2.40 The plan provides a surplus of over 200,000 sq.m. This is a buffer of about 20% over the Gross need and is deemed sufficient to meet Coventry's unmet need.

**Table 4.4 Preferred Option (Reg 19) (March 25) Overall Supply-Demand Balance (2024-2045)**

	Sq.m	Ha
Gross need	(1,026,627)	(283.8)
Committed Supply	286,987	81.5
New Allocations	945,000	270
Surplus/Deficit	205,360	67.7
<i>Coventry's unmet local need</i>	<i>(180,000)</i>	<i>(45)</i>
<i>Surplus/Deficit</i>	<i>surplus</i>	<i>surplus</i>

Source: Rugby Borough Local Plan Preferred Option (Reg 19)

**Coventry & Warwickshire Employment Needs - Addendum to the Coventry & Warwickshire Alignment Paper (November 2025)**

4.2.41 The document says that an error in the quantity C&W strategic land supply was identified that has reduced the overall supply of strategic land. This results in the need for an additional large site to be apportioned to Rugby (identified as Area 7).

4.2.42 This increases the upper end of the need for strategic sites from 84ha to 134ha (an additional 50ha).

**Development Needs Topic Paper (December 2025) ('December 2025 DNTP')**

4.2.43 The December 2025 DNTP sets out a new plan period for the latest version of the emerging local plan: 2025 to 2042. It adjusts earlier demand figures to reflect the updated local plan period. As a result, local demand need in Rugby is 60.8ha and strategic demand is 116.5ha.

4.2.44 The paper identifies a combined industrial need between local and strategic sites of 284ha (1.0m sq.m) once completions and commitments are accounted for.

4.2.45 The paper says that only 9ha of Coventry's own need can't be met. This is a decrease of 80% but is not explained. It suggests that Rugby could contribute about 2.5ha to that need.

4.2.46 The paper sets out the types of sites that are needed in Rugby to meet its need:

- 2-3 larger B8/mixed sites of 50ha
- 1-2 smaller B2/B1 sites of about 25ha

4.2.47 It says that the larger B8 sites have been granted permission at Crowner Fields Farm (Frasers Campus), Padge Hall Farm and Walsgrave Hill. Two of the three sites are new since the March 2025 DNTP was published.

4.2.48 The latest calculations on employment land remove a 20% buffer of supply over demand compared to the previous March 2025 DNTP. It suggests that the figure for strategic land

already contains a buffer because it is at the higher end of a range. It also states that the identified supply is controlled by developers that have a good track record of delivery and that nearly half of the identified supply is permitted.

4.2.49 This begs the question why a buffer was included in the March 2025 DNTP but is now not needed. The council should be planning to meet objectively assessed need which given uncertainties over delivery and the need to have sites ready for development beyond the plan period justifies including of a buffer as well.

4.2.50 It also says that by 2033 a new plan for a unitary authority including Rugby will have been adopted and will provide an opportunity to consider whether further supply is required. A statutory consultation is currently open until 26 March 2026 to inform an assessment by the Secretary of State of the merits of the proposals for:

- a. One unitary council for the whole of the area of Warwickshire comprising the current areas of North Warwickshire, Nuneaton and Bedworth, Rugby, Stratford-on-Avon and Warwick; or
- b. Two unitary councils comprising the current areas of:
  - North unitary authority: North Warwickshire, Nuneaton & Bedworth, and Rugby
  - South unitary authority: Stratford-on-Avon, and Warwick

4.2.51 It is considered unlikely that a unitary plan will be produced in this relatively short timeframe to 2033. No decision has yet been made on the merits of having a unitary council and which authorities this would involve. In the case of Buckinghamshire, a unitary authority was formed in 2020 and nearly six years later it still hasn't produced a new local plan. No clear justification has been set out for 'kicking the can down the road' in terms of not meeting their full objectively assessed employment need.

### ***Rugby Borough Local Plan Proposed Submission Version (Reg 19) (January 2026) ('January 2026 Reg 19')***

4.2.52 The most recent Reg 19 document is supported by Development Needs Topic Paper (December 2025). The new version changes the plan period to 2025-2042 (from 2024-2045).

4.2.53 The document identifies a gross need for 1,034,000 sq.m or 287ha from 2025-2042 for both small and large sites. (The Development Needs Topic Paper identifies a need of 1,024,000 sq.m. This is a discrepancy that indicates there is a supply surplus that can be used to meet Coventry's local need. In fact, this is not possible.) The document identifies commitments of 494,000 sq.m. This is a considerable increase arising primarily from Crowner Fields Farm being permitted. (In the March 2025 Reg 19 it was a draft allocation.) New allocations are reduced to 540,000 sq.m from 945,000 sq.m. Part of this reduction is due to the Subject Site's lower floorspace figure of 60,000 sq.m (from 130,000 sq.m).

4.2.54 The overall supply (comprised of commitments and allocations) is now 1,034,000 sq.m.

This covers the demand figure but there is now no supply buffer as explained in the December 2025 DNTP.

- 4.2.55 At the same time, Prologis Park (100ha; 350,000 sq.m) is no longer a draft allocation and Walsgrave Hill (83ha; 290,000 sq.m) is a new draft allocation. No explanation is given.

### 4.3 Conclusion

- 4.3.1 The MOU between the different C&W local authorities recognises that Rugby will contribute towards the employment land needs of Coventry. However, over time, this commitment has been downgraded to the point where in the latest version of the emerging local plan Rugby is barely contributing.
- 4.3.2 The Alignment Paper from November 2024 plays an important role in Rugby's employment land assessment by synthesising earlier evidence base documents. For **local demand**, it adds four additional years of historic property data for the purpose of forecasting demand. This somehow causes a 66% decline in demand compared to the 2022 HEDNA. This is a decrease from 218ha down to 74ha. This dramatic reduction is neither recognised or explained in the Alignment Paper and yet transforms the council's need.
- 4.3.3 The Alignment Paper also presents an estimate of **strategic demand** taken from the 2022 HEDNA. However, the Alignment Paper nets off Padge Hill Farm (66ha) from the headline demand figure but then also includes it as a supply figure. The site appears to be counted twice in the Council's calculations as a means of meeting its needs. Our conclusion is that this is an error that should be rectified by adding 66ha to need.
- 4.3.4 Between the March 2025 DNTP and the December 2025 DNTP, the level of need in Coventry that the Council would seek to contribute decreased from 45ha to 9ha. This 80% decline in Coventry's need in just 9 months is not explained in the evidence. Of the 9ha of Coventry's need, the December 2025 DNTP says that Rugby could contribute about 2.5ha. This is a significant change in approach. Rugby had previously committed to meeting about 45ha of Coventry's unmet need.
- 4.3.5 The December 2025 DNTP also sets out how the council has removed a 20% supply buffer which had previously increased the likelihood that all its employment land needs could be met. However, the removal of the buffer significantly increases the risk that Rugby will not meet its needs. The buffer had previously been in place 'to provide supply flexibility'. It is unclear why the emerging local plan no longer needs the same level of supply flexibility. The council says that their demand figures already contain sufficient buffer. Savills believes that the removal of the buffer significantly increases the risk to the council's ability to meet demand, especially in light of a key error that we have identified.
- 4.3.6 The December 2025 DNTP also justifies the removal of the buffer by stating that the identified supply is controlled by developers with good track records of delivery. However, developers' priorities often change and financial difficulties can arise which can limit the amount of land that comes forward over the plan period. Based on its experience, Savills suggests that the council should have retained the buffer. The council has not sufficiently explained why it previously included a buffer but that now it deems it

unnecessary.

- 4.3.7 The council also states in the December 2025 DNTP that by 2033 a new plan for a Warwickshire unitary authority (which includes Rugby) will have been adopted and that this process will provide an opportunity for the employment land supply to be considered. However, it is unlikely that a new plan will be in place by that time. As a cautionary tale, Buckinghamshire became a unitary authority in April 2020 and nearly six years later it still hasn't produced a new local plan. This is due to organisational disruption after the reorganisation of four former local authorities into a single entity. As a result, milestones were missed.
- 4.3.8 Warwickshire is unlikely to become a unitary authority until 2028 based on expected elections in 2027. There is a risk that it will take considerable time for the six relevant local authorities to integrate and consider employment land need together.

## 5 I&L Market Signals

### Introduction and Key Conclusions

#### Section Aim

- The aim of this section is to review characteristics of the I&L market in the PMA and assess whether it is supply or demand constrained.
- The consideration of market signals is a key requirement of the National Planning Policy Framework (NPPF) (Paragraph 31) for underpinning the preparation and review of all Local Plan policies.

#### Key Conclusions

- The conclusion of our review of market signals is that the relevant property markets have healthy demand and are broadly supply constrained. (In subsequent sections we consider the factors influencing future scale of demand and our estimate of total demand including suppressed demand).

### 5.1 Summary: A Strong and Supply-Constrained Market

- 5.1.1 Rugby's emerging local plan makes a distinction between strategic warehousing (B8 above 100,000 sq.ft) and other industrial premises (B8 under 100,000 sq.ft, B2, E(g)(iii)). Market data provided by CoStar, which our assessment is based on, does not make as stark a distinction. Warehousing and industrial premises can be identical in terms of size and functionality. We do, however, make a distinction between size categories to differentiate strategic uses (above 100,000 sq.ft) from non-strategic (below 100,000 sq.ft). Our analysis covers both industrial and warehousing facilities. Strategic premises though are predominantly warehouses because this use often requires larger floorplates.
- 5.1.2 Rugby's central location in the Golden Triangle means it is a good location for distribution companies aiming to access major markets and population centres. From strategic locations like Coventry Logistics Park and Ansty Park, about 90% of the UK's population is reachable within four hours by road. Additionally, East Midlands Airport and key east coast seaports are close by for air and sea transport.
- 5.1.3 As discussed in Section 3, we review property market data at two geographic levels: Rugby and Coventry & Warwickshire (C&W). This is in line with Rugby Council's emerging local plan identifying need for I&L space at both local and strategic scale (see Section 4). We also review large property segment (100k+ sq.ft). Key summary market supply and demand indicators for the PMAs are shown in **Table 5.1** below.



**Table 5.1 Summary of the Key Market Supply & Demand Indicators**

	Inventory (2026 YTD) (sq.ft)	Current Availability Rate (2026 YTD) (%)	Ave. Market Rent (2026 YTD) (£/sq.ft)	Rental Growth (2012- 2023)	Ave. Net Absorption p.a. (2016- 25) (sq.ft)	Ave. Net Deliveries p.a. (2016-25) (sq.ft)
Rugby	20,072,668	11.1%	£9.36	75%	642,352	745,267
Coventry & Warwickshire	100,802,501	6.7%	£9.35	84%	1,484,658	1,798,169

Source: Savills, CoStar, 2024

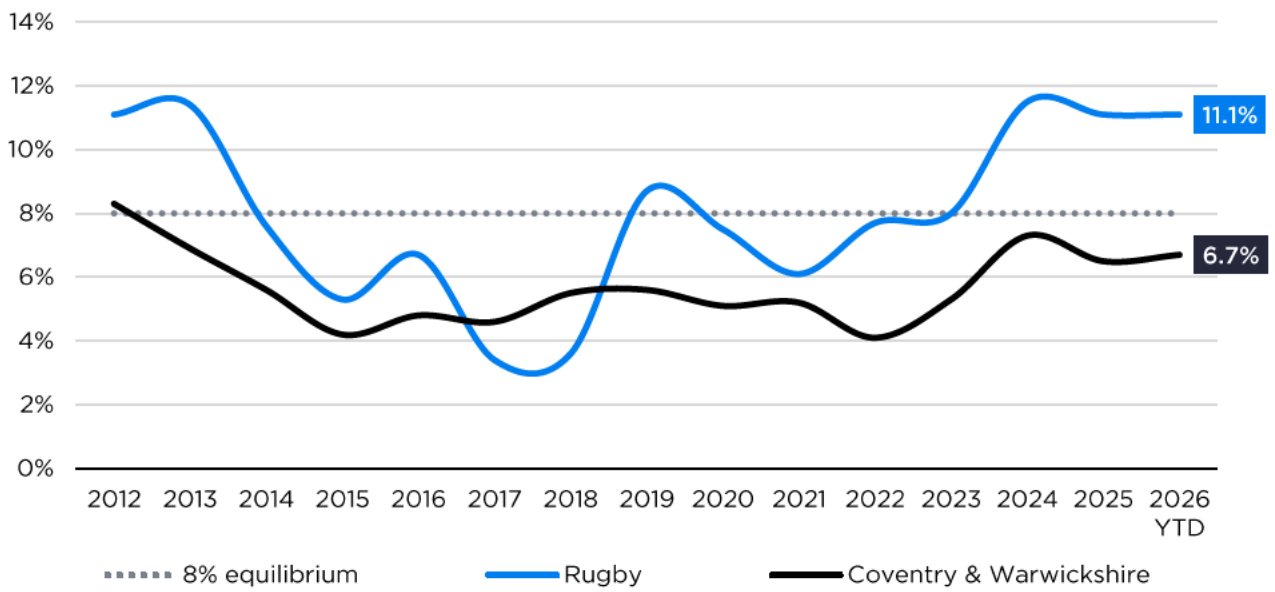
- 5.1.4 Rugby comprises around 20.1 million sq.ft (1.9 million sq.m) of I&L floorspace which equates to nearly 20% of the total inventory in the C&W.
- 5.1.5 In terms of availability, C&W has availability below the usual benchmark of an 8% market equilibrium availability rate. Rugby has recently increased marginally although it has been below 8% for much of the last decade.
- 5.1.6 Demand in Rugby, as measured by net absorption, is about 642,000 sq.ft per annum. About 86% of new supply that has come forward has been taken up by the market. This is despite Rugby having one of the highest delivery rates in England at c.3.7% of inventory per annum.
- 5.1.7 In the wider PMA, the overall rate of availability remains well below the market equilibrium of 8%. This suggests supply has still not expanded sufficiently to reach equilibrium. This inference is consistent with the unsustainable rise in rental levels in Rugby and C&W of 75% and 84% respectively between 2012 and 2026. These growth rates are around twice the rate of inflation, indicating that the market remains broadly supply-constrained.

## 5.2 Availability is Below the Market Equilibrium

- 5.2.1 At the national level, 8% availability across all size bands is commonly referred to as the level where a market is broadly in balance (i.e. equilibrium frictional capacity) in terms of supply and demand, as sourced in publications such as:
  - GLA’s Land for Industry and Transport Supplementary Planning Guidance (SPG) (2012)
  - London Plan (2021), and
  - British Property Federation’s (BPF) ‘*Levelling Up – The Logic of Logistics*’ Report.
- 5.2.2 Below this level, analysis finds that available supply tends to become tight and rents increase as occupiers compete for limited available stock.
- 5.2.3 As shown in **Figure 5.1**, availability in C&W has been below the 8% equilibrium for more than a decade. Rugby’s availability rate was below the 8% equilibrium for most of the last decade.

5.2.4 This shows that the I&L market has been below market equilibrium availability rate for a considerable period of time. As a result, occupiers have been forced to remain in their existing premises, even if not ideal for their operational requirements, or have had to leave the area to find suitable premises elsewhere, taking the jobs and investment with them.

**Figure 5.1 Availability Rate 2012-2026 YTD**



Source: CoStar, Savills, 2064

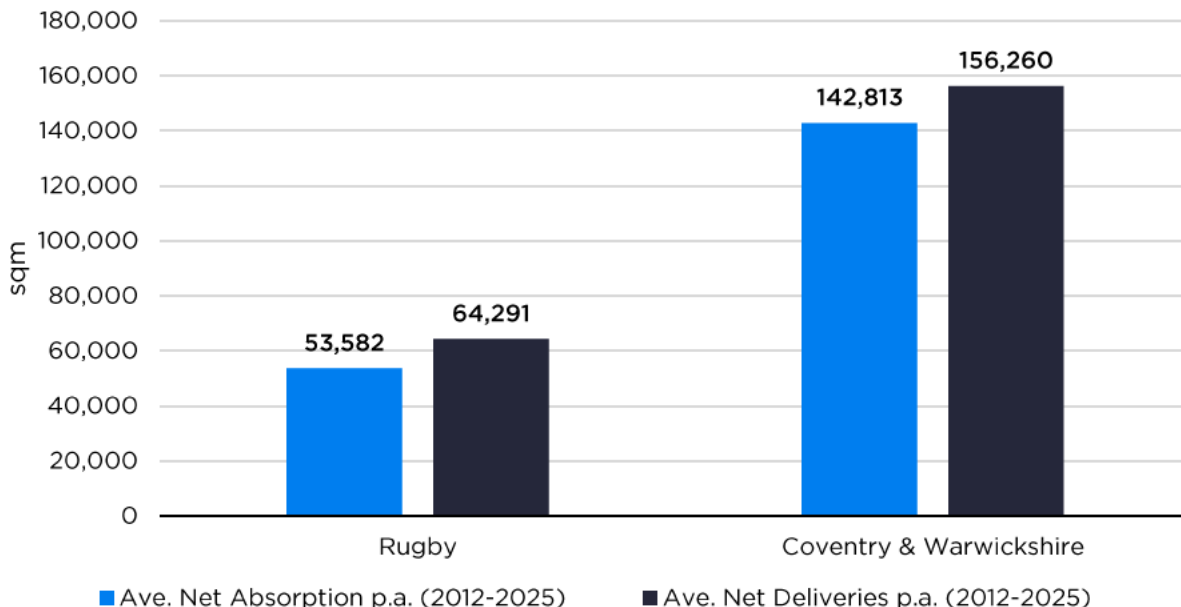
### 5.3 Demand has been Meeting Rapidly-Growing Supply

5.3.1 Net absorption is a useful measure of demand based on lease deals. It compares occupied space (move-ins) versus vacated space (move-outs). This can be compared with net deliveries as a measure of supply and registers the change in inventory (floorspace) related primarily to new developments.

5.3.2 **Figure 5.2** below shows that over the past decade (2016-2025), average levels of net absorption (demand) have been comparable to net deliveries (supply) across Rugby and C&W. The change in supply has not increased enough to allow the market to significantly increase availability in the FEMA as shown in **Figure 5.1**.



**Figure 5.2 Net Absorption and Net Deliveries p.a. (2014-2025)**



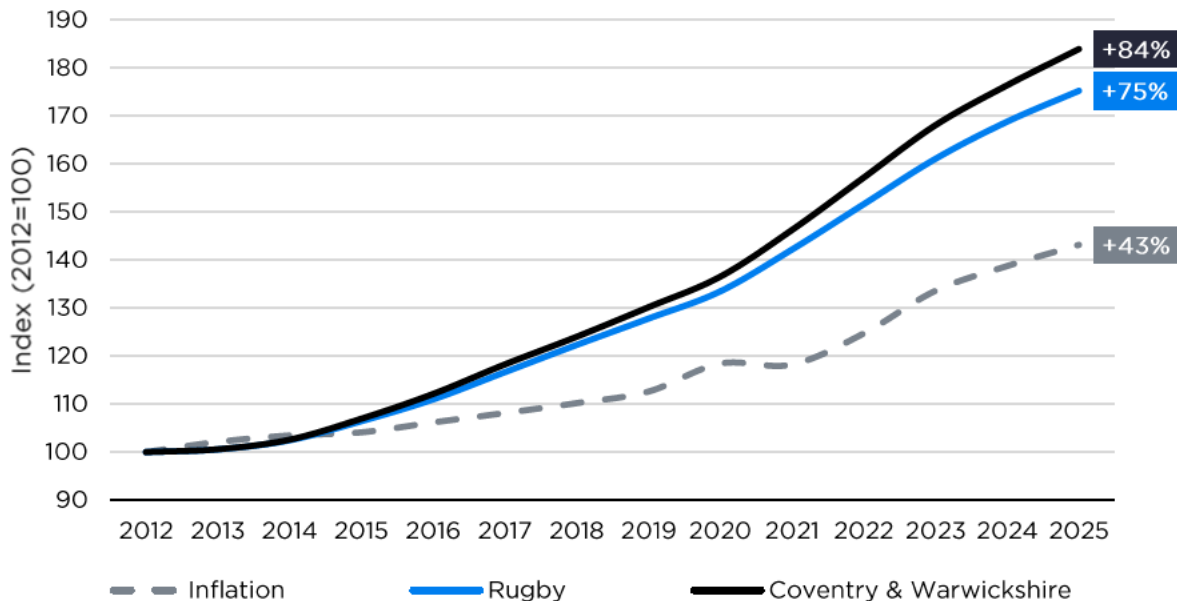
Source: CoStar, Savills, 2026

## 5.4 Strong Rental Growth

- 5.4.1 Another market indicator for understanding the relationship between supply and demand is rental growth. When demand outstrips supply, rental growth is typically higher as occupiers compete for limited available stock. This in turn drives up rents. Conversely, when there is sufficient supply to accommodate demand, rental growth is lower.
- 5.4.2 Across Rugby and C&W rents have grown at about three times the rate of inflation. This corroborates the availability analysis above, namely these geographies have all been supply constrained historically, with their respective availability rates being below the 8% equilibrium for much of the last decade. **Figure 5.3** below shows that between 2012 and 2025, rents have grown by 75% and 84% respectively in Rugby and C&W.



**Figure 5.3 Rental Growth Vs. Inflation (2012-2025)**



Source: CoStar, Savills, 2026

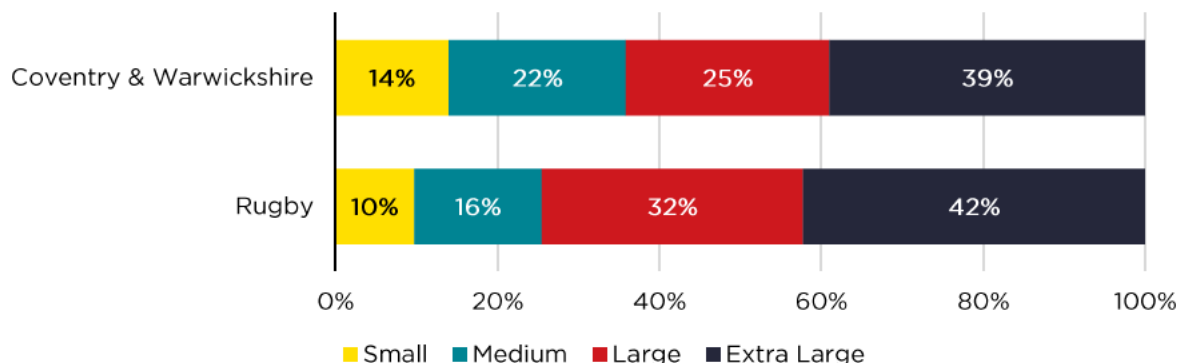
5.4.3 Even though industrial rents in Rugby and C&W have been growing significantly over the last decade, tenants have been generally willing to accept them because of the advantageous location.

## 5.5 The PMA Requires More Strategic I&L Units

5.5.1 Rugby is a strategic I&L hub. Over the past 10 years, about 86% of I&L absorption has been in units over 100,000 sq.ft. The proportion of stock in large premises is also relatively high but it does not reflect actual demand. Whilst both the local and subregional markets have relatively more supply in large I&L units compared to the England average, this indicates strong investment demand in the area which has made it possible to deliver strategic stock (Figure 5.4).

5.5.2 This analysis suggests more large units are required in Rugby, as well as C&W more widely. Large units require large sites similar to the Subject Site. Large developments also require the best locations close to junctions on nationally significant motorways which the Subject Site provides.

**Figure 5.4 Share of Inventory by Size Band (2026 YTD) in Rugby and C&W**



Source: CoStar, Savills, 2026

5.5.3 The large unit market (units of 100,000 + sq.ft) for C&W is summarised in Table 5.2 below.

**Table 5.2 Summary of Key Market Supply & Demand Indicators 100k sq.ft+ units**

Area	Inventory (2026 YTD) (sq.ft)	Availability Rate (%)	Ave. Market Rents (2026 YTD)	Ave. Net Absorption p.a. (2016-25)	Ave. Net Deliveries p.a. (2016-25)
Coventry & Warwickshire (100k+ sq.ft)	60,205,903	6.5%	£9.33	1,275,524	1,598,858

Source: Savills; CoStar, 2026.

5.5.4 For units of 100,000 + sq.ft the C&W area has 60.2 million sq.ft of I&L floorspace. This equates to nearly 60% of C&W’s total I&L inventory.

5.5.5 At 6.5%, availability for large units in the PMA is similar to that of all I&L stock (6.7%). This suggests a similar level of constraint in the PMA’s large-box market when compared to all size categories.

5.5.6 In 100K + sq.ft units, demand in C&W, as measured by net absorption, at about 1.3m sq.ft per annum, has been not significantly below net deliveries at 1.6m sq.ft. The same trend is observed across all sizes in C&W. Coupled with low availability and high rental growth, this suggests a constrained market.

5.5.7 As discussed in Section 3, our PMAs do not capture sites along the M1 corridor located east of A5 road which follows the North-East boundary of the C&W area. These nearby locations (such as Magna Park, Logicor Park, DIRFT) will offer a degree of competition to developments in Rugby. However, these sites are also under pressure to accommodate the needs of their own market and economic areas. We discuss this further in Section 6.

5.5.8 On balance we have focused our analysis on the C&W PMA but review and recognise the wide context of supply in the M1 corridor.

## 5.6 Conclusion

- 5.6.1 Rugby and C&W are commercially attractive locations in high demand by I&L occupiers.
- 5.6.2 The I&L market for strategic premises is supply constrained. The evidence indicates that both Rugby and C&W more widely have been supply-constrained for most of the past decade.
- 5.6.3 The I&L market in the Rugby and C&W have experienced high levels of leasing activity (net absorption) despite significant new supply (net deliveries) coinciding with high rental growth and low availability. We interpret this as an indication that overall the market is supply-constrained. Strong rental growth is observed in markets where occupiers have to compete aggressively with one another for limited available stock which is pushing up rents.
- 5.6.4 In subsequent sections we interpret how this supply constrained context feeds through to estimates of future demand.

## 6 Estimate of Future Demand

### Introduction and Key Conclusions

#### Section Aim

- The purpose of this section is to estimate future I&L land demand in the wider PMA, as this is considered the relevant market area for large strategic I&L premises (such as the Site). This is then compared against the estimated demand stated in the Rugby Borough Local Plan 2025-2042 Proposed Submission Version (Regulation 19) (January 2026). We also see how this demand could be apportioned to Rugby.
- We present below our methodology for estimating future I&L demand. Our methodology is designed to be NPPF-compliant. It builds upon historic take-up (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up.

#### Key Conclusions

- Based on our demand methodology, over a 17-year period (consistent with the draft local plan), we estimate FEMA-wide I&L demand to be 727ha of land (for 100k+ sq.ft premises). This is significantly more than the HEDNA (2022) prorated estimate of 468ha over a 17-year time period.
- When demand is apportioned to Rugby, this results in a requirement for 305ha for all I&L uses over the same 17-year period and 230ha for premises 100k+ sq.ft. This is significantly greater than the Council's latest evidence which estimates 177ha and 116ha respectively.

### 6.1 Savills Estimates of Future Demand

- 6.1.1 We take a sub-regional approach to estimate future I&L demand. Rugby's market, like all local areas, is part of a wider sub-regional market, and therefore is subject to supply and demand forces which need to be assessed beyond its local authority boundaries. This is true for many commercial sectors, but it is particularly important for I&L occupiers.
- 6.1.2 Our sub-regional assessment considers future demand from within the PMA. We consider this geography as broadly representative of the Study Area's subregional market. Our future demand calculations within the PMA include 'suppressed demand' or demand lost historically due to supply constraints.
- 6.1.3 We consider the full market for I&L units, estimating demand for all unit sizes and relevant planning use classes covering light industrial, manufacturing and warehousing. We consider that a suitable approach as it draws on a large pool of data and the fact light industrial, manufacturing and warehouse occupiers desire similar types of premises with similar locational characteristics.
- 6.1.4 The steps we follow in estimating future I&L demand are set out below.

### **Step 1: Time Frame**

- 6.1.5 We assume an 17-year period which is consistent with the latest version of the draft local plan.

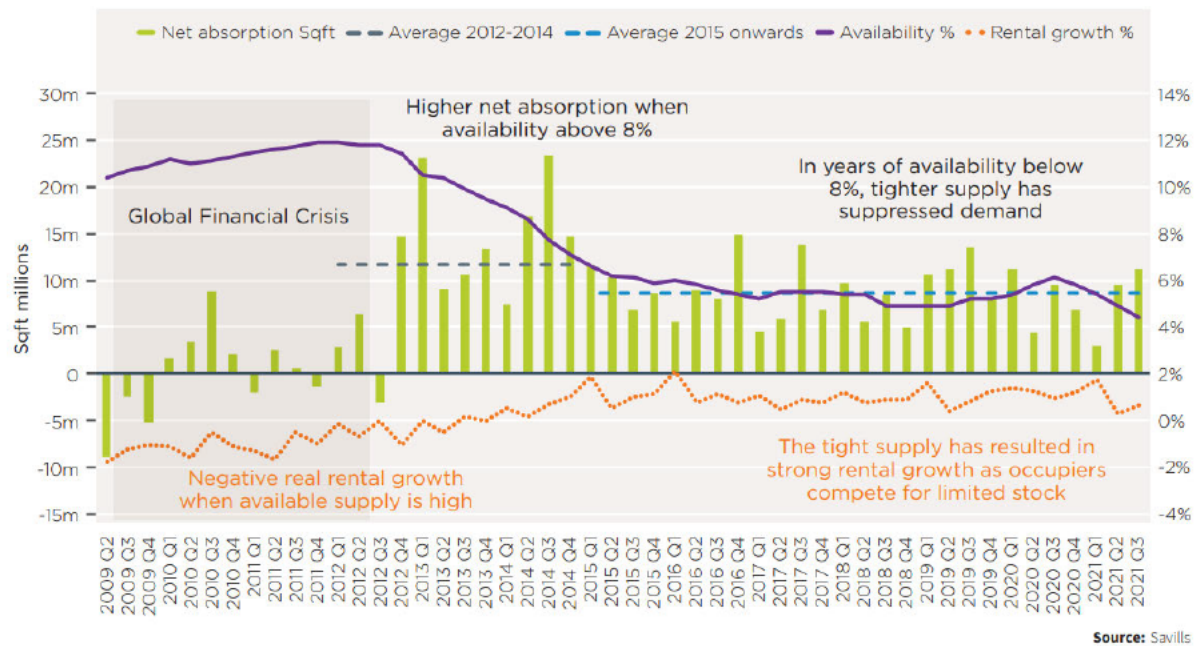
### **Step 2: Estimation of Historic Demand (Before Accounting for Suppressed Demand)**

- 6.1.6 This is based on the average annualised net absorption for the PMA/FEMA at 1.5m sq.ft per annum for the overall I&L market between 2016 and 2025. We consider net-absorption to be the starting point measure of demand for floorspace as it indicates the quantum of net floorspace occupied over a period of time (i.e., move-ins minus move-outs) based on lease deals.

### **Step 3: Estimation of Future Demand, Including Allowance for Suppressed Demand**

- 6.1.7 The rationale for accounting for suppressed demand is that when sufficient supply is not available, demand cannot be accommodated. Supply and demand are linked across all commercial property sectors. We describe a market where supply does not keep up with demand as being 'supply-constrained'. Limited supply in a strongly performing market, such as the FEMA's I&L sector, means that demand cannot be fully satisfied, typically resulting in strong rental growth. To estimate suppressed demand we use a method that looks at the historic difference between equilibrium availability and actual availability. This is set out below.
- 6.1.8 At the national level, the market equilibrium level, where supply and demand are broadly in balance and rents are more stable, is around 8% availability. We have investigated the relationship between real rental growth (i.e., rental growth adjusted for inflation) over the past decade at the national level and observed its relationship to availability, it becomes clear that I&L rents begin to grow strongly when availability is below 8%. This relationship is illustrated in **Figure 6.1** below. When availability was above 8% between 2009 and 2014 real rental growth (net of inflation) was either negative or only slightly positive. This enabled demand to be accommodated as sufficient supply was available. However, since 2014, as availability dipped below 8% and has stayed below this level ever since at the national level, real rents have grown year-on-year. During this period net absorption has been lower than the 2009-2014 period despite the I&L sector going from strength to strength. This suggests the suppressing nature tight availability (below 8%) has had on I&L demand nationally.

**Figure 6.1 Historic Net Absorption, Availability and Real Rental Growth in England**



Source: CoStar, OBR, Savills

- 6.1.9 The 8% benchmark is also applicable to the PMA given its I&L market has broadly followed the same trajectory as the national market. Within the Study Area, I&L availability dropped below the 8% equilibrium level in 2015. In terms of I&L rents, the PMA began outpacing inflation from around 2014 when availability dropped below 8%, similar to the national market.
- 6.1.10 Further review of underlying demand drivers is given in **Appendix 1**. This gives support for our assumption that drivers of historic suppressed demand are likely to extend in to the future.
- 6.1.11 Our calculations of suppressed demand are set out in **Table 6.1** below. The individual steps for calculating the PMA’s suppressed demand are as follows:
- Step 3a: For years where availability has been below the 8% equilibrium threshold, we calculate the quantum of floorspace necessary to achieve 8% availability (Column ‘Av. To EQ (sq.ft)’ in Table 8.1, calculation F)
  - Step 3b: We then take the average of the ratio between net absorption and available floorspace for every year over the past decade (Calculation E averages 68% for the PMA based on Column ‘Net Absorption/Availability’)
  - Step 3c: We apply this average to the estimated floorspace required to reach 8% availability in each year where the market is below the 8% availability threshold to estimate each period’s suppressed demand (Calculation F\*E in Column ‘Suppressed Net Absorption (sq.ft)’)
  - Step 3d: We calculate average suppressed net absorption over the past decade. This gives the annualised suppressed demand figure used as a top-up to the historic trend.

# Symmetry Park Rugby Phase 2

## Market Assessment and Review of Draft Local Plan



The estimated average suppressed demand figure for the PMA is 799k sq.ft per annum since 2016.

6.1.12 Table 6.1 shows the relevant calculations.

**Table 6.1 Suppressed Demand Calculations within the PMA**

	A	B	C=(A*B)	D	D/C	F=(8%-B)*A	F*E
Year	Inventory (sqm)	Availability (%)	Available Floorspace (sqm)	Net Absorption (sqm)	Net Absorption / Availability	Av. To EQ (sqm)	Suppressed Net Absorption (sqm)
2025	100,802,501	6.5%	6,552,163	292,676	4%	1,512,038	520,718
2024	100,809,160	7.3%	7,359,069	-494,076	-7%	705,664	0
2023	98,579,881	5.3%	5,224,734	1,333,685	26%	2,661,657	916,627
2022	95,295,168	4.1%	3,907,102	3,409,501	87%	3,716,512	1,279,900
2021	91,763,431	5.2%	4,771,698	663,939	14%	2,569,376	884,847
2020	91,952,927	5.1%	4,689,599	2,964,592	63%	2,666,635	918,341
2019	90,398,837	5.6%	5,062,335	1,588,937	31%	2,169,572	747,162
2018	88,005,581	5.5%	4,840,307	169,501	4%	2,200,140	757,688
2017	86,924,255	4.6%	3,998,516	1,818,434	45%	2,955,425	1,017,795
2016	84,581,831	4.8%	4,059,928	3,099,388	76%	2,706,619	932,111

E = average  
Suppressed Demand = Average

Source: Savills, CoStar, 2026

6.1.13 Step 3e: The final step requires adding the combined annualised historic and suppressed demand figures and multiplying this by the number of years in the period (17 years), as shown in Table 6.2. This gives a total estimated floorspace demand of 38.8 million sq.ft for the FEMA over an 18-year period.

**Table 6.2 Total Historic and Suppressed Demand Calculations**

	Sq.ft
(A) Annualised historic demand	1,484,650
(B) Annualised suppressed demand	797,520
(C) Total annualised demand (A+B)	2,282,180
(D) Total demand over 17-year period (C*20)	38,797,000

Source: Savills, 2026. Figures may not add due to rounding

### Step 4: Savills Estimate of Future Demand across the PMA

6.1.14 Adding the combined historic and suppressed demand estimates yields a total demand of 38.7 million sq.ft of I&L floorspace in the PMA over the 17-year period.

6.1.15 The HEDNA uses plot ratios of 35%-40% for industrial uses to translate floorspace to land

needs. Based on our experience, recent changes in the I&L sector mean that occupiers are moving towards larger building footprints and requiring lower site coverage to allow for adequate yard space, cross-docking, sustainable urban drainage, and strategic landscaping. These modern occupier requirements imply a lower plot ratio, typically in the region of 30% to 40%. As a midpoint, we use a 37.5% plot ratio in line with HEDNA assumptions.

- 6.1.16 Using a 37.5% plot ratio, over a 17-year period, we estimate PMA-wide I&L demand to be 961 ha of land.
- 6.1.17 We apportion overall need in the FEMA down to the need for strategic land and premises (greater than 100,000 sq.ft) based on 76%. This proportion reflects the activity and stock of strategic premises in the FEMA as a proportion of the overall market. The figure for this proportion of the market is 727ha over the 17-year period.

**Step 5: Sensitivity Testing**

- 6.1.18 Whilst we consider our future baseline demand estimates to be robust and reflective of market signals looking back 10 years (2016-2025), it is important we take account of the fact that the I&L sector has gone through a period of unprecedented growth in recent years with a number of structural growth drivers. To ensure our modelling process is robust, we have carried out a high level sensitivity analysis to understand what could happen to future I&L demand should the sector’s historic demand performance strengthen or weaken in the future..
- 6.1.19 We have applied a higher level 10% uplift (+) and reduction (-) to the baseline figure. The impact of the sensitivity is presented in Table 6.3.

**Table 6.3 Land Demand Estimates over in PMA - Sensitivity Testing Results**

	Lower estimate	Savills BCentral Case Demand Scenario	Higher estimate
PMA Strategic I&L Demand	654	727	800

Source: Savills (2026)

**6.2 Comparison of the FEMA-Level Demand for Strategic Land with the 2022 HEDNA**

- 6.2.1 Our assessment is that the 2022 HEDNA demand approach does not give sufficient consideration to market signals. Below we outline what we consider to be some of the key questions around the demand methodology used.
- 6.2.2 The 2022 HEDNA is primarily based on past completions as the primary method for estimating future I&L demand. (It also incorporates a scenario based on traffic growth and premises replacement demand.) We do not consider past completions on its own as a sufficient indicator of demand in the context of a supply-constrained market. The leading demand measure of floorspace is net absorption, which indicates the quantum of net floorspace occupied over a period of time (i.e., move-ins minus move-outs) based on lease deals. Development completions on the other hand is a supply measure (rather than

a demand measure) which calculates new floorspace delivered.

6.2.3 Without available land supply, development completions cannot happen, and therefore the past completion method may be an incomplete indicator of actual market demand, particularly in supply-constrained contexts. The projection forward of historic supply trends runs the risk of further continuing a supply constrained ('tight') market.

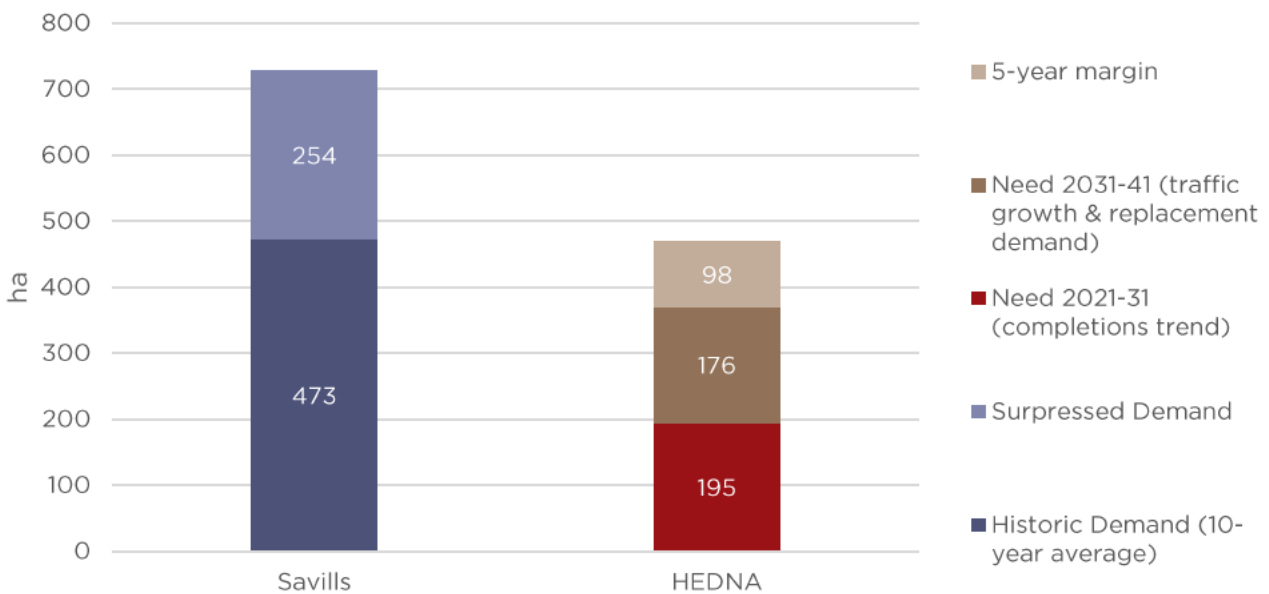
6.2.4 The results of our demand assessment for C&W are compared to 2022 HEDNA in **Table 6.4**. We have adjusted the 2022 HEDNA figure to reflect the 17-year period of the emerging local plan. Both projections show estimated need for strategic sites (100k+ sq.ft). The difference is largely due to the historic annualised demand over the last 10 years significantly outperforming HEDNA projection, as well as Savills model estimating part of the demand that has been constrained by tight supply, and projecting it forward. It shows that if we reduce our demand estimate by 10%, it is still well above the 2022 HEDNA estimate.

**Table 6.4 Total Demand for Strategic Land Compared with the 2022 HEDNA**

Indicator	Savills Baseline		Savills 10% Uplift		Savills 10% Reduction		2022 HEDNA	
	sq.ft	ha	sq.ft	ha	sq.ft	ha	sq.ft	ha
Annualised demand	1,726,421	42.8	1,899,063	47.1	1,553,779	38.5	1,112,056	27.6
Total demand over 17-year period	29,349,151	727.1	32,284,066	799.8	26,414,236	654.4	18,904,948	468

Source: Savills (2026), HEDNA (2022)

**Figure 6.2 Total Demand for Strategic Employment Land C&W and 2022 HEDNA**



Source: Savills (2024), HEDNA (2022)

6.2.5 It is possible that to a degree the 2022 HEDNA 'traffic growth and replacement demand'

is equivalent to Savills suppressed demand estimate. However as shown in **Figure 6.2** this is a lower estimate than our demand figure.

6.2.6 As a conservative precaution, our estimate does not account for a number of factors that may potentially result in a higher demand projection and that were included in HEDNA estimates:

- **Margin for flexibility:** The HEDNA projections include margin for flexibility to account for the potential delay in some sites coming forwards; an additional buffer so that in future demand is greater than forecasts it can be accommodated, and to reflect the tight market in recent years with low current vacancy rates. This is included as five years of gross completions for industrial / distribution. This margin may be allowed for in our enhanced demand estimate but it is not certain sufficient allowance has been made.
- **Replacement demand:** HEDNA states its demand projections to be gross figures. This is due to the demand projection partly comprising replacement demand (for the forecast period over 2031). Replacement demand factors make provision for losses of future stock, assuming that past patterns of losses continue. Some stock is lost as it ages and premises become redundant. We did not include replacement demand in our projections as we are assuming that this is already allowed for in the net absorptions approach. However if sites are not re-developed and instead new sites are developed to allow for lost industrial sites then our approach will under-estimate this factor.
- **Increase in future traffic:** HEDNA long-term projection (over 2031) partly comprises increase in future traffic volumes based on MDS Transmodal GB Freight Model. We agree there are reasonable indications of demand growing further due to the rise in e-commerce and other structural shifts. It is not clear whether our suppressed demand estimate fully allows for this effect.

6.2.7 We further recognise that our estimate of suppressed demand is a matter of judgement and interpretation and it is possible that future information may suggest an adjustment to our estimate. Our judgement is that unless there are significant changes in wider macro-economic conditions and/or significant increases in supply in the nearby area, our approach provides a good indication of market need.

6.2.8 The results of our analysis suggest that HEDNA may have under-estimated sub-regional demand. The HEDNA report acknowledges that the future need for strategic I&L sites may be higher:

*'We do however consider that there are factors which point to the potential to see stronger demand than this. Firstly is the shift towards e-commerce which has arisen from the Covid-19 pandemic, which has accelerated previous trends. Second is the effects of trade disruptions and macro-economic uncertainties, including the effects of Brexit ..., on level of stock holding (the impacts of which have been to increase the requirements for warehouse space).'* (paragraph 10.42, page 230)

### 6.3 Demand Apportioned to Rugby

6.3.1 Following the same steps outlined above, we assess future demand apportioned to Rugby based on Rugby's share of activity and inventory in the FEMA. **Table 6.5** shows

that on this basis, overall I&L demand apportioned to Rugby is projected to be around 723k sq.ft per annum or 12.3m sq.ft over the 17-year period. In terms of land area this is equivalent to 17.9ha per annum and 305 ha over 17 years.

**Table 6.5 Rugby Floorspace Demand and Land Need Apportioned to Rugby Over 17 Years**

Indicator	Total	
	sq.ft	ha
Annualised demand	723,102	17.9
Total demand	12,292,731	305

Source: Savills (2026)

6.3.2 We appreciate that not all of the demand need be accommodated locally in Rugby, and similarly demand in the wider PMA could be re-apportioned to Rugby. We agree with HEDNA’s view that demand for strategic sites (over 100,000 sq.ft) covers a sub-regional area across Coventry and Warwickshire, due to footloose nature of occupiers and varying availability of land. However Rugby was among the largest contributors to strategic I&L supply in recent years and is expected to remain so. Most new supply has been absorbed at pace. This demonstrates that as a location it is able to attract high levels of demand in line with our estimates above.

6.3.3 **Table 6.6** shows our estimate of demand for strategic I&L land in Rugby (230 ha). This is based on the apportionment of FEMA-level demand for strategic I&L land applied to Rugby.

**Table 6.6 Strategic I&L Floorspace and Land Need for Rugby Over 17 Years**

17-year Demand Projection	Total	
	sq.ft	ha
Rugby (All I&L)	12,292,731	305
Rugby (Strategic I&L)	9,299,118	230

Source: Savills (2026)

### 6.4 Comparison of Rugby-Level Demand with the Council’s Latest Evidence Base

6.4.1 In this subsection we compare Savills assessment of demand in Rugby with the latest estimates in the Council’s evidence base. When we compared Savills FEMA-level demand for strategic sites with the Council’s evidence base, we used the 2022 HEDNA. The 2022 HEDNA is the most recent FEMA-level demand estimate in the Council’s evidence. However, for a Rugby-level assessment of need, the Council has produced a number of versions. The latest version is set out in the December Needs Topic Paper December 2025 (‘December 2025 DNTP’). This is shown in **Table 6.7**.

6.4.2 Savills estimate of demand is considerably above the Council’s. However, the strategic demand figure in the December 2025 DNTP includes a reduction for Padge Hill Farm comprising 66ha. We believe that that site should not be used to reduce strategic demand. Therefore the Council’s figure is likely to be greater although still below Savills figure.

**Table 6.7 Comparison of Rugby-Level Demand with Council's December 2025 DNTP**

17-year Demand Projection	Savills		December 2025 DNTP	
	sq.ft	ha	sq.ft	ha
Rugby (Local/ I&L)	2,993,613	75	2,617,804	61
Rugby (Strategic I&L)	9,299,118	230	4,633,902	117
Rugby (All I&L)	12,292,731	305	7,251,707	177

Source: Savills (2026), December 2025 DNTP

## 6.5 Need in Neighbouring Sub-Regional Areas

6.5.1 As discussed in Section 3 our PMAs do not capture sites along the M1 corridor located east of A5 road which follows the North-East boundary of the C&W area. These nearby locations (such as Magna Park, Logicor Park, DIRFT) will offer a degree of competition to developments in Rugby. However these sites are also under pressure to accommodate the needs of their own market and economic areas. These sites are largely catering for the South East Midlands LEP area (SEMLEP). The SEMLEP market is projected to experience a shortage of its own in strategic warehousing between 2021 and 2040 according to Warehousing and Logistics in the South East Midlands study (2022)<sup>5</sup>. This is summarised in Table 6.8 below.

**Table 6.8 SEMLEP Strategic Warehousing Demand and Supply Balance (2021-2040)**

		Market Signals (High)	Market Signals (Low)	TGRD Central	Completions
Demand 2021-40 ('000 sq.ft)	Road	45,574	35,715	32,787	42,194
	Rail	19,278	19,278	19,278	19,278
Supply at April 2021 ('000 sq.ft)	Road	34,595	34,595	34,595	34,595
	Rail	8,547	8,547	8,547	8,547
Balance ('000 sq.ft)	Road	-10,979	-1,119	1,808	-7,599
	Rail	-10,732	-10,732	-10,732	-10,732
Balance (Ha @ 0.35)	Road	-291	-30	48	-202
	Rail	-285	-285	-285	-285
<b>Balance</b>	<b>Total</b>	<b>-576</b>	<b>-315</b>	<b>-237</b>	<b>-487</b>

Source: Warehousing and Logistics in the South East Midlands (2022)

6.5.2 The risk of future deficit is also relevant to SEMLEP sub-areas adjacent to Rugby and C&W such as West Northamptonshire, as identified by the recently published study. This is summarised in Table 6.9 below which shows significant need for strategic warehousing. This is illustrated by deals such as Amazon and Nike committing to c.4 million sq.ft leases at Segro Logistics Park Northampton and Magna Park Corby.

<sup>5</sup> See Table 15.3, page 128, Warehousing and Logistics in the South East Midlands (2022)

**Table 6.9 West Northants Strategic Warehousing Demand-Supply Balance 2025-2043 (Ha)**

Metric	Strategic Industrial - Minimum	Strategic Industrial- Higher
Strategic warehousing total supply	307	307
Strategic warehousing total recommended needs	484	601
Strategic warehousing (need) and surplus	-177	-294

*Source: West Northamptonshire Housing and Economic Needs Assessment Update (2024)*

6.5.3 On balance we have focused our analysis on the C&W PMA but review and recognise the wider context of supply in the M1 corridor.

## 6.6 Conclusion

6.6.1 Based on Savills’ demand methodology, over a 17-year period we estimate FEMA-level demand for strategic premises (greater than 100,000 sq.ft) of 727ha of land. This compares to a figure of about 468ha that is a prorated figure taken from the 2022 HEDNA.

6.6.2 Within Rugby, Savills estimate of demand is comprised of past activity and suppressed demand. The figure is 305ha across I&L premises and 230ha for strategic I&L sites. This exceeds the equivalent figures in the Council’s latest evidence base which is about 177ha and 116ha respectively.

## 7 Review of Supply

### Introduction and Key Conclusions

#### Section Aim

- The purpose of this section is to provide a review of the supply of buildings in excess of 100,000 sq. ft (9,290 sq. m), and land which can accommodate a B2/B8 units of this scale within the Coventry and Warwickshire PMA.

#### Key Conclusions

- There is a total of c. 273ha of supply of buildings and land with either a planning permission or allocation within the Coventry & Warwickshire PMA. Of this total, c. 78 ha is within the Rugby Borough Council area.
- There is a further c. 548 ha of land which is proposed to be allocated within the sub-region which has the potential to accommodate strategic scale B2/B8 development. Of this total, c. 181 ha is proposed to be allocated within Rugby Borough (excluding the Subject Site). It is important to note that these sites have no formal planning status and do not yet form part of the supply of land available to meet an occupier requirement. The sites are subject to varying degrees of uncertainty in relation to planning and delivery timescales.
- In summary, supply within Rugby Borough comprises the following:
  - Buildings: 185,465 sq. m of floorspace equating to approximately 46.37 ha of land at 40% density.
  - Land with Planning Permission: c. 31.23 ha
  - Proposed Allocations with available land and without planning permission: c. 181 ha
- On a qualitative basis, supply is particularly constrained in relation to deliverable strategic scale opportunities for B8 use, with most of the land portfolio being smaller scale sites and a number being restricted to B2 use. The actual supply of deliverable land to meet occupier requirements, particularly in the case of the larger strategic scale B8 units and especially over the shorter term is therefore very limited.

### 7.1 Approach

- 7.1.1 We have reviewed the supply of land within each of the local authorities within the Coventry & Warwickshire sub-region, which includes the local authorities of Rugby, Nuneaton & Bedworth, North Warwickshire, Coventry, Stratford-on-Avon, and Warwick. We have included sites with planning permission or an allocation for B2 or B8 development. Data collection was undertaken in February/March 2026 and represents a snapshot in time.
- 7.1.2 In order to objectively assess the level of supply we have considered all sites of 2.3 ha and above which can accommodate a unit of 100,000 sq. ft (9,290 sq. m) plus. Where a

site below this threshold has planning permission for a unit of 100,000 sq. ft (9,290 sq. m) or more then this has been included for completeness. The majority of land supply within the sub-region is included within sites which are above this size threshold, therefore we consider our assessment to be a comprehensive review of overall supply.

7.1.3 We consider three sources of supply:

- Building supply being B2 and/or B8 buildings of 100,000 sq. ft (9,290 sq. m) or more which are available (including those which are under construction).
- Land supply being sites of 2.3 ha or more with planning permission for B2 or B8 development which can accommodate a unit of 100,000 sq. ft (9,290 sq. m) or more; and
- Pipeline supply of sites of 2.3 ha or more which benefit from an allocation for B2 or B8 development and can accommodate a unit of 100,000 sq. ft (9,290 sq. m or more).

7.1.4 Proposed draft allocations (which do not already benefit from planning permission) have been reviewed separately. These sites have no formal planning status and there is therefore a higher degree of risk associated with their delivery. Speculative developer promotions that fall outside of the Land Supply, Pipeline Supply or Proposed Allocations (as defined above) are not included within the supply.

## 7.2 Building Supply

7.2.1 We have assessed the supply of B2/B8 buildings of 100,000 sq. ft (9,290 sq. m) plus within the Coventry & Warwickshire PMA. This includes all buildings which are vacant, including those which are under construction. Available buildings are set out at **Table 7.1**, below.

**Table 7.1 Supply of Buildings (100,000 sq.ft +) in the PMA**

Ref	Building	Local Authority	Size (sq. ft)	Size (sq. m)	Comment
1	Unit 6, Symmetry Park Rugby	Rugby	338,307	31,430	Grade A
2	Unit 7, Symmetry Park Rugby	Rugby	170,528	15,843	Grade A
3	Rugby 673, Castle Mound Way	Rugby	673,270	65,248	Second hand
4	Rugby 251, Castle Mound Way	Rugby	250,400	23,263	Grade A
5	Rugby 106, Central Park Drive	Rugby	106,196	9,866	Grade A
6	Central Park 100	Rugby	100,766	9,361	Refurbished
7	1 Cosford Lane, Swift Valley Industrial Estate	Rugby	162,066	15,056	Second hand
8	DC5 Prologis Park Ryton	Rugby	170,535	15,399	Second hand
9	Power Park 170, Coventry	Coventry	168,249	15,630	Refurbished
10	Unit 2 Coventry Logistics Park	Coventry	252,210	23,341	Second hand
11	SPC 140 (Unit 4C), SEGRO Park Coventry	Warwick	140,567	13,059	Grade A
12	C540 Panattoni Park Coventry	Nuneaton & Bedworth	538,193	50,000	Grade A

# Symmetry Park Rugby Phase 2

Market Assessment and Review of Draft Local Plan



Ref	Building	Local Authority	Size (sq. ft)	Size (sq. m)	Comment
13	Hazel Way, Nuneaton	Nuneaton & Bedworth	152,449	14,162	Second hand
14	Nuneaton 230	Nuneaton & Bedworth	230,384	21,404	Refurbished
15	Unit 1 Redditch Gateway	Stratford on Avon	289,272	26,893	Grade A
<b>TOTAL</b>			<b>3,743,392</b>	<b>349,955</b>	

Source: Savills 2026

7.2.2 There are 15 buildings available or under construction within the sub-region, providing a total floorspace of c. 3.74 million sq. ft (349,955 sq. m). Of this total, eight buildings are available or under construction within Rugby Borough with a total floorspace of c. 1.97 million sq. ft (185,465 sq. m).

7.2.3 Less than half of the floorspace available or under construction is new Grade A space, with the majority being second-hand space. For example, 673,270 sq. ft (65,248 sq. m) of space at Rugby 673 which would be considered Grade C based on the building's age and specification and therefore not suitable to meet the demands of those occupiers seeking the highest specification, modern space. This building alone accounts for nearly 18% of the total available floorspace within the sub-region and 34% of the available floorspace in Rugby Borough.

7.2.4 The supply of buildings is likely to be less than stated if JD.com take Rugby251 on completion as planned.

## 7.3 Land Supply

7.3.1 We have analysed the supply of land with planning permission for B2 or B8 use which can accommodate a unit of 100,000 sq. ft (9,290 sq. m) plus, within the Coventry & Warwickshire PMA. As noted above, we have included sites of 2.3 ha or more within our assessment, and the results are set out at Table 7.2 below.

**Table 7.2 Supply of Land with Planning Permission**

Ref.	Name	Authority	Planning Reference	Remain- ing Land 100k sq. ft plus B2/B8 (ha)	B2/B8 Capacity 100k sq. ft plus (sq. m)	Comment
1	Rugby Radio Station	Rugby	R/11/6099	7.75	31,000	Outline planning granted May 2014 for a Sustainable Urban Extension - up to 31,000 sq. m B2/B8 (B8 limited to units of 5,000 sq. m or less)

# Symmetry Park Rugby Phase 2

Market Assessment and Review of Draft Local Plan



Ref.	Name	Authority	Planning Reference	Remaining Land 100k sq. ft plus B2/B8 (ha)	B2/B8 Capacity 100k sq. ft plus (sq. m)	Comment
2	Plot 4, Ansty Park	Rugby	R19/1540 R25/0912	3.33	15,302	Outline planning granted June 2021 and restricted to B1/B2 only. Recently submitted planning application for Plot 4 - proposes flexible B2/B8 (pending determination)
3	Padge Hall Farm, Hinckley (Land South of A5)	Rugby (cross boundary application)	R21/0985	20.15	80,610	Planning permission granted Dec 2023. Unit 1 (Syncreon) excluded.
4	A45 Eastern Green (Pickford Gate)	Coventry	OUT/2018/3 225 PL/2025/00 00257/RESM	2.77	11,078	Outline planning consent including 15ha employment (B1/B2/B8). Being brought forward as mid-box scheme. One plot proposed for larger unit included here.
5	South of Alcester Road (Stratford 46)	Stratford on Avon	19/01402/O UT	6.65	30,100	Mixed use commercial scheme. Area of B2/B8 plots included.
6	Land at Thickthorn, Kenilworth	Warwick	W/24/1536	8.00	22,000	Allocated for B1/B2. Hybrid planning app to include outline planning for employment (B2) granted Dec 2021. Reserved Matters submitted Nov 2024 for 22,000 sq. m B2 use - pending determination.
7	Land at Stratford Road, Warwick (Longbridge, Warwick )	Warwick	W/22/1077	8.78	40,000	Outline planning granted July 2024. E(g)iii, B2, B8.
8	Land in the vicinity of Coventry Airport - DS16 (Gateway South)	Warwick	W/18/0522 W/25/1215 W/22/0731	37.00	181,009	Major employment site of sub-regional significance. Remaining land.
9	Land to the south of Horiba MIRA Technology Park & Enterprise Zone	North Warwickshire	PAP/2022/0 423	39.30	213,500	Outline planning consent for B2, E(g), B8 granted Feb 2024. Parameter plan shows developable site area of 39.3 ha. B8 uses shall be ancillary or secondary. <b>[NB gross area is 59 ha - to be agreed which is used depending on calculation of shortfall].</b>

# Symmetry Park Rugby Phase 2

Market Assessment and Review of Draft Local Plan



Ref.	Name	Authority	Planning Reference	Remaining Land 100k sq. ft plus B2/B8 (ha)	B2/B8 Capacity 100k sq. ft plus (sq. m)	Comment
10	Bowling Green Lane (Exhall Interchange)	Nuneaton & Bedworth	39611	16.87	60,000	Outline planning granted Sept 2024 for development of up to 60,000 sq. m of B2/B8/E(g)(ii and iii) including ancillary E(g)(i).
<b>TOTAL</b>				<b>150.60</b>	<b>684,599</b>	

Source: Savills 2026

7.3.2 There is a total of c. **150.6 ha** of land across **10 sites** within the Coventry & Warwickshire PMA, with a total capacity of c. 684,599 sq.m (approximately 7.4m sq.ft). Of this total, 31.2ha of land across 3 sites is located within Rugby. However, these headline figures do not account for qualitative issues with the land supply whereby a significant proportion is limited in terms of permitted use and a particular shortage of large scale strategic sites.

7.3.3 Sites within the portfolio of land with planning permission which are subject to restrictions on use which prohibit B8 use:

- Land at Thickthorn (8.00 ha);
- Land to the South of Horiba MIRA (39.30 ha)
- Rugby Radio Station (7.75 ha) – B8 units are permitted but restricted to a maximum unit size of 53,819 sq. ft (5,000 sq. m).

7.3.4 The majority of sites are of a relatively small scale. The only site of strategic scale (generally considered to be a minimum of 25ha in line with the regional evidence base) capable of accommodating strategic B8 development is the remaining land at Gateway South in Warwick District.

7.3.5 Overall, taking into account the qualitative assessment, the supply of land with planning permission capable of accommodating strategic scale development is very constrained, with limited deliverable opportunities within short timeframes for strategic scale employment use. The situation is particularly constrained for the largest sites and in relation to strategic scale B8.

## 7.4 Pipeline Supply

7.4.1 We have also assessed the ‘pipeline’ supply of sites that benefit from an allocation but do not have planning permission. The assessment includes sites of 2.3ha or more, with an allocation for B2 or B8 use, consistent with the assessment of consented land supply above. Where possible we have based the floorspace capacity of each site on indicative proposals for the site, application documents, or specified floorspace limits within the relevant local plan policies. Where there is no information available, we have assumed a density of 40% based on the gross developable site area.

7.4.2 These sites are subject to varying degrees of risk around delivery and timescales.

7.4.3 A schedule of allocated sites (which do not benefit from planning permission) within the Coventry & Warwickshire PMA is set out at Table 7.3.

**Table 7.3: Pipeline Supply (Allocations)**

Ref	Site	Local Authority	B2/B8 100k sq. ft plus Ha (gross)	B2/B8 100k sq. ft plus Sq. M remaining	Comment
1	Land at Baginton Fields and South East of Whitley Business Park	Coventry	25.00	100,000	Within multiple ownerships. Local Wildlife Site and Flood Zone 3 areas will impact on net developable area of this site.
2	Land at Stratford Road, Warwick (Longbridge, Warwick)	Warwick	2.92	11,680	Remaining land in allocation which is outside planning permission boundary.
3	Land to the west of Birch Coppice, Dodon	North Warwickshire	5.10	17,850	Allotments on the site required to be replaced and relocated to alternative location north of the A5 prior to start of construction.
4	Coventry Road	Nuneaton & Bedworth	2.32*	9,290	Outline planning application submitted Nov 2023 for up to 23,000 square metres of flexible Class E(g)(iii), B2 and B8 floorspace, predominantly small and mid-box units due to site constraints. Awaiting determination.
<b>TOTAL:</b>			<b>35.34</b>	<b>138,820</b>	

\*assumed 40% plot density

Source: Savills 2026

7.4.4 There is a total of **4 allocated sites** (without planning permission) extending to c. **35.34 ha** with a total capacity of c. **138,820 sq. m (1.49 million sq. ft)** for units of 100,000 sq. ft (9,290 sq. m) plus. Nearly all of the sites are of a relatively small scale. Land at Baginton Fields, which is the only site of strategic scale, is within multiple ownerships which has so far prevented planning being progressed. Proposals for Coventry Road are predominantly for small and mid-box units with one unit of 100,000 sq. ft (9,290 sq. m) included within the planning application proposals.

7.4.5 Despite the constrained position highlighted in relation to deliverable sites with planning permission, there is therefore very little land coming through the planning pipeline to bolster the supply available to meet the needs of occupiers, particularly to accommodate strategic scale B2/B8 units.

## 7.5 Draft Allocations

7.5.1 In addition to the supply of land and buildings reviewed above, there are a number of

proposed draft allocations within the emerging Local Plans for Rugby Borough and South Warwickshire (Stratford on Avon and Warwick). *As noted previously, these draft allocations are subject to a much greater degree of planning and delivery risk given the early stage of the planning process.*

7.5.2 Those that are proposed for B2 or B8 development and have the potential to accommodate units of 100,000 sq. ft (9,290 sq. m) plus have been summarised below at **Table 7.4**. Please note that the Subject Site which is a proposed draft allocation has been excluded from the review below.

**Table 7.4 Draft Allocations**

Ref	Site	Local Authority	B2/B8 100k sq. ft plus Ha (gross)	B2/B8 100k sq. ft plus Sq. M remaining	Comment
1	Coton Park East	Rugby	34.97	111,000	Total site area and floorspace adjusted to take account of floorspace provision of 4,000 sq. m in smaller units of up to 1,500 sq. m for small and medium sized businesses.
2	North of Ansty Park	Rugby	21.20	75,000	To be restricted to B2, E(g)(ii) and E(g)(iii) with ancillary E(g)(i).
3	Crowner Fields Farm and Home Farm, Ansty	Rugby	0	0	Site area 112.18 ha with proposed capacity for c. 275,000 sq. m B2,B8,E(g) and c. 18,000 sq. m E(g)(i) office floorspace. No longer available – being delivered for Frasers Group HQ. <b>The site sits in the Green Belt.</b>
4	Land at Walsgrave Hill	Rugby	124.93	282,500	c. 290,000 sq. m floorspace for employment use including provision of 7,500 sq. m floorspace in small to medium size (removed from total which also excludes new park)
5	Land at Gaydon	Stratford on Avon	104.50	418,000	Proposed to be allocated for strategic B2 and small scale B8. Currently allocated specifically to meet JLR expansion needs.
6	Wedgnoek Farm	Warwick	141.00	564,000	Eg, B2, B8.
7	Land at Red House Farm	Warwick	121.00	484,000	Eg(iii), B2, B8. New motorway junction required. Deliverability constraints.
<b>TOTAL</b>			<b>547.60</b>	<b>1,934,500</b>	

Source: Savills 2026

7.5.3 There are seven draft allocations with a total site area of **547.60 ha**. Indicatively, these sites have the potential to provide up c. 20.8 million sq. ft (1.93 million sq. m) of strategic scale B2 / B8 floorspace. Land at Gaydon (104.5 ha) is proposed to be restricted to B2 in

relation to units of strategic scale (greater than 100,000 sq.ft), with only smaller scale B8 proposed. North of Ansty Park (21.20 ha) is also proposed to be restricted to B2 use.

7.5.4 The proposed supply of land which has the potential to accommodate strategic scale B8 units is therefore more constrained than the overall total suggests.

## 7.6 Supply Summary

7.6.1 Table 7.5 sets out the supply, broken down by local authority area.

Table 7.5: Supply Summary (100,000 sq.ft / 2.3 ha plus, I&L)

Local Authority	Buildings		Land with Planning Permission		Allocated Land			Savills Total Including Buildings
	sq. m	Ha (assume 40% density)	Ha	Sq. m	Ha	Sq. m	sq. m	ha
Rugby	185,465	46.37	31.23	126,912	-	-	312,377	77.60
Coventry	38,971	9.74	2.77	11,078	25.00	100,000	150,049	37.51
Stratford on Avon	26,893	6.72	6.65	30,100	-	-	56,993	13.37
Warwick	13,059	3.26	53.78	243,009	2.92	11,680	267,748	59.96
Nuneaton & Bedworth	85,566	21.39	16.87	60,000	2.32	9,290	154,856	40.58
North Warwickshire	-	-	39.30	213,500	5.10	17,850	231,350	44.40
<b>Total</b>	<b>349,955</b>	<b>87.49</b>	<b>150.60</b>	<b>684,599</b>	<b>35.34</b>	<b>138,820</b>	<b>1,173,374</b>	<b>273.43</b>

Source: Savills 2026

7.6.2 Key points are summarised below:

- There is a total of c. **273 ha** of supply of buildings and land with either a planning permission or allocation within the Coventry & Warwickshire sub-region which can accommodate a unit of 100,000 sq. ft (9,290 sq. m). Of which:
  - c. 55 ha is subject to restrictions which either prohibit or limit B8 use.
- c. **78 ha** of the total supply is within Rugby which one site Rugby Radio Station (7.75 ha) is restricted to B8 units below 5,000 sq. m. There is a further c. **548 ha** of land which is proposed to be allocated within the sub-region which has the potential to accommodate strategic scale B2/B8 development. Of which:
  - c. 126 ha is subject to restrictions which either prohibit or limit B8 use.

7.6.3 c. 181 ha is proposed to be allocated within Rugby Borough (excluding the Subject Site). Of which one site North of Ansty Park (21.20 ha) is restricted to B2 / E(g) uses. Therefore, supply within Rugby Borough comprises the following:

- *Buildings*: 185,465 sq. m of floorspace equating to approximately **46.37 ha** of land at 40% density.

- *Land with Planning Permission: c. 31.23 ha*
- *Proposed Allocations with available land and without planning permission: c. 181 ha*

7.6.4 On a qualitative basis, supply is particularly constrained in relation to deliverable strategic scale opportunities for B8 use, with most of the land portfolio being smaller scale sites and a number restricted to B2 use. The actual supply of deliverable land to meet occupier requirements, particularly in the case of the larger strategic scale B8 units and especially over the shorter term, is therefore very limited.

## 8 Balance of Supply and Demand

### Introduction and Key Conclusions

#### Section Aim

- This section analyses the balance of supply and demand. It provides an estimate of the amount of supply available to meet current demand as well as anticipated demand. It concludes that extending the Subject Site to its original full allocation would help ensure that the council can meet its full objectively assessed need. If Rugby Symmetry Park Phase 2 is fully extended, then the gap between supply and demand is reduced substantially.

#### Key Conclusions

- For the reasons set out in this report we consider that the council's evidence base has underestimated demand. Savills estimate presents a case which suggests the need for additional allocations. This adds further justification to the case for extending the amount of development on the Subject Site to the original 130,000 sq.m.
- Our conclusion based on evidence is that there is a strong case for Rugby to allocate the Subject Site to its fullest extent.

### 8.1 Supply Compared with Demand

- 8.1.1 Based on the Savills suppressed demand methodology, over a 17-year period we estimate demand of 727ha for strategic I&L land across the PMA. If demand is apportioned to Rugby, we estimate demand to be 230ha for strategic I&L land over the same time period.
- 8.1.2 A summary of our assessments of demand and supply for strategic I&L premises (greater than 100,000 sq.ft) in the PMA is presented in **Table 8.1**. Demand in the PMA is about 727ha. Supply is initially comprised of sites with planning permission and sites allocated in local plans and sums to about 186ha. This leaves a deficit in the PMA for strategic I&L land of about 540ha.
- 8.1.3 There are about 548ha of draft site allocations (excluding the Subject Site) across the six local authorities in the FEMA. As stated in the preceding section, we do not place a high degree of certainty to their delivery because they may not be ultimately adopted. Even if they are adopted, they may not be commercially attractive or suitable and may not be brought forward. Therefore there is a case for ensuring there is additional capacity to meet the need for strategic premises.
- 8.1.4 Based on Savills experience, there is a need for a buffer or contingency that ensures there is (1) sufficient supply flexibility and (2) to address the risk that not all sites will come forward. Therefore we conservatively discount the draft allocations by 20%. We also justify this discount because of (3) the need for there to be capacity at the end of the plan period so that the demand that extends beyond the plan period can be suitably accommodated without having to wait for new allocations to be adopted in future local

plan reviews (where there is inherent uncertainty on timescales given local government reorganisation).

- 8.1.5 Another caveat to the supply picture in the PMA in particular is that many of the sites with permissions have restrictions on their use class or the size of the permissible units. Therefore, even if a site is theoretically large enough to accommodate a large premises (greater than 100,000 sq.ft), the permission may restrict it. The site-by-site details about site limitations are set out in the preceding supply section.
- 8.1.6 **Table 8.1** demonstrates that without additional sites being allocated, there is a high likelihood that the PMA risks a supply shortfall for strategic I&L land. It shows that there is a high degree of uncertainty around the FEMA’s capacity to meet its strategic demand. Once the 20% discount is applied to the draft allocations, we estimate there is a deficit of about 103ha. If the Subject Site’s full capacity of 130,000 sq.m (40.7ha), as set out in the early version of the emerging local plan, it would meaningfully contribute to addressing this deficit in a highly sustainable and proven commercial location.

**Table 8.1 C&W PMA Balance of Demand and Supply for Strategic I&L Use Over 17-Year Period**

Demand/Supply	ha
Savills assessment of I&L demand (ha)	(727.1)
Savills review of supply of I&L land (ha)	
<i>Sites with planning permission</i>	150.6
<i>Sites allocated but without planning permission</i>	35.3
Total supply	185.9
<b>Balance of demand vs supply (ha)</b>	<b>(541.2)</b>
Symmetry Park Rugby Phase 2 (Subject Site)	40.7
Savills review of supply of I&L land (ha)	
<i>Other draft allocation sites<sup>6</sup> (547.6ha discounted by 20%)</i>	438.1
<b>Balance of demand vs supply (ha)</b>	<b>(62.4)</b>

Source: Savills 2026

- 8.1.7 A summary of demand and supply for strategic I&L in Rugby is presented in **Table 8.2**. The approach is identical to the analysis on the PMA level and draws on demand and supply analysis in preceding sections.

<sup>6</sup> Not including the Subject Site, which is listed separately.

**Table 8.2 Rugby Balance of Demand and Supply for Strategic I&L Use Over 17-Year Period**

Demand/Supply	ha
Savills assessment of I&L demand (ha)	(230.4)
Savills review of supply of I&L land (ha)	
<i>Sites with planning permission</i>	31.2
<i>Sites allocated but without planning permission</i>	0
Total supply	31.2
<b>Balance of demand vs supply (ha)</b>	<b>(199.2)</b>
Symmetry Park Rugby Phase 2 (Subject Site)	40.7
Savills review of supply of I&L land (ha)	
<i>Other draft allocation sites<sup>7</sup> (181.1ha discounted by 20%)</i>	144.9
<b>Balance of demand vs supply (ha)</b>	<b>(13.6)</b>

Source: Savills 2026

- 8.1.8 The table shows that Rugby has an overall deficit of about 54ha and is therefore at risk of a supply shortfall unless additional allocations in Rugby are made. Even if the draft allocations are adopted as well as the Subject Site, there is still a risk of a deficit. However, it would significantly reduce it.
- 8.1.9 Given the wider context of the PMA and the attractive characteristics of the Proposed Development site, there is a compelling case for allocating some of the wider demand to Symmetry Park Rugby Phase 2 – a proven commercial location, in a highly sustainable location outside of the Green Belt.
- 8.1.10 In summary, the current supply of permitted sites and allocations is insufficient to ensure that demand for strategic I&L premises is met. There are a range of draft allocations that could meaningfully contribute towards the deficit although there is a degree of uncertainty about their deliverability, their commercial attractiveness, and whether they are available to meet particular needs given that a number of the sites have restrictions as to the use and size of units. Therefore we have conservatively applied a 20% discount to them based on Savills experience.
- 8.1.11 The Proposed Development is on a site of about 40.7ha with a floorspace capacity of about 1.3m sq.ft. There is considerable need for the Subject Site as originally intended.

<sup>7</sup> Not including the Subject Site, which is listed separately.

## 9 Summary and Recommendations

- 9.1.1 Both Rugby and the wider Coventry and Warwickshire PMA have been supply constrained for most of the past decade. This has resulted in strong rental growth as occupiers have had to compete with one another for limited available stock which has pushed up rents. Additionally, this has suppressed demand as new space was not available for occupiers to meet their needs.
- 9.1.2 Rugby and the Subject Site in particular is one of the premier I&L locations in the country and are attractive locations for I&L investment. However, the insufficient level of new supply compared to strong demand is limiting the council's ability to fully benefit from the I&L sector's growth and from capturing other economic benefits like jobs across a diverse range of professions. The Proposed Development will help to meet the needs of the sector in a prime location.
- 9.1.3 We have reviewed local employment evidence. Our assessment is that the selected methods have not adequately taken account of market drivers which we estimate has led to an underestimation of market demand for I&L uses in the PMAs. We have also identified a range of concerns we have about the evidence base.
- 9.1.4 Rugby and C&W I&L markets are supply constrained, as indicated by historically low levels of availability, high demand, and strong rental growth.
- 9.1.5 Our approach to estimating future demand is designed to assess the impact historic supply constraints have had on suppressing demand. Our methodology is NPPG-compliant as it builds upon historic demand (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as suppressed demand which is added to the historic demand trend as a top-up.
- 9.1.6 Based on our demand methodology, over a 17-year period (consistent with the January 2026 Reg 19 local plan), we estimate PMA-wide I&L demand to be 727 ha of land (for 100k+ sq.ft premises). This is more than the estimate based on the 2022 HEDNA which is a prorated 468ha over the same time period.
- 9.1.7 If demand is apportioned to Rugby based on past take-up distribution this results in a total requirement for 305ha of land for I&L uses over the same 17-year period (for premises of all sizes). For strategic premises, the requirement is for 230ha.
- 9.1.8 Our assessment of supply and then the balance of demand and supply, in sections 7 and 8 respectively, indicate that there is a need for the entirety of the Subject Site, as originally favoured by the council. Much of the supply has restrictions or limitations that prevent them from accommodating strategic I&L premises, even if they are large enough in absolute terms. These are set out in section 7. The balance of demand and supply shows that there is highly likely to be a deficit in that there is insufficient supply to meet demand. Given this, there is a need for a supply buffer or contingency. The Subject Site could contribute towards the deficit and the need for a buffer.
- 9.1.9 Our conclusion is that there is a strong case for Rugby to allocate the Subject Site to its

## Symmetry Park Rugby Phase 2

Market Assessment and Review of Draft Local Plan

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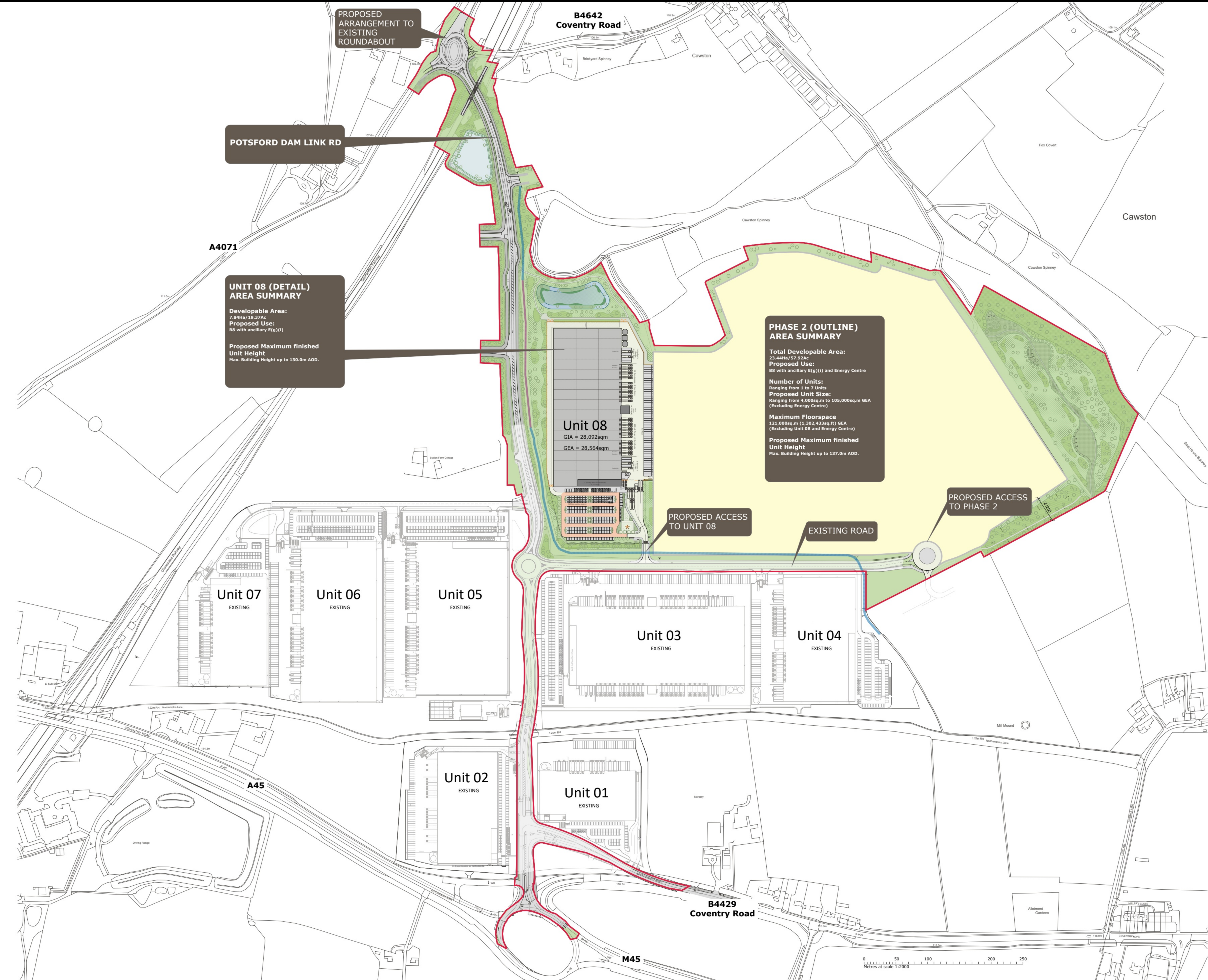


full capacity on the basis of the employment land evidence base. The Subject Site is not located within the Green Belt, and is well placed in terms of its connection to the national motorway and trunk road network, which is a strong factor in its favour in terms of occupier requirements. If approved, the Subject Site would become one of the largest sources of continued new supply of strategic land in Rugby, located in one of the best locations in the wider sub-region, and would cater for a diverse range of occupiers with local, regional, and national supply chains building on the success of the Phase 1 scheme and the significant inward investment to the Borough that it has delivered.



**Appendix 3 Illustrative Masterplan and Parameters Plan accompanying planning application reference R25/0896**

Rev	Date	Iss By	App By	Description
P06	28.06.24	MMS		Drawing scale revised
P07	04.07.24			Areas added/updated
P08	12.07.24	MC		Drawing updated to include comments
P09	19.07.24	MC		Roundabouts to north and east updated. Northern road and Unit 08 updated. Existing notes updated and new ones added. Diverted watercourse shown. Site boundary line and areas updated.
P10	25.07.24	MC		Watercourse - extended, notes updated as per Sinteric comments.
P11	13.08.24	HA		Drawing updated following review.
P12	23.08.24	HA		Drawing updated following TSI review.
P13	29.08.24	HA		Drawing amended.
P14	11.09.24	HA		Updates to plan to Frampston's planning comments.
P15	19.09.24	HA		Drawing updated. GEs added.
P16	01.10.24	HA		Phase 2 outline developable area updated. Title tags updated.
P17	20.01.25	HA		Drawing updated. Site boundary amended. Existing and Proposed Public Rights of Way added.
P18	07.03.25	HA		PH09 and footpath location updated.
P19	12.03.25	HA		Red Line boundary updated. Pottford Dam Link Pond amended.
P20	05.06.25	HA		Drawing Status changed to Planning.
P21	19.06.25	HA		Phase 2 (Outline) Area and red line amended. Landscaping proposal amended and drawing updated.



**UNIT 08 (DETAIL) AREA SUMMARY**

Developable Area: 7.84Ha/19.37Ac  
 Proposed Use: B8 with ancillary E(g)(l)  
 Proposed Maximum finished Unit Height: Max. Building Height up to 130.0m AOD.

**PHASE 2 (OUTLINE) AREA SUMMARY**

Total Developable Area: 23.44Ha/57.92Ac  
 Proposed Use: B8 with ancillary E(g)(l) and Energy Centre  
 Number of Units: Ranging from 1 to 7 Units  
 Proposed Unit Size: Ranging from 4,200sq.m to 105,000sq.m GEA (Excluding Energy Centre)  
 Maximum Floorspace: 121,600sq.m (1,392,433sq.ft) GEA (Excluding Unit 08 and Energy Centre)  
 Proposed Maximum finished Unit Height: Max. Building Height up to 137.0m AOD.

**Unit 08**  
 GIA = 28,092sqm  
 GEA = 28,564sqm

**Unit 07**  
 EXISTING

**Unit 06**  
 EXISTING

**Unit 05**  
 EXISTING

**Unit 03**  
 EXISTING

**Unit 04**  
 EXISTING

**Unit 02**  
 EXISTING

**Unit 01**  
 EXISTING



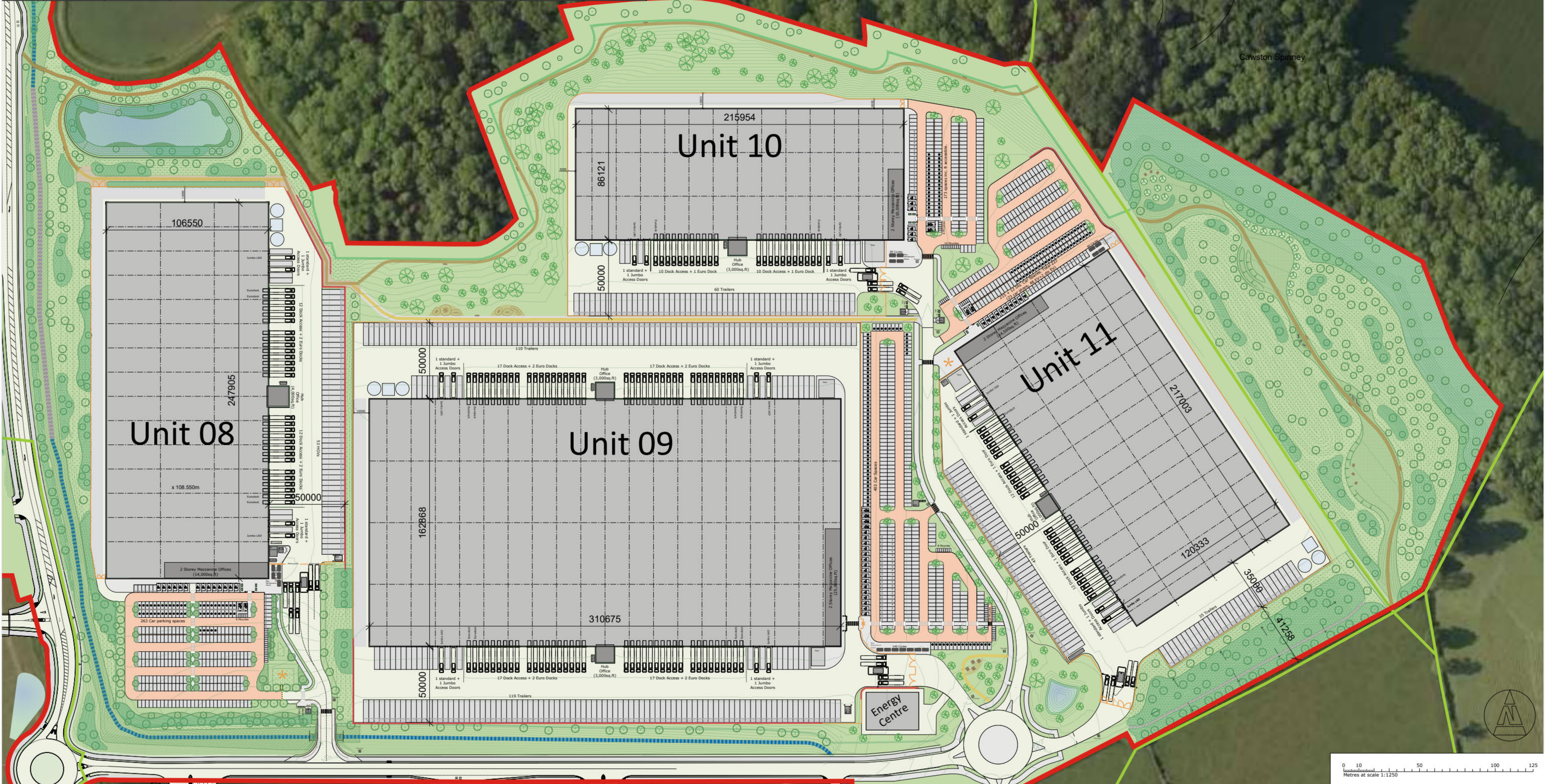
- Legend**
- Application Site Boundary
  - Development Zone: Includes all elements related to individual development plots, including buildings, hardstanding, parking, landscaping, bunding and storm water attenuation.
  - Green Strategic Landscaping - bunds and planting.
  - Existing development
  - Watercourse - Existing
  - Watercourse Diversion

Rev	Date	By	Description
Q	28.01.25	HA	Site plan updated to incorporate Country Park. Energy centre relocated.
R	17.02.25	HA	Unit 11 layout and net site area amended.
S	03.03.25	HA	Plan updated to reflect revised contours and levels.
T	16.06.25	HA	Landscaping updated. Landscaping, plant compounds, net areas and red line updated.

**Schedule of Accommodation**

(unit areas are Gross Internal)

Unit	Distribution	Main Office	Hub Office	Gatehouse	Total GIA	Total GEA	Car Parking	Trailer Spaces	Cycle Spaces	Net Site Area
Unit 08	284,012sq.ft	14,129sq.ft	4,015sq.ft	224sq.ft	302,380sq.ft	307,460sq.ft	265	61	100	13.16 Acres
	26,385.6sq.m	1,312.6sq.m	373.0sq.m	20.8sq.m	28,092.0sq.m	28,564.0sq.m				5.33 Hectares
Unit 09	544,644sq.ft	25,000sq.ft	6,000sq.ft	224sq.ft	575,868sq.ft	586,030sq.ft	403	226	140	24.90 Acres
	50,599.1sq.m	2,322.6sq.m	557.4sq.m	20.8sq.m	53,499.9sq.m	54,444.0sq.m				10.08 Hectares
Unit 10	200,190sq.ft	10,000sq.ft	3,000sq.ft	224sq.ft	213,414sq.ft	216,806sq.ft	173	60	80	9.39 Acres
	18,598.3sq.m	929.0sq.m	278.7sq.m	20.8sq.m	19,826.8sq.m	20,142.0sq.m				3.80 Hectares
Unit 11	281,073sq.ft	14,500sq.ft	3,000sq.ft	224sq.ft	298,797sq.ft	303,875sq.ft	227	78	80	12.71 Acres
	26,112.5sq.m	1,347.1sq.m	278.7sq.m	20.8sq.m	27,759.1sq.m	28,231.0sq.m				5.14 Hectares



**Appendix 4    Warwickshire County Council – Ecology consultation response dated  
01/12/2025**



**CONSULTATION RESPONSE FROM WARWICKSHIRE COUNTY COUNCIL: ECOLOGY**

<b>DISTRICT OR BOROUGH</b>	Rugby Borough Council
<b>APPLICATION NUMBER</b>	R25/0896
<b>ADDRESS</b>	Land To The North Of Symmetry Park, Western Link, Rugby
<b>PROPOSAL</b>	<p>Hybrid planning application comprising:</p> <ul style="list-style-type: none"> <li>- Full planning application for the erection of one Use Class B8 (Warehousing and Distribution) unit, with ancillary Use E(G)(i) (offices) with associated infrastructure including vehicle parking and service areas (including lorry parking), sustainable drainage provision, gate house, sprinkler tanks, pump houses, gas and electricity substations. Earthworks and plateauing of the wider development site including the formation of bunds. Completion of the Sustainable Transport Corridor connection to adjacent land to the east and the creation of the Potsford Dam link to the A4701 roundabout including associated landscaping and infrastructure, bridge to Cawston Greenway and the creation of the Cawston Landscape Park.</li> <li>- Outline planning application for Use Class B8 (Warehousing and Distribution) units with ancillary Use Class (G)(i) (offices) with associated site infrastructure including vehicle parking and service areas (including lorry parking), energy centre, landscaping, sustainable drainage system. All matters reserved expect means of access.</li> </ul>
<b>PLANNING CASE OFFICER</b>	Karen McCulloch
<b>DEPARTMENT</b>	ECOLOGY
<b>ECOLOGY OFFICER</b>	Jane Harrison, Ecologist
<b>DATE COMMENTS SENT</b>	01/12/2025
<b>RESPONSE:</b>	
No comment	<input type="checkbox"/>
Objection	<input checked="" type="checkbox"/>
Deferral/refusal	<input type="checkbox"/>

<b>Further information required</b>	
<b>Conditions</b>	
<b>Advice Notes</b>	
<b>REASON FOR RECOMMENDATION:</b>	
<p><b>Summary of reasons for objection</b></p> <p>The GI and BI objectives as shown in SW Rugby SPD (2024) paragraph 13.8 are not met.</p> <p>Soft landscaping proposals for the Potsford Dam spine road do not allow hop overs for bats, with trees not large enough to span the road, as shown in the example Figure 7 of the SPD.</p> <p>The proposed culverting of 19.5m of the Avon tributary closes the watercourse, which is currently open. The use of culverts, even with a mammal shelf included, represents a barrier to bats and other mammals that use the watercourse. This otter that has been recorded on the reservoir. It greatly decreases watercourse value for all species and may lead to road casualties. It should be clarified why there is a need to culvert, rather than bridge. A culverted watercourse does not allow open connectivity through the site and maintain links between LWS Rugby to Leamington Disused Railway and Cock Robin Wood as laid out in the SPD.</p> <p>Cumulative effects do not appear to be assessed. This is important for badger populations in particular.</p> <p><b>Habitat/Biodiversity Net Gain (BNG)</b></p> <p>A 10% mandatory biodiversity net gain is required for this application. A Defra Statutory Biodiversity metric submitted shows a habitat area gain of 13.30 units (12.58%), hedgerow unit gain of 3.76 units (31.32%) and watercourse unit loss of 0.50 units (4.49%).</p> <p><b>Comments</b></p> <p>Loss of other neutral grassland, modified grassland, mixed scrub, bramble scrub, broadleaved woodland, individual trees and cereal cropland.</p> <p>No existing habitat will be retained and enhanced according to the metric.</p> <p>Onsite habitat creation consists of introduced shrub, other neutral grassland, mixed scrub, modified grassland, SuDS, broadleaved woodland and individual trees.</p> <p>Nine compartments of offsite woodland (Cawston Woodlands) will be enhanced from moderate to good condition, with one compartment proposed poor to moderate.</p> <p>To protect Cawston Woodlands a 15m woodland buffer is proposed. This must be fenced off with appropriate signage included to ensure no encroachment. A plan showing the location of the fence must be included in the CEMP. From this boundary it will be necessary to clarify is the northeast corner of Unit 8 is outside of the 15m Ancient Woodland Site (AWS) buffer.</p> <p>Regarding hedgerows; H1, H3, H4 and H5 will be lost. H2 and H9 will be partially lost. H6 and H7 will be fully retained with no enhancement. 2.12 km species rich native hedgerow will be created. Why will 1.702km be native but not also species rich whilst there is the opportunity to plant many species.</p>	

An increase in watercourse units appears to be achievable through reducing encroachment levels. However, this culverting of watercourses should be seen as a last resort (e.g. bridge over S1 (Avon tributary)).

Once BNG is agreed the deemed condition mandated by the Environment Act 2021 will apply, and the Decision Notice should include relevant wording to that effect. To support discharge of the deemed condition, a completed [Biodiversity Gain Plan \(BGP\)](#), a Habitat Management and Monitoring Plan (HMMP), including a detailed proposed habitat/landscape plan and corresponding Defra metric must be submitted to the LPA. A separate condition for a HMMP is recommended to ensure enactment of the HMMP.

## **Protected species**

Surveys have been carried out over several years from 2014 to 2022 and update surveys during 2024. Table EDP 1.1: Summary of Surveys Undertaken 2014 – 2022 is very helpful.

### **Birds**

Noted as a potential constraint in trees, vegetation and in arable fields. Notable species recorded include farmland species skylark F2 and F3, yellowhammer and linnet.

F2 and F3 will be lost to facilitate the development. Compensation for the loss of skylark habitat will be required.

### **Bats**

Roosts - No buildings were on the site. No surveys needed.

Three trees were identified as having features during a ground level assessment. Following an aerial inspection only T3 was found to have suitable roosting features, and these were PRF-I or suitable for individual bats, rather than more than one or maternity and/or hibernation roosts.

Commuting and foraging - Higher levels of activity were concentrated around the woodland habitat to the north and Potsford Dam irrigation lake (pond P1). Most passes were common species, including pipistrelle species and myotis species.

Free movement of this species from Potsford Lake and Cawston Woodlands into the wider landscape could be impeded by lack of suitable mature trees and vegetation along the spine road.

### **Dormouse**

No records were returned for his species and a survey undertaken in 2024 found no evidence of dormice.

### **Otter**

Two records of this species within the site in 2025 and 2017. No signs of otter were recorded during update surveys in 2024.

Otters may be occasionally using the site for access to P1, Potsford Dam irrigation lake and commuting routes associated with River Avon. They may also be using the ancient woodland.

The link road will include a bridge over the Avon tributary. A mammal shelf is included in the culvert, however, the use of culverting reduces the attraction of the watercourse for this species and increases the likelihood for road casualties. It is strongly recommended that a bridge is considered coupled with robust measures to avoid harm to otters and other riparian species. These measures will need to be included within a CEMP.

#### **Water Vole**

One record from 2002 northeast of the site is held by WBRC.

No signs were observed during previous surveys, nor during a 2024 update. No constraints are expected for this species.

#### **Badger**

Recent site surveys were undertaken in 2024 and 2025 following a series of surveys between 2017 to 2022. No signs of badger were found across the site.

The wider site will be in a state of transition, and this may especially include dispersal of this species. It is important to be aware of this and remain vigilant. Pre-checks should be undertaken as well as scheduled walkover surveys during clearance and construction phases of the development. Cumulative effects do not appear to be assessed. This is particularly important for badger populations associated within the woodland.

Reasonable avoidance measures outlined in the mitigation strategy should be included in a CEMP.

#### **Reptiles**

Grass snake was recorded within the wider site in 2021. Two were recorded along south edge of Cawston Spinney close to Ditch 1 (D1). Surveys concluded a small population of grass snake were present on the site.

Ecological supervision of site clearance is recommended and the methodology outlined in the Mitigation Strategy should be included in a CEMP with appropriate management of the ancient woodland buffer to be incorporated into the HMMP.

#### **Great crested newt (GCN) and amphibians**

No ponds were present within the site. Potsford Dam irrigation lake was adjacent to the site boundary to the north. Traditional bottle trapping and eDNA surveys were undertaken and negative results for GCN were returned. The lake is largely unsuitable due to presence of fish and waterfowl.

Sensitive clearance for reptiles, which will be included in a CEMP, will include appropriate measures for amphibians, including GCN. Should any newts be encountered, all work must stop whilst ecological advice is sought. A Natural England Licence may be needed if more than one GCN is found.

#### **Bloody-nosed beetle**

Three surveys found this species, a Warwickshire Local Biodiversity Action Plan (LBAP) Priority Species in several locations outside the red line and two within the application site boundary in 2021, adult beetle, and 2024, larval stage.

Most boundary vegetation will be retained, but internal hedgerows, H3, H4 and H5 will be removed to accommodate the proposed units. Boundary vegetation will be fenced off as part of the retention.

Hedgerows will be buffered during construction (not H 3-6). Fencing locations with appropriate signage must be shown in the CEMP together with responsibilities for initial and regular checks.

**FURTHER INFORMATION REQUIRED:**

- Clarification on use of culvert, rather than bridge.
- Evaluation of cumulative effects, particularly for badger

**AMENDMENTS RECOMMENDED:**

- Replicate lines of blue and green infrastructure connectivity in accordance with agreed SW Rugby SPD.

**DOCUMENTS REVIEWED:**

- As standard, WCC Ecology reviews aerial photography, consults Warwickshire Biological Record Centre (WBRC) and Habitat Biodiversity Audit (HBA) Phase 1 data.
- PHASE 2 ILLUSTRATIVE MASTERPLAN
- WATERCOURSE CULVERT, T\_22\_2608-CIV-SK-0102 P1
- Appendix A.10 Phasing Plan
- ES Vol 2 Appendix D.2 Biodiversity Net Gain Assessment Part 4 (Illustrative Landscape Strategy - Sheet 1 of 3)
- ES Vol 2 Appendix D.2 Biodiversity Net Gain Assessment Part 5 (Illustrative Landscape Strategy - Sheet 2 of 3)
- ES Vol 2 Appendix D.2 Biodiversity Net Gain Assessment Part 6 (Illustrative Landscape Strategy - Sheet 3 of 3)
- ES Vol 2 Appendix D.2 Biodiversity Net Gain Assessment Part 7
- Statutory Biodiversity Metric v3.1, J. Snow, June 2026 (sic)
- ES Vol 2 Appendix D.4 Landscape and Ecological Management Plan Unit 8 Part 1
- ES Vol 2 Appendix D.4 Landscape and Ecological Management Plan Unit 8 Part 2
- ES Vol 2 Appendix D.4 Landscape and Ecological Management Plan Unit 8 Part 3
- ES Vol 2 Appendix D.4 Landscape and Ecological Management Plan Unit 8 Part 4
- ES\_Vol\_2\_Appendix\_D\_v1\_Redacted, Technical Appendix D.1 Ecological Baseline Report
- ES Vol 2 Appendix D.5 Protected Species Mitigation Strategy
- ES Vol 2 Appendix D.3 Woodland Management Plans

**RECOMMENDED CONDITIONS TO BE APPLIED:**

- TBC

**RECOMMENDED ADVICE NOTES TO BE APPLIED:**

- TBC

**RECOMMENDED SECTION 106 REQUIREMENT (standard clause, contribution amount, trigger for payment)**

- Biodiversity Net Gain to secure monitoring fees
- Skylark compensation – to compensate for a section 41 Priority Species

**DISCHARGE OF CONDITIONS ONLY:**

(Please confirm which condition(s) is/are being discharged)

- N/A

**Note for applicants: Please be aware that this specialist advice is provided to the Local Planning Authority through a Service Level Agreement with Warwickshire County Council. If you have any**

queries about the content of this document, please correspond **directly with the Planning Officer** dealing with the planning application or discharge of condition application. We are unable to respond directly to applicant enquiries regarding the advice that we have provided as part of this service.

Warwickshire County Council also offers a **chargeable support service for applicants** and information can be found about this service here:

<https://www.warwickshire.gov.uk/sdcecologypreapp>

The following legislation is used to assist in the assessment of planning applications:

(edit as appropriate):

Legislation source	Reference
NPPF Dec 2024	Paras 8, 187, 188, 192, 193, 194, 195
Environment Act 2021	Mandatory net gain Biodiversity Duty Local Nature Recovery Plan
District or Borough Local Plan and supporting SPD's	Local Plan policy reference: Rugby Borough Council Local Plan 2011-2031 (2019) Policy NE1 Protecting Designated Biodiversity and Geodiversity Assets Policy NE2: Strategic Green and Blue Infrastructure
ODPM circular 06/2005: Biodiversity and Geological Conservation	Requirement for species survey work to be carried out prior to the determination of a planning application. Paras. 98 and 99
NERC Act 2006	Biodiversity Duty (see also Environment Act 2021) Section 41, habitats and species of Principal Importance (previously BAP)
Various International, European and National laws in relation to the protection of species and habitats	International and national site protection: Ramsar sites (from Ramsar Convention), Habitat and Birds Directives (Natura 2000 sites include SAC's and SPA's), SSSI's, National Nature Reserves, Local Wildlife Sites, Local Nature Reserves.  Habitats and Species protection: Habitat and Species Regulations (protected sites and species). Wildlife and Countryside Act 1981 (as amended including special Schedule 1), Natural England Standing Advice. Badger Act.

**Appendix 5 Representations in respect of Landscape circumstances, prepared by EDP**



**Symmetry Park, Rugby:  
Phase 2**

**Representations in  
Respect of Landscape  
Circumstances**

Prepared by:  
**The Environmental Dimension  
Partnership Ltd**

On behalf of:  
**Tritax Big Box**

March 2026

Report Reference  
**edp7232\_r022b**

## Document Control

### DOCUMENT INFORMATION

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## **Contents**

Section 1	Introduction .....	4
Section 2	Published Documentation Review .....	8
Section 3	LSA Review .....	14
Section 4	Conclusions .....	24

## **Section 1**

### **Introduction**

#### **INTRODUCTION AND KEY CONCLUSIONS**

- 1.1 This paper in respect of Landscape and Visual circumstances has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Tritax Big Box Developments (TBBD) and provides a review of 'The area of South West Rugby, Landscape Sensitivity Assessment' (LSA) undertaken by Node on behalf of Rugby Borough Council (RBC) in January 2026, and previous landscape studies of this area.
- 1.2 EDP is an independent environmental planning consultancy with offices in Cirencester, Cardiff and Cheltenham. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website ([www.edp-uk.co.uk](http://www.edp-uk.co.uk)). EDP is a Registered Practice of the Landscape Institute<sup>1</sup> specialising in the assessment of the effects of proposed development on the landscape.

#### **KEY FINDINGS OF EDP'S LSA REVIEW**

- 1.3 The Site does not lie within, or contain, any nationally or locally designated landscapes and it does not represent, in a perceptual or physical sense, a landscape of any great importance or distinct character. Though there are features of higher value within the local context most notably Cawston Spinney, EDP consider the value and susceptibility of the Site itself, to be low, leading to an overall low sensitivity.
- 1.4 It is clear that, overall, while Cawston Spinney itself provides a strong contribution to landscape value, there is limited evidence provided as to why land beyond the woodland edge to the south, is considered to meet the same criteria. Though the LSA acknowledges that there may be areas of higher landscape value adjacent to the woodland edge, there is little evidence provided as to why this judgement of landscape value should extend as far as the boundaries of the defined character area, where land is privately owned arable land with strong visual associations with adjacent logistics built form. While EDP would agree with the general narrative within the conclusions of the LSA, the judgements of overall sensitivity, and in particular the defined areas of sensitivity, are unclear.
- 1.5 Sensitivity boundaries appear to correspond closely with safeguarded land extents and development typologies which were determined prior to the publication of the LSA. While such alignment is not inherently inappropriate, there is limited evidence within the LSA to demonstrate that these boundaries are independently derived from landscape character analysis rather than reflecting allocation geometry or policy-defined edges. Where assessment units mirror planning boundaries without clear landscape justification, there is a risk that the sensitivity framework may be influenced, or perceived to be influenced, by policy structuring rather than intrinsic landscape characteristics.

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<sup>1</sup> LI Practice Number 1010.

- 1.6 It appears that the reduction in the quantum of floorspace within the Site allocation was set out prior to the issue of the LSA, and there is no evidence which justifies the shape, size and capacity of the indicative development area.

## POLICY BACKGROUND

- 1.7 The Site is located at Ordnance Survey Grid Reference (OSGR) SP 46869 72326 and lies within the administrative boundary of Rugby Borough Council. The Site is covered by policy DS8 in RBC's adopted Local Plan (2019), which allocates the south-west Rugby Site for around 35ha (gross) of B8 (storage and distribution) employment land (Policies DS3, DS4, DS8 and DS9) and 5,000 dwellings and identifies the site as 'Safeguarded Land'.
- 1.8 The Site is also a draft allocation for employment use in the RBC Local Plan Preferred Option Consultation Document which was published for consultation in March 2025, identifying the Site as 'Site ID 17' : 'South West Rugby employment phase 2'. An extract of Rugby's Preferred Option Consultation Document is provided below at **Image EDP 1.1**.




**Image EDP 1.1:** Extract from Rugby's Preferred Option Consultation Document with the Site shown as South West Rugby employment phase 2.

- 1.9 More recently, the allocation of the Site (as illustrated below at **Image EDP 1.2**) was presented within RBC Local Plan 2025-2042 Regulation 19 Consultation at the Council's Cabinet meeting on 06 January 2026 (see Agenda Item 5<sup>2</sup>). Importantly, though the 'indicative built development area' has been reduced within the Regulation 19 plan, this

<sup>2</sup><https://www.rugby.gov.uk/documents/20124/60878026/PUBLIC+AGENDA+Cabinet+6+January+2026.pdf/71fbaec1-180b-9e4a-9579-b221a6001060?version=1.0&t=1766162451071>

reduction predated the first draft issue of the LSA (the LSA was first issued in draft 10 days later on 16 January 2026).

<b>Site ID:</b> 17	<b>Site name:</b> South West Rugby employment phase 2
<b>Site area:</b> 40.70ha	<b>Allocation:</b> circa 60,000m <sup>2</sup> of floorspace for employment use
<p><b>Development requirements:</b></p> <ul style="list-style-type: none"> <li>• Creation of a wooded circa 23ha publicly accessible country park alongside Cawston Spinney to include footpaths linking to existing routes and providing east-west connectivity along the northern site boundary.</li> <li>• Provision of overnight lorry parking facilities sufficient to cater for the anticipated use of the units.</li> <li>• Provision of tree lining to the Potsford Dam Link and Sustainable Transport Corridor.</li> <li>• To accord with the South West Rugby Design Code SPD.</li> <li>• Contributions to the strategic infrastructure costs identified in Appendix K of the South West Rugby Masterplan SPD.</li> <li>• The existing Public Rights of Way (PROW) must be maintained, and the design of the development must ensure they are pleasant to use. Wherever possible PROW should be routed through public open space, be segregated from roads, and be well overlooked. PROW should be maintained on their existing lines, with diversions only occurring where this is not practicable. PROW should be accessible to as many people as possible, including those who are disabled or less mobile.</li> <li>• Pedestrian and cycle network improvements identified in Appendix K of the South West Rugby Masterplan SPD.</li> </ul>	
 <p>The map shows the site allocation (red outline) and an indicative built development area (dotted line). It includes labels for 'Cawston Spinney', 'Potsford Dam Link', 'Sustainable transport corridor', and 'Existing employment development'. A legend on the right defines symbols for allocation site, built development area, trees, PROW, and public open space. A scale bar at the bottom right indicates 0, 100, and 200 meters.</p>	

**Image EDP 1.2:** Extract from Rugby Borough Council Proposed Submission Local Plan Consultation (Regulation 19) considered by the Cabinet on 06 January 2026.

1.10 It appears that the reduction in the quantum of floorspace within the Site allocation was set out prior to the issue of the LSA, and that the “*indicative development area*” shown in the Annex: Development Site Allocations to the Plan (**Image EDP 1.2**) is not evidence-led as it does not follow the conclusions of the LSA. This is supported by the reference within the Stage 2 Site Options Assessment (December 2025) which states that (with EDP emphasis) “*Mitigations proposed in the illustrative masterplan include management and retention of mature hedgerows and trees, new areas of shrubs, trees and wildflowers within a 15m woodland buffer in the north of the site*”.

1.11 In summary, there is no evidence which justifies the shape, size and capacity of the indicative development area.

**BRIEF DESCRIPTION OF THE SITE AND ITS CONTEXT**

1.12 The Site is situated approximately 5km to the south-west of Rugby town centre, on the outskirts of Cawston. It comprises four agricultural field parcels with a network of hedgerows and individual trees. Symmetry Park Phase 1, which is located to the south of the Site, was granted planning permission in 2020. Within the local context, the Site is in close proximity to busy major transport links; namely the A45 and A4071, which dissect the landscape to the south and west.

1.13 The northern boundary of the main body of the Site is bound by a pond and woodland blocks (namely Cawston Spinney, Fox Covert and Boat House Spinney). Beyond the immediate

context of the Site, residential development is located to the north and east of the Site. These properties are associated with the southern edge of Rugby.

1.14 Beyond the Site boundary and within the immediate context, the following planning applications have been submitted or constructed:

- To the south and south-west of the Site, Units 1-7 of Symmetry Park Phase 1 and the Spine Road are now complete, resulting in a change to the character of the Site;
- To the south-east, an application for 1,600 residential dwellings, with additional uses, has been submitted under planning reference R25/0491, in accordance with the wider South-West Rugby allocation;
- To the west, an application for 350 dwellings has been submitted under planning reference R22/0853, in accordance with the wider South West Rugby allocation; and
- To the north, beyond the Cawston Spinney woodland, an application for 275 dwellings (application reference R22/0853) has a resolution to grant planning permission awarded by the Council.

## Section 2 Published Documentation Review

- 2.1 EDP has been providing advice on landscape matters to TBBD since the outset of the design process for their landholding within the South West Rugby Allocation and in so doing, helping to ensure that the masterplan is sensitive to its landscape context. During this time, in addition to carrying out numerous site visits for more than a decade, EDP have reviewed various published documents with regards to the Landscape and Visual value of this site.
- 2.2 In reviewing the Council's latest LSA undertaken by NODE (LSA), it is important to first review all previous local assessments for context.

### **PUBLISHED DOCUMENTATION REVIEW**

#### **Landscape Assessment of the Borough of Rugby Sensitivity and Condition Study (2006)**

The 2006 study is not referenced within the LSA.

- 2.3 The RBC Landscape Assessment (Warwickshire County Council, 2006) remains the most comprehensive landscape character evidence for the borough that formed part of the evidence base to the adopted local plan. Although predating Natural England's 2014 guidance, the methodology is consistent with the earlier Countryside Agency LCA guidance (2002), which underpins the current approach.
- 2.4 This 2006 study defines the Site partly within the Dunsmore: Plateau Fringe Landscape Character Type (LCT) and the main body of the Site within the Dunsmore: Plateau Farmlands LCT.
- 2.5 The Dunsmore: Plateau Farmlands LCT is described as being:
- "A very distinctive landscape – gently rolling, low glacial plateau being characterised by: an 'empty' landscape of former waste with few roads and little settlement; a regular, geometric field pattern defined by closely cropped hawthorn hedges; many mature hedgerow oaks; large blocks of ancient woodland; remnants of heathy vegetation in woodlands and roadside verges, such as birch and bracken."*
- 2.6 The condition of the Dunsmore: Plateau Farmlands LCT is described as varying considerably and states that:
- "A significant area to the south of Bilton, extending to the west of Dunsmore has a strong condition. This is one of the most intact areas of countryside on Rugby's immediate urban fringe. Beyond this, there is quite a large area, between Cawston Spinney and the Coventry Road (B4429), which is in decline. At the extreme end of the spectrum, the landfill Site at Lawford Heath is shown as being of 'weak' condition."*
- 2.7 The following points of relevance to the Proposed Development are highlighted with regard to landscape sensitivity:

- *“Where tree cover is stronger, such as south of Cawston and Ryton, visibility is lower.*
  - *Ecological sensitivity is generally low elsewhere except for an area south of Cawston where smaller blocks of ancient woodland may also be found.*
  - *The strongly unified pattern and the gently rolling topography with scattered trees are the key elements which contribute to its sensitivity.”*
- 2.8 The Dunsmore: Plateau Fringe. This LCT (where the northern access route is located) is described as being *“a variable landscape with an undulating topography of low rounded hills, broad valleys, and short, steep slopes occurring on the northern and southern edge of the Dunsmore plateau...”* it is a *“..large-scale, intensively farmed agricultural landscape, characterised by large arable fields, often with a poorly defined field pattern...”*
- 2.9 The condition of the Plateau Fringe LCT is described as generally in decline *“with the exception of an area of parkland between the River Avon and Long Lawford, and land around Church Lawford and King’s Newnham, where the condition is strong. The southern fringe or escarpment on the other hand, is not only highly sensitive, but also largely in strong condition, making this an important feature to the south of the town”.*
- 2.10 The Site and its context are considered to be more representative of the Dunsmore: Plateau Farmlands LCT rather than the Dunsmore: Plateau Fringe LCT. Although part of the Site falls within the southernmost areas of the Dunsmore: Plateau Fringe LCT, it is divorced from the wider LCT by a disused railway line and new residential development to the north of Coventry Road. The Site and its surroundings exhibit many of the broad characteristics of the Plateau Farmlands LCT - the gently rolling, low glacial plateau, a regular geometric field pattern, defined by closely cropped hawthorn hedges, many mature hedgerow oaks and large blocks of ancient woodland.
- 2.11 As it was undertaken in 2006, the Landscape Assessment of the Borough of Rugby Sensitivity and Condition Study does not take into consideration the changes resulting from the construction of Symmetry Park Phase 1. Since its production, the commercial development to the south of the Site has considerably altered the character of the Dunsmore: Plateau Farmlands LCT and whilst some of the overarching fabric of the Site remains characteristic, the use has changed from agricultural to commercial. Some of the features described, such as the regular geometric field pattern, closely cropped hawthorn hedges and mature hedgerow oaks have been lost whilst others have been enhanced as a result of the recent development to the south of the Site.

### **South-West Rugby Landscape Sensitivity Study (2017)**

The 2017 study, which is marked as draft on the Council’s website, is referenced within the LSA, though it is acknowledged that “it is important to note that the assessment was undertaken before the delivery of large-scale employment development in the southern parts of zones 20n and 21c. The sensitivity judgements therefore reflect the landscape baseline at the time of assessment, against which subsequent change can be understood. These findings informed the conclusions [of the LSA] regarding the relative sensitivity and development suitability of the zones assessed”.

2.12 The 2017 study was also undertaken prior to the completion of the commercial development to the south of the Site and, as such, also does not provide an up-to-date assessment of the local context. It located the Site within 'Zone:20n' which was described as:

*"This zone comprises an open medium –large scale field pattern managed for cropping within the Dunsmore Plateau Farmlands landscape. Hedges are trimmed with insignificant hedge trees surviving. Tree cover is limited to within the green lane public right of way R168 (Northampton Lane). Landform in this zone is undulating and gives rise to some very prominent skylines. The group of properties of Oak House, The Barn and Station Farm Cottage are visible within this zone, as well as from neighbouring zones. The disused Leamington – Rugby railway line, which is a Local Wildlife Site, runs through the western edge of the zone and a tributary of the River Avon, also a Local Wildlife Site, cuts across the central part of the zone. The zone has a strong landscape framework comprising adjacent Ancient and Semi-Natural Woodland, the disused railway line and the mature trees along PRoW R168 (Northampton Lane). However, internally it is very open, with views right across almost the whole zone, which is typical of landscapes in the Plateau Farmlands".*

### **Rugby Borough Landscape Character Assessment (2025)**

The LSA refers to this 2025 broader study.

2.13 The 2025 Landscape Character Assessment provides an update to the previous 2006 study and, as such, does not define any new character areas of relevance to the Site. The Site remains within the Dunsmore Landscape Character Area (LCA) and, more specifically, within the Plateau Farmlands LCT.

2.14 The 2025 Landscape Character Assessment provides an updated description of the Plateau Farmlands LCT, which is a broad area described as being *"characterised by its 'empty' landscape with few roads and settlements. The gently rolling topography of the low glacial plateau is characterised by sandy soils, large areas of ancient woodland, and remnant heathland in woodlands and roadside verges. The regular geometric field pattern is defined by closely cropped hawthorn hedges."*

2.15 The 2025 Landscape Character Assessment sets out a number of 'forces for change' for the wider Dunsmore LCA, which includes the Dunsmore Plateau Farmlands LCT, including:

- *"Inappropriate development bordering woodlands, causing habitat fragmentation and species isolation.*
- *Loss of mature trees remnant from the 1970s epidemic has exacerbated habitat fragmentation.*
- *Loss of hedgerows due to urban development and agricultural intensification. The creation of larger fields has exacerbated habitat fragmentation. In addition, there has been a general decline in the practice of hedge laying and an increase in annual trimming, resulting in gaps and loss of structure.*

- *Sensitive design is lacking in some new residential developments, particularly around historic villages and Rugby's peri-urban areas. A high number of converted redundant farm buildings for residential and holiday use are not in line with the landscape character.*
- *Significant decrease in the number of dairy farms and mixed farming in the area.*
- *Ridge and furrow and other historical earthworks continue to be lost as a result of ploughing, reseeding and the conversion to arable land.”*

2.16 The 2025 assessment then goes on to provide a set of guidelines for development within this landscape, to “*protect the distinctiveness of the Dunsmore LCA*”. This includes (with EDP emphasis where relevant to the Site):

- *“Protect hedgerows and hedgerow trees, many of which are Oak trees (Quercus robur).*
- *Maintaining and enhancing the enclosed wooded character of the landscape. This is especially important in Dunsmore Parklands which is generally in decline.*
- *Maintaining and enhancing the distinctive character of the landscape. This is especially important in Plateau Farmlands where a large area between Cawston Spinney and the Coventry Road is in decline.*
- *Enhance the structure and key features of the farmed landscape. This is especially important in the Plateau Fringe which is generally in decline.*
- *Planting of woodlands should be encouraged where appropriate. The mosaic of habitats including woodlands, hedgerows and heathlands, alongside the sustainable management of agricultural land will enhance the character of the landscape.*
- *Protect and manage Draycote Reservoir and the network of canals and rivers to enhance biodiversity, water quality and for their contribution to recreation, sense of place and geodiversity.*
- *Protect and manage the historic character and settlement pattern, including the deserted settlements, ancient settlements, veteran trees, farmsteads, country houses and landscaped parklands. This will enhance the educational and recreational experience for urban and rural communities.*
- *Enhance the character of settlements in accordance with the landscape through improved design standards. Increased development and property improvements from population change and increased affluence is having an urbanising impact on settlements and dwellings”.*

### **RBC Landscape Sensitivity Assessments (2025)**

This up-to-date site-specific assessment is not referenced within the LSA.

2.17 The RBC Landscape Sensitivity Assessment (March, 2025, updated November 2025) provides a specific assessment of the Site, being based on the same methodology as the

Rugby Borough Landscape Character Assessment (2025), with the Site being referred to as 'South West Rugby Safeguarded Land'.

2.18 The 2025 Sensitivity Assessment concludes that:

- Landscape Value: **Low** – *“The site has little landscape value. Its rural character is diminished by Symmetry Park. There is some natural value due to the hedgerows”*;
- Visual Value: **Low** – *“The site itself has minimal visual value - although in its present state it may allow views of the spinney that could be lost if the site were developed”*;
- Mitigation potential: *“Maintain existing hedgerows. Set development back from the spinney”*; and
- Overall Landscape Sensitivity: **Low** – *“The site consists of four arable fields surrounded by Cawston Spinney to the north and Symmetry Park to the south. Any sensitivity to change is likely to stem from its position as a setting for the spinney, which is a LWS”*.

#### **EDP ASSESSMENT OF LANDSCAPE CHARACTER**

2.19 Earlier published Landscape Character Assessments provide some contextual understanding of the defining characteristics of the wider landscape and, in some respects, the Site itself. Prior to the publication of the LSA, and where published assessments provide an update-to-date assessment of local character with consideration of new logistics development to the south of the Site, published documentation is aligned in that, while there may be some components of value within the landscape, which would be the case for most greenfield landscapes, both the landscape and visual value of the Site overall is assessed as being low.

2.20 The expanding settlement of Rugby and the recent development within Symmetry Park Phase 1 has changed the landscape context to the north (residential) and south (commercial) of the Site from rural to suburban. The disused railway embankment with mature vegetation is a prominent linear feature cutting through the landscape and separating the urban settlement of Rugby from the agricultural hinterland to the west.

2.21 Scenic quality across the Site is varied primarily due to the influence of topography and the enclosing effect of surrounding trees, and woodland to the north (Cawston Spinney, Fox Covert and Boat House Spinney). Trees and hedgerows around the rest of the Site boundary provide further containment and contribute to the sense of place.

2.22 The landscape elements with the potential to be adversely impacted by the development of the Site would include hedgerow boundaries and mature trees which define the existing agricultural field parcels. These landscape elements have been shown to be characteristic of published character assessments and are present within the Site or local context. However, the Site is adversely affected, in a sensory manner, by its proximity to the existing Symmetry Park Phase 1 development, which is clearly visible in short-distance views.

2.23 The Site does not lie within, or contain any nationally or locally designated landscapes and it does not represent, in a perceptual or physical sense, a landscape of any great importance

or distinct character. Though there are features of higher value within the local context, most notably Cawston Spinney, EDP consider the value and susceptibility of the Site itself, to be low, leading to an overall low sensitivity.

- 2.24 EDP's judgement of sensitivity is aligned with those published character assessments prior to the issue of the LSA (which as noted above, fails to take account of all of these previously published studies).

## Section 3 LSA Review

- 3.1 This review considers whether the LSA (January 2026) provides a robust assessment of landscape and visual value and sensitivity, having regard to accepted guidance, including the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) provided by the Landscape Institute and an Approach to Landscape Character Assessment' (Natural England, 2014).

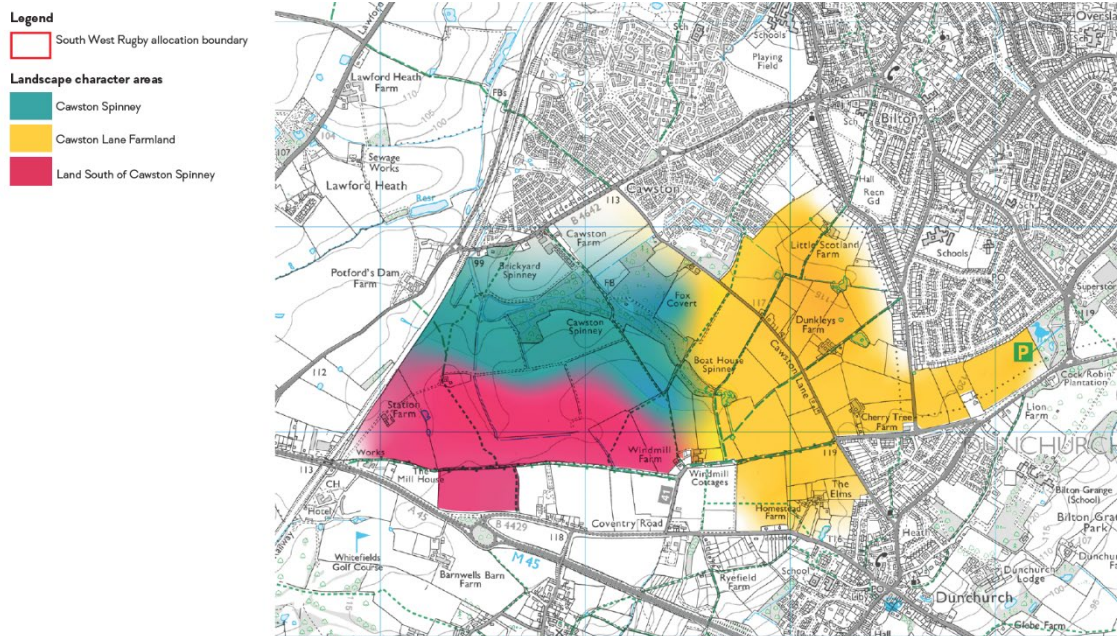
### METHODOLOGY AND APPROACH

- 3.2 Notably, the LSA was produced after the submission of TBBD's application which would deliver up to 149,564 sqm GEA of B8 Use Class (with ancillary offices), an energy centre, and the Potford Dam Link Road. No reference is made within the LSA to the current application material with regards to the value of the Site in landscape and visual terms, and no rebuttal/comment is afforded to the detailed application analysis.
- 3.3 More importantly, as can be seen above, not all of the Council's published documents that refer to landscape character have been referenced by the LSA, as the RBC Landscape Sensitivity Assessment (March, 2025) and the Landscape Assessment of the Borough of Rugby (2006) have not been referenced at all.
- 3.4 As above, the RBC Landscape Sensitivity Assessment (March, 2025) provides a site-specific assessment and concludes that the landscape value, visual value, and overall sensitivity of the Site is low. However, this is not taken into consideration by the LSA.
- 3.5 Though the LSA provides a judgement of landscape value against up-to-date guidance, namely the Landscape Institute's TGN 02-21: Assessing landscape value outside national designations, limited evidence is provided to define the boundaries of each of the character areas upon which the assessment of value is undertaken.

### Landscape Character Areas

- 3.6 As illustrated at **Image EDP 3.1**, the LSA identifies three character areas, including the Cawston Spinney character area, the Cawston Lane Farmland character area and Land South of Cawston Spinney (note that baseline mapping does not show the extent of logistics development to the south). The LSA then confirms that: "**These areas were delineated based on dominant physical and visual features, as well as how the landscape is experienced, rather than through rigid, fixed boundaries. The boundaries are naturally fluid, with some overlap and transition, reflecting the dynamic and complex nature of the landscape**", however, little evidence is provided as to why the boundaries of each character area are where they are.
- 3.7 The LSA acknowledges that (with EDP emphasis) "*While these areas form part of a wider, coherent landscape and share certain characteristics, they also **exhibit differences in their character, function, and relationship with their surroundings**. As a result, each area may be subject to a different evaluation of landscape value*". However, with an assessment at

such a fine landscape scale, it is surprising that there is limited evidence provided to justify the boundary between these character areas. Such an approach can result in elements of higher landscape value, which in this case includes Cawston Wood itself, potentially elevating the value of land surrounding the woodland which, in fact, ‘exhibit a difference in character, function, and relationship with their surroundings’.



**Image EDP 3.1:** Extract from LSA, showing ‘Figure 4.4: Indicative Landscape Character Areas’. Baseline mapping here does not show the extent of logistics development to the south.

3.8 The Site is located within the Cawston Spinney and Land South of Cawston Spinney character areas and, as such, no further consideration is given to the Cawston Lane Farmland character area.

**Analysis of Landscape Character Areas**

3.9 As can be seen above at **Image EDP 3.1**, the boundary between the Cawston Spinney and Land South of Cawston Spinney character areas is not defined by ‘dominant physical and visual features’; the boundary does not follow existing field boundaries or woodland edges, nor does it follow an obvious or abrupt change in topography. As such, according to the LSA definition, the boundary between each character area can only relate to ‘how the landscape is experienced’, though the LSA does acknowledge that: “*The boundaries are naturally fluid, with some overlap and transition, reflecting the dynamic and complex nature of the landscape*”.

3.10 For ease of reference, the key characteristics and points relating to landscape value identified by the LSA for both the Cawston Spinney character area and the Land South of Cawston Spinney character areas are set out below:

- “Cawston Spinney character area
  - Woodland forming the focal point of views
  - Change in topography descending towards Cawston Wood Fishery Pond

- *Enclosed and intimate character within the woodland*
- *Significant contribution to the site's natural and ecological value"*
- *"Land South of Cawston Spinney character area*
  - *Expansive arable fields with views dominated by large-scale industrial development*
  - *Stark contrast with the woodland to the north*
  - *Limited tree cover and a legible field pattern*
  - *Presence of a green lane and hedgerows along field boundaries, sometimes fragmented"*.

3.11 It is clear that the key characteristics of the defined Cawston Spinney character area largely relate to the woodland itself, with the main attributes beyond the woodland relating to topography descending towards Cawston Wood Fishery Pond and with the woodland being a 'focal point of views'.

3.12 The Site itself, given its open agricultural nature, could in its entirety align with all of the characteristics of the Land South of Cawston Spinney character area, and it is only the land immediately adjacent to the woodland itself that relates to the existing logistics development to a lesser degree.

3.13 There is limited evidence or justification within the LSA to define the boundaries between the two character areas, there are no 'dominant physical and visual features' to define the boundary, and there is limited justification as to the ways in which this landscape is experienced to justify the boundary in the location shown.

### **Landscape Value**

3.14 The LSA refers to Landscape Institute Technical Note 02/21 Table 1 and GLVIA3 Box 5.1 in providing a judgement on landscape value. For each of the defined character areas, it concludes that:

- *Cawston Spinney character area*: "... **good landscape value**. *The area demonstrates multiple positive factors, including elevated natural heritage, functional ecological elements, scenic and perceptual qualities, and well-structured landscapes. While the limited number of cultural heritage assets and partial visibility of nearby industrial development slightly temper the experience, the combination of woodland, open areas, and Local Wildlife Sites creates a recognisable sense of place and overall good landscape value"*; and
- *Land South of Cawston Spinney character area*: "...**ordinary landscape value**. *The landscape is strongly influenced by the adjacent industrial estate, with built form, infrastructure and associated activity exerting a dominant presence that reduces tranquillity and limits scenic and perceptual quality. Although elements of the rural landscape remain, including open fields and hedgerows, these features do not*

*combine to create a distinctive or coherent sense of place. However, towards the boundary with the Cawston Spinney character area, there is a perceptible transition in landscape character, reflecting the increasing influence of woodland and a more enclosed landscape structure beyond the character area”.*

3.15 For ease of reference, the criteria for both ordinary and good landscape value stated within the LSA is provided below (with EDP emphasis):

- **Good:** “Landscapes, or areas of landscape, that have a **recognisable landscape value, likely including multiple positive factors, and potentially creating a distinctive sense of place**. This includes (but is not exclusive to) landscapes that, to a lay person, can be recognised as having: elevated natural and/or cultural heritage interest; scenic and/or perceptual qualities; and/ or a good condition that may feature some detracting factors, but none sufficient to fundamentally undermine its quality (etc.). In some instances, the category may be used for landscapes which feature just one, or a small collection of particularly strong landscape elements while otherwise being of relatively ordinary character (e.g. an area that well illustrates a specific historical land use). The category will include most locally designated or locally valued landscapes where their constituent characteristics and elements are of sufficient quality, and areas within national designations that contribute to, but may not be exemplar of the characteristics and qualities for which they are celebrated”; and
- **Ordinary:** “Landscapes, or areas of landscapes, that **may feature one or more elements of interest or quality, but are generally of a common typology**, and a character not warranting particular celebration. This will include the majority of landscapes, including many rural and peri-urban environments. In some scenarios, the category may be used where a **landscape features both positive and negative elements which balance to a broadly net neutral position**. The ordinary category may be applied to specific areas of both nationally designated or locally designated/valued landscapes, when those localities' character is not deemed to make meaningful contributions to the wider value and significance of these landscapes, or where character may markedly differ from the qualities for which they are primarily protected”.

3.16 It is clear then that, to meet the LSA criteria of ‘good’, a landscape must include ‘multiple positive factors’ and potentially create a ‘distinctive sense of place’. In considering this in detail, **Table EDP 3.1** below considers the LSA judgements of landscape value against each of the nine criteria within Landscape Institute Technical Note 02/21, with EDP commentary.

**Table EDP 3.1:** Key Judgements Relating to Landscape Value

	<b>Cawston Spinney Character Area</b>	<b>Land South of Cawston Spinney Character Area</b>	<b>EDP Commentary</b>
<b>Natural Heritage</b>	<i>“Cawston Spinney character area makes a strong contribution to landscape value, owing to the presence of ancient and semi-natural woodland, its inclusion within a LWS, and its ecological, perceptual, and structural importance within the surrounding landscape.”</i>	<i>“Land South of Cawston Spinney character area makes a weak to moderate contribution to landscape value, reflecting the influence of industrial development, limited internal structure, and locally increased ecological value adjacent to Cawston Spinney.”</i>	Elements of higher value, and with “perceptual, and structural importance within the surrounding landscape” relate only to the woodland itself. The Site is entirely arable land with limited internal structure. Land immediately adjacent to the woodland might have some locally increased ecological value, though no evidence is provided for this, nor does this attribute extend into the Site.
<b>Cultural Heritage</b>	<i>“Cawston Spinney character area makes a moderate contribution to cultural heritage. While it contains the statutory Grade II Listed Building Cawston Farmhouse, the limited number of heritage assets within the area constrains its overall contribution.”</i>	<i>“Land South of Cawston Spinney character area makes a weak contribution to cultural heritage. The area is dominated by industrial infrastructure, and historic features and patterns are largely compromised, limiting its heritage value.”</i>	While Cawston Spinney makes some contribution to cultural heritage, it is clear that the Site, as arable land, makes a limited contribution.
<b>Landscape Condition</b>	<i>“Cawston Spinney character area makes an elevated moderate contribution, tending towards strong. Well-established woodland blocks, generally intact hedgerows, and a coherent landscape framework provide structure and ecological value.”</i>	<i>“Land South of Cawston Spinney character area makes a moderate contribution, tending towards the lower end of the scale. While field patterns remain legible, and the area includes a green lane, limited tree cover and fragmented hedgerows weaken overall structural integrity. However, the area retains sufficient landscape framework to approach moderate contribution.”</i>	While the woodland itself is a ‘well-established woodland block’, the entirety of the Site would be considered to include ‘limited tree cover and fragmented hedgerows weaken overall structural integrity’.

	<b>Cawston Spinney Character Area</b>	<b>Land South of Cawston Spinney Character Area</b>	<b>EDP Commentary</b>
<b>Distinctiveness</b>	<i>“Cawston Spinney character area- moderate-to-strong contribution. Large woodland blocks, undulating topography, and historic farmsteads provide a recognisable and characterful sense of place.”</i>	<i>“Land South of Cawston Spinney character area- weak-to-moderate contribution, closer to weak. Industrial influence, simplified field patterns, and limited tree cover reduce distinctiveness, though basic field structure maintains a minimal connection to the regional character.”</i>	The site is not woodland and does not contain a <i>“historic farmsteads provide a recognisable and characterful sense of place”</i> . Across the Site, there is an <i>“industrial influence, simplified field patterns, and limited tree cover reduce distinctiveness, though basic field structure maintains a minimal connection to the regional character”</i> .
<b>Recreational</b>	<i>“Cawston Spinney character area- moderate to strong contribution, leaning towards strong. Woodland paths and public rights of way are well used for walking and dog walking, and the wooded setting provides a high-quality recreational experience.”</i>	<i>“Land South of Cawston Spinney character area – moderate contribution. While public rights of way remain in use, the diversion of a footpath through industrial development reduces the quality of the recreational experience compared with the other character areas”.</i>	Public Rights of Way are present within and adjacent to the Site, though it is questioned whether land outside of the woodland can be described as providing a ‘high-quality experience’.
<b>Perceptual (scenic)</b>	<i>“Cawston Spinney character area – moderate to strong contribution, leaning towards strong. Despite some disruptive views from exposed northern areas, enclosed woodland, strong natural edges, and filtered views provide a visually rich and immersive scenic experience across much of the character area.”</i>	<i>“Land South of Cawston Spinney character area – weak contribution. The dominance and frequent visibility of industrial development, combined with simplified field patterns and limited vegetation, significantly reduces scenic quality and visual appeal.”</i>	While views within the woodland itself might be enclosed, there is limited evidence to justify why land outside of the woodland would be considered to provide a ‘visually rich and immersive scenic experience across much of the character area’. Across the entire Site, ‘frequent visibility of industrial development, combined with simplified field patterns and limited vegetation’.

	<b>Cawston Spinney Character Area</b>	<b>Land South of Cawston Spinney Character Area</b>	<b>EDP Commentary</b>
<b>Perceptual (wildness and tranquillity)</b>	<i>“Cawston Spinney character area – moderate to strong contribution, tending towards strong. Enclosed woodland areas provide a strong sense of seclusion and calm, with birdsong and limited intrusion creating locally high levels of tranquillity, despite some disturbance at more exposed edges.”</i>	<i>“Land South of Cawston Spinney character area – weak contribution. The dominance of industrial infrastructure, associated activity, and artificial lighting significantly reduces perceived tranquillity, with limited buffering from vegetation or landform.”</i>	Again, there is limited evidence provided to justify why land outside of the woodland, within the more open areas, would be considered to provide locally high levels of tranquillity. Furthermore, though it is acknowledged that <i>“despite some disturbance at more exposed edges”</i> , this does not appear to have been considered in the overall judgement.
<b>Associations</b>	<i>“All three character areas make a weak contribution to landscape value, as there are no known associations with notable people, events, cultural works, scientific achievements, or other factors that influence perceptions of the landscape.”</i>	<i>“All three character areas make a weak contribution to landscape value, as there are no known associations with notable people, events, cultural works, scientific achievements, or other factors that influence perceptions of the landscape.”</i>	No differentiation between each parcel.
<b>Functional</b>	<i>“Cawston Spinney character area makes strong contribution. Ancient and semi-natural woodland and Local Wildlife Sites provide important ecosystem services, habitat connectivity, and a key role in the local green infrastructure network.”</i>	<i>“Land South of Cawston Spinney character area makes moderate contribution. Industrial development limits functional landscape elements, though boundary hedgerows and peripheral trees provide some ecological and connective value.”</i>	Again, there is limited evidence provided to justify why land outside of the woodland, within the more open areas, would be considered to provide <i>“important ecosystem services, (and) habitat connectivity”</i> .

- 3.17 It is clear that, overall, while the Cawston Spinney woodland itself provides a strong contribution to landscape value, there is limited evidence provided as to why land beyond the woodland edge to the south is considered to meet the same criteria. Though the LSA acknowledges that there may be areas of higher landscape value adjacent to the woodland edge, there is little evidence provided as to why this judgement of landscape value should extend as far as the boundaries of the defined character area where land is privately owned arable land with strong visual associations with adjacent logistics-built form.
- 3.18 Notably, the character of the Site will change further as the development of land associated with the wider south-west Rugby allocation is progressed.
- 3.19 Overall, EDP do not agree that the entire Cawston Spinney character area defined by the LSA meets the 'good' criteria, as land beyond the woodland itself does not meet the criteria of including "*multiple positive factors, and potentially creating a distinctive sense of place*". In defining the character areas as shown, the LSA has over emphasised the value of the landscape beyond Cawston Spinney which has, inevitably, inflated the overall judgement of landscape sensitivity.

### **Susceptibility to Change**

- 3.20 The LSA does not define a specific development scenario in order to consider susceptibility to change, only considering 'residential' and 'commercial' development. However, in considering a 'commercial' development, for each defined character area, the LSA concludes that:

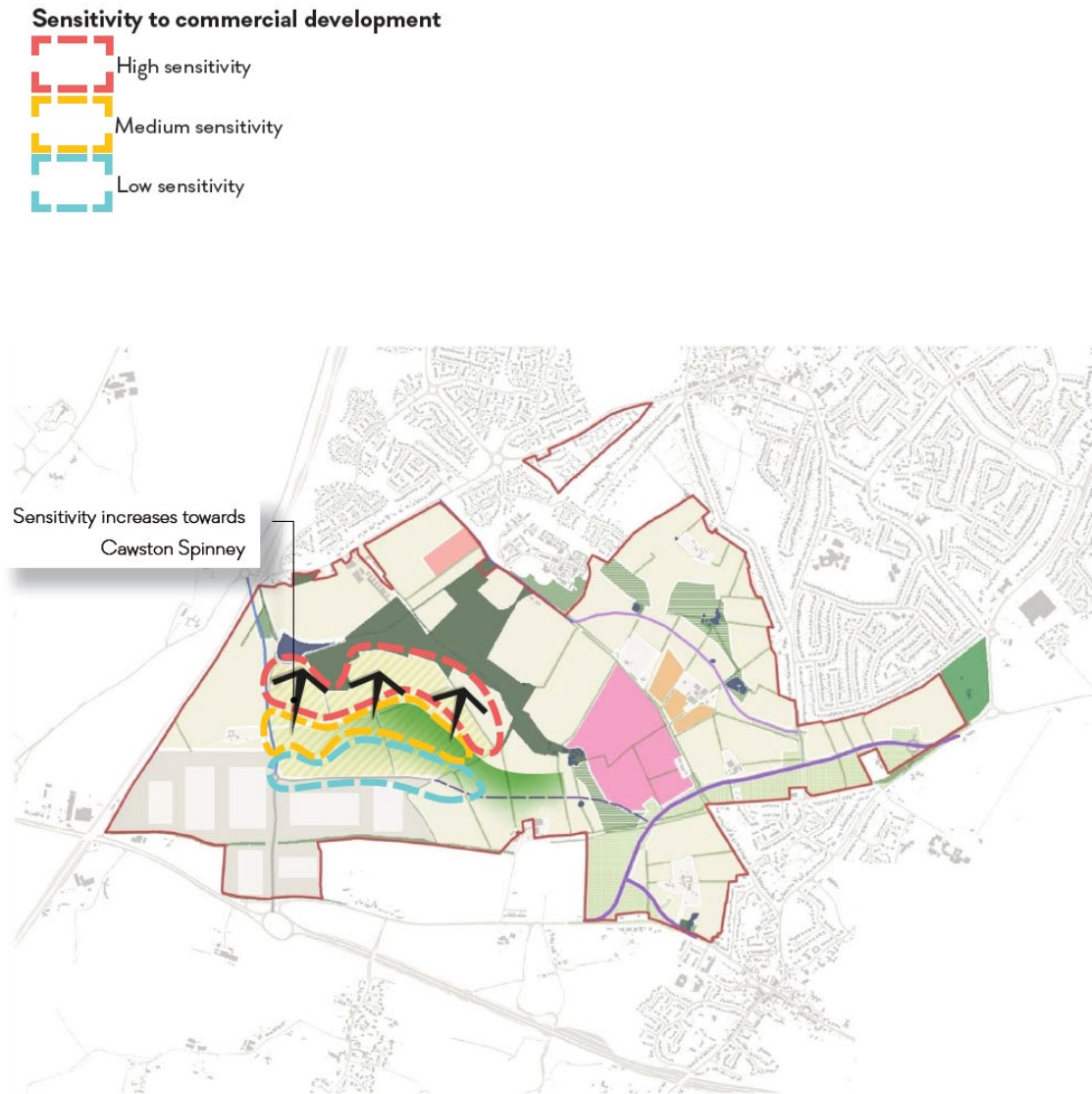
- Cawston Woodland: "*The area immediately south of the woodland edge has high susceptibility to commercial development. Large-scale built form would be incongruous with the existing landscape, altering baseline character and affecting landscape and ecological features that contribute positively to the character, setting, and integrity of the Cawston Spinney character area*"; and
- South of the Woodland: "*Parts of the character area are already developed for commercial use, with the Iron Mountain Industrial Estate occupying land to the south and south-west. In these areas, large-scale built form is a defining feature of the baseline landscape. While this reduces susceptibility to change, further commercial development could intensify built form and extend industrial influence. As such, land within and immediately adjoining the existing industrial estate from the north is assessed as having medium susceptibility to commercial development*

*In contrast, the safeguarded land located immediately south of Cawston Spinney character area performs a buffering function between industrial development and the edge of Cawston Spinney character area. The introduction of commercial development within the northern portion of the area could undermine this role and result in an incongruous extension of industrial character towards the spinney. Such change could give rise to notable adverse effects on landscape character and on the setting and integrity of Cawston Spinney. Accordingly, this zone is assessed as having high susceptibility to commercial development*".

- 3.21 Under GLVIA3, susceptibility concerns the ability of a landscape to accommodate a type of development without undue harm to its key characteristics. Considerations of susceptibility should therefore refer to inherent landscape attributes and explain why those characteristics may be sensitive to a defined category of development (e.g., large-scale commercial development). The LSA appears to go beyond this, moving into effect-based reasoning and predicting outcomes, including that *“The introduction of commercial development within the northern portion of the area could undermine this role and result in an incongruous extension of industrial character towards the spinney.”* In relation to residential development, the LSA also suggests mitigation measures that might *“reduce the contrast with surrounding agricultural land.”* Such commentary extends beyond assessing inherent susceptibility and instead begins to anticipate the likely effects of development which, under GLVIA3 and the August 2024 Clarifications provided by the Landscape Institute, should be appropriately addressed at LVIA stage (this has been provided within TBBD’s application which, as above, has not been reviewed by the LSA).
- 3.22 Overall, the judgements of susceptibility within the LSA are unclear, particularly as there appears to be a level of judgment of the effects arising from development having informed the level of susceptibility.

#### **Landscape Sensitivity**

- 3.23 In assessing landscape sensitivity, the LSA defines three different levels of sensitivity across the Site though, again, the boundaries between each area are unclear.
- 3.24 The LSA concludes that (refer to **Image EDP 3.2**) (with EDP emphasis);
- *“The southernmost portion of the area, assessed as having ordinary landscape value and medium susceptibility to commercial development, is classified as having **medium to low sensitivity**. A professional judgement of low sensitivity is applied, reflecting the established baseline created by the adjacent industrial estate, where large-scale commercial development is already a defining characteristic of the landscape.*
  - *Further north, within the transitional zone between the Land South of Cawston Spinney and the Cawston Spinney character areas, the combination of ordinary landscape value and high susceptibility results in an overall **medium sensitivity**, reflecting the area's role in mediating between the industrial landscape to the south and the more enclosed, wooded character of Cawston Spinney.*
  - *Within the Cawston Spinney character area, the landscape has good value and high susceptibility. While the sensitivity matrix indicates **high to medium sensitivity**, our **professional judgement is to classify this portion of land as high sensitivity**, reflecting the intact landscape condition and the area's role in protecting the ecological and landscape integrity of the spinney”.*
- 3.25 Notably, the overall sensitivity for the southernmost portion of the area has been assessed downwards, with the Cawston Spinney character area being assessed upwards.



**Image EDP 3.2:** Extract from LSA summary of landscape sensitivity.

## **Section 4**

### **Conclusions**

- 4.1 The Site does not lie within, or contain, any nationally or locally designated landscapes and it does not represent, in a perceptual or physical sense, a landscape of any great importance or distinct character.
- 4.2 It is clear that, overall, while Cawston Spinney itself provides a strong contribution to landscape value, there is limited evidence provided as to why land beyond the woodland edge to the south, is considered to meet the same criteria. Though the LSA acknowledges that there may be areas of higher landscape value adjacent to the woodland edge, there is little evidence provided as to why this judgement of landscape value should extend as far as the boundaries of the defined character area, where land is privately owned arable land with strong visual associations with adjacent logistics-built form. Though there are features of higher value within the local context most notably Cawston Spinney, EDP consider the value and susceptibility of the Site itself, to be low, leading to an overall low sensitivity.
- 4.3 EDP's review shows that, though the LSA post-dates the drafting of the Council's Proposed Submission Local Plan (Reg 19), there is a notable correspondence between defined character areas and policy extents. Sensitivity boundaries appear to correspond closely with indicative built development extents within policy which, as set out above, were determined prior to the publication of the LSA. While such alignment is not inherently inappropriate, there is limited evidence within the LSA to demonstrate that these boundaries are independently derived from landscape character analysis rather than reflecting allocation geometry or policy-defined edges. Where assessment units mirror planning boundaries without clear landscape justification, there is a risk that the sensitivity framework may be influenced, or perceived to be influenced, by policy structuring rather than intrinsic landscape characteristics.
- 4.4 EDP's judgement of landscape and visual sensitivity is aligned with those published character assessments prior to the issue of the LSA, not all of which have been reviewed by the LSA. Essentially, the LSA is an outlier in this case. Though there are features of higher value within the local context, most notably Cawston Spinney, EDP concur with the findings of the RBC Landscape Sensitivity Assessment (March, 2025) and consider the value and susceptibility of the Site itself to be low, leading to an overall low sensitivity.
- 4.5 It appears that the reduction in the quantum of floorspace within the Site allocation was set out prior to the issue of the LSA, and there is no evidence which justifies the shape, size and capacity of the indicative development area.



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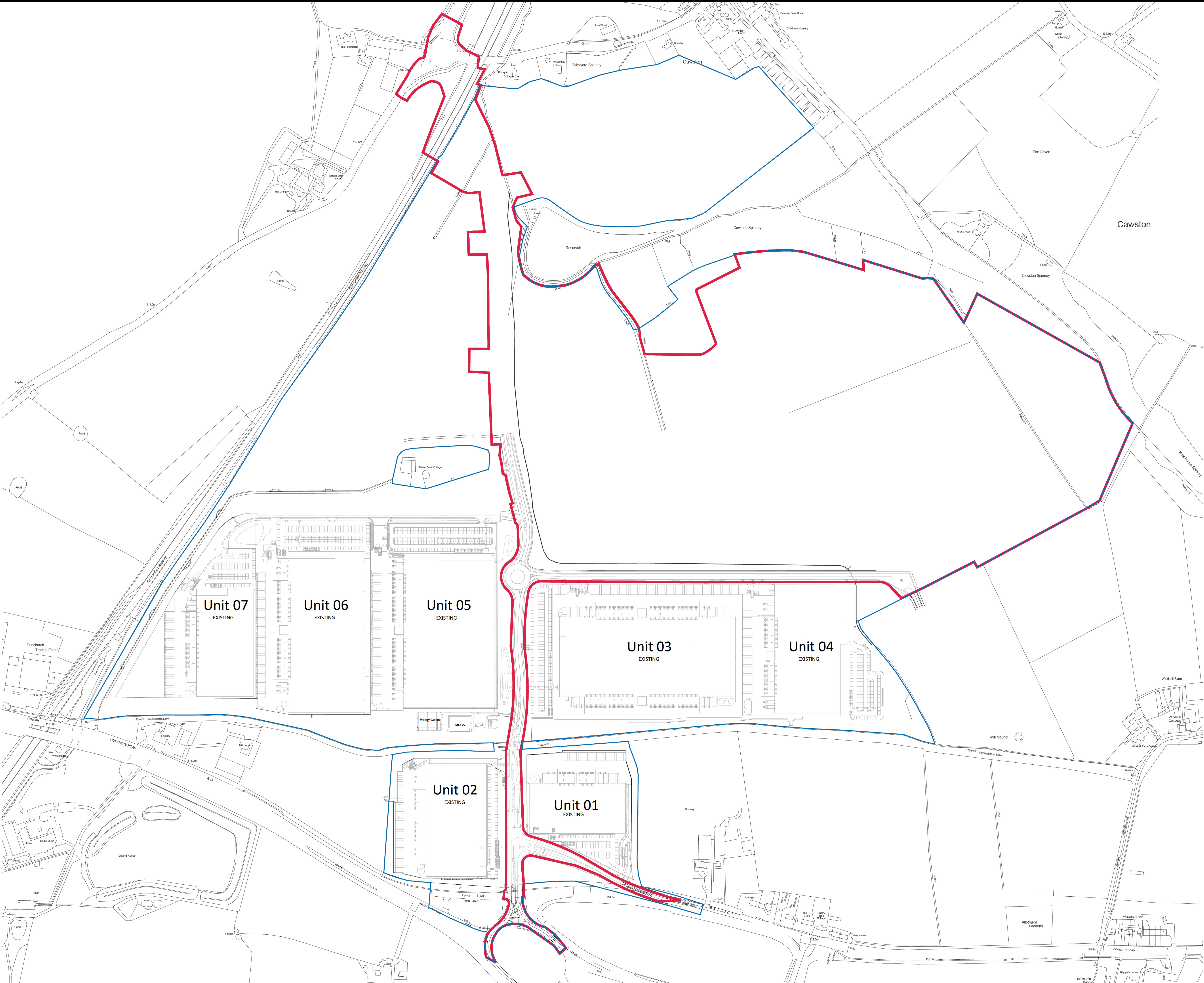


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Rev	Date	Iss. By	App. By	Description
P01	22.10.24	HA	RS	Title approved
P02	27.02.25	HA	RS	Red Line area amended
P03	12.09.25	HA	RS	Red Line area amended Drawing Status changed to Planning



- Legend
- Proposed Application Site Boundary
  - Ownership Boundary
  - Existing development

Red Line area = 46.362 Ha (114.561 Acres)  
 Unit 8 site area = 7.84Ha (19.375Ac)  
 Outline Application area = 23.678Ha (58.5Ac)

Do not scale from this drawing for purposes other than the planning application.  
 Red Line boundary based on OS Data and NOT confirmed as the legal boundary.  
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# Symmetry Park Rugby Phase 2

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Market Assessment and Review of Draft Local Plan

March 2026



## Table of Contents

<b>Executive Summary</b> .....	<b>3</b>
<b>1 Introduction</b> .....	<b>6</b>
1.1 Overview and Summary .....	6
1.2 Structure.....	6
1.3 Reader Note.....	7
<b>2 Subject Site and the Proposed Development</b> .....	<b>8</b>
2.1 Site Context .....	8
2.2 Existing and Proposed Development .....	9
<b>3 Defining a Property Market Area</b> .....	<b>11</b>
3.1 The Local Authority Approach: FEMA .....	11
3.2 PMAs .....	12
3.3 Relationship Between Rugby and the Wider C&W PMA .....	12
<b>4 Policy and Evidence Base Review</b> .....	<b>14</b>
4.1 National Planning Policy .....	14
4.2 Local Planning Policy and Evidence Base.....	17
4.3 Conclusion .....	25
<b>5 I&amp;L Market Signals</b> .....	<b>27</b>
5.1 Summary: A Strong and Supply-Constrained Market.....	27
5.2 Availability is Below the Market Equilibrium .....	28
5.3 Demand has been Meeting Rapidly-Growing Supply .....	29
5.4 Strong Rental Growth.....	30
5.5 The PMA Requires More Strategic I&L Units .....	31
5.6 Conclusion .....	33
<b>6 Estimate of Future Demand</b> .....	<b>34</b>
6.1 Savills Estimates of Future Demand .....	34
6.2 Comparison of the FEMA-Level Demand for Strategic Land with the 2022 HEDNA.....	38
6.3 Demand Apportioned to Rugby .....	40
6.4 Comparison of Rugby-Level Demand with the Council’s Latest Evidence Base.....	41
6.5 Need in Neighbouring Sub-Regional Areas .....	42
6.6 Conclusion .....	43
<b>7 Review of Supply</b> .....	<b>44</b>

# Symmetry Park Rugby Phase 2

Market Assessment and Review of Draft Local Plan

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7.1	Approach .....	44
7.2	Building Supply .....	45
7.3	Land Supply .....	46
7.4	Pipeline Supply .....	48
7.5	Draft Allocations .....	49
7.6	Supply Summary .....	51
<b>8</b>	<b>Balance of Supply and Demand .....</b>	<b>53</b>
8.1	Supply Compared with Demand.....	53
<b>9</b>	<b>Summary and Recommendations .....</b>	<b>56</b>

## Executive Summary

This report has been prepared by Savills Economics on behalf of Tritax Big Box Developments (TBBD) to support representations submitted in response to Rugby Borough Council's emerging Local Plan (Regulation 19 Draft, January 2026). The report assesses the extent to which Symmetry Park Rugby Phase 2 (South West Rugby Employment Phase 2), the Subject Site, is needed to ensure that the Council is able to meet its need for strategic I&L employment land that can accommodate premises greater than 100,000 sq.ft.

The Subject Site is approximately 40.7ha. Regulation 19 Draft Local Plan (January 2026) proposes to allocate approximately 60,000 sq.m (646,000 sq.ft) of employment floorspace to the Subject Site (this is approximately equivalent to 17ha of land.) This represents a significant reduction compared with the 130,000 sq.m (1.4m sq.ft) allocation (approximately 37ha of land) proposed in the earlier Regulation 19 Draft Local Plan (March 2025). This change has occurred alongside a series of revisions to the Council's employment land evidence base.

This report therefore reviews the relevant policy context, assesses market signals within the relevant property market area, and compares the Council's assessment of employment land demand with Savills own assessment based on the Savills Supressed Demand Model.

Property market evidence indicates that the industrial and logistics (I&L) market across Rugby and the wider Coventry and Warwickshire property market area (PMA) has been strong and supply-constrained for a sustained period. Availability rates have generally remained below the market equilibrium benchmark of around 8%; rental growth has significantly outpaced inflation; and leasing activity has kept pace with the considerable level of new development.

Our analysis of future demand indicates that the scale of I&L land needed is significant within the PMA and Rugby in particular. It reflects continued growth in this prime, nationally significant logistics location; structural changes in supply chain management; ongoing demand for large modern distribution facilities; and historic constraints on the supply of employment land.

Our review of the Council's evidence base identifies a number of methodological issues and inconsistencies that introduce uncertainty into the manner in which the council intends to provide employment land to meet its needs for premises greater than 100,000 sq.ft. In particular:

- Changes introduced in the 2024 Alignment Paper significantly reduce estimated local employment land demand compared with the earlier 2022 HEDNA, without clear explanation.
- Certain sites appear to have been double-counted within the Council's supply calculations.
- The Council removed a 20% supply buffer previously intended to provide supply flexibility within the employment land portfolio.
- The contribution expected from Rugby towards Coventry's unmet employment land needs has been significantly reduced through successive iterations of the evidence base.
- Many of the available sites comprising the potential supply have restrictions on their use or the size of the units which will limit their capacity to delivery strategic I&L premises.
- The vast majority of supply that has capacity to delivery strategic I&L premises are the same

sites that will also need to meet local need comprising non-strategic premises, thus potentially crowding out strategic units.

Savills own assessment of the balance of supply and demand shows there is a high degree of uncertainty around the current supply of I&L sites that can accommodate premises greater than 100,000 sq.ft to meet the identified need both in the FEMA and in Rugby. Indeed, the supply assessment demonstrates that there are just a handful of strategic sites in the FEMA with the required characteristics which positions them to meet the ongoing need for strategic I&L premises. Most of the supply comprises sites poised to deliver smaller scale premises or are not considered prime. This is detailed in our supply review.

Table E1 sets out our assessment of the balance of supply and demand for strategic sites in the PMA. Based on our estimate of demand (727ha) and of supply, we estimate there to be a deficit of about 103ha. Whilst we fully account for sites with planning permission or which are allocated, we have discounted draft allocations because of the various risks to their delivery; the need for a buffer or contingency; and the need for additional capacity for the end of the plan period. The Subject Site's full allocation (equivalent to 40.7ha) would contribute meaningfully to the deficit.

**Table E1 PMA Balance of Demand and Supply for Strategic I&L Use Over 17-Year Period**

Demand/Supply	ha
Savills assessment of I&L demand (ha)	(727.1)
Savills review of supply of I&L land (ha)	
<i>Sites with planning permission</i>	150.6
<i>Sites allocated but without planning permission</i>	35.3
Total supply	185.9
<b>Balance of demand vs supply (ha)</b>	<b>(541.2)</b>
Symmetry Park Rugby Phase 2 (Subject Site)	40.7
Savills review of supply of I&L land (ha)	
<i>Other draft allocation sites<sup>1</sup> (547.6ha discounted by 20%)</i>	438.1
<b>Balance of demand vs supply (ha)</b>	<b>(62.4)</b>

Source: Savills 2026

<sup>1</sup> Not including the Subject Site, which is listed separately.

Table E2 sets out the same analysis for Rugby where we estimate the deficit to be about 54ha and the Subject Site significantly contributing to overcoming the supply gap.

**Table E2 Rugby Balance of Demand and Supply for Strategic I&L Use Over 17-Year Period**

Demand/Supply	ha
Savills assessment of I&L demand (ha)	(230.4)
Savills review of supply of I&L land (ha)	
<i>Sites with planning permission</i>	31.2
<i>Sites allocated but without planning permission</i>	0
Total supply	31.2
<b>Balance of demand vs supply (ha)</b>	<b>(199.2)</b>
Symmetry Park Rugby Phase 2 (Subject Site)	40.7
Savills review of supply of I&L land (ha)	
<i>Other draft allocation sites<sup>2</sup> Site (181.1ha discounted by 20%)</i>	144.9
<b>Balance of demand vs supply (ha)</b>	<b>(13.6)</b>

Source: Savills 2026

Against this context, the full, original allocation of Symmetry Park Rugby Phase 2 for 130,000 sq.m represents a suitable and deliverable way for the Council to ensure it can meet a reasonable estimate of the need for strategic I&L logistics activity. The Site benefits from access to the strategic road network and sits within the Midlands’ established logistics corridor. An extension of the draft allocation would be the most efficient and commercially attractive manner in which the Council can ensure sufficient strategic employment need over the period of the draft local plan.

The findings of this report is there is a robust case for maintaining the larger allocation consistent with earlier versions of the emerging local plan on the basis of the market evidence.

<sup>2</sup> Not including the Subject Site, which is listed separately.

## 1 Introduction

### 1.1 Overview and Summary

- 1.1.1 The purpose of this report is to provide a market assessment to support representations submitted on behalf of Tritax Big Box Developments (TBBD) in relation to the emerging Local Plan prepared by Rugby Borough Council. The report presents the proposed development for South West Rugby Employment Phase 2 ('the Subject Site'), also known as Symmetry Park Rugby Phase 2, and reviews the evidence base underpinning the latest Regulation 19 Draft Local Plan.
- 1.1.2 The Regulation 19 Draft Local Plan (January 2026) proposes to allocate approximately 60,000 sq.m of employment floorspace at the Subject Site. This is a significant reduction compared with the 130,000 sq.m allocation proposed in the earlier Regulation 19 Draft Local Plan (March 2025). The reduction in the scale of the allocation raises questions as to whether the Council has sufficiently justified this change.
- 1.1.3 The report reviews the relevant planning policy context and evidence base, examines market signals within the relevant functional economic market area (FEMA) / property market area (PMA), and assesses the balance of future supply and demand for industrial and logistics (I&L) floorspace. The assessment focuses on the Coventry and Warwickshire sub-regional market (the FEMA/PMA), which reflects the functional geography used in the Coventry and Warwickshire Housing and Economic Development Needs Assessment (2022 HEDNA). It is considered the most appropriate market area for assessing demand for strategic logistics premises.

### 1.2 Structure

- 1.2.1 The structure of this report is based around the following chapters:
- **Chapter 1 – Introduction** sets out the purpose and structure of the report;
  - **Chapter 2 – Subject Site and Proposed Development** summarises key information about the Proposed Development;
  - **Chapter 3 – Defining a PMA** used for analysis of property market data;
  - **Chapter 4 – Review of Policy and Evidence Base** examines relevant policies and evidence base documents associated with the PMA;
  - **Chapter 5 – I&L Market Signals** examines the characteristics of the I&L market within the PMA and considers whether the market is supply or demand constrained;
  - **Chapter 6 – Estimate of Future Demand** provides our calculations for future I&L land demand in the wider PMA and compares this against the demand stated in the Rugby Borough Local Plan 2025-2042 Proposed Submission Version (Regulation 19) (January 2026);

- **Chapter 7 – Review of Supply** summarises the current and future supply of I&L sites across Coventry and Warwickshire, alongside Rugby Borough Council’s assessment of local supply;
- **Chapter 8 – Balance of Supply and Demand** estimates the amount of supply available to meet current demand and anticipated demand over the short and medium-term;
- **Chapter 9 – Summary and Recommendations** summarises the key findings of the analysis and sets out the overall conclusions of the report.

## 1.3 Reader Note

- 1.3.1 When we refer to the I&L sector, we mean Light Industrial (formerly B1c use class now part of Class E), General Industry (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require warehouses and factories (including ancillary offices) and associated yard spaces.
- 1.3.2 These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England. In order to gather relevant property market demand and supply data for the I&L sector, we used Savills proprietary data along with CoStar data covering light industrial, industrial and logistics uses.

## 2 Subject Site and the Proposed Development

### Introduction and Key Conclusions

#### Section Aim

- This section describes the Subject Site's locational context and the Proposed Development.

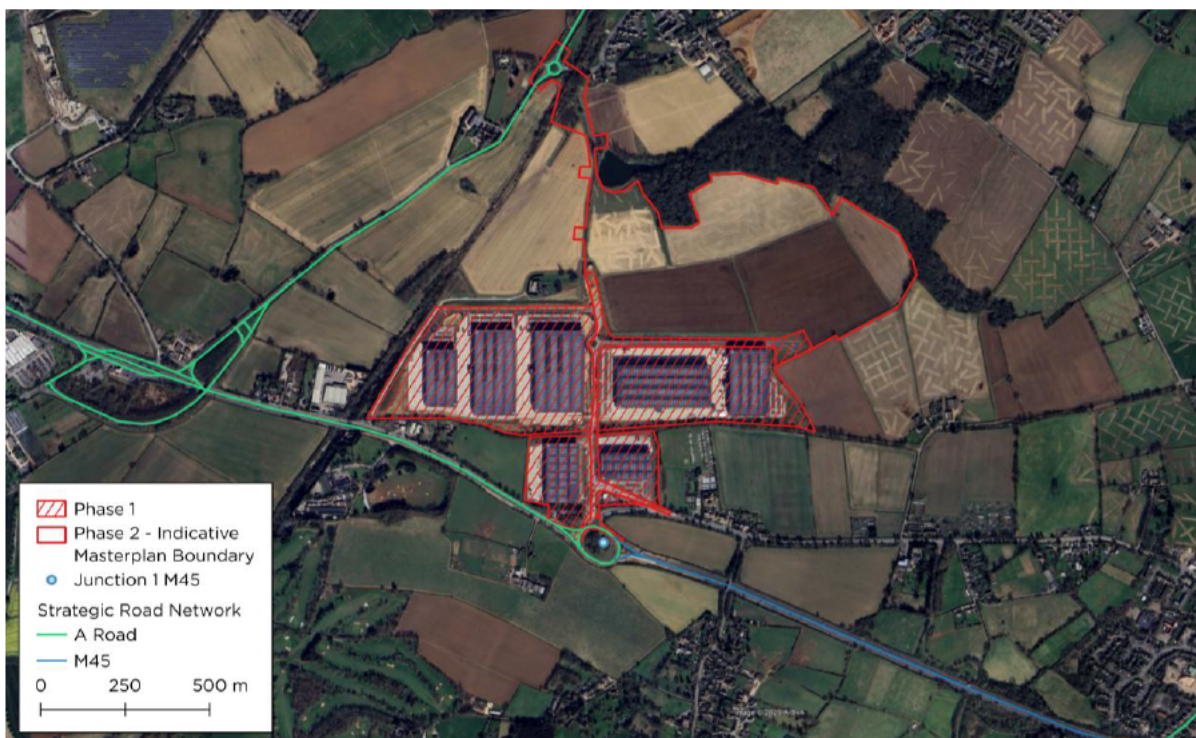
#### Key Conclusions

- The Subject Site benefits from the excellent connectivity to the strategic road network, including the M45 and A45, which connect to the southbound M1 to the east.
- The Proposed Development comprises logistics development totalling circa 1.4m sq.ft (GIA) with ancillary office space.

### 2.1 Site Context

2.1.1 The Subject Site comprises South West Rugby Employment Phase 2 (Symmetry Park), a strategic allocation within the emerging Rugby local plan. The Subject Site extends to circa 40.7 hectares and is currently predominantly in agricultural use. It lies within the local authority of Rugby Borough Council, approximately 0.6 miles south of Rugby Town Centre, and adjacent to the existing Symmetry Park Rugby (Phase 1) development. **Figure 2.1** shows the location of the Subject Site.

Figure 2.1 Subject Site Location



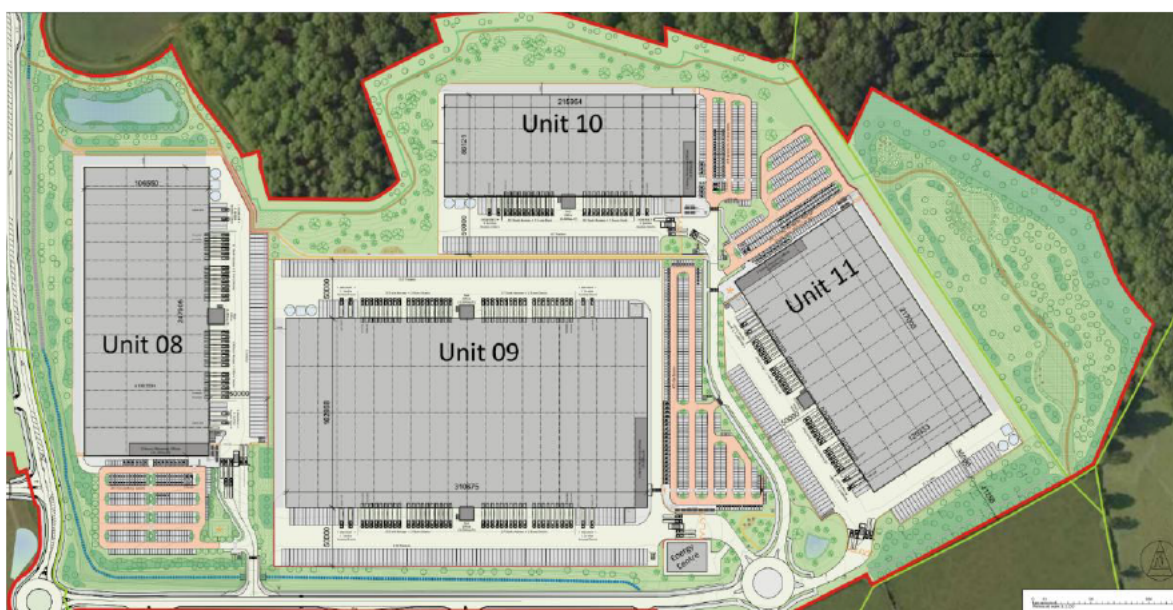
Source: Savills, 2026

- 2.1.2 The Site benefits from strong strategic connectivity. It is served by a link road connecting to the Thurlaston Interchange (Junction 1 of the M45 and A45), located approximately 0.4 miles to the south of the Site. The M45 provides direct access to the M1 (Junction 17) to the east, enabling connectivity to the wider strategic network. The A45 forms part of the National Highways Strategic Road Network, providing connections to key destinations to the west, including Coventry and Birmingham.
- 2.1.3 The Site is located within the Midlands' established strategic logistics corridor, often referred to as the 'Golden Triangle', which provides access to a significant proportion of the UK population within a four-hour drive time. This area is recognised as one of the UK's most important locations for strategic distribution and logistics activity.
- 2.1.4 Based on the Regulation 19 Draft Local Plan (January 2026), the Site is allocated to deliver approximately 60,000 sq.m (646,000 sq.ft) of employment floorspace (this is approximately equivalent to 17ha of land). This represents a significant reduction compared with the 130,000 sq.m (1.4m sq.ft) allocation (which is approximately 37ha of land) proposed in the earlier Regulation 19 Draft Local Plan (March 2025).
- 2.1.5 Key development requirements for the Site include the delivery of a 23ha country park adjacent to Cawston Spinney (increased from 8.6 ha at Preferred Options stage), improvements to pedestrian and cycle connectivity, provision of overnight lorry parking, and the incorporation of landscape and tree planting along the Potsford Dam Link and Sustainable Transport Corridor.

## 2.2 Existing and Proposed Development

- 2.2.1 **Figure 2.2** shows the illustrative masterplan for Phase 2 of Symmetry Park, Rugby.

**Figure 2.2 Symmetry Park, Rugby – Phase 2 Illustrative Masterplan**



Source: SGP Architects, 2026.

# Symmetry Park Rugby Phase 2



## Market Assessment and Review of Draft Local Plan

- 2.2.2 Outline planning consent (R16/2569) for Phase 1 of Symmetry Park was granted in 2020 for up to 186,500 sq.m (2m sq.ft) of B8 logistics floorspace. Phase 1 has since delivered seven units and has attracted a range of occupiers, including a major pre-let of Units 1-5 to Iron Mountain. Unit 6 (338,000 sq.ft) and Unit 7 (170,000 sq.ft) are currently available to let.
- 2.2.3 Phase 2, which is currently being promoted for employment use, has the potential to deliver up to 1.4m sq.ft of logistics, warehouse and industrial space.
- 2.2.4 Based on the latest illustrative masterplan, Phase 2 comprises four units (Unit 8, 9, 10 and 11) with ancillary office space and supporting infrastructure. The units range in size from approximately 215,000 sq.ft to 576,000 sq.ft (GIA) and together provide a total of around 1,390,500 sq.ft of floorspace (GIA).
- 2.2.5 A schedule of floor areas by unit is shown in **Table 2.1** below.

**Table 2.1 Symmetry Park, Rugby Schedule of Accommodation**

Units	GIA (sq.ft)
Unit 8	302,380
Unit 9	575,868
Unit 10	213,414
Unit 11	298,797
<b>Total</b>	<b>1,390,459</b>

Source: SGP Architects, 2026

## 3 Defining a Property Market Area

### Introduction and Key Conclusions

#### Section Aim

- Before we can consider market demand and supply signals, we first need to define an appropriate Property Market Area (PMA). The PMA needs to be relevant to the Subject Site, namely it is the broad 'area of search' the Site sits within that prospective I&L occupiers will consider when looking to lease space. The PMA includes the main competitor locations to the Subject Site for attracting this occupier demand.

#### Key Conclusions

- We conclude that the most relevant PMA to use is a wider Coventry & Warwickshire (C&W) area which the council considers to be its functional economic market area (FEMA).

### 3.1 The Local Authority Approach: FEMA

- 3.1.1 In order to define an appropriate PMA for the Subject Site, we first consider Rugby Borough Council's employment evidence to see if the Council has defined an appropriate Functional Economic Market Area (FEMA). A FEMA is effectively a collection of administrative areas which share economic linkages as defined by travel to work patterns, housing market areas, shared infrastructure, labour skills, etc. Where appropriate, we look to use the Council defined FEMA as a proxy for the PMA for I&L uses.
- 3.1.2 The Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (2022) reviews the definition of FEMA based on previous research and updated market data. This includes the 'core sub-region' functional geography mentioned in the Rugby Employment Land Study (2015) and the Functional Economic Geography of the Coventry, Solihull and Warwickshire Sub-Region (2010) ('Topic Paper').
- 3.1.3 The 'core sub-region' comprises the local authorities of Nuneaton and Bedworth, Coventry, Rugby, Warwick, southern North Warwickshire and most of Stratford-on-Avon. Parts of North Warwickshire and Stratford-on-Avon are more closely related to economic areas to the west. The HEDNA and the Topic Paper identify that the core sub-region exhibits a high level of self-containment in commuting patterns.
- 3.1.4 However, both the 2022 HEDNA and the Topic Paper consider the 'best-fit' FEMA as the local authority boundaries of Coventry and Warwickshire Local Enterprise Partnership (LEP), albeit the core sub-region cannot fit onto this boundary. The Coventry and Warwickshire LEP comprises the local authorities of Coventry, North Warwickshire, Nuneaton and Bedworth, Rugby, Stratford-on-Avon, and Warwick.
- 3.1.5 The HEDNA reports that 71% of internal migration is contained within the sub-region, indicating a strong level of functional integration. While there are some differences

between the northern and southern parts of the sub-region regarding house prices and economic structure, both areas maintain strong economic and commuting links with Coventry, which functions as a key hub for the wider sub-region.

### 3.2 PMAs

3.2.1 We consulted with Savills agents to establish a view on the geographical area most relevant to the market within which the Subject Site operates. This identified two geographical levels: the local and wider PMAs.

3.2.2 At the local level, the agents consider the PMA to largely comprise Rugby Borough. However, this market is primarily relevant to smaller-scale industrial development. Given the nature and scale of the proposed occupiers at Symmetry Park, Rugby, this local PMA is not considered the most appropriate geography for the purposes of this assessment.

3.2.3 Given the potential scale and strategic location of the Subject Site, occupier demand is likely to be drawn from larger logistics operators. These occupiers typically operate extensive supply chains, often covering catchments of up to four hours' drive time or more, and require large modern premises, which are often in limited supply. As a result, they tend to consider a much wider geographic search area when identifying suitable sites or buildings to meet their operational needs.

3.2.4 For these reasons, we consider it necessary to focus on a larger PMA that captures this market dynamic instead of just considering Rugby alone. The agents largely agree with the conclusions of HEDNA in that Coventry and Warwickshire LEP is a good approximation of the relevant sub-regional market.

3.2.5 We broadly agree with the Council's FEMA. The Coventry and Warwickshire (C&W) LEP economic geography forms the 'sub-regional' PMA when assessing strategic warehousing needs. This FEMA-led approach is consistent with Paragraph 19 of Planning Practice Guidance<sup>3</sup>.

3.2.6 However, there are some drawbacks to using the C&W PMA. In particular, it does not capture sites located along the M1 corridor to the east of the A5 which follows the North-East boundary of the C&W area. These nearby locations (such as Magna Park, Logicor Park, DIRFT) will offer a degree of competition to developments in Rugby. However, they are also under pressure to accommodate the needs of their own market and economic areas. On balance, we have focused our analysis on the C&W PMA, while recognising the wider context of supply along the M1 corridor.

3.2.7 The sub-regional PMA and local PMA are presented in **Figure 3.1** below.

### 3.3 Relationship Between Rugby and the Wider C&W PMA

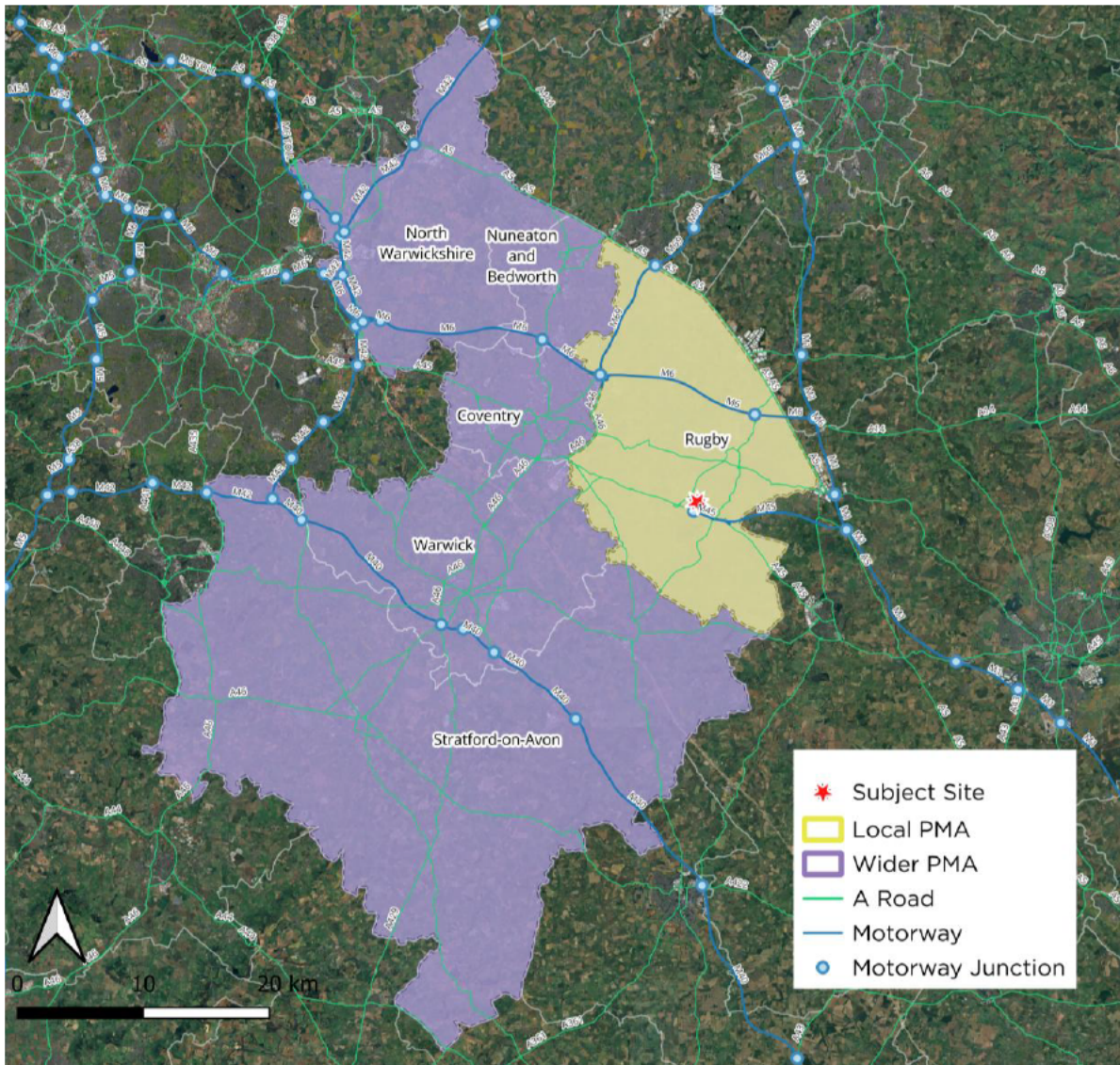
3.3.1 The purpose of defining a PMA is to identify the geographic area within which sites may come forward to meet market demand. Subject to individual site characteristics, from a market perspective it is generally less important where sites are located within the PMA, provided that demand across the PMA can be accommodated. As a result, at a local

<sup>3</sup> Paragraph: 019 Reference ID: 61-019-20190315

authority level, such as Rugby, future supply does not necessarily need to mirror the pattern of historic development. Supply may be more or less concentrated in particular sub-areas of the PMA than has historically been the case. Historic development patterns should therefore not be treated as a direct determinant of where future allocations should be located. To assume a direct alignment between past development and future allocations would implicitly pre-determine how demand should be distributed.

3.3.2 In subsequent sections we assess the overall level of demand, and how this compares with supply. We recognise that, provided demand is met, the ultimate decision on where to distribute supply is a local authority decision, taking into account all relevant factors. For the purposes of this assessment, we illustrate how future demand within the PMA could be apportioned to Rugby based on historic development and take-up patterns. This approach is used purely for illustrative purposes and should not be interpreted as representing the level of demand that must be accommodated within Rugby itself.

**Figure 3.1 Sub-Regional and Local PMA**



Source: Savills (2026).

## 4 Policy and Evidence Base Review

### Introduction and Key Conclusions

#### Section Aim

- This section reviews the relevant policies and evidence base documents associated with the PMA. Our review focuses on the future demand estimates for employment land and floorspace and how this compares to current and proposed allocations, and Symmetry Park, Rugby in particular.

#### Key Conclusions

- Our review identifies a number of risks in the council's approach to meeting its employment land requirement across a series of evidence base documents.
- Some of the assumptions, decisions or change in approach used to demonstrate how the identified need will be met appear to be insufficiently justified, not fully explained or potentially erroneous within the supporting evidence base.
- The key concerns are around changes brought about by the 2024 Alignment Paper; how certain sites are treated as sources of supply; the council's approach to meeting the need in Coventry; and the reduction in the supply buffer which ensures supply flexibility.
- The council recognises the risk in this approach but states that these issues can be revisited through planmaking under a new unitary authority. However, we are sceptical that such a review will be done in a timely manner.
- The key concerns arising from our review are detailed in the body of this section and the conclusion.

### 4.1 National Planning Policy

#### *Adopted NPPF (December 2024)*

- 4.1.1 The latest version of the National Planning Policy Framework (NPPF) was published in December 2024 and subsequently amended in February 2025. It sets out the government's planning policies for England and how these policies should be applied.
- 4.1.2 The purpose of the NPPF is to contribute to the achievement of sustainable development via three overarching objectives: economic, social and environmental. The 'economic objective' (paragraph 8a) is 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'*.
- 4.1.3 The NPPF places significant weight on supporting sustainable economic growth and ensuring that sufficient land is available to meet the needs of different sectors of the economy, including I&L uses. Paragraphs 85 to 87 requires planning policies and decisions to support economic growth and productivity, stating:

*'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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity.'*

- 4.1.4 Paragraph 87 states *'planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for storage and distribution operations at a variety of scales and in suitably accessible locations.'*
- 4.1.5 The NPPF paragraph 31 also specifically references the I&L sector that *'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.'*
- 4.1.6 Our demand-supply analysis considers market signals and builds on historic take-up trends by considering future forecasts of market growth drivers such as suppressed demand. This is considered to be an NPPF-compliant methodology.

### **Draft NPPF (December 2025)**

- 4.1.7 The Government published a consultation draft of a revised NPPF in December 2025, with the intention that a final version will be adopted following consultation. This makes clear that economic growth is the number one mission of this government. The draft continues to emphasise the importance of ensuring that sufficient land is available to support economic growth, including logistics development. For example, paragraph 16 states:

*'...the planning system has three overarching objectives in providing for the homes, commercial development, facilities and infrastructure which society needs. [...]*

*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; ....' (pages 4-5)*

- 4.1.8 Policy S5 Principle of Development Outside Settlements states:

*'Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework: [...]*

*Development which would address an evidenced unmet need [...] and where the*

*development would:*

*ii. comprise major development for storage and distribution purposes which accords with policy E3.’ (page 24. Policy E3 relates to locational requirements of freight and logistics)*

4.1.9 It introduces significant provisions under Policies E1-E3 and S5 to support economic growth and modern logistics.

4.1.10 Policy E1 Providing the Conditions for Long Term Economic Growth states:

*‘To support business investment and employment, development plans should, at the most appropriate level: [...]*

*Allocate sites to implement the economic vision and strategy and meet existing and anticipated needs over the plan period, paying particular regard to facilitating development to meet the needs of a modern economy (including sites and premises which are flexible and adaptable) and the specific locational requirements of different sectors. This includes, where a need exists or is anticipated, 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 (including ‘last mile’ deliveries), transport innovation and decarbonisation’ (page 39)*

4.1.11 Policy E2 Meeting the Need for Business Land and Premises states:

*‘To support business growth, 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;’ (page 40)*

4.1.12 Policy E3 Freight and Logistics states:

*‘To support the effective and efficient movement of goods, development proposals for freight and logistics uses 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.’*

## 4.2 Local Planning Policy and Evidence Base

4.2.1 This subsection reviews both the relevant planning policy framework and supporting evidence base. A considerable body of analysis has been produced by the Council as successive versions of the emerging Local Plan have been published. The evidence base is characterised by significant changes in the estimated level of employment land demand and the approach taken to meeting this need. The following Rugby and sub-regional documents are particularly relevant to the Proposed Development:

- Coventry and Warwickshire Employment Land Memorandum of Understanding (MoU) (2016)
- Rugby Local Plan 2011-2031 (2019)
- South West Rugby Masterplan Supplementary Planning Document (SPD) (2021 and 2024)
- West Midlands Strategic Employment Sites Study (2021)
- Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (2022)
- Coventry and Warwickshire Employment Land Report (2023)
- Rugby Local Plan Review Issues and Options (Regulation 18) (October 2023)
- HEDNA-WMSESS Alignment Paper (November 2024)
- Development Needs Topic Paper (March 2025)
- Preferred Option (Regulation 19) (March 2025)
- Development Needs Topic Paper (December 2025)
- Proposed Submission Version (Regulation 19) (January 2026)

### ***Coventry and Warwickshire Employment Land Memorandum of Understand ('MOU') (2016)***

4.2.2 The C&W Employment Land MoU sets out the agreed position of local authorities within C&W to redistribute employment land requirements to address the shortfall in supply in Coventry.

4.2.3 The MoU identifies a shortfall of 241 hectares of employment land in Coventry, of which 45 hectares is to be redistributed to Rugby. This informs the quantum of employment land required within Rugby to contribute towards Coventry's unmet employment land needs, and therefore influences the overall employment land requirement identified in the Rugby Local Plan<sup>4</sup>.

### ***Rugby Local Plan 2011-2031 (Adopted 2019)***

4.2.4 The Rugby Borough Council Local Plan 2011-2031 ('Rugby Local Plan') sets out the Council's spatial vision to deliver sustainable growth.

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<sup>4</sup> This approach is in line with our assessment of how to treat sub-areas within PMAs, as outlined in our previous section.

- 4.2.5 Policy DS1 identifies an overall employment land need of 208 ha over the plan period (2011 to 2031). This comprises 98 ha of land to contribute to Coventry’s unmet needs and 110 ha to meet the local needs in Rugby.
- 4.2.6 The 98 ha of land contributing to Coventry’s unmet needs is spread across two major employment sites near Coventry: Prologis Ryton and Ansty Park. This is higher than the 45 ha stated in the 2016 C&W Employment Land MoU but considered beneficial to the sub-regional economic growth.
- 4.2.7 The 110 ha employment land need in Rugby is derived from the mid-point of the recommended range (96-128 ha) in a 2015 evidence base document.
- 4.2.8 **Table 4.1** summarises the components contributing to the employment land target in Rugby. This includes three new allocations totalling 58.5 ha in size. In total, 114 ha of land is identified to meet Rugby’s needs.

**Table 4.1 Supply to Meet the Rugby Local Plan Employment Land Target (Gross)**

Component of Rugby Local Plan (2019) Case	Area (ha)
Completions between 2011 and the adoption of Rugby Local Plan	42.16
Supply (Strategically significant employment sites; Core Strategy allocations)	13.62
Three new allocations in the Rugby Local Plan (Policy DS4.1-DS4.3)	58.50
<b>Total</b>	<b>114.28</b>

*Source: Rugby Borough Council Local Plan 2011-2031 (2019), p.26-27*

- 4.2.9 Policy DS4: Employment Allocations sets out the three new employment land allocations including South West Rugby.
- 4.2.10 Policy DS8: South West Rugby and Policy DS9: South West Rugby Spine Road Network are directly relevant to the Proposed Development. Phase 1 of Symmetry Park Rugby is part of the South West Rugby allocation. The policies state that the South West Rugby employment land allocation should accommodate 35 ha of employment land for B8 uses, associated onsite services and facilities, and a comprehensive sustainable transport provision, including a spine road. The delivery should be informed by the South West Rugby Masterplan SPD (‘SW Rugby SPD’).
- 4.2.11 The local plan identifies South West Rugby as a long-term commitment and does not expect the site to be delivered through one overarching outline permission.

***South West Rugby Masterplan Supplementary Planning Document (2021, 2024)***

- 4.2.12 The South West Rugby SPD was initially published in 2021. It defined the boundary of the South West Rugby employment allocation. This is shown in **Figure 4.1**.
- 4.2.13 Phase 1 of Symmetry Park Rugby represents the permitted development as part of the

# Symmetry Park Rugby Phase 2

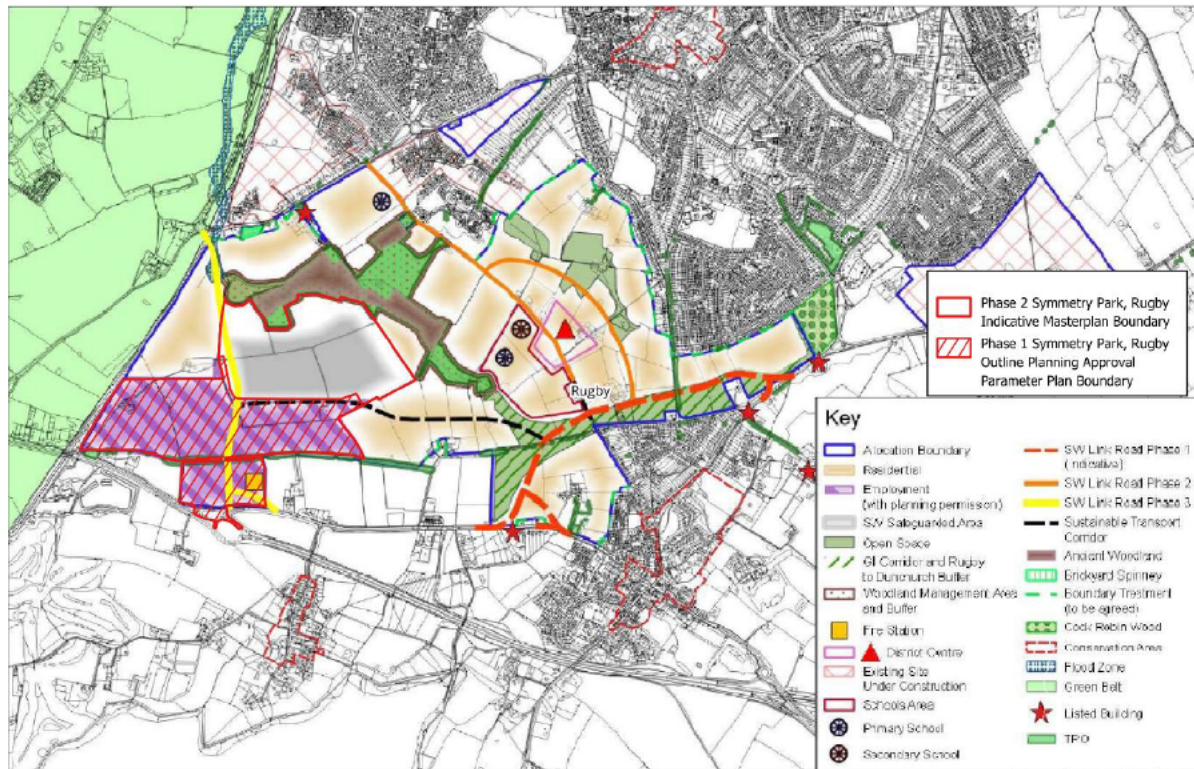
## Market Assessment and Review of Draft Local Plan



employment allocation. Phase 2 is categorised as ‘safeguarded land’.

4.2.14 The latest version of the South West Rugby Masterplan SPD was adopted in 2024. It did not make any changes to the status of the employment land.

**Figure 4.1 South West Rugby Masterplan SPD Map**



Source: Rugby Borough Council South West Rugby Masterplan SPD (Consultation Version) (2024) (Boundary of Symmetry Park, Rugby Phases 1 and 2 added by Savills)

### **West Midlands Strategic Employment Sites Study (‘WMSESS’) (2021)**

4.2.15 The WMSESS provides a schedule of the existing and potential supply of strategic employment sites in the region. The availability and capacity of these locations are subjected to availability tests. The study applies a 25-hectare threshold for the identification of strategic sites.

4.2.16 The WMSESS finds that the current supply of allocated and committed employment land represents a maximum of about 7.4 years supply.

### **Coventry and Warwickshire HEDNA (2022)**

4.2.17 The 2022 HEDNA estimates employment land needs of local authorities in Coventry and Warwickshire.

4.2.18 The report uses three models to forecast I&L demand: labour demand, floorspace trends, and completion trends. The report uses a size threshold of 9,000 sq.m to distinguish between strategic and non-strategic industrial premises.

4.2.19 The following considerations inform the preferred scenarios for the different I&L

categories:

- For industrial and non-strategic warehousing, the report identifies completion trends as the preferred forecast model.
- For strategic warehousing, the report uses completions trend for forecasting demand in the first ten years (2021 to 2031) to reflect a stronger demand potential in the short term. For the 2031 to 2041/50 period, it prefers the mid-point between low and high replacement scenarios in the traffic growth and replacement demand modelling to reflect a slower growth potential in the longer term.

4.2.20 Table 4.2 summarises the preferred scenarios that include some margin adjustments.

**Table 4.2 HEDNA Gross Employment Land Need (2021-2041/50)**

Type of Employment Land	Preferred Model(s)	Market	Land need 2021 to 2041 (ha)	Land need 2021 to 2050 ha
Industrial and smaller warehouses (up to 9,000 sq.m floor area) (gross)	Completions trend model	Rugby	151	218
Strategic warehouses (over 9,000 sq.m in floor area) (gross)	Completions trend model (2021 to 2031)	Coventry and Warwickshire	551	735
	Traffic growth and replacement demand model (2031 to 2041/50)			

Source: HEDNA, page 236.

4.2.21 Over the 2021 to 2041 timeframe, the demand estimate for industrial and smaller warehouses is 151 ha. This is able to be met by floorspace completions and identified supply. Therefore there is no residual net need. (Completions and supply data are taken from the Council’s Annual Monitoring Report. We did not review the document.) Over the 2021 to 2050 timeframe, the estimated demand of 218 ha is not met by completions and identified supply. The net need is 40.3 ha and new land needs to be found.

4.2.22 The supply-demand analysis was not undertaken for the strategic warehouse category.

**Coventry and Warwickshire Employment Land Report (2023)**

4.2.23 Coventry and Warwickshire Employment Land Report (2023) states:

*Land has been taken up more quickly than anticipated because Coventry and*

*Warwickshire's economy has been more successful and buoyant than was predicted since the last Local Plans were drawn up.*

4.2.24 There is only 96 ha of 'oven-ready' employment land available and only one site of strategic scale.

***Rugby Borough Local Plan Issues and Options (Regulation 18) (October 2023)***

4.2.25 The Rugby Borough Local Plan Issues and Options set out the issues and context of employment land in Rugby.

4.2.26 The document uses the 2022 HEDNA as the basis for its employment land needs. **Table 4.3** and **Figure 4.2** summarise the future employment land needs associated with Rugby identified in the 2022 HEDNA. The analysis does not include strategic warehousing.

**Table 4.3 Industrial and Non-Strategic Warehousing Demand and Supply in Rugby**

	Land area (ha) (2021 to 2041)	Land area (ha) (2021 to 2050)
Demand (from 2022 HEDNA)	150.5	218.2
Completions (since 2021)	32.7	32.7
Total supply	145.3	145.3
Supply to be identified	N/A	40.29

*Source: Rugby Borough Local Plan Issues and Options (2023), p.15.*

4.2.27 With regard to the additional requirement for strategic employment land, the document acknowledges that Rugby is an attractive location for warehousing. It is in the Golden Triangle and therefore benefits from a central location for national distribution networks and from excellent road/rail infrastructure. This makes it commercially attractive.

4.2.28 The document identifies the Subject Site (Phase 2 Symmetry Park Rugby) as one of eight indicative locations with the potential to be brought forward as a strategic employment site. The Subject Site is referred to as 'Safeguarded land within the South West Rugby allocation'.

4.2.29 Rugby's share of the sub-regional strategic warehousing requirement is not set out in the document. However, paragraph 3.32 states that Rugby is expected to contribute towards wider requirements.

***HEDNA-WMSESS Alignment Paper ('Alignment Paper') (November 2024)***

4.2.30 This document seeks to reconcile two previous evidence base documents, the 2022 HEDNA and the WMSESS. It uses the 2022 HEDNA for local I&L need and the WMSESS for strategic warehousing need.

4.2.31 The document maintains the same timeframe as the 2023 Reg 18 but changes the data series used in the 2022 HEDNA (by adding four additional years of data) to forecast local I&L demand. This dramatically reduces the level of local I&L need between 2021 and 2050 from 218ha to 74ha. This dramatic change is not recognised or explained in the Alignment

Paper. Local need in Rugby for 2021 to 2041/2050 therefore reduces to between 56 ha and 74 ha respectively.

4.2.32 The document identifies total strategic need of between 75ha to 150ha for Rugby. But then nets off the permission for Padge Hill Farm (and another small site) which are equivalent to 66 ha. Therefore strategic need is reduced to 84ha. However, whilst reducing the level of demand for strategic I&L, Padge Hill Farm is then used as part of supply again in the March 2025 Development Needs Topic Paper. This appears to indicate that the Council has double counted Padge Hill Farm as contributing towards Rugby's supply.

### ***Development Needs Topic Paper (March 2025) ('March 2025 DNTP')***

4.2.33 The March 2025 DNTP sets out that the plan period for the new emerging local plan as 2024 to 2045. It adjusts earlier demand figures to reflect the updated local plan period. As a result, local need in Rugby is 68ha and strategic need is 84ha.

4.2.34 The paper identifies a combined industrial need between local and strategic sites of 284ha (1.0m sq.m) once completions and commitments are accounted for.

4.2.35 The paper says that 45ha of Coventry's own need can't be met and considers that gross need would be 1.2m sq.m (329ha) if Rugby meets it.

4.2.36 The paper sets out the types of sites that are needed in Rugby to meet its need:

- 1-2 larger B8/mixed sites of 50ha
- 1-2 smaller B2/B1 sites of about 25ha

4.2.37 It says that the larger B8 sites have been granted permission at Padge Hall Farm and Frasers Campus (Crowners Field Farm) and therefore aren't required.

### ***Rugby Borough Local Plan Preferred Option (Reg 19) (March 2025) ('March 2025 Reg 19')***

4.2.38 This document is supported by the Development Needs Topic Paper (March 2025). The new draft plan period has required the employment land data to be adjusted.

4.2.39 The document identifies demand for 1,026,546 sq.m or 284ha for both small and large sites. It identifies commitments of 286,987 sq.m and proposes new allocations of 945,000 sq.m including subject site (130,000 sq.m). This is shown in **Table 4.4**.

4.2.40 The plan provides a surplus of over 200,000 sq.m. This is a buffer of about 20% over the Gross need and is deemed sufficient to meet Coventry's unmet need.

	Sq.m	Ha
Gross need	(1,026,627)	(283.8)
Committed Supply	286,987	81.5
New Allocations	945,000	270
Surplus/Deficit	205,360	67.7
<i>Coventry's unmet local need</i>	<i>(180,000)</i>	<i>(45)</i>
<i>Surplus/Deficit</i>	<i>surplus</i>	<i>surplus</i>

Source: Rugby Borough Local Plan Preferred Option (Reg 19)

**Coventry & Warwickshire Employment Needs - Addendum to the Coventry & Warwickshire Alignment Paper (November 2025)**

4.2.41 The document says that an error in the quantity C&W strategic land supply was identified that has reduced the overall supply of strategic land. This results in the need for an additional large site to be apportioned to Rugby (identified as Area 7).

4.2.42 This increases the upper end of the need for strategic sites from 84ha to 134ha (an additional 50ha).

**Development Needs Topic Paper (December 2025) ('December 2025 DNTP')**

4.2.43 The December 2025 DNTP sets out a new plan period for the latest version of the emerging local plan: 2025 to 2042. It adjusts earlier demand figures to reflect the updated local plan period. As a result, local demand need in Rugby is 60.8ha and strategic demand is 116.5ha.

4.2.44 The paper identifies a combined industrial need between local and strategic sites of 284ha (1.0m sq.m) once completions and commitments are accounted for.

4.2.45 The paper says that only 9ha of Coventry's own need can't be met. This is a decrease of 80% but is not explained. It suggests that Rugby could contribute about 2.5ha to that need.

4.2.46 The paper sets out the types of sites that are needed in Rugby to meet its need:

- 2-3 larger B8/mixed sites of 50ha
- 1-2 smaller B2/B1 sites of about 25ha

4.2.47 It says that the larger B8 sites have been granted permission at Crowner Fields Farm (Frasers Campus), Padge Hall Farm and Walsgrave Hill. Two of the three sites are new since the March 2025 DNTP was published.

4.2.48 The latest calculations on employment land remove a 20% buffer of supply over demand compared to the previous March 2025 DNTP. It suggests that the figure for strategic land

already contains a buffer because it is at the higher end of a range. It also states that the identified supply is controlled by developers that have a good track record of delivery and that nearly half of the identified supply is permitted.

4.2.49 This begs the question why a buffer was included in the March 2025 DNTP but is now not needed. The council should be planning to meet objectively assessed need which given uncertainties over delivery and the need to have sites ready for development beyond the plan period justifies including of a buffer as well.

4.2.50 It also says that by 2033 a new plan for a unitary authority including Rugby will have been adopted and will provide an opportunity to consider whether further supply is required. A statutory consultation is currently open until 26 March 2026 to inform an assessment by the Secretary of State of the merits of the proposals for:

- a. One unitary council for the whole of the area of Warwickshire comprising the current areas of North Warwickshire, Nuneaton and Bedworth, Rugby, Stratford-on-Avon and Warwick; or
- b. Two unitary councils comprising the current areas of:
  - North unitary authority: North Warwickshire, Nuneaton & Bedworth, and Rugby
  - South unitary authority: Stratford-on-Avon, and Warwick

4.2.51 It is considered unlikely that a unitary plan will be produced in this relatively short timeframe to 2033. No decision has yet been made on the merits of having a unitary council and which authorities this would involve. In the case of Buckinghamshire, a unitary authority was formed in 2020 and nearly six years later it still hasn't produced a new local plan. No clear justification has been set out for 'kicking the can down the road' in terms of not meeting their full objectively assessed employment need.

***Rugby Borough Local Plan Proposed Submission Version (Reg 19) (January 2026) ('January 2026 Reg 19')***

4.2.52 The most recent Reg 19 document is supported by Development Needs Topic Paper (December 2025). The new version changes the plan period to 2025-2042 (from 2024-2045).

4.2.53 The document identifies a gross need for 1,034,000 sq.m or 287ha from 2025-2042 for both small and large sites. (The Development Needs Topic Paper identifies a need of 1,024,000 sq.m. This is a discrepancy that indicates there is a supply surplus that can be used to meet Coventry's local need. In fact, this is not possible.) The document identifies commitments of 494,000 sq.m. This is a considerable increase arising primarily from Crowner Fields Farm being permitted. (In the March 2025 Reg 19 it was a draft allocation.) New allocations are reduced to 540,000 sq.m from 945,000 sq.m. Part of this reduction is due to the Subject Site's lower floorspace figure of 60,000 sq.m (from 130,000 sq.m).

4.2.54 The overall supply (comprised of commitments and allocations) is now 1,034,000 sq.m.

This covers the demand figure but there is now no supply buffer as explained in the December 2025 DNTP.

4.2.55 At the same time, Prologis Park (100ha; 350,000 sq.m) is no longer a draft allocation and Walsgrave Hill (83ha; 290,000 sq.m) is a new draft allocation. No explanation is given.

### 4.3 Conclusion

4.3.1 The MOU between the different C&W local authorities recognises that Rugby will contribute towards the employment land needs of Coventry. However, over time, this commitment has been downgraded to the point where in the latest version of the emerging local plan Rugby is barely contributing.

4.3.2 The Alignment Paper from November 2024 plays an important role in Rugby's employment land assessment by synthesising earlier evidence base documents. For **local demand**, it adds four additional years of historic property data for the purpose of forecasting demand. This somehow causes a 66% decline in demand compared to the 2022 HEDNA. This is a decrease from 218ha down to 74ha. This dramatic reduction is neither recognised or explained in the Alignment Paper and yet transforms the council's need.

4.3.3 The Alignment Paper also presents an estimate of **strategic demand** taken from the 2022 HEDNA. However, the Alignment Paper nets off Padge Hill Farm (66ha) from the headline demand figure but then also includes it as a supply figure. The site appears to be counted twice in the Council's calculations as a means of meeting its needs. Our conclusion is that this is an error that should be rectified by adding 66ha to need.

4.3.4 Between the March 2025 DNTP and the December 2025 DNTP, the level of need in Coventry that the Council would seek to contribute decreased from 45ha to 9ha. This 80% decline in Coventry's need in just 9 months is not explained in the evidence. Of the 9ha of Coventry's need, the December 2025 DNTP says that Rugby could contribute about 2.5ha. This is a significant change in approach. Rugby had previously committed to meeting about 45ha of Coventry's unmet need.

4.3.5 The December 2025 DNTP also sets out how the council has removed a 20% supply buffer which had previously increased the likelihood that all its employment land needs could be met. However, the removal of the buffer significantly increases the risk that Rugby will not meet its needs. The buffer had previously been in place 'to provide supply flexibility'. It is unclear why the emerging local plan no longer needs the same level of supply flexibility. The council says that their demand figures already contain sufficient buffer. Savills believes that the removal of the buffer significantly increases the risk to the council's ability to meet demand, especially in light of a key error that we have identified.

4.3.6 The December 2025 DNTP also justifies the removal of the buffer by stating that the identified supply is controlled by developers with good track records of delivery. However, developers' priorities often change and financial difficulties can arise which can limit the amount of land that comes forward over the plan period. Based on its experience, Savills suggests that the council should have retained the buffer. The council has not sufficiently explained why it previously included a buffer but that now it deems it

unnecessary.

- 4.3.7 The council also states in the December 2025 DNTP that by 2033 a new plan for a Warwickshire unitary authority (which includes Rugby) will have been adopted and that this process will provide an opportunity for the employment land supply to be considered. However, it is unlikely that a new plan will be in place by that time. As a cautionary tale, Buckinghamshire became a unitary authority in April 2020 and nearly six years later it still hasn't produced a new local plan. This is due to organisational disruption after the reorganisation of four former local authorities into a single entity. As a result, milestones were missed.
- 4.3.8 Warwickshire is unlikely to become a unitary authority until 2028 based on expected elections in 2027. There is a risk that it will take considerable time for the six relevant local authorities to integrate and consider employment land need together.

## 5 I&L Market Signals

### Introduction and Key Conclusions

#### Section Aim

- The aim of this section is to review characteristics of the I&L market in the PMA and assess whether it is supply or demand constrained.
- The consideration of market signals is a key requirement of the National Planning Policy Framework (NPPF) (Paragraph 31) for underpinning the preparation and review of all Local Plan policies.

#### Key Conclusions

- The conclusion of our review of market signals is that the relevant property markets have healthy demand and are broadly supply constrained. (In subsequent sections we consider the factors influencing future scale of demand and our estimate of total demand including suppressed demand).

### 5.1 Summary: A Strong and Supply-Constrained Market

- 5.1.1 Rugby's emerging local plan makes a distinction between strategic warehousing (B8 above 100,000 sq.ft) and other industrial premises (B8 under 100,000 sq.ft, B2, E(g)(iii)). Market data provided by CoStar, which our assessment is based on, does not make as stark a distinction. Warehousing and industrial premises can be identical in terms of size and functionality. We do, however, make a distinction between size categories to differentiate strategic uses (above 100,000 sq.ft) from non-strategic (below 100,000 sq.ft). Our analysis covers both industrial and warehousing facilities. Strategic premises though are predominantly warehouses because this use often requires larger floorplates.
- 5.1.2 Rugby's central location in the Golden Triangle means it is a good location for distribution companies aiming to access major markets and population centres. From strategic locations like Coventry Logistics Park and Ansty Park, about 90% of the UK's population is reachable within four hours by road. Additionally, East Midlands Airport and key east coast seaports are close by for air and sea transport.
- 5.1.3 As discussed in Section 3, we review property market data at two geographic levels: Rugby and Coventry & Warwickshire (C&W). This is in line with Rugby Council's emerging local plan identifying need for I&L space at both local and strategic scale (see Section 4). We also review large property segment (100k+ sq.ft). Key summary market supply and demand indicators for the PMAs are shown in **Table 5.1** below.



**Table 5.1 Summary of the Key Market Supply & Demand Indicators**

	Inventory (2026 YTD) (sq.ft)	Current Availability Rate (2026 YTD) (%)	Ave. Market Rent (2026 YTD) (£/sq.ft)	Rental Growth (2012- 2023)	Ave. Net Absorption p.a. (2016- 25) (sq.ft)	Ave. Net Deliveries p.a. (2016-25) (sq.ft)
Rugby	20,072,668	11.1%	£9.36	75%	642,352	745,267
Coventry & Warwickshire	100,802,501	6.7%	£9.35	84%	1,484,658	1,798,169

Source: Savills, CoStar, 2024

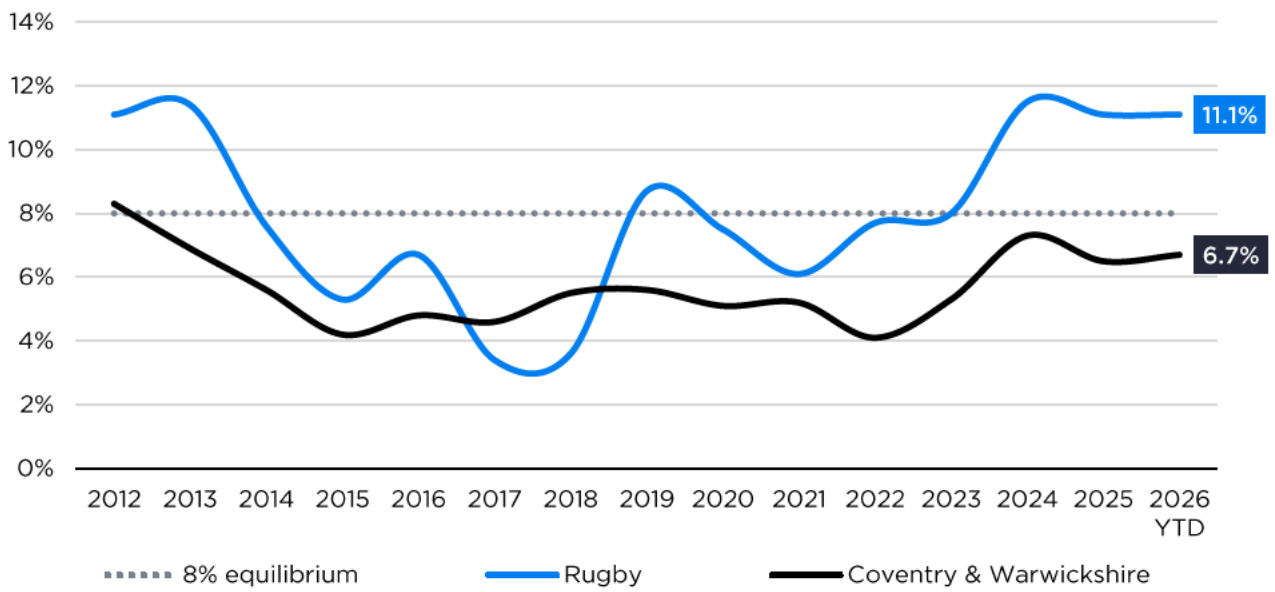
- 5.1.4 Rugby comprises around 20.1 million sq.ft (1.9 million sq.m) of I&L floorspace which equates to nearly 20% of the total inventory in the C&W.
- 5.1.5 In terms of availability, C&W has availability below the usual benchmark of an 8% market equilibrium availability rate. Rugby has recently increased marginally although it has been below 8% for much of the last decade.
- 5.1.6 Demand in Rugby, as measured by net absorption, is about 642,000 sq.ft per annum. About 86% of new supply that has come forward has been taken up by the market. This is despite Rugby having one of the highest delivery rates in England at c.3.7% of inventory per annum.
- 5.1.7 In the wider PMA, the overall rate of availability remains well below the market equilibrium of 8%. This suggests supply has still not expanded sufficiently to reach equilibrium. This inference is consistent with the unsustainable rise in rental levels in Rugby and C&W of 75% and 84% respectively between 2012 and 2026. These growth rates are around twice the rate of inflation, indicating that the market remains broadly supply-constrained.

## 5.2 Availability is Below the Market Equilibrium

- 5.2.1 At the national level, 8% availability across all size bands is commonly referred to as the level where a market is broadly in balance (i.e. equilibrium frictional capacity) in terms of supply and demand, as sourced in publications such as:
  - GLA’s Land for Industry and Transport Supplementary Planning Guidance (SPG) (2012)
  - London Plan (2021), and
  - British Property Federation’s (BPF) ‘*Levelling Up – The Logic of Logistics*’ Report.
- 5.2.2 Below this level, analysis finds that available supply tends to become tight and rents increase as occupiers compete for limited available stock.
- 5.2.3 As shown in **Figure 5.1**, availability in C&W has been below the 8% equilibrium for more than a decade. Rugby’s availability rate was below the 8% equilibrium for most of the last decade.

5.2.4 This shows that the I&L market has been below market equilibrium availability rate for a considerable period of time. As a result, occupiers have been forced to remain in their existing premises, even if not ideal for their operational requirements, or have had to leave the area to find suitable premises elsewhere, taking the jobs and investment with them.

**Figure 5.1 Availability Rate 2012-2026 YTD**



Source: CoStar, Savills, 2064

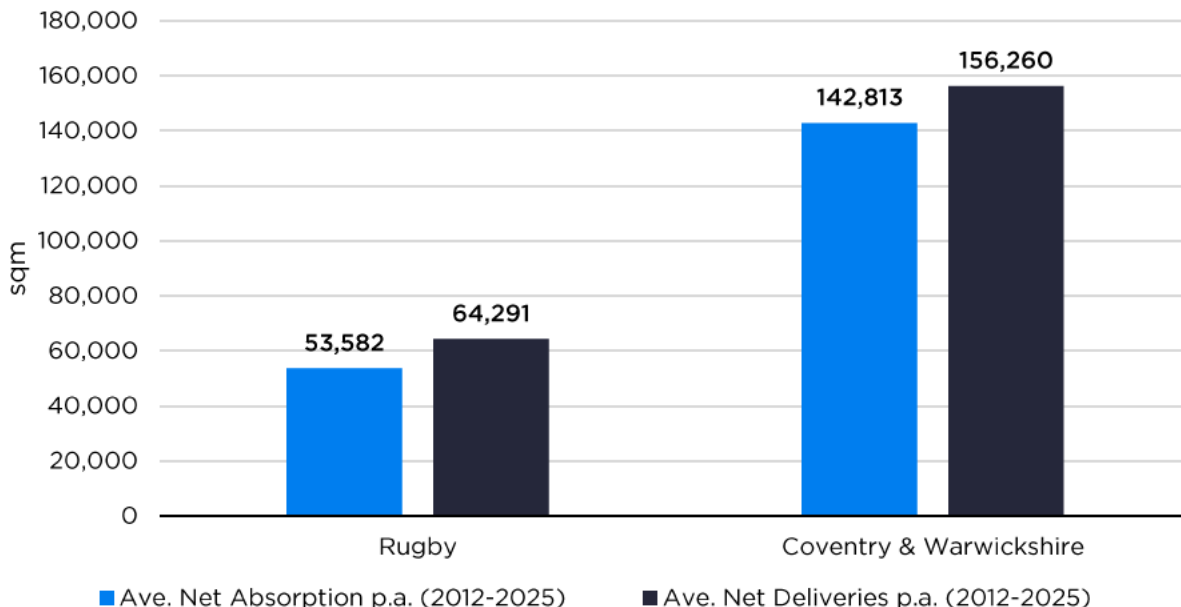
### 5.3 Demand has been Meeting Rapidly-Growing Supply

5.3.1 Net absorption is a useful measure of demand based on lease deals. It compares occupied space (move-ins) versus vacated space (move-outs). This can be compared with net deliveries as a measure of supply and registers the change in inventory (floorspace) related primarily to new developments.

5.3.2 **Figure 5.2** below shows that over the past decade (2016-2025), average levels of net absorption (demand) have been comparable to net deliveries (supply) across Rugby and C&W. The change in supply has not increased enough to allow the market to significantly increase availability in the FEMA as shown in **Figure 5.1**.



**Figure 5.2 Net Absorption and Net Deliveries p.a. (2014-2025)**



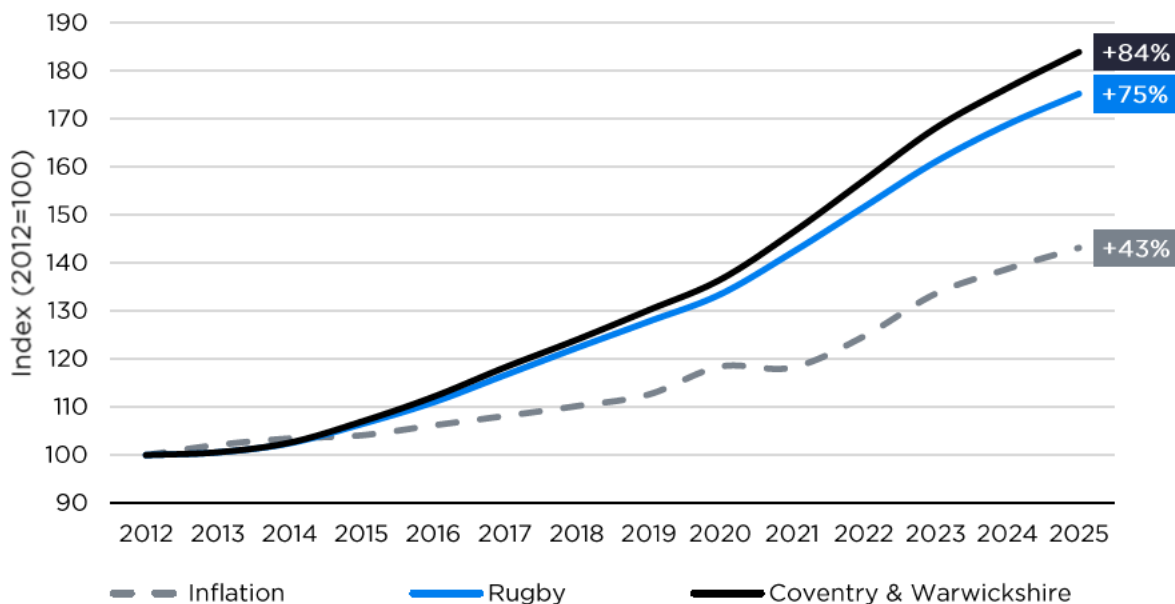
Source: CoStar, Savills, 2026

## 5.4 Strong Rental Growth

- 5.4.1 Another market indicator for understanding the relationship between supply and demand is rental growth. When demand outstrips supply, rental growth is typically higher as occupiers compete for limited available stock. This in turn drives up rents. Conversely, when there is sufficient supply to accommodate demand, rental growth is lower.
- 5.4.2 Across Rugby and C&W rents have grown at about three times the rate of inflation. This corroborates the availability analysis above, namely these geographies have all been supply constrained historically, with their respective availability rates being below the 8% equilibrium for much of the last decade. **Figure 5.3** below shows that between 2012 and 2025, rents have grown by 75% and 84% respectively in Rugby and C&W.



**Figure 5.3 Rental Growth Vs. Inflation (2012-2025)**



Source: CoStar, Savills, 2026

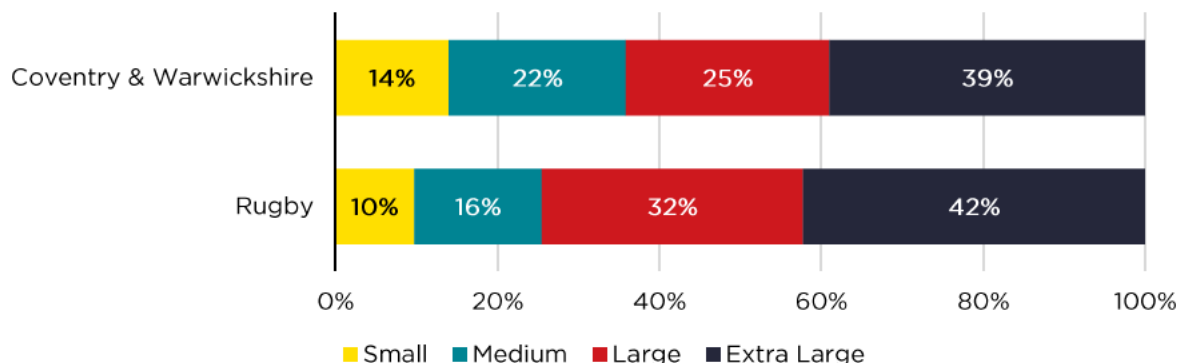
5.4.3 Even though industrial rents in Rugby and C&W have been growing significantly over the last decade, tenants have been generally willing to accept them because of the advantageous location.

## 5.5 The PMA Requires More Strategic I&L Units

5.5.1 Rugby is a strategic I&L hub. Over the past 10 years, about 86% of I&L absorption has been in units over 100,000 sq.ft. The proportion of stock in large premises is also relatively high but it does not reflect actual demand. Whilst both the local and subregional markets have relatively more supply in large I&L units compared to the England average, this indicates strong investment demand in the area which has made it possible to deliver strategic stock (Figure 5.4).

5.5.2 This analysis suggests more large units are required in Rugby, as well as C&W more widely. Large units require large sites similar to the Subject Site. Large developments also require the best locations close to junctions on nationally significant motorways which the Subject Site provides.

**Figure 5.4 Share of Inventory by Size Band (2026 YTD) in Rugby and C&W**



Source: CoStar, Savills, 2026

5.5.3 The large unit market (units of 100,000 + sq.ft) for C&W is summarised in Table 5.2 below.

**Table 5.2 Summary of Key Market Supply & Demand Indicators 100k sq.ft+ units**

Area	Inventory (2026 YTD) (sq.ft)	Availability Rate (%)	Ave. Market Rents (2026 YTD)	Ave. Net Absorption p.a. (2016-25)	Ave. Net Deliveries p.a. (2016-25)
Coventry & Warwickshire (100k+ sq.ft)	60,205,903	6.5%	£9.33	1,275,524	1,598,858

Source: Savills; CoStar, 2026.

5.5.4 For units of 100,000 + sq.ft the C&W area has 60.2 million sq.ft of I&L floorspace. This equates to nearly 60% of C&W’s total I&L inventory.

5.5.5 At 6.5%, availability for large units in the PMA is similar to that of all I&L stock (6.7%). This suggests a similar level of constraint in the PMA’s large-box market when compared to all size categories.

5.5.6 In 100K + sq.ft units, demand in C&W, as measured by net absorption, at about 1.3m sq.ft per annum, has been not significantly below net deliveries at 1.6m sq.ft. The same trend is observed across all sizes in C&W. Coupled with low availability and high rental growth, this suggests a constrained market.

5.5.7 As discussed in Section 3, our PMAs do not capture sites along the M1 corridor located east of A5 road which follows the North-East boundary of the C&W area. These nearby locations (such as Magna Park, Logicor Park, DIRFT) will offer a degree of competition to developments in Rugby. However, these sites are also under pressure to accommodate the needs of their own market and economic areas. We discuss this further in Section 6.

5.5.8 On balance we have focused our analysis on the C&W PMA but review and recognise the wide context of supply in the M1 corridor.

### 5.6 Conclusion

- 5.6.1 Rugby and C&W are commercially attractive locations in high demand by I&L occupiers.
- 5.6.2 The I&L market for strategic premises is supply constrained. The evidence indicates that both Rugby and C&W more widely have been supply-constrained for most of the past decade.
- 5.6.3 The I&L market in the Rugby and C&W have experienced high levels of leasing activity (net absorption) despite significant new supply (net deliveries) coinciding with high rental growth and low availability. We interpret this as an indication that overall the market is supply-constrained. Strong rental growth is observed in markets where occupiers have to compete aggressively with one another for limited available stock which is pushing up rents.
- 5.6.4 In subsequent sections we interpret how this supply constrained context feeds through to estimates of future demand.

## 6 Estimate of Future Demand

### Introduction and Key Conclusions

#### Section Aim

- The purpose of this section is to estimate future I&L land demand in the wider PMA, as this is considered the relevant market area for large strategic I&L premises (such as the Site). This is then compared against the estimated demand stated in the Rugby Borough Local Plan 2025-2042 Proposed Submission Version (Regulation 19) (January 2026). We also see how this demand could be apportioned to Rugby.
- We present below our methodology for estimating future I&L demand. Our methodology is designed to be NPPF-compliant. It builds upon historic take-up (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up.

#### Key Conclusions

- Based on our demand methodology, over a 17-year period (consistent with the draft local plan), we estimate FEMA-wide I&L demand to be 727ha of land (for 100k+ sq.ft premises). This is significantly more than the HEDNA (2022) prorated estimate of 468ha over a 17-year time period.
- When demand is apportioned to Rugby, this results in a requirement for 305ha for all I&L uses over the same 17-year period and 230ha for premises 100k+ sq.ft. This is significantly greater than the Council's latest evidence which estimates 177ha and 116ha respectively.

### 6.1 Savills Estimates of Future Demand

- 6.1.1 We take a sub-regional approach to estimate future I&L demand. Rugby's market, like all local areas, is part of a wider sub-regional market, and therefore is subject to supply and demand forces which need to be assessed beyond its local authority boundaries. This is true for many commercial sectors, but it is particularly important for I&L occupiers.
- 6.1.2 Our sub-regional assessment considers future demand from within the PMA. We consider this geography as broadly representative of the Study Area's subregional market. Our future demand calculations within the PMA include 'suppressed demand' or demand lost historically due to supply constraints.
- 6.1.3 We consider the full market for I&L units, estimating demand for all unit sizes and relevant planning use classes covering light industrial, manufacturing and warehousing. We consider that a suitable approach as it draws on a large pool of data and the fact light industrial, manufacturing and warehouse occupiers desire similar types of premises with similar locational characteristics.
- 6.1.4 The steps we follow in estimating future I&L demand are set out below.

### **Step 1: Time Frame**

- 6.1.5 We assume an 17-year period which is consistent with the latest version of the draft local plan.

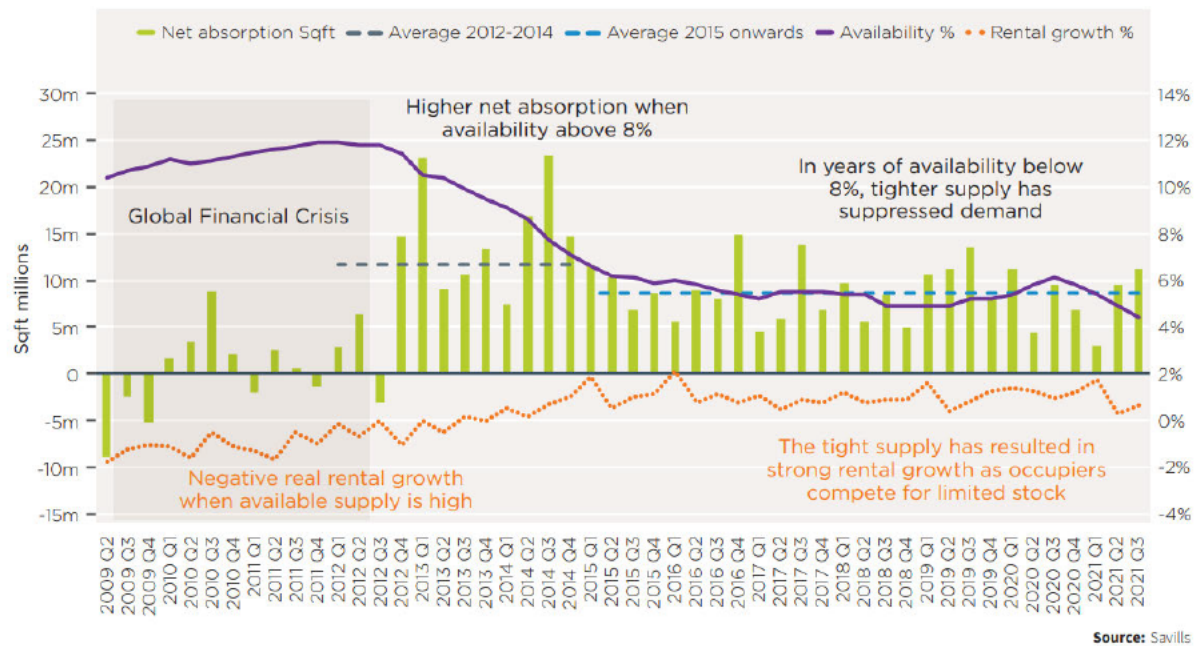
### **Step 2: Estimation of Historic Demand (Before Accounting for Suppressed Demand)**

- 6.1.6 This is based on the average annualised net absorption for the PMA/FEMA at 1.5m sq.ft per annum for the overall I&L market between 2016 and 2025. We consider net-absorption to be the starting point measure of demand for floorspace as it indicates the quantum of net floorspace occupied over a period of time (i.e., move-ins minus move-outs) based on lease deals.

### **Step 3: Estimation of Future Demand, Including Allowance for Suppressed Demand**

- 6.1.7 The rationale for accounting for suppressed demand is that when sufficient supply is not available, demand cannot be accommodated. Supply and demand are linked across all commercial property sectors. We describe a market where supply does not keep up with demand as being 'supply-constrained'. Limited supply in a strongly performing market, such as the FEMA's I&L sector, means that demand cannot be fully satisfied, typically resulting in strong rental growth. To estimate suppressed demand we use a method that looks at the historic difference between equilibrium availability and actual availability. This is set out below.
- 6.1.8 At the national level, the market equilibrium level, where supply and demand are broadly in balance and rents are more stable, is around 8% availability. We have investigated the relationship between real rental growth (i.e., rental growth adjusted for inflation) over the past decade at the national level and observed its relationship to availability, it becomes clear that I&L rents begin to grow strongly when availability is below 8%. This relationship is illustrated in **Figure 6.1** below. When availability was above 8% between 2009 and 2014 real rental growth (net of inflation) was either negative or only slightly positive. This enabled demand to be accommodated as sufficient supply was available. However, since 2014, as availability dipped below 8% and has stayed below this level ever since at the national level, real rents have grown year-on-year. During this period net absorption has been lower than the 2009-2014 period despite the I&L sector going from strength to strength. This suggests the suppressing nature tight availability (below 8%) has had on I&L demand nationally.

**Figure 6.1 Historic Net Absorption, Availability and Real Rental Growth in England**



Source: CoStar, OBR, Savills

- 6.1.9 The 8% benchmark is also applicable to the PMA given its I&L market has broadly followed the same trajectory as the national market. Within the Study Area, I&L availability dropped below the 8% equilibrium level in 2015. In terms of I&L rents, the PMA began outpacing inflation from around 2014 when availability dropped below 8%, similar to the national market.
- 6.1.10 Further review of underlying demand drivers is given in **Appendix 1**. This gives support for our assumption that drivers of historic suppressed demand are likely to extend in to the future.
- 6.1.11 Our calculations of suppressed demand are set out in **Table 6.1** below. The individual steps for calculating the PMA’s suppressed demand are as follows:
- Step 3a: For years where availability has been below the 8% equilibrium threshold, we calculate the quantum of floorspace necessary to achieve 8% availability (Column ‘Av. To EQ (sq.ft)’ in Table 8.1, calculation F)
  - Step 3b: We then take the average of the ratio between net absorption and available floorspace for every year over the past decade (Calculation E averages 68% for the PMA based on Column ‘Net Absorption/Availability’)
  - Step 3c: We apply this average to the estimated floorspace required to reach 8% availability in each year where the market is below the 8% availability threshold to estimate each period’s suppressed demand (Calculation F\*E in Column ‘Suppressed Net Absorption (sq.ft)’)
  - Step 3d: We calculate average suppressed net absorption over the past decade. This gives the annualised suppressed demand figure used as a top-up to the historic trend.

# Symmetry Park Rugby Phase 2

## Market Assessment and Review of Draft Local Plan



The estimated average suppressed demand figure for the PMA is 799k sq.ft per annum since 2016.

6.1.12 Table 6.1 shows the relevant calculations.

**Table 6.1 Suppressed Demand Calculations within the PMA**

	A	B	C=(A*B)	D	D/C	F=(8%-B)*A	F*E
Year	Inventory (sqm)	Availability (%)	Available Floorspace (sqm)	Net Absorption (sqm)	Net Absorption / Availability	Av. To EQ (sqm)	Suppressed Net Absorption (sqm)
2025	100,802,501	6.5%	6,552,163	292,676	4%	1,512,038	520,718
2024	100,809,160	7.3%	7,359,069	-494,076	-7%	705,664	0
2023	98,579,881	5.3%	5,224,734	1,333,685	26%	2,661,657	916,627
2022	95,295,168	4.1%	3,907,102	3,409,501	87%	3,716,512	1,279,900
2021	91,763,431	5.2%	4,771,698	663,939	14%	2,569,376	884,847
2020	91,952,927	5.1%	4,689,599	2,964,592	63%	2,666,635	918,341
2019	90,398,837	5.6%	5,062,335	1,588,937	31%	2,169,572	747,162
2018	88,005,581	5.5%	4,840,307	169,501	4%	2,200,140	757,688
2017	86,924,255	4.6%	3,998,516	1,818,434	45%	2,955,425	1,017,795
2016	84,581,831	4.8%	4,059,928	3,099,388	76%	2,706,619	932,111

E = average  
Suppressed Demand = Average

Source: Savills, CoStar, 2026

6.1.13 Step 3e: The final step requires adding the combined annualised historic and suppressed demand figures and multiplying this by the number of years in the period (17 years), as shown in Table 6.2. This gives a total estimated floorspace demand of 38.8 million sq.ft for the FEMA over an 18-year period.

**Table 6.2 Total Historic and Suppressed Demand Calculations**

	Sq.ft
(A) Annualised historic demand	1,484,650
(B) Annualised suppressed demand	797,520
(C) Total annualised demand (A+B)	2,282,180
(D) Total demand over 17-year period (C*20)	38,797,000

Source: Savills, 2026. Figures may not add due to rounding

### Step 4: Savills Estimate of Future Demand across the PMA

6.1.14 Adding the combined historic and suppressed demand estimates yields a total demand of 38.7 million sq.ft of I&L floorspace in the PMA over the 17-year period.

6.1.15 The HEDNA uses plot ratios of 35%-40% for industrial uses to translate floorspace to land

needs. Based on our experience, recent changes in the I&L sector mean that occupiers are moving towards larger building footprints and requiring lower site coverage to allow for adequate yard space, cross-docking, sustainable urban drainage, and strategic landscaping. These modern occupier requirements imply a lower plot ratio, typically in the region of 30% to 40%. As a midpoint, we use a 37.5% plot ratio in line with HEDNA assumptions.

- 6.1.16 Using a 37.5% plot ratio, over a 17-year period, we estimate PMA-wide I&L demand to be 961 ha of land.
- 6.1.17 We apportion overall need in the FEMA down to the need for strategic land and premises (greater than 100,000 sq.ft) based on 76%. This proportion reflects the activity and stock of strategic premises in the FEMA as a proportion of the overall market. The figure for this proportion of the market is 727ha over the 17-year period.

**Step 5: Sensitivity Testing**

- 6.1.18 Whilst we consider our future baseline demand estimates to be robust and reflective of market signals looking back 10 years (2016-2025), it is important we take account of the fact that the I&L sector has gone through a period of unprecedented growth in recent years with a number of structural growth drivers. To ensure our modelling process is robust, we have carried out a high level sensitivity analysis to understand what could happen to future I&L demand should the sector’s historic demand performance strengthen or weaken in the future..
- 6.1.19 We have applied a higher level 10% uplift (+) and reduction (-) to the baseline figure. The impact of the sensitivity is presented in Table 6.3.

**Table 6.3 Land Demand Estimates over in PMA - Sensitivity Testing Results**

	Lower estimate	Savills BCentral Case Demand Scenario	Higher estimate
PMA Strategic I&L Demand	654	727	800

Source: Savills (2026)

**6.2 Comparison of the FEMA-Level Demand for Strategic Land with the 2022 HEDNA**

- 6.2.1 Our assessment is that the 2022 HEDNA demand approach does not give sufficient consideration to market signals. Below we outline what we consider to be some of the key questions around the demand methodology used.
- 6.2.2 The 2022 HEDNA is primarily based on past completions as the primary method for estimating future I&L demand. (It also incorporates a scenario based on traffic growth and premises replacement demand.) We do not consider past completions on its own as a sufficient indicator of demand in the context of a supply-constrained market. The leading demand measure of floorspace is net absorption, which indicates the quantum of net floorspace occupied over a period of time (i.e., move-ins minus move-outs) based on lease deals. Development completions on the other hand is a supply measure (rather than

a demand measure) which calculates new floorspace delivered.

6.2.3 Without available land supply, development completions cannot happen, and therefore the past completion method may be an incomplete indicator of actual market demand, particularly in supply-constrained contexts. The projection forward of historic supply trends runs the risk of further continuing a supply constrained ('tight') market.

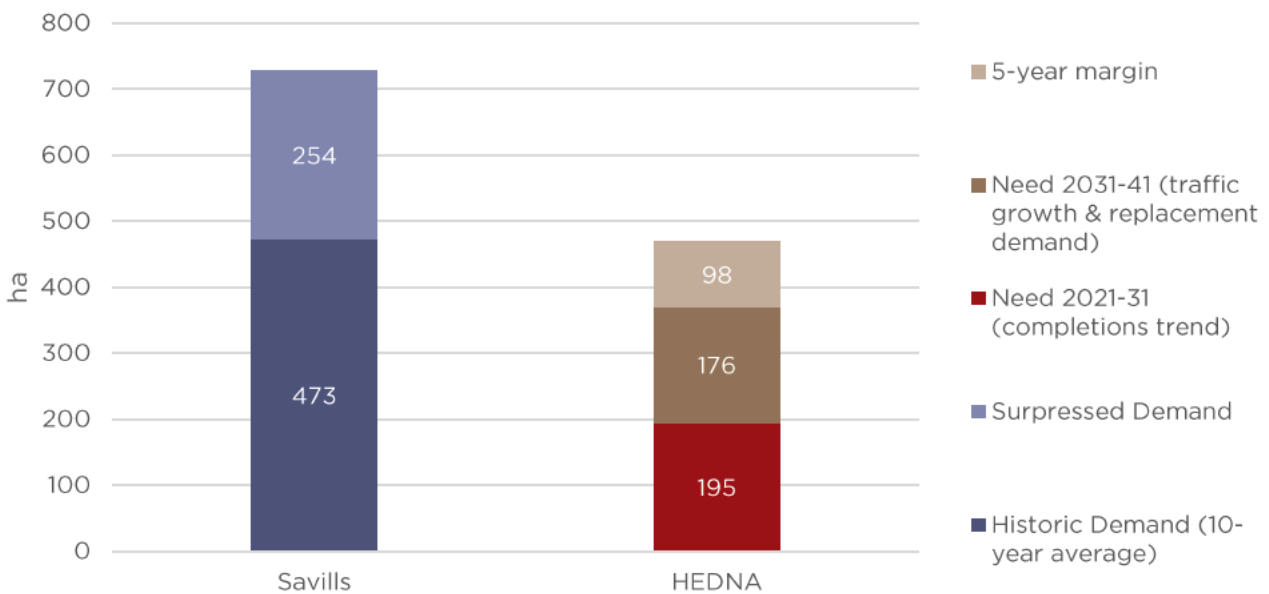
6.2.4 The results of our demand assessment for C&W are compared to 2022 HEDNA in Table 6.4. We have adjusted the 2022 HEDNA figure to reflect the 17-year period of the emerging local plan. Both projections show estimated need for strategic sites (100k+ sq.ft). The difference is largely due to the historic annualised demand over the last 10 years significantly outperforming HEDNA projection, as well as Savills model estimating part of the demand that has been constrained by tight supply, and projecting it forward. It shows that if we reduce our demand estimate by 10%, it is still well above the 2022 HEDNA estimate.

**Table 6.4 Total Demand for Strategic Land Compared with the 2022 HEDNA**

Indicator	Savills Baseline		Savills 10% Uplift		Savills 10% Reduction		2022 HEDNA	
	sq.ft	ha	sq.ft	ha	sq.ft	ha	sq.ft	ha
Annualised demand	1,726,421	42.8	1,899,063	47.1	1,553,779	38.5	1,112,056	27.6
Total demand over 17-year period	29,349,151	727.1	32,284,066	799.8	26,414,236	654.4	18,904,948	468

Source: Savills (2026), HEDNA (2022)

**Figure 6.2 Total Demand for Strategic Employment Land C&W and 2022 HEDNA**



Source: Savills (2024), HEDNA (2022)

6.2.5 It is possible that to a degree the 2022 HEDNA 'traffic growth and replacement demand'

is equivalent to Savills suppressed demand estimate. However as shown in **Figure 6.2** this is a lower estimate than our demand figure.

6.2.6 As a conservative precaution, our estimate does not account for a number of factors that may potentially result in a higher demand projection and that were included in HEDNA estimates:

- **Margin for flexibility:** The HEDNA projections include margin for flexibility to account for the potential delay in some sites coming forwards; an additional buffer so that in future demand is greater than forecasts it can be accommodated, and to reflect the tight market in recent years with low current vacancy rates. This is included as five years of gross completions for industrial / distribution. This margin may be allowed for in our enhanced demand estimate but it is not certain sufficient allowance has been made.
- **Replacement demand:** HEDNA states its demand projections to be gross figures. This is due to the demand projection partly comprising replacement demand (for the forecast period over 2031). Replacement demand factors make provision for losses of future stock, assuming that past patterns of losses continue. Some stock is lost as it ages and premises become redundant. We did not include replacement demand in our projections as we are assuming that this is already allowed for in the net absorptions approach. However if sites are not re-developed and instead new sites are developed to allow for lost industrial sites then our approach will under-estimate this factor.
- **Increase in future traffic:** HEDNA long-term projection (over 2031) partly comprises increase in future traffic volumes based on MDS Transmodal GB Freight Model. We agree there are reasonable indications of demand growing further due to the rise in e-commerce and other structural shifts. It is not clear whether our suppressed demand estimate fully allows for this effect.

6.2.7 We further recognise that our estimate of suppressed demand is a matter of judgement and interpretation and it is possible that future information may suggest an adjustment to our estimate. Our judgement is that unless there are significant changes in wider macro-economic conditions and/or significant increases in supply in the nearby area, our approach provides a good indication of market need.

6.2.8 The results of our analysis suggest that HEDNA may have under-estimated sub-regional demand. The HEDNA report acknowledges that the future need for strategic I&L sites may be higher:

*'We do however consider that there are factors which point to the potential to see stronger demand than this. Firstly is the shift towards e-commerce which has arisen from the Covid-19 pandemic, which has accelerated previous trends. Second is the effects of trade disruptions and macro-economic uncertainties, including the effects of Brexit ..., on level of stock holding (the impacts of which have been to increase the requirements for warehouse space).'* (paragraph 10.42, page 230)

### 6.3 Demand Apportioned to Rugby

6.3.1 Following the same steps outlined above, we assess future demand apportioned to Rugby based on Rugby's share of activity and inventory in the FEMA. **Table 6.5** shows

that on this basis, overall I&L demand apportioned to Rugby is projected to be around 723k sq.ft per annum or 12.3m sq.ft over the 17-year period. In terms of land area this is equivalent to 17.9ha per annum and 305 ha over 17 years.

**Table 6.5 Rugby Floorspace Demand and Land Need Apportioned to Rugby Over 17 Years**

Indicator	Total	
	sq.ft	ha
Annualised demand	723,102	17.9
Total demand	12,292,731	305

Source: Savills (2026)

6.3.2 We appreciate that not all of the demand need be accommodated locally in Rugby, and similarly demand in the wider PMA could be re-apportioned to Rugby. We agree with HEDNA’s view that demand for strategic sites (over 100,000 sq.ft) covers a sub-regional area across Coventry and Warwickshire, due to footloose nature of occupiers and varying availability of land. However Rugby was among the largest contributors to strategic I&L supply in recent years and is expected to remain so. Most new supply has been absorbed at pace. This demonstrates that as a location it is able to attract high levels of demand in line with our estimates above.

6.3.3 **Table 6.6** shows our estimate of demand for strategic I&L land in Rugby (230 ha). This is based on the apportionment of FEMA-level demand for strategic I&L land applied to Rugby.

**Table 6.6 Strategic I&L Floorspace and Land Need for Rugby Over 17 Years**

17-year Demand Projection	Total	
	sq.ft	ha
Rugby (All I&L)	12,292,731	305
Rugby (Strategic I&L)	9,299,118	230

Source: Savills (2026)

### 6.4 Comparison of Rugby-Level Demand with the Council’s Latest Evidence Base

6.4.1 In this subsection we compare Savills assessment of demand in Rugby with the latest estimates in the Council’s evidence base. When we compared Savills FEMA-level demand for strategic sites with the Council’s evidence base, we used the 2022 HEDNA. The 2022 HEDNA is the most recent FEMA-level demand estimate in the Council’s evidence. However, for a Rugby-level assessment of need, the Council has produced a number of versions. The latest version is set out in the December Needs Topic Paper December 2025 (‘December 2025 DNTP’). This is shown in **Table 6.7**.

6.4.2 Savills estimate of demand is considerably above the Council’s. However, the strategic demand figure in the December 2025 DNTP includes a reduction for Padge Hill Farm comprising 66ha. We believe that that site should not be used to reduce strategic demand. Therefore the Council’s figure is likely to be greater although still below Savills figure.

**Table 6.7 Comparison of Rugby-Level Demand with Council's December 2025 DNTP**

17-year Demand Projection	Savills		December 2025 DNTP	
	sq.ft	ha	sq.ft	ha
Rugby (Local/ I&L)	2,993,613	75	2,617,804	61
Rugby (Strategic I&L)	9,299,118	230	4,633,902	117
Rugby (All I&L)	12,292,731	305	7,251,707	177

Source: Savills (2026), December 2025 DNTP

## 6.5 Need in Neighbouring Sub-Regional Areas

6.5.1 As discussed in Section 3 our PMAs do not capture sites along the M1 corridor located east of A5 road which follows the North-East boundary of the C&W area. These nearby locations (such as Magna Park, Logicor Park, DIRFT) will offer a degree of competition to developments in Rugby. However these sites are also under pressure to accommodate the needs of their own market and economic areas. These sites are largely catering for the South East Midlands LEP area (SEMLEP). The SEMLEP market is projected to experience a shortage of its own in strategic warehousing between 2021 and 2040 according to Warehousing and Logistics in the South East Midlands study (2022)<sup>5</sup>. This is summarised in Table 6.8 below.

**Table 6.8 SEMLEP Strategic Warehousing Demand and Supply Balance (2021-2040)**

		Market Signals (High)	Market Signals (Low)	TGRD Central	Completions
Demand 2021-40 ('000 sq.ft)	Road	45,574	35,715	32,787	42,194
	Rail	19,278	19,278	19,278	19,278
Supply at April 2021 ('000 sq.ft)	Road	34,595	34,595	34,595	34,595
	Rail	8,547	8,547	8,547	8,547
Balance ('000 sq.ft)	Road	-10,979	-1,119	1,808	-7,599
	Rail	-10,732	-10,732	-10,732	-10,732
Balance (Ha @ 0.35)	Road	-291	-30	48	-202
	Rail	-285	-285	-285	-285
<b>Balance</b>	<b>Total</b>	<b>-576</b>	<b>-315</b>	<b>-237</b>	<b>-487</b>

Source: Warehousing and Logistics in the South East Midlands (2022)

6.5.2 The risk of future deficit is also relevant to SEMLEP sub-areas adjacent to Rugby and C&W such as West Northamptonshire, as identified by the recently published study. This is summarised in Table 6.9 below which shows significant need for strategic warehousing. This is illustrated by deals such as Amazon and Nike committing to c.4 million sq.ft leases at Segro Logistics Park Northampton and Magna Park Corby.

<sup>5</sup> See Table 15.3, page 128, Warehousing and Logistics in the South East Midlands (2022)

**Table 6.9 West Northants Strategic Warehousing Demand-Supply Balance 2025-2043 (Ha)**

Metric	Strategic Industrial - Minimum	Strategic Industrial- Higher
Strategic warehousing total supply	307	307
Strategic warehousing total recommended needs	484	601
Strategic warehousing (need) and surplus	-177	-294

*Source: West Northamptonshire Housing and Economic Needs Assessment Update (2024)*

6.5.3 On balance we have focused our analysis on the C&W PMA but review and recognise the wider context of supply in the M1 corridor.

## 6.6 Conclusion

6.6.1 Based on Savills’ demand methodology, over a 17-year period we estimate FEMA-level demand for strategic premises (greater than 100,000 sq.ft) of 727ha of land. This compares to a figure of about 468ha that is a prorated figure taken from the 2022 HEDNA.

6.6.2 Within Rugby, Savills estimate of demand is comprised of past activity and suppressed demand. The figure is 305ha across I&L premises and 230ha for strategic I&L sites. This exceeds the equivalent figures in the Council’s latest evidence base which is about 177ha and 116ha respectively.

## 7 Review of Supply

### Introduction and Key Conclusions

#### Section Aim

- The purpose of this section is to provide a review of the supply of buildings in excess of 100,000 sq. ft (9,290 sq. m), and land which can accommodate a B2/B8 units of this scale within the Coventry and Warwickshire PMA.

#### Key Conclusions

- There is a total of c. 273ha of supply of buildings and land with either a planning permission or allocation within the Coventry & Warwickshire PMA. Of this total, c. 78 ha is within the Rugby Borough Council area.
- There is a further c. 548 ha of land which is proposed to be allocated within the sub-region which has the potential to accommodate strategic scale B2/B8 development. Of this total, c. 181 ha is proposed to be allocated within Rugby Borough (excluding the Subject Site). It is important to note that these sites have no formal planning status and do not yet form part of the supply of land available to meet an occupier requirement. The sites are subject to varying degrees of uncertainty in relation to planning and delivery timescales.
- In summary, supply within Rugby Borough comprises the following:
  - Buildings: 185,465 sq. m of floorspace equating to approximately 46.37 ha of land at 40% density.
  - Land with Planning Permission: c. 31.23 ha
  - Proposed Allocations with available land and without planning permission: c. 181 ha
- On a qualitative basis, supply is particularly constrained in relation to deliverable strategic scale opportunities for B8 use, with most of the land portfolio being smaller scale sites and a number being restricted to B2 use. The actual supply of deliverable land to meet occupier requirements, particularly in the case of the larger strategic scale B8 units and especially over the shorter term is therefore very limited.

### 7.1 Approach

- 7.1.1 We have reviewed the supply of land within each of the local authorities within the Coventry & Warwickshire sub-region, which includes the local authorities of Rugby, Nuneaton & Bedworth, North Warwickshire, Coventry, Stratford-on-Avon, and Warwick. We have included sites with planning permission or an allocation for B2 or B8 development. Data collection was undertaken in February/March 2026 and represents a snapshot in time.
- 7.1.2 In order to objectively assess the level of supply we have considered all sites of 2.3 ha and above which can accommodate a unit of 100,000 sq. ft (9,290 sq. m) plus. Where a

site below this threshold has planning permission for a unit of 100,000 sq. ft (9,290 sq. m) or more then this has been included for completeness. The majority of land supply within the sub-region is included within sites which are above this size threshold, therefore we consider our assessment to be a comprehensive review of overall supply.

7.1.3 We consider three sources of supply:

- Building supply being B2 and/or B8 buildings of 100,000 sq. ft (9,290 sq. m) or more which are available (including those which are under construction).
- Land supply being sites of 2.3 ha or more with planning permission for B2 or B8 development which can accommodate a unit of 100,000 sq. ft (9,290 sq. m) or more; and
- Pipeline supply of sites of 2.3 ha or more which benefit from an allocation for B2 or B8 development and can accommodate a unit of 100,000 sq. ft (9,290 sq. m or more).

7.1.4 Proposed draft allocations (which do not already benefit from planning permission) have been reviewed separately. These sites have no formal planning status and there is therefore a higher degree of risk associated with their delivery. Speculative developer promotions that fall outside of the Land Supply, Pipeline Supply or Proposed Allocations (as defined above) are not included within the supply.

## 7.2 Building Supply

7.2.1 We have assessed the supply of B2/B8 buildings of 100,000 sq. ft (9,290 sq. m) plus within the Coventry & Warwickshire PMA. This includes all buildings which are vacant, including those which are under construction. Available buildings are set out at **Table 7.1**, below.

**Table 7.1 Supply of Buildings (100,000 sq.ft +) in the PMA**

Ref	Building	Local Authority	Size (sq. ft)	Size (sq. m)	Comment
1	Unit 6, Symmetry Park Rugby	Rugby	338,307	31,430	Grade A
2	Unit 7, Symmetry Park Rugby	Rugby	170,528	15,843	Grade A
3	Rugby 673, Castle Mound Way	Rugby	673,270	65,248	Second hand
4	Rugby 251, Castle Mound Way	Rugby	250,400	23,263	Grade A
5	Rugby 106, Central Park Drive	Rugby	106,196	9,866	Grade A
6	Central Park 100	Rugby	100,766	9,361	Refurbished
7	1 Cosford Lane, Swift Valley Industrial Estate	Rugby	162,066	15,056	Second hand
8	DC5 Prologis Park Ryton	Rugby	170,535	15,399	Second hand
9	Power Park 170, Coventry	Coventry	168,249	15,630	Refurbished
10	Unit 2 Coventry Logistics Park	Coventry	252,210	23,341	Second hand
11	SPC 140 (Unit 4C), SEGRO Park Coventry	Warwick	140,567	13,059	Grade A
12	C540 Panattoni Park Coventry	Nuneaton & Bedworth	538,193	50,000	Grade A

# Symmetry Park Rugby Phase 2

Market Assessment and Review of Draft Local Plan



Ref	Building	Local Authority	Size (sq. ft)	Size (sq. m)	Comment
13	Hazel Way, Nuneaton	Nuneaton & Bedworth	152,449	14,162	Second hand
14	Nuneaton 230	Nuneaton & Bedworth	230,384	21,404	Refurbished
15	Unit 1 Redditch Gateway	Stratford on Avon	289,272	26,893	Grade A
<b>TOTAL</b>			<b>3,743,392</b>	<b>349,955</b>	

Source: Savills 2026

7.2.2 There are 15 buildings available or under construction within the sub-region, providing a total floorspace of c. 3.74 million sq. ft (349,955 sq. m). Of this total, eight buildings are available or under construction within Rugby Borough with a total floorspace of c. 1.97 million sq. ft (185,465 sq. m).

7.2.3 Less than half of the floorspace available or under construction is new Grade A space, with the majority being second-hand space. For example, 673,270 sq. ft (65,248 sq. m) of space at Rugby 673 which would be considered Grade C based on the building's age and specification and therefore not suitable to meet the demands of those occupiers seeking the highest specification, modern space. This building alone accounts for nearly 18% of the total available floorspace within the sub-region and 34% of the available floorspace in Rugby Borough.

7.2.4 The supply of buildings is likely to be less than stated if JD.com take Rugby251 on completion as planned.

## 7.3 Land Supply

7.3.1 We have analysed the supply of land with planning permission for B2 or B8 use which can accommodate a unit of 100,000 sq. ft (9,290 sq. m) plus, within the Coventry & Warwickshire PMA. As noted above, we have included sites of 2.3 ha or more within our assessment, and the results are set out at Table 7.2 below.

**Table 7.2 Supply of Land with Planning Permission**

Ref.	Name	Authority	Planning Reference	Remain- ing Land 100k sq. ft plus B2/B8 (ha)	B2/B8 Capacity 100k sq. ft plus (sq. m)	Comment
1	Rugby Radio Station	Rugby	R/11/6099	7.75	31,000	Outline planning granted May 2014 for a Sustainable Urban Extension - up to 31,000 sq. m B2/B8 (B8 limited to units of 5,000 sq. m or less)

# Symmetry Park Rugby Phase 2

Market Assessment and Review of Draft Local Plan



Ref.	Name	Authority	Planning Reference	Remaining Land 100k sq. ft plus B2/B8 (ha)	B2/B8 Capacity 100k sq. ft plus (sq. m)	Comment
2	Plot 4, Ansty Park	Rugby	R19/1540 R25/0912	3.33	15,302	Outline planning granted June 2021 and restricted to B1/B2 only. Recently submitted planning application for Plot 4 - proposes flexible B2/B8 (pending determination)
3	Padge Hall Farm, Hinckley (Land South of A5)	Rugby (cross boundary application)	R21/0985	20.15	80,610	Planning permission granted Dec 2023. Unit 1 (Syncreon) excluded.
4	A45 Eastern Green (Pickford Gate)	Coventry	OUT/2018/3 225 PL/2025/00 00257/RESM	2.77	11,078	Outline planning consent including 15ha employment (B1/B2/B8). Being brought forward as mid-box scheme. One plot proposed for larger unit included here.
5	South of Alcester Road (Stratford 46)	Stratford on Avon	19/01402/O UT	6.65	30,100	Mixed use commercial scheme. Area of B2/B8 plots included.
6	Land at Thickthorn, Kenilworth	Warwick	W/24/1536	8.00	22,000	Allocated for B1/B2. Hybrid planning app to include outline planning for employment (B2) granted Dec 2021. Reserved Matters submitted Nov 2024 for 22,000 sq. m B2 use - pending determination.
7	Land at Stratford Road, Warwick (Longbridge, Warwick )	Warwick	W/22/1077	8.78	40,000	Outline planning granted July 2024. E(g)iii, B2, B8.
8	Land in the vicinity of Coventry Airport - DS16 (Gateway South)	Warwick	W/18/0522 W/25/1215 W/22/0731	37.00	181,009	Major employment site of sub-regional significance. Remaining land.
9	Land to the south of Horiba MIRA Technology Park & Enterprise Zone	North Warwickshire	PAP/2022/0 423	39.30	213,500	Outline planning consent for B2, E(g), B8 granted Feb 2024. Parameter plan shows developable site area of 39.3 ha. B8 uses shall be ancillary or secondary. <b>[NB gross area is 59 ha - to be agreed which is used depending on calculation of shortfall].</b>

# Symmetry Park Rugby Phase 2

Market Assessment and Review of Draft Local Plan



Ref.	Name	Authority	Planning Reference	Remaining Land 100k sq. ft plus B2/B8 (ha)	B2/B8 Capacity 100k sq. ft plus (sq. m)	Comment
10	Bowling Green Lane (Exhall Interchange)	Nuneaton & Bedworth	39611	16.87	60,000	Outline planning granted Sept 2024 for development of up to 60,000 sq. m of B2/B8/E(g)(ii and iii) including ancillary E(g)(i).
<b>TOTAL</b>				<b>150.60</b>	<b>684,599</b>	

Source: Savills 2026

7.3.2 There is a total of c. 150.6 ha of land across 10 sites within the Coventry & Warwickshire PMA, with a total capacity of c. 684,599 sq.m (approximately 7.4m sq.ft). Of this total, 31.2ha of land across 3 sites is located within Rugby. However, these headline figures do not account for qualitative issues with the land supply whereby a significant proportion is limited in terms of permitted use and a particular shortage of large scale strategic sites.

7.3.3 Sites within the portfolio of land with planning permission which are subject to restrictions on use which prohibit B8 use:

- Land at Thickthorn (8.00 ha);
- Land to the South of Horiba MIRA (39.30 ha)
- Rugby Radio Station (7.75 ha) – B8 units are permitted but restricted to a maximum unit size of 53,819 sq. ft (5,000 sq. m).

7.3.4 The majority of sites are of a relatively small scale. The only site of strategic scale (generally considered to be a minimum of 25ha in line with the regional evidence base) capable of accommodating strategic B8 development is the remaining land at Gateway South in Warwick District.

7.3.5 Overall, taking into account the qualitative assessment, the supply of land with planning permission capable of accommodating strategic scale development is very constrained, with limited deliverable opportunities within short timeframes for strategic scale employment use. The situation is particularly constrained for the largest sites and in relation to strategic scale B8.

## 7.4 Pipeline Supply

7.4.1 We have also assessed the ‘pipeline’ supply of sites that benefit from an allocation but do not have planning permission. The assessment includes sites of 2.3ha or more, with an allocation for B2 or B8 use, consistent with the assessment of consented land supply above. Where possible we have based the floorspace capacity of each site on indicative proposals for the site, application documents, or specified floorspace limits within the relevant local plan policies. Where there is no information available, we have assumed a density of 40% based on the gross developable site area.

7.4.2 These sites are subject to varying degrees of risk around delivery and timescales.

7.4.3 A schedule of allocated sites (which do not benefit from planning permission) within the Coventry & Warwickshire PMA is set out at Table 7.3.

**Table 7.3: Pipeline Supply (Allocations)**

Ref	Site	Local Authority	B2/B8 100k sq. ft plus Ha (gross)	B2/B8 100k sq. ft plus Sq. M remaining	Comment
1	Land at Baginton Fields and South East of Whitley Business Park	Coventry	25.00	100,000	Within multiple ownerships. Local Wildlife Site and Flood Zone 3 areas will impact on net developable area of this site.
2	Land at Stratford Road, Warwick (Longbridge, Warwick)	Warwick	2.92	11,680	Remaining land in allocation which is outside planning permission boundary.
3	Land to the west of Birch Coppice, Dodon	North Warwickshire	5.10	17,850	Allotments on the site required to be replaced and relocated to alternative location north of the A5 prior to start of construction.
4	Coventry Road	Nuneaton & Bedworth	2.32*	9,290	Outline planning application submitted Nov 2023 for up to 23,000 square metres of flexible Class E(g)(iii), B2 and B8 floorspace, predominantly small and mid-box units due to site constraints. Awaiting determination.
<b>TOTAL:</b>			<b>35.34</b>	<b>138,820</b>	

\*assumed 40% plot density

Source: Savills 2026

7.4.4 There is a total of **4 allocated sites** (without planning permission) extending to c. **35.34 ha** with a total capacity of c. **138,820 sq. m (1.49 million sq. ft)** for units of 100,000 sq. ft (9,290 sq. m) plus. Nearly all of the sites are of a relatively small scale. Land at Baginton Fields, which is the only site of strategic scale, is within multiple ownerships which has so far prevented planning being progressed. Proposals for Coventry Road are predominantly for small and mid-box units with one unit of 100,000 sq. ft (9,290 sq. m) included within the planning application proposals.

7.4.5 Despite the constrained position highlighted in relation to deliverable sites with planning permission, there is therefore very little land coming through the planning pipeline to bolster the supply available to meet the needs of occupiers, particularly to accommodate strategic scale B2/B8 units.

## 7.5 Draft Allocations

7.5.1 In addition to the supply of land and buildings reviewed above, there are a number of

proposed draft allocations within the emerging Local Plans for Rugby Borough and South Warwickshire (Stratford on Avon and Warwick). *As noted previously, these draft allocations are subject to a much greater degree of planning and delivery risk given the early stage of the planning process.*

7.5.2 Those that are proposed for B2 or B8 development and have the potential to accommodate units of 100,000 sq. ft (9,290 sq. m) plus have been summarised below at **Table 7.4**. Please note that the Subject Site which is a proposed draft allocation has been excluded from the review below.

**Table 7.4 Draft Allocations**

Ref	Site	Local Authority	B2/B8 100k sq. ft plus Ha (gross)	B2/B8 100k sq. ft plus Sq. M remaining	Comment
1	Coton Park East	Rugby	34.97	111,000	Total site area and floorspace adjusted to take account of floorspace provision of 4,000 sq. m in smaller units of up to 1,500 sq. m for small and medium sized businesses.
2	North of Ansty Park	Rugby	21.20	75,000	To be restricted to B2, E(g)(ii) and E(g)(iii) with ancillary E(g)(i).
3	Crowner Fields Farm and Home Farm, Ansty	Rugby	0	0	Site area 112.18 ha with proposed capacity for c. 275,000 sq. m B2,B8,E(g) and c. 18,000 sq. m E(g)(i) office floorspace. No longer available - being delivered for Frasers Group HQ. <b>The site sits in the Green Belt.</b>
4	Land at Walsgrave Hill	Rugby	124.93	282,500	c. 290,000 sq. m floorspace for employment use including provision of 7,500 sq. m floorspace in small to medium size (removed from total which also excludes new park)
5	Land at Gaydon	Stratford on Avon	104.50	418,000	Proposed to be allocated for strategic B2 and small scale B8. Currently allocated specifically to meet JLR expansion needs.
6	Wedgnoek Farm	Warwick	141.00	564,000	Eg, B2, B8.
7	Land at Red House Farm	Warwick	121.00	484,000	Eg(iii), B2, B8. New motorway junction required. Deliverability constraints.
<b>TOTAL</b>			<b>547.60</b>	<b>1,934,500</b>	

Source: Savills 2026

7.5.3 There are seven draft allocations with a total site area of **547.60 ha**. Indicatively, these sites have the potential to provide up c. 20.8 million sq. ft (1.93 million sq. m) of strategic scale B2 / B8 floorspace. Land at Gaydon (104.5 ha) is proposed to be restricted to B2 in

relation to units of strategic scale (greater than 100,000 sq.ft), with only smaller scale B8 proposed. North of Ansty Park (21.20 ha) is also proposed to be restricted to B2 use.

7.5.4 The proposed supply of land which has the potential to accommodate strategic scale B8 units is therefore more constrained than the overall total suggests.

## 7.6 Supply Summary

7.6.1 Table 7.5 sets out the supply, broken down by local authority area.

Table 7.5: Supply Summary (100,000 sq.ft / 2.3 ha plus, I&L)

Local Authority	Buildings		Land with Planning Permission		Allocated Land			Savills Total Including Buildings
	sq. m	Ha (assume 40% density)	Ha	Sq. m	Ha	Sq. m	sq. m	ha
Rugby	185,465	46.37	31.23	126,912	-	-	312,377	77.60
Coventry	38,971	9.74	2.77	11,078	25.00	100,000	150,049	37.51
Stratford on Avon	26,893	6.72	6.65	30,100	-	-	56,993	13.37
Warwick	13,059	3.26	53.78	243,009	2.92	11,680	267,748	59.96
Nuneaton & Bedworth	85,566	21.39	16.87	60,000	2.32	9,290	154,856	40.58
North Warwickshire	-	-	39.30	213,500	5.10	17,850	231,350	44.40
<b>Total</b>	<b>349,955</b>	<b>87.49</b>	<b>150.60</b>	<b>684,599</b>	<b>35.34</b>	<b>138,820</b>	<b>1,173,374</b>	<b>273.43</b>

Source: Savills 2026

7.6.2 Key points are summarised below:

- There is a total of c. **273 ha** of supply of buildings and land with either a planning permission or allocation within the Coventry & Warwickshire sub-region which can accommodate a unit of 100,000 sq. ft (9,290 sq. m). Of which:
  - c. 55 ha is subject to restrictions which either prohibit or limit B8 use.
- c. **78 ha** of the total supply is within Rugby which one site Rugby Radio Station (7.75 ha) is restricted to B8 units below 5,000 sq. m. There is a further c. **548 ha** of land which is proposed to be allocated within the sub-region which has the potential to accommodate strategic scale B2/B8 development. Of which:
  - c. 126 ha is subject to restrictions which either prohibit or limit B8 use.

7.6.3 c. 181 ha is proposed to be allocated within Rugby Borough (excluding the Subject Site). Of which one site North of Ansty Park (21.20 ha) is restricted to B2 / E(g) uses. Therefore, supply within Rugby Borough comprises the following:

- *Buildings*: 185,465 sq. m of floorspace equating to approximately **46.37 ha** of land at 40% density.

- *Land with Planning Permission: c. 31.23 ha*
- *Proposed Allocations with available land and without planning permission: c. 181 ha*

7.6.4 On a qualitative basis, supply is particularly constrained in relation to deliverable strategic scale opportunities for B8 use, with most of the land portfolio being smaller scale sites and a number restricted to B2 use. The actual supply of deliverable land to meet occupier requirements, particularly in the case of the larger strategic scale B8 units and especially over the shorter term, is therefore very limited.

## 8 Balance of Supply and Demand

### Introduction and Key Conclusions

#### Section Aim

- This section analyses the balance of supply and demand. It provides an estimate of the amount of supply available to meet current demand as well as anticipated demand. It concludes that extending the Subject Site to its original full allocation would help ensure that the council can meet its full objectively assessed need. If Rugby Symmetry Park Phase 2 is fully extended, then the gap between supply and demand is reduced substantially.

#### Key Conclusions

- For the reasons set out in this report we consider that the council's evidence base has underestimated demand. Savills estimate presents a case which suggests the need for additional allocations. This adds further justification to the case for extending the amount of development on the Subject Site to the original 130,000 sq.m.
- Our conclusion based on evidence is that there is a strong case for Rugby to allocate the Subject Site to its fullest extent.

### 8.1 Supply Compared with Demand

- 8.1.1 Based on the Savills suppressed demand methodology, over a 17-year period we estimate demand of 727ha for strategic I&L land across the PMA. If demand is apportioned to Rugby, we estimate demand to be 230ha for strategic I&L land over the same time period.
- 8.1.2 A summary of our assessments of demand and supply for strategic I&L premises (greater than 100,000 sq.ft) in the PMA is presented in **Table 8.1**. Demand in the PMA is about 727ha. Supply is initially comprised of sites with planning permission and sites allocated in local plans and sums to about 186ha. This leaves a deficit in the PMA for strategic I&L land of about 540ha.
- 8.1.3 There are about 548ha of draft site allocations (excluding the Subject Site) across the six local authorities in the FEMA. As stated in the preceding section, we do not place a high degree of certainty to their delivery because they may not be ultimately adopted. Even if they are adopted, they may not be commercially attractive or suitable and may not be brought forward. Therefore there is a case for ensuring there is additional capacity to meet the need for strategic premises.
- 8.1.4 Based on Savills experience, there is a need for a buffer or contingency that ensures there is (1) sufficient supply flexibility and (2) to address the risk that not all sites will come forward. Therefore we conservatively discount the draft allocations by 20%. We also justify this discount because of (3) the need for there to be capacity at the end of the plan period so that the demand that extends beyond the plan period can be suitably accommodated without having to wait for new allocations to be adopted in future local

plan reviews (where there is inherent uncertainty on timescales given local government reorganisation).

- 8.1.5 Another caveat to the supply picture in the PMA in particular is that many of the sites with permissions have restrictions on their use class or the size of the permissible units. Therefore, even if a site is theoretically large enough to accommodate a large premises (greater than 100,000 sq.ft), the permission may restrict it. The site-by-site details about site limitations are set out in the preceding supply section.
- 8.1.6 **Table 8.1** demonstrates that without additional sites being allocated, there is a high likelihood that the PMA risks a supply shortfall for strategic I&L land. It shows that there is a high degree of uncertainty around the FEMA’s capacity to meet its strategic demand. Once the 20% discount is applied to the draft allocations, we estimate there is a deficit of about 103ha. If the Subject Site’s full capacity of 130,000 sq.m (40.7ha), as set out in the early version of the emerging local plan, it would meaningfully contribute to addressing this deficit in a highly sustainable and proven commercial location.

**Table 8.1 C&W PMA Balance of Demand and Supply for Strategic I&L Use Over 17-Year Period**

Demand/Supply	ha
Savills assessment of I&L demand (ha)	(727.1)
Savills review of supply of I&L land (ha)	
<i>Sites with planning permission</i>	150.6
<i>Sites allocated but without planning permission</i>	35.3
Total supply	185.9
<b>Balance of demand vs supply (ha)</b>	<b>(541.2)</b>
Symmetry Park Rugby Phase 2 (Subject Site)	40.7
Savills review of supply of I&L land (ha)	
<i>Other draft allocation sites<sup>6</sup> (547.6ha discounted by 20%)</i>	438.1
<b>Balance of demand vs supply (ha)</b>	<b>(62.4)</b>

Source: Savills 2026

- 8.1.7 A summary of demand and supply for strategic I&L in Rugby is presented in **Table 8.2**. The approach is identical to the analysis on the PMA level and draws on demand and supply analysis in preceding sections.

<sup>6</sup> Not including the Subject Site, which is listed separately.

**Table 8.2 Rugby Balance of Demand and Supply for Strategic I&L Use Over 17-Year Period**

Demand/Supply	ha
Savills assessment of I&L demand (ha)	(230.4)
Savills review of supply of I&L land (ha)	
<i>Sites with planning permission</i>	31.2
<i>Sites allocated but without planning permission</i>	0
Total supply	31.2
<b>Balance of demand vs supply (ha)</b>	<b>(199.2)</b>
Symmetry Park Rugby Phase 2 (Subject Site)	40.7
Savills review of supply of I&L land (ha)	
<i>Other draft allocation sites<sup>7</sup> (181.1ha discounted by 20%)</i>	144.9
<b>Balance of demand vs supply (ha)</b>	<b>(13.6)</b>

Source: Savills 2026

- 8.1.8 The table shows that Rugby has an overall deficit of about 54ha and is therefore at risk of a supply shortfall unless additional allocations in Rugby are made. Even if the draft allocations are adopted as well as the Subject Site, there is still a risk of a deficit. However, it would significantly reduce it.
- 8.1.9 Given the wider context of the PMA and the attractive characteristics of the Proposed Development site, there is a compelling case for allocating some of the wider demand to Symmetry Park Rugby Phase 2 – a proven commercial location, in a highly sustainable location outside of the Green Belt.
- 8.1.10 In summary, the current supply of permitted sites and allocations is insufficient to ensure that demand for strategic I&L premises is met. There are a range of draft allocations that could meaningfully contribute towards the deficit although there is a degree of uncertainty about their deliverability, their commercial attractiveness, and whether they are available to meet particular needs given that a number of the sites have restrictions as to the use and size of units. Therefore we have conservatively applied a 20% discount to them based on Savills experience.
- 8.1.11 The Proposed Development is on a site of about 40.7ha with a floorspace capacity of about 1.3m sq.ft. There is considerable need for the Subject Site as originally intended.

<sup>7</sup> Not including the Subject Site, which is listed separately.

## 9 Summary and Recommendations

- 9.1.1 Both Rugby and the wider Coventry and Warwickshire PMA have been supply constrained for most of the past decade. This has resulted in strong rental growth as occupiers have had to compete with one another for limited available stock which has pushed up rents. Additionally, this has suppressed demand as new space was not available for occupiers to meet their needs.
- 9.1.2 Rugby and the Subject Site in particular is one of the premier I&L locations in the country and are attractive locations for I&L investment. However, the insufficient level of new supply compared to strong demand is limiting the council's ability to fully benefit from the I&L sector's growth and from capturing other economic benefits like jobs across a diverse range of professions. The Proposed Development will help to meet the needs of the sector in a prime location.
- 9.1.3 We have reviewed local employment evidence. Our assessment is that the selected methods have not adequately taken account of market drivers which we estimate has led to an underestimation of market demand for I&L uses in the PMAs. We have also identified a range of concerns we have about the evidence base.
- 9.1.4 Rugby and C&W I&L markets are supply constrained, as indicated by historically low levels of availability, high demand, and strong rental growth.
- 9.1.5 Our approach to estimating future demand is designed to assess the impact historic supply constraints have had on suppressing demand. Our methodology is NPPG-compliant as it builds upon historic demand (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as suppressed demand which is added to the historic demand trend as a top-up.
- 9.1.6 Based on our demand methodology, over a 17-year period (consistent with the January 2026 Reg 19 local plan), we estimate PMA-wide I&L demand to be 727 ha of land (for 100k+ sq.ft premises). This is more than the estimate based on the 2022 HEDNA which is a prorated 468ha over the same time period.
- 9.1.7 If demand is apportioned to Rugby based on past take-up distribution this results in a total requirement for 305ha of land for I&L uses over the same 17-year period (for premises of all sizes). For strategic premises, the requirement is for 230ha.
- 9.1.8 Our assessment of supply and then the balance of demand and supply, in sections 7 and 8 respectively, indicate that there is a need for the entirety of the Subject Site, as originally favoured by the council. Much of the supply has restrictions or limitations that prevent them from accommodating strategic I&L premises, even if they are large enough in absolute terms. These are set out in section 7. The balance of demand and supply shows that there is highly likely to be a deficit in that there is insufficient supply to meet demand. Given this, there is a need for a supply buffer or contingency. The Subject Site could contribute towards the deficit and the need for a buffer.
- 9.1.9 Our conclusion is that there is a strong case for Rugby to allocate the Subject Site to its

## Symmetry Park Rugby Phase 2

Market Assessment and Review of Draft Local Plan

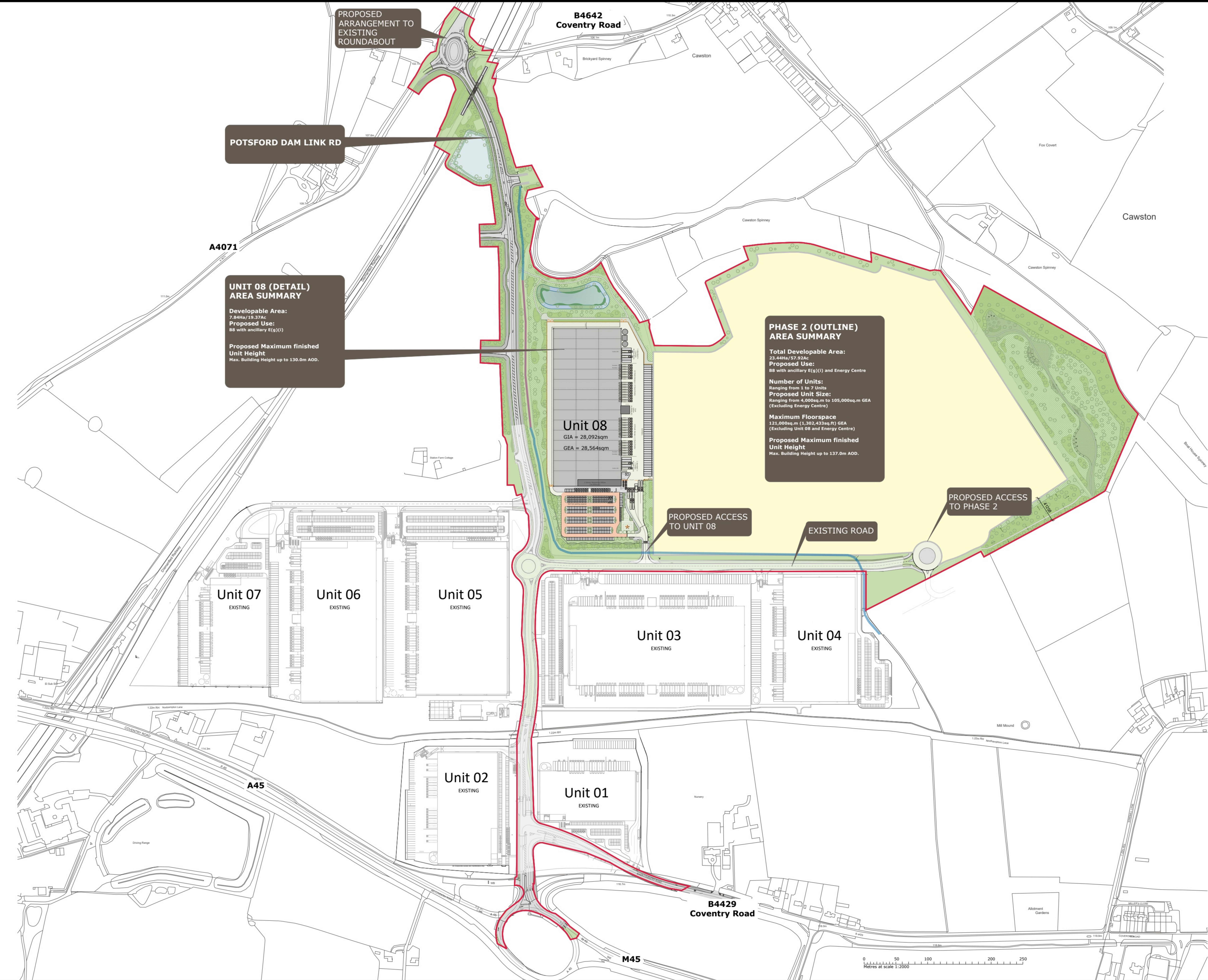
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full capacity on the basis of the employment land evidence base. The Subject Site is not located within the Green Belt, and is well placed in terms of its connection to the national motorway and trunk road network, which is a strong factor in its favour in terms of occupier requirements. If approved, the Subject Site would become one of the largest sources of continued new supply of strategic land in Rugby, located in one of the best locations in the wider sub-region, and would cater for a diverse range of occupiers with local, regional, and national supply chains building on the success of the Phase 1 scheme and the significant inward investment to the Borough that it has delivered.



Rev	Date	Iss By	App By	Description
P06	28.06.24	MMS		Drawing scale revised
P07	04.07.24			Areas added/updated
P08	12.07.24	MC		Drawing updated to include comments
P09	19.07.24	MC		Roundabouts to north and east updated. Northern road and Unit 08 updated. Existing notes updated and new ones added. Diverted watercourse shown. Site boundary line and areas updated.
P10	25.07.24	MC		Watercourse - extended, notes updated as per Sinteric comments.
P11	13.08.24	HA		Drawing updated following review.
P12	23.08.24	HA		Drawing updated following TSI review.
P13	29.08.24	HA		Drawing amended.
P14	11.09.24	HA		Updates to plan to Frampston's planning comments.
P15	19.09.24	HA		Drawing updated. GEAs added.
P16	01.10.24	HA		Phase 2 outline developable area updated. Title tags updated.
P17	20.01.25	HA		Drawing updated. Site boundary amended. Existing and Proposed Public Rights of Way added.
P18	07.03.25	HA		PH09 and footpath location updated.
P19	12.05.25	HA		Red Line boundary updated. Pottford Dam Link Pond amended.
P20	05.06.25	HA		Drawing Status changed to Planning.
P21	19.06.25	HA		Phase 2 (Outline) Area and red line amended. Landscaping proposal amended and drawing updated.



**UNIT 08 (DETAIL) AREA SUMMARY**

Developable Area:  
7.84Ha/19.37Ac  
Proposed Use:  
B8 with ancillary E(g)(1)

Proposed Maximum finished Unit Height  
Max. Building Height up to 130.0m AOD.

**PHASE 2 (OUTLINE) AREA SUMMARY**

Total Developable Area:  
23.44Ha/57.92Ac  
Proposed Use:  
B8 with ancillary E(g)(1) and Energy Centre

Number of Units:  
Ranging from 1 to 7 Units  
Proposed Unit Size:  
Ranging from 4,200sq.m to 105,000sq.m GEA (Excluding Energy Centre)

Maximum Floorspace:  
121,600sq.m (1,392,433sq.ft) GEA (Excluding Unit 08 and Energy Centre)

Proposed Maximum finished Unit Height  
Max. Building Height up to 137.0m AOD.

- Legend**
- Application Site Boundary
  - Development Zone: Includes all elements related to individual development plots, including buildings, hardstanding, parking, landscaping, bunding and storm water attenuation.
  - Green Strategic Landscaping - bunds and planting.
  - Existing development
  - Watercourse - Existing
  - Watercourse Diversion

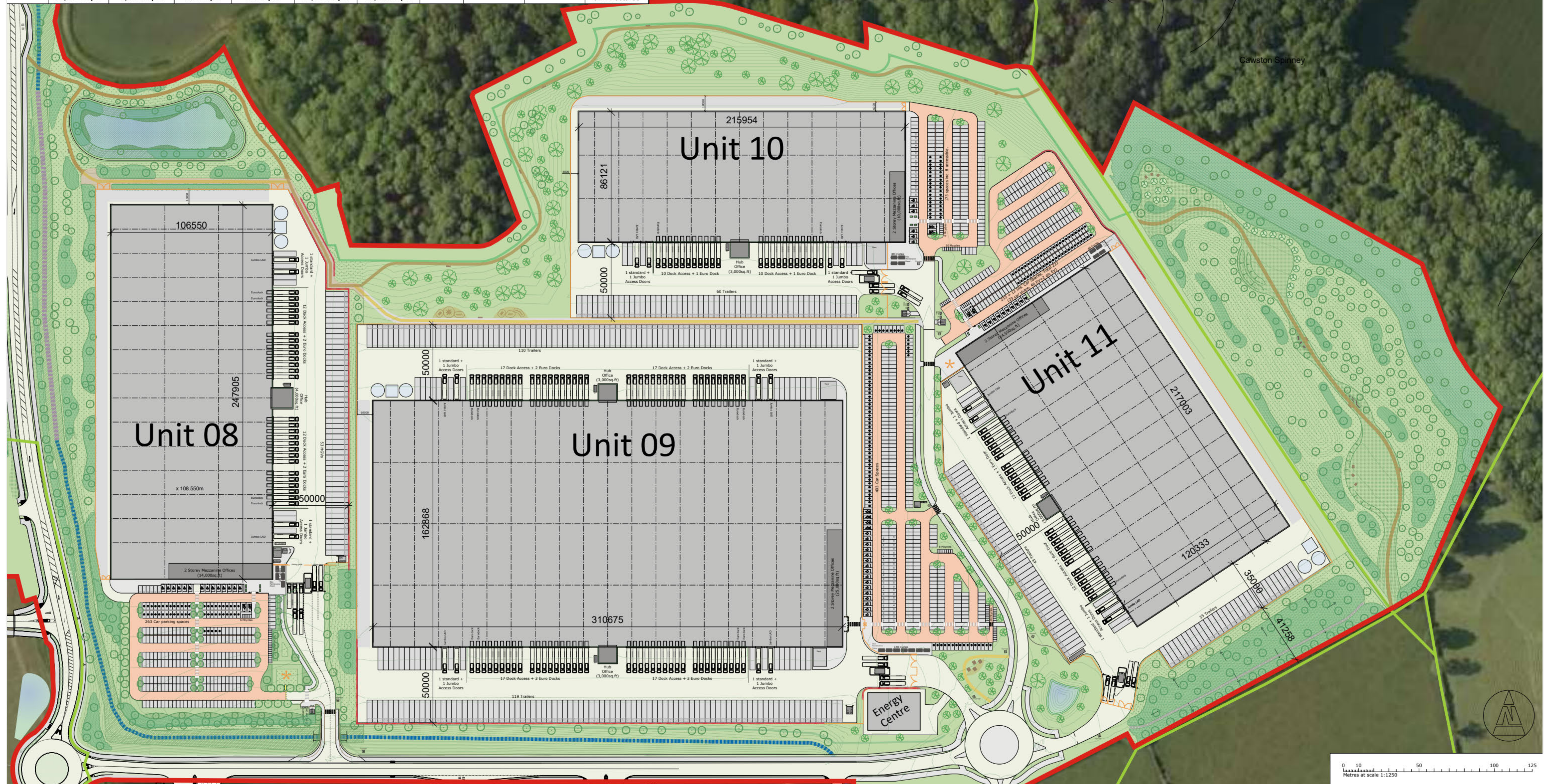
Do not scale from this drawing for purposes other than the planning application.  
Real Line Boundary based on OS Data and NOT confirmed as the legal boundary.  
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Rev	Date	By	Description
Q	28.01.25	HA	Site plan updated to incorporate Country Park. Energy centre relocated.
R	17.02.25	HA	Unit 11 layout and net site area amended.
S	03.03.25	HA	Plan updated to reflect revised contours and levels. Landscaping updated.
T	16.06.25	HA	Landscaping, plant compounds, net areas and red line updated.

**Schedule of Accommodation**

(unit areas are Gross Internal)

Unit	Distribution	Main Office	Hub Office	Gatehouse	Total GIA	Total GEA	Car Parking	Trailer Spaces	Cycle Spaces	Net Site Area
Unit 08	284,012sq.ft	14,129sq.ft	4,015sq.ft	224sq.ft	302,380sq.ft	307,460sq.ft	265	61	100	13.16 Acres
	26,385.6sq.m	1,312.6sq.m	373.0sq.m	20.8sq.m	28,092.0sq.m	28,564.0sq.m				5.33 Hectares
Unit 09	544,644sq.ft	25,000sq.ft	6,000sq.ft	224sq.ft	575,868sq.ft	586,030sq.ft	403	226	140	24.90 Acres
	50,599.1sq.m	2,322.6sq.m	557.4sq.m	20.8sq.m	53,499.9sq.m	54,444.0sq.m				10.08 Hectares
Unit 10	200,190sq.ft	10,000sq.ft	3,000sq.ft	224sq.ft	213,414sq.ft	216,806sq.ft	173	60	80	9.39 Acres
	18,598.3sq.m	929.0sq.m	278.7sq.m	20.8sq.m	19,826.8sq.m	20,142.0sq.m				3.80 Hectares
Unit 11	281,073sq.ft	14,500sq.ft	3,000sq.ft	224sq.ft	298,797sq.ft	303,875sq.ft	227	78	80	12.71 Acres
	26,112.5sq.m	1,347.1sq.m	278.7sq.m	20.8sq.m	27,759.1sq.m	28,231.0sq.m				5.14 Hectares





**CONSULTATION RESPONSE FROM WARWICKSHIRE COUNTY COUNCIL: ECOLOGY**

<b>DISTRICT OR BOROUGH</b>	Rugby Borough Council
<b>APPLICATION NUMBER</b>	R25/0896
<b>ADDRESS</b>	Land To The North Of Symmetry Park, Western Link, Rugby
<b>PROPOSAL</b>	<p>Hybrid planning application comprising:</p> <ul style="list-style-type: none"> <li>- Full planning application for the erection of one Use Class B8 (Warehousing and Distribution) unit, with ancillary Use E(G)(i) (offices) with associated infrastructure including vehicle parking and service areas (including lorry parking), sustainable drainage provision, gate house, sprinkler tanks, pump houses, gas and electricity substations. Earthworks and plateauing of the wider development site including the formation of bunds. Completion of the Sustainable Transport Corridor connection to adjacent land to the east and the creation of the Potsford Dam link to the A4701 roundabout including associated landscaping and infrastructure, bridge to Cawston Greenway and the creation of the Cawston Landscape Park.</li> <li>- Outline planning application for Use Class B8 (Warehousing and Distribution) units with ancillary Use Class (G)(i) (offices) with associated site infrastructure including vehicle parking and service areas (including lorry parking), energy centre, landscaping, sustainable drainage system. All matters reserved expect means of access.</li> </ul>
<b>PLANNING CASE OFFICER</b>	Karen McCulloch
<b>DEPARTMENT</b>	ECOLOGY
<b>ECOLOGY OFFICER</b>	Jane Harrison, Ecologist
<b>DATE COMMENTS SENT</b>	01/12/2025
<b>RESPONSE:</b>	
No comment	<input type="checkbox"/>
Objection	<input checked="" type="checkbox"/>
Deferral/refusal	<input type="checkbox"/>

<b>Further information required</b>	
<b>Conditions</b>	
<b>Advice Notes</b>	
<b>REASON FOR RECOMMENDATION:</b>	
<p><b>Summary of reasons for objection</b></p> <p>The GI and BI objectives as shown in SW Rugby SPD (2024) paragraph 13.8 are not met.</p> <p>Soft landscaping proposals for the Potsford Dam spine road do not allow hop overs for bats, with trees not large enough to span the road, as shown in the example Figure 7 of the SPD.</p> <p>The proposed culverting of 19.5m of the Avon tributary closes the watercourse, which is currently open. The use of culverts, even with a mammal shelf included, represents a barrier to bats and other mammals that use the watercourse. This otter that has been recorded on the reservoir. It greatly decreases watercourse value for all species and may lead to road casualties. It should be clarified why there is a need to culvert, rather than bridge. A culverted watercourse does not allow open connectivity through the site and maintain links between LWS Rugby to Leamington Disused Railway and Cock Robin Wood as laid out in the SPD.</p> <p>Cumulative effects do not appear to be assessed. This is important for badger populations in particular.</p> <p><b>Habitat/Biodiversity Net Gain (BNG)</b></p> <p>A 10% mandatory biodiversity net gain is required for this application. A Defra Statutory Biodiversity metric submitted shows a habitat area gain of 13.30 units (12.58%), hedgerow unit gain of 3.76 units (31.32%) and watercourse unit loss of 0.50 units (4.49%).</p> <p><b>Comments</b></p> <p>Loss of other neutral grassland, modified grassland, mixed scrub, bramble scrub, broadleaved woodland, individual trees and cereal cropland.</p> <p>No existing habitat will be retained and enhanced according to the metric.</p> <p>Onsite habitat creation consists of introduced shrub, other neutral grassland, mixed scrub, modified grassland, SuDS, broadleaved woodland and individual trees.</p> <p>Nine compartments of offsite woodland (Cawston Woodlands) will be enhanced from moderate to good condition, with one compartment proposed poor to moderate.</p> <p>To protect Cawston Woodlands a 15m woodland buffer is proposed. This must be fenced off with appropriate signage included to ensure no encroachment. A plan showing the location of the fence must be included in the CEMP. From this boundary it will be necessary to clarify is the northeast corner of Unit 8 is outside of the 15m Ancient Woodland Site (AWS) buffer.</p> <p>Regarding hedgerows; H1, H3, H4 and H5 will be lost. H2 and H9 will be partially lost. H6 and H7 will be fully retained with no enhancement. 2.12 km species rich native hedgerow will be created. Why will 1.702km be native but not also species rich whilst there is the opportunity to plant many species.</p>	

An increase in watercourse units appears to be achievable through reducing encroachment levels. However, this culverting of watercourses should be seen as a last resort (e.g. bridge over S1 (Avon tributary)).

Once BNG is agreed the deemed condition mandated by the Environment Act 2021 will apply, and the Decision Notice should include relevant wording to that effect. To support discharge of the deemed condition, a completed [Biodiversity Gain Plan \(BGP\)](#), a Habitat Management and Monitoring Plan (HMMP), including a detailed proposed habitat/landscape plan and corresponding Defra metric must be submitted to the LPA. A separate condition for a HMMP is recommended to ensure enactment of the HMMP.

## **Protected species**

Surveys have been carried out over several years from 2014 to 2022 and update surveys during 2024. Table EDP 1.1: Summary of Surveys Undertaken 2014 – 2022 is very helpful.

### **Birds**

Noted as a potential constraint in trees, vegetation and in arable fields. Notable species recorded include farmland species skylark F2 and F3, yellowhammer and linnet.

F2 and F3 will be lost to facilitate the development. Compensation for the loss of skylark habitat will be required.

### **Bats**

Roosts - No buildings were on the site. No surveys needed.

Three trees were identified as having features during a ground level assessment. Following an aerial inspection only T3 was found to have suitable roosting features, and these were PRF-I or suitable for individual bats, rather than more than one or maternity and/or hibernation roosts.

Commuting and foraging - Higher levels of activity were concentrated around the woodland habitat to the north and Potsford Dam irrigation lake (pond P1). Most passes were common species, including pipistrelle species and myotis species.

Free movement of this species from Potsford Lake and Cawston Woodlands into the wider landscape could be impeded by lack of suitable mature trees and vegetation along the spine road.

### **Dormouse**

No records were returned for his species and a survey undertaken in 2024 found no evidence of dormice.

### **Otter**

Two records of this species within the site in 2025 and 2017. No signs of otter were recorded during update surveys in 2024.

Otters may be occasionally using the site for access to P1, Potsford Dam irrigation lake and commuting routes associated with River Avon. They may also be using the ancient woodland.

The link road will include a bridge over the Avon tributary. A mammal shelf is included in the culvert, however, the use of culverting reduces the attraction of the watercourse for this species and increases the likelihood for road casualties. It is strongly recommended that a bridge is considered coupled with robust measures to avoid harm to otters and other riparian species. These measures will need to be included within a CEMP.

#### **Water Vole**

One record from 2002 northeast of the site is held by WBRC.

No signs were observed during previous surveys, nor during a 2024 update. No constraints are expected for this species.

#### **Badger**

Recent site surveys were undertaken in 2024 and 2025 following a series of surveys between 2017 to 2022. No signs of badger were found across the site.

The wider site will be in a state of transition, and this may especially include dispersal of this species. It is important to be aware of this and remain vigilant. Pre-checks should be undertaken as well as scheduled walkover surveys during clearance and construction phases of the development. Cumulative effects do not appear to be assessed. This is particularly important for badger populations associated within the woodland.

Reasonable avoidance measures outlined in the mitigation strategy should be included in a CEMP.

#### **Reptiles**

Grass snake was recorded within the wider site in 2021. Two were recorded along south edge of Cawston Spinney close to Ditch 1 (D1). Surveys concluded a small population of grass snake were present on the site.

Ecological supervision of site clearance is recommended and the methodology outlined in the Mitigation Strategy should be included in a CEMP with appropriate management of the ancient woodland buffer to be incorporated into the HMMP.

#### **Great crested newt (GCN) and amphibians**

No ponds were present within the site. Potsford Dam irrigation lake was adjacent to the site boundary to the north. Traditional bottle trapping and eDNA surveys were undertaken and negative results for GCN were returned. The lake is largely unsuitable due to presence of fish and waterfowl.

Sensitive clearance for reptiles, which will be included in a CEMP, will include appropriate measures for amphibians, including GCN. Should any newts be encountered, all work must stop whilst ecological advice is sought. A Natural England Licence may be needed if more than one GCN is found.

#### **Bloody-nosed beetle**

Three surveys found this species, a Warwickshire Local Biodiversity Action Plan (LBAP) Priority Species in several locations outside the red line and two within the application site boundary in 2021, adult beetle, and 2024, larval stage.

Most boundary vegetation will be retained, but internal hedgerows, H3, H4 and H5 will be removed to accommodate the proposed units. Boundary vegetation will be fenced off as part of the retention.

Hedgerows will be buffered during construction (not H 3-6). Fencing locations with appropriate signage must be shown in the CEMP together with responsibilities for initial and regular checks.

**FURTHER INFORMATION REQUIRED:**

- Clarification on use of culvert, rather than bridge.
- Evaluation of cumulative effects, particularly for badger

**AMENDMENTS RECOMMENDED:**

- Replicate lines of blue and green infrastructure connectivity in accordance with agreed SW Rugby SPD.

**DOCUMENTS REVIEWED:**

- As standard, WCC Ecology reviews aerial photography, consults Warwickshire Biological Record Centre (WBRC) and Habitat Biodiversity Audit (HBA) Phase 1 data.
- PHASE 2 ILLUSTRATIVE MASTERPLAN
- WATERCOURSE CULVERT, T\_22\_2608-CIV-SK-0102 P1
- Appendix A.10 Phasing Plan
- ES Vol 2 Appendix D.2 Biodiversity Net Gain Assessment Part 4 (Illustrative Landscape Strategy - Sheet 1 of 3)
- ES Vol 2 Appendix D.2 Biodiversity Net Gain Assessment Part 5 (Illustrative Landscape Strategy - Sheet 2 of 3)
- ES Vol 2 Appendix D.2 Biodiversity Net Gain Assessment Part 6 (Illustrative Landscape Strategy - Sheet 3 of 3)
- ES Vol 2 Appendix D.2 Biodiversity Net Gain Assessment Part 7
- Statutory Biodiversity Metric v3.1, J. Snow, June 2026 (sic)
- ES Vol 2 Appendix D.4 Landscape and Ecological Management Plan Unit 8 Part 1
- ES Vol 2 Appendix D.4 Landscape and Ecological Management Plan Unit 8 Part 2
- ES Vol 2 Appendix D.4 Landscape and Ecological Management Plan Unit 8 Part 3
- ES Vol 2 Appendix D.4 Landscape and Ecological Management Plan Unit 8 Part 4
- ES\_Vol\_2\_Appendix\_D\_v1\_Redacted, Technical Appendix D.1 Ecological Baseline Report
- ES Vol 2 Appendix D.5 Protected Species Mitigation Strategy
- ES Vol 2 Appendix D.3 Woodland Management Plans

**RECOMMENDED CONDITIONS TO BE APPLIED:**

- TBC

**RECOMMENDED ADVICE NOTES TO BE APPLIED:**

- TBC

**RECOMMENDED SECTION 106 REQUIREMENT (standard clause, contribution amount, trigger for payment)**

- Biodiversity Net Gain to secure monitoring fees
- Skylark compensation – to compensate for a section 41 Priority Species

**DISCHARGE OF CONDITIONS ONLY:**

(Please confirm which condition(s) is/are being discharged)

- N/A

**Note for applicants: Please be aware that this specialist advice is provided to the Local Planning Authority through a Service Level Agreement with Warwickshire County Council. If you have any**

queries about the content of this document, please correspond **directly with the Planning Officer** dealing with the planning application or discharge of condition application. We are unable to respond directly to applicant enquiries regarding the advice that we have provided as part of this service.

Warwickshire County Council also offers a **chargeable support service for applicants** and information can be found about this service here:

<https://www.warwickshire.gov.uk/sdcecolgypreapp>

The following legislation is used to assist in the assessment of planning applications:

(edit as appropriate):

Legislation source	Reference
NPPF Dec 2024	Paras 8, 187, 188, 192, 193, 194, 195
Environment Act 2021	Mandatory net gain Biodiversity Duty Local Nature Recovery Plan
District or Borough Local Plan and supporting SPD's	Local Plan policy reference: Rugby Borough Council Local Plan 2011-2031 (2019) Policy NE1 Protecting Designated Biodiversity and Geodiversity Assets Policy NE2: Strategic Green and Blue Infrastructure
ODPM circular 06/2005: Biodiversity and Geological Conservation	Requirement for species survey work to be carried out prior to the determination of a planning application. Paras. 98 and 99
NERC Act 2006	Biodiversity Duty (see also Environment Act 2021) Section 41, habitats and species of Principal Importance (previously BAP)
Various International, European and National laws in relation to the protection of species and habitats	International and national site protection: Ramsar sites (from Ramsar Convention), Habitat and Birds Directives (Natura 2000 sites include SAC's and SPA's), SSSI's, National Nature Reserves, Local Wildlife Sites, Local Nature Reserves.  Habitats and Species protection: Habitat and Species Regulations (protected sites and species). Wildlife and Countryside Act 1981 (as amended including special Schedule 1), Natural England Standing Advice. Badger Act.



**Symmetry Park, Rugby:  
Phase 2**

**Representations in  
Respect of Landscape  
Circumstances**

Prepared by:  
**The Environmental Dimension  
Partnership Ltd**

On behalf of:  
**Tritax Big Box**

March 2026

Report Reference  
**edp7232\_r022b**

## Document Control

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## **Contents**

Section 1	Introduction .....	4
Section 2	Published Documentation Review .....	8
Section 3	LSA Review .....	14
Section 4	Conclusions .....	24

## **Section 1**

### **Introduction**

#### **INTRODUCTION AND KEY CONCLUSIONS**

- 1.1 This paper in respect of Landscape and Visual circumstances has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Tritax Big Box Developments (TBBD) and provides a review of 'The area of South West Rugby, Landscape Sensitivity Assessment' (LSA) undertaken by Node on behalf of Rugby Borough Council (RBC) in January 2026, and previous landscape studies of this area.
- 1.2 EDP is an independent environmental planning consultancy with offices in Cirencester, Cardiff and Cheltenham. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website ([www.edp-uk.co.uk](http://www.edp-uk.co.uk)). EDP is a Registered Practice of the Landscape Institute<sup>1</sup> specialising in the assessment of the effects of proposed development on the landscape.

#### **KEY FINDINGS OF EDP'S LSA REVIEW**

- 1.3 The Site does not lie within, or contain, any nationally or locally designated landscapes and it does not represent, in a perceptual or physical sense, a landscape of any great importance or distinct character. Though there are features of higher value within the local context most notably Cawston Spinney, EDP consider the value and susceptibility of the Site itself, to be low, leading to an overall low sensitivity.
- 1.4 It is clear that, overall, while Cawston Spinney itself provides a strong contribution to landscape value, there is limited evidence provided as to why land beyond the woodland edge to the south, is considered to meet the same criteria. Though the LSA acknowledges that there may be areas of higher landscape value adjacent to the woodland edge, there is little evidence provided as to why this judgement of landscape value should extend as far as the boundaries of the defined character area, where land is privately owned arable land with strong visual associations with adjacent logistics built form. While EDP would agree with the general narrative within the conclusions of the LSA, the judgements of overall sensitivity, and in particular the defined areas of sensitivity, are unclear.
- 1.5 Sensitivity boundaries appear to correspond closely with safeguarded land extents and development typologies which were determined prior to the publication of the LSA. While such alignment is not inherently inappropriate, there is limited evidence within the LSA to demonstrate that these boundaries are independently derived from landscape character analysis rather than reflecting allocation geometry or policy-defined edges. Where assessment units mirror planning boundaries without clear landscape justification, there is a risk that the sensitivity framework may be influenced, or perceived to be influenced, by policy structuring rather than intrinsic landscape characteristics.

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<sup>1</sup> LI Practice Number 1010.

- 1.6 It appears that the reduction in the quantum of floorspace within the Site allocation was set out prior to the issue of the LSA, and there is no evidence which justifies the shape, size and capacity of the indicative development area.

## POLICY BACKGROUND

- 1.7 The Site is located at Ordnance Survey Grid Reference (OSGR) SP 46869 72326 and lies within the administrative boundary of Rugby Borough Council. The Site is covered by policy DS8 in RBC's adopted Local Plan (2019), which allocates the south-west Rugby Site for around 35ha (gross) of B8 (storage and distribution) employment land (Policies DS3, DS4, DS8 and DS9) and 5,000 dwellings and identifies the site as 'Safeguarded Land'.
- 1.8 The Site is also a draft allocation for employment use in the RBC Local Plan Preferred Option Consultation Document which was published for consultation in March 2025, identifying the Site as 'Site ID 17' : 'South West Rugby employment phase 2'. An extract of Rugby's Preferred Option Consultation Document is provided below at **Image EDP 1.1**.




**Image EDP 1.1:** Extract from Rugby's Preferred Option Consultation Document with the Site shown as South West Rugby employment phase 2.

- 1.9 More recently, the allocation of the Site (as illustrated below at **Image EDP 1.2**) was presented within RBC Local Plan 2025-2042 Regulation 19 Consultation at the Council's Cabinet meeting on 06 January 2026 (see Agenda Item 5<sup>2</sup>). Importantly, though the 'indicative built development area' has been reduced within the Regulation 19 plan, this

<sup>2</sup><https://www.rugby.gov.uk/documents/20124/60878026/PUBLIC+AGENDA+Cabinet+6+January+2026.pdf/71fbaec1-180b-9e4a-9579-b221a6001060?version=1.0&t=1766162451071>

reduction predated the first draft issue of the LSA (the LSA was first issued in draft 10 days later on 16 January 2026).

<b>Site ID:</b> 17	<b>Site name:</b> South West Rugby employment phase 2
<b>Site area:</b> 40.70ha	<b>Allocation:</b> circa 60,000m <sup>2</sup> of floorspace for employment use
<p><b>Development requirements:</b></p> <ul style="list-style-type: none"> <li>• Creation of a wooded circa 23ha publicly accessible country park alongside Cawston Spinney to include footpaths linking to existing routes and providing east-west connectivity along the northern site boundary.</li> <li>• Provision of overnight lorry parking facilities sufficient to cater for the anticipated use of the units.</li> <li>• Provision of tree lining to the Potsford Dam Link and Sustainable Transport Corridor.</li> <li>• To accord with the South West Rugby Design Code SPD.</li> <li>• Contributions to the strategic infrastructure costs identified in Appendix K of the South West Rugby Masterplan SPD.</li> <li>• The existing Public Rights of Way (PROW) must be maintained, and the design of the development must ensure they are pleasant to use. Wherever possible PROW should be routed through public open space, be segregated from roads, and be well overlooked. PROW should be maintained on their existing lines, with diversions only occurring where this is not practicable. PROW should be accessible to as many people as possible, including those who are disabled or less mobile.</li> <li>• Pedestrian and cycle network improvements identified in Appendix K of the South West Rugby Masterplan SPD.</li> </ul>	
 <p style="font-size: small; text-align: right;">Key:  <span style="border: 1px solid red; display: inline-block; width: 10px; height: 10px; margin-right: 5px;"></span> Allocation site  <span style="border-bottom: 1px dashed red; width: 20px; margin-right: 5px;"></span> Indicative built development area  <span style="background-color: #4CAF50; width: 10px; height: 10px; margin-right: 5px;"></span> Trees including ancient woodland  <span style="border-bottom: 1px dashed blue; width: 20px; margin-right: 5px;"></span> Existing PROW - Footpath  <span style="border-bottom: 1px dashed grey; width: 20px; margin-right: 5px;"></span> Existing PROW - Bridleway  <span style="background-color: #e0f2f1; width: 10px; height: 10px; margin-right: 5px;"></span> Public open space  <span style="border-bottom: 1px dashed red; width: 20px; margin-right: 5px;"></span> Proposed new leisure route</p> <p style="font-size: x-small; text-align: right;">Scale 1:7              Site development principles              0 100 200 M</p>	

**Image EDP 1.2:** Extract from Rugby Borough Council Proposed Submission Local Plan Consultation (Regulation 19) considered by the Cabinet on 06 January 2026.

1.10 It appears that the reduction in the quantum of floorspace within the Site allocation was set out prior to the issue of the LSA, and that the “*indicative development area*” shown in the Annex: Development Site Allocations to the Plan (**Image EDP 1.2**) is not evidence-led as it does not follow the conclusions of the LSA. This is supported by the reference within the Stage 2 Site Options Assessment (December 2025) which states that (with EDP emphasis) “*Mitigations proposed in the illustrative masterplan include management and retention of mature hedgerows and trees, new areas of shrubs, trees and wildflowers within a 15m woodland buffer in the north of the site*”.

1.11 In summary, there is no evidence which justifies the shape, size and capacity of the indicative development area.

**BRIEF DESCRIPTION OF THE SITE AND ITS CONTEXT**

1.12 The Site is situated approximately 5km to the south-west of Rugby town centre, on the outskirts of Cawston. It comprises four agricultural field parcels with a network of hedgerows and individual trees. Symmetry Park Phase 1, which is located to the south of the Site, was granted planning permission in 2020. Within the local context, the Site is in close proximity to busy major transport links; namely the A45 and A4071, which dissect the landscape to the south and west.

1.13 The northern boundary of the main body of the Site is bound by a pond and woodland blocks (namely Cawston Spinney, Fox Covert and Boat House Spinney). Beyond the immediate

context of the Site, residential development is located to the north and east of the Site. These properties are associated with the southern edge of Rugby.

1.14 Beyond the Site boundary and within the immediate context, the following planning applications have been submitted or constructed:

- To the south and south-west of the Site, Units 1-7 of Symmetry Park Phase 1 and the Spine Road are now complete, resulting in a change to the character of the Site;
- To the south-east, an application for 1,600 residential dwellings, with additional uses, has been submitted under planning reference R25/0491, in accordance with the wider South-West Rugby allocation;
- To the west, an application for 350 dwellings has been submitted under planning reference R22/0853, in accordance with the wider South West Rugby allocation; and
- To the north, beyond the Cawston Spinney woodland, an application for 275 dwellings (application reference R22/0853) has a resolution to grant planning permission awarded by the Council.

## Section 2 Published Documentation Review

- 2.1 EDP has been providing advice on landscape matters to TBBD since the outset of the design process for their landholding within the South West Rugby Allocation and in so doing, helping to ensure that the masterplan is sensitive to its landscape context. During this time, in addition to carrying out numerous site visits for more than a decade, EDP have reviewed various published documents with regards to the Landscape and Visual value of this site.
- 2.2 In reviewing the Council's latest LSA undertaken by NODE (LSA), it is important to first review all previous local assessments for context.

### **PUBLISHED DOCUMENTATION REVIEW**

#### **Landscape Assessment of the Borough of Rugby Sensitivity and Condition Study (2006)**

The 2006 study is not referenced within the LSA.

- 2.3 The RBC Landscape Assessment (Warwickshire County Council, 2006) remains the most comprehensive landscape character evidence for the borough that formed part of the evidence base to the adopted local plan. Although predating Natural England's 2014 guidance, the methodology is consistent with the earlier Countryside Agency LCA guidance (2002), which underpins the current approach.
- 2.4 This 2006 study defines the Site partly within the Dunsmore: Plateau Fringe Landscape Character Type (LCT) and the main body of the Site within the Dunsmore: Plateau Farmlands LCT.
- 2.5 The Dunsmore: Plateau Farmlands LCT is described as being:  
  
*"A very distinctive landscape – gently rolling, low glacial plateau being characterised by: an 'empty' landscape of former waste with few roads and little settlement; a regular, geometric field pattern defined by closely cropped hawthorn hedges; many mature hedgerow oaks; large blocks of ancient woodland; remnants of heathy vegetation in woodlands and roadside verges, such as birch and bracken."*
- 2.6 The condition of the Dunsmore: Plateau Farmlands LCT is described as varying considerably and states that:  
  
*"A significant area to the south of Bilton, extending to the west of Dunsmore has a strong condition. This is one of the most intact areas of countryside on Rugby's immediate urban fringe. Beyond this, there is quite a large area, between Cawston Spinney and the Coventry Road (B4429), which is in decline. At the extreme end of the spectrum, the landfill Site at Lawford Heath is shown as being of 'weak' condition."*
- 2.7 The following points of relevance to the Proposed Development are highlighted with regard to landscape sensitivity:

- *“Where tree cover is stronger, such as south of Cawston and Ryton, visibility is lower.*
  - *Ecological sensitivity is generally low elsewhere except for an area south of Cawston where smaller blocks of ancient woodland may also be found.*
  - *The strongly unified pattern and the gently rolling topography with scattered trees are the key elements which contribute to its sensitivity.”*
- 2.8 The Dunsmore: Plateau Fringe. This LCT (where the northern access route is located) is described as being *“a variable landscape with an undulating topography of low rounded hills, broad valleys, and short, steep slopes occurring on the northern and southern edge of the Dunsmore plateau...”* it is a *“..large-scale, intensively farmed agricultural landscape, characterised by large arable fields, often with a poorly defined field pattern...”*
- 2.9 The condition of the Plateau Fringe LCT is described as generally in decline *“with the exception of an area of parkland between the River Avon and Long Lawford, and land around Church Lawford and King’s Newnham, where the condition is strong. The southern fringe or escarpment on the other hand, is not only highly sensitive, but also largely in strong condition, making this an important feature to the south of the town”.*
- 2.10 The Site and its context are considered to be more representative of the Dunsmore: Plateau Farmlands LCT rather than the Dunsmore: Plateau Fringe LCT. Although part of the Site falls within the southernmost areas of the Dunsmore: Plateau Fringe LCT, it is divorced from the wider LCT by a disused railway line and new residential development to the north of Coventry Road. The Site and its surroundings exhibit many of the broad characteristics of the Plateau Farmlands LCT - the gently rolling, low glacial plateau, a regular geometric field pattern, defined by closely cropped hawthorn hedges, many mature hedgerow oaks and large blocks of ancient woodland.
- 2.11 As it was undertaken in 2006, the Landscape Assessment of the Borough of Rugby Sensitivity and Condition Study does not take into consideration the changes resulting from the construction of Symmetry Park Phase 1. Since its production, the commercial development to the south of the Site has considerably altered the character of the Dunsmore: Plateau Farmlands LCT and whilst some of the overarching fabric of the Site remains characteristic, the use has changed from agricultural to commercial. Some of the features described, such as the regular geometric field pattern, closely cropped hawthorn hedges and mature hedgerow oaks have been lost whilst others have been enhanced as a result of the recent development to the south of the Site.

### **South-West Rugby Landscape Sensitivity Study (2017)**

The 2017 study, which is marked as draft on the Council’s website, is referenced within the LSA, though it is acknowledged that “it is important to note that the assessment was undertaken before the delivery of large-scale employment development in the southern parts of zones 20n and 21c. The sensitivity judgements therefore reflect the landscape baseline at the time of assessment, against which subsequent change can be understood. These findings informed the conclusions [of the LSA] regarding the relative sensitivity and development suitability of the zones assessed”.

2.12 The 2017 study was also undertaken prior to the completion of the commercial development to the south of the Site and, as such, also does not provide an up-to-date assessment of the local context. It located the Site within 'Zone:20n' which was described as:

*"This zone comprises an open medium –large scale field pattern managed for cropping within the Dunsmore Plateau Farmlands landscape. Hedges are trimmed with insignificant hedge trees surviving. Tree cover is limited to within the green lane public right of way R168 (Northampton Lane). Landform in this zone is undulating and gives rise to some very prominent skylines. The group of properties of Oak House, The Barn and Station Farm Cottage are visible within this zone, as well as from neighbouring zones. The disused Leamington – Rugby railway line, which is a Local Wildlife Site, runs through the western edge of the zone and a tributary of the River Avon, also a Local Wildlife Site, cuts across the central part of the zone. The zone has a strong landscape framework comprising adjacent Ancient and Semi-Natural Woodland, the disused railway line and the mature trees along PRoW R168 (Northampton Lane). However, internally it is very open, with views right across almost the whole zone, which is typical of landscapes in the Plateau Farmlands".*

### **Rugby Borough Landscape Character Assessment (2025)**

The LSA refers to this 2025 broader study.

2.13 The 2025 Landscape Character Assessment provides an update to the previous 2006 study and, as such, does not define any new character areas of relevance to the Site. The Site remains within the Dunsmore Landscape Character Area (LCA) and, more specifically, within the Plateau Farmlands LCT.

2.14 The 2025 Landscape Character Assessment provides an updated description of the Plateau Farmlands LCT, which is a broad area described as being *"characterised by its 'empty' landscape with few roads and settlements. The gently rolling topography of the low glacial plateau is characterised by sandy soils, large areas of ancient woodland, and remnant heathland in woodlands and roadside verges. The regular geometric field pattern is defined by closely cropped hawthorn hedges."*

2.15 The 2025 Landscape Character Assessment sets out a number of 'forces for change' for the wider Dunsmore LCA, which includes the Dunsmore Plateau Farmlands LCT, including:

- *"Inappropriate development bordering woodlands, causing habitat fragmentation and species isolation.*
- *Loss of mature trees remnant from the 1970s epidemic has exacerbated habitat fragmentation.*
- *Loss of hedgerows due to urban development and agricultural intensification. The creation of larger fields has exacerbated habitat fragmentation. In addition, there has been a general decline in the practice of hedge laying and an increase in annual trimming, resulting in gaps and loss of structure.*

- *Sensitive design is lacking in some new residential developments, particularly around historic villages and Rugby's peri-urban areas. A high number of converted redundant farm buildings for residential and holiday use are not in line with the landscape character.*
- *Significant decrease in the number of dairy farms and mixed farming in the area.*
- *Ridge and furrow and other historical earthworks continue to be lost as a result of ploughing, reseeding and the conversion to arable land.”*

2.16 The 2025 assessment then goes on to provide a set of guidelines for development within this landscape, to “*protect the distinctiveness of the Dunsmore LCA*”. This includes (with EDP emphasis where relevant to the Site):

- *“Protect hedgerows and hedgerow trees, many of which are Oak trees (Quercus robur).*
- *Maintaining and enhancing the enclosed wooded character of the landscape. This is especially important in Dunsmore Parklands which is generally in decline.*
- *Maintaining and enhancing the distinctive character of the landscape. This is especially important in Plateau Farmlands where a large area between Cawston Spinney and the Coventry Road is in decline.*
- *Enhance the structure and key features of the farmed landscape. This is especially important in the Plateau Fringe which is generally in decline.*
- *Planting of woodlands should be encouraged where appropriate. The mosaic of habitats including woodlands, hedgerows and heathlands, alongside the sustainable management of agricultural land will enhance the character of the landscape.*
- *Protect and manage Draycote Reservoir and the network of canals and rivers to enhance biodiversity, water quality and for their contribution to recreation, sense of place and geodiversity.*
- *Protect and manage the historic character and settlement pattern, including the deserted settlements, ancient settlements, veteran trees, farmsteads, country houses and landscaped parklands. This will enhance the educational and recreational experience for urban and rural communities.*
- *Enhance the character of settlements in accordance with the landscape through improved design standards. Increased development and property improvements from population change and increased affluence is having an urbanising impact on settlements and dwellings”.*

### **RBC Landscape Sensitivity Assessments (2025)**

This up-to-date site-specific assessment is not referenced within the LSA.

2.17 The RBC Landscape Sensitivity Assessment (March, 2025, updated November 2025) provides a specific assessment of the Site, being based on the same methodology as the

Rugby Borough Landscape Character Assessment (2025), with the Site being referred to as 'South West Rugby Safeguarded Land'.

2.18 The 2025 Sensitivity Assessment concludes that:

- Landscape Value: **Low** – *“The site has little landscape value. Its rural character is diminished by Symmetry Park. There is some natural value due to the hedgerows”*;
- Visual Value: **Low** – *“The site itself has minimal visual value - although in its present state it may allow views of the spinney that could be lost if the site were developed”*;
- Mitigation potential: *“Maintain existing hedgerows. Set development back from the spinney”*; and
- Overall Landscape Sensitivity: **Low** – *“The site consists of four arable fields surrounded by Cawston Spinney to the north and Symmetry Park to the south. Any sensitivity to change is likely to stem from its position as a setting for the spinney, which is a LWS”*.

#### **EDP ASSESSMENT OF LANDSCAPE CHARACTER**

2.19 Earlier published Landscape Character Assessments provide some contextual understanding of the defining characteristics of the wider landscape and, in some respects, the Site itself. Prior to the publication of the LSA, and where published assessments provide an update-to-date assessment of local character with consideration of new logistics development to the south of the Site, published documentation is aligned in that, while there may be some components of value within the landscape, which would be the case for most greenfield landscapes, both the landscape and visual value of the Site overall is assessed as being low.

2.20 The expanding settlement of Rugby and the recent development within Symmetry Park Phase 1 has changed the landscape context to the north (residential) and south (commercial) of the Site from rural to suburban. The disused railway embankment with mature vegetation is a prominent linear feature cutting through the landscape and separating the urban settlement of Rugby from the agricultural hinterland to the west.

2.21 Scenic quality across the Site is varied primarily due to the influence of topography and the enclosing effect of surrounding trees, and woodland to the north (Cawston Spinney, Fox Covert and Boat House Spinney). Trees and hedgerows around the rest of the Site boundary provide further containment and contribute to the sense of place.

2.22 The landscape elements with the potential to be adversely impacted by the development of the Site would include hedgerow boundaries and mature trees which define the existing agricultural field parcels. These landscape elements have been shown to be characteristic of published character assessments and are present within the Site or local context. However, the Site is adversely affected, in a sensory manner, by its proximity to the existing Symmetry Park Phase 1 development, which is clearly visible in short-distance views.

2.23 The Site does not lie within, or contain any nationally or locally designated landscapes and it does not represent, in a perceptual or physical sense, a landscape of any great importance

or distinct character. Though there are features of higher value within the local context, most notably Cawston Spinney, EDP consider the value and susceptibility of the Site itself, to be low, leading to an overall low sensitivity.

- 2.24 EDP's judgement of sensitivity is aligned with those published character assessments prior to the issue of the LSA (which as noted above, fails to take account of all of these previously published studies).

## Section 3 LSA Review

- 3.1 This review considers whether the LSA (January 2026) provides a robust assessment of landscape and visual value and sensitivity, having regard to accepted guidance, including the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) provided by the Landscape Institute and an Approach to Landscape Character Assessment' (Natural England, 2014).

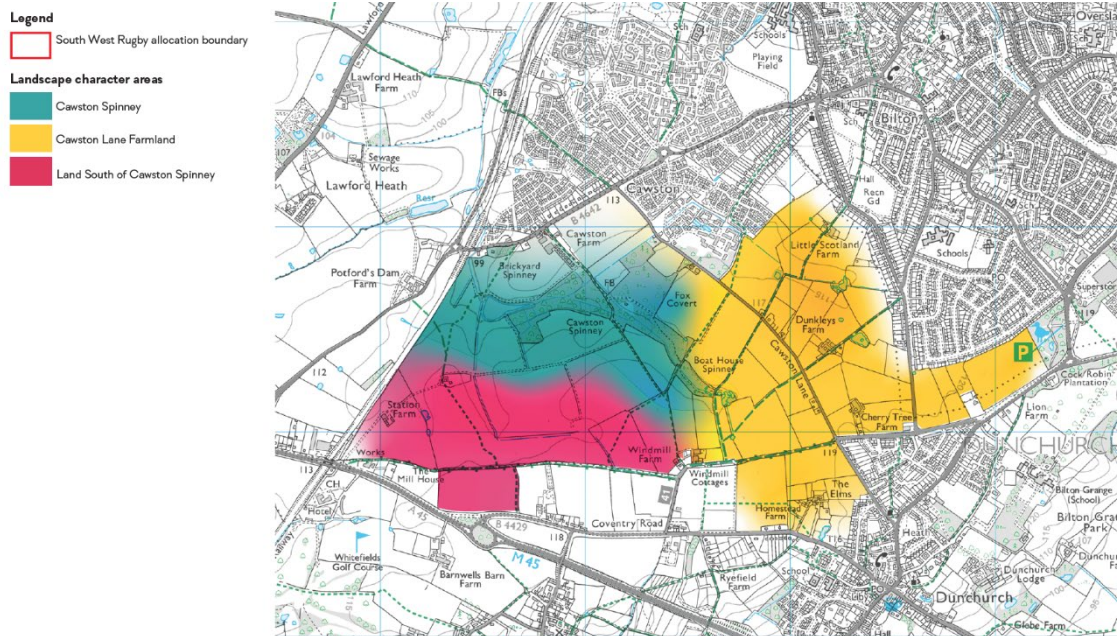
### METHODOLOGY AND APPROACH

- 3.2 Notably, the LSA was produced after the submission of TBBD's application which would deliver up to 149,564 sqm GEA of B8 Use Class (with ancillary offices), an energy centre, and the Potford Dam Link Road. No reference is made within the LSA to the current application material with regards to the value of the Site in landscape and visual terms, and no rebuttal/comment is afforded to the detailed application analysis.
- 3.3 More importantly, as can be seen above, not all of the Council's published documents that refer to landscape character have been referenced by the LSA, as the RBC Landscape Sensitivity Assessment (March, 2025) and the Landscape Assessment of the Borough of Rugby (2006) have not been referenced at all.
- 3.4 As above, the RBC Landscape Sensitivity Assessment (March, 2025) provides a site-specific assessment and concludes that the landscape value, visual value, and overall sensitivity of the Site is low. However, this is not taken into consideration by the LSA.
- 3.5 Though the LSA provides a judgement of landscape value against up-to-date guidance, namely the Landscape Institute's TGN 02-21: Assessing landscape value outside national designations, limited evidence is provided to define the boundaries of each of the character areas upon which the assessment of value is undertaken.

### Landscape Character Areas

- 3.6 As illustrated at **Image EDP 3.1**, the LSA identifies three character areas, including the Cawston Spinney character area, the Cawston Lane Farmland character area and Land South of Cawston Spinney (note that baseline mapping does not show the extent of logistics development to the south). The LSA then confirms that: "**These areas were delineated based on dominant physical and visual features, as well as how the landscape is experienced, rather than through rigid, fixed boundaries. The boundaries are naturally fluid, with some overlap and transition, reflecting the dynamic and complex nature of the landscape**", however, little evidence is provided as to why the boundaries of each character area are where they are.
- 3.7 The LSA acknowledges that (with EDP emphasis) "*While these areas form part of a wider, coherent landscape and share certain characteristics, they also **exhibit differences in their character, function, and relationship with their surroundings**. As a result, each area may be subject to a different evaluation of landscape value*". However, with an assessment at

such a fine landscape scale, it is surprising that there is limited evidence provided to justify the boundary between these character areas. Such an approach can result in elements of higher landscape value, which in this case includes Cawston Wood itself, potentially elevating the value of land surrounding the woodland which, in fact, ‘exhibit a difference in character, function, and relationship with their surroundings’.



**Image EDP 3.1:** Extract from LSA, showing ‘Figure 4.4: Indicative Landscape Character Areas’. Baseline mapping here does not show the extent of logistics development to the south.

3.8 The Site is located within the Cawston Spinney and Land South of Cawston Spinney character areas and, as such, no further consideration is given to the Cawston Lane Farmland character area.

### ***Analysis of Landscape Character Areas***

3.9 As can be seen above at **Image EDP 3.1**, the boundary between the Cawston Spinney and Land South of Cawston Spinney character areas is not defined by ‘dominant physical and visual features’; the boundary does not follow existing field boundaries or woodland edges, nor does it follow an obvious or abrupt change in topography. As such, according to the LSA definition, the boundary between each character area can only relate to ‘how the landscape is experienced’, though the LSA does acknowledge that: “*The boundaries are naturally fluid, with some overlap and transition, reflecting the dynamic and complex nature of the landscape*”.

3.10 For ease of reference, the key characteristics and points relating to landscape value identified by the LSA for both the Cawston Spinney character area and the Land South of Cawston Spinney character areas are set out below:

- “Cawston Spinney character area
  - *Woodland forming the focal point of views*
  - *Change in topography descending towards Cawston Wood Fishery Pond*

- *Enclosed and intimate character within the woodland*
- *Significant contribution to the site's natural and ecological value"*
- *"Land South of Cawston Spinney character area*
  - *Expansive arable fields with views dominated by large-scale industrial development*
  - *Stark contrast with the woodland to the north*
  - *Limited tree cover and a legible field pattern*
  - *Presence of a green lane and hedgerows along field boundaries, sometimes fragmented".*

3.11 It is clear that the key characteristics of the defined Cawston Spinney character area largely relate to the woodland itself, with the main attributes beyond the woodland relating to topography descending towards Cawston Wood Fishery Pond and with the woodland being a 'focal point of views'.

3.12 The Site itself, given its open agricultural nature, could in its entirety align with all of the characteristics of the Land South of Cawston Spinney character area, and it is only the land immediately adjacent to the woodland itself that relates to the existing logistics development to a lesser degree.

3.13 There is limited evidence or justification within the LSA to define the boundaries between the two character areas, there are no 'dominant physical and visual features' to define the boundary, and there is limited justification as to the ways in which this landscape is experienced to justify the boundary in the location shown.

### **Landscape Value**

3.14 The LSA refers to Landscape Institute Technical Note 02/21 Table 1 and GLVIA3 Box 5.1 in providing a judgement on landscape value. For each of the defined character areas, it concludes that:

- *Cawston Spinney character area*: "... **good landscape value**. *The area demonstrates multiple positive factors, including elevated natural heritage, functional ecological elements, scenic and perceptual qualities, and well-structured landscapes. While the limited number of cultural heritage assets and partial visibility of nearby industrial development slightly temper the experience, the combination of woodland, open areas, and Local Wildlife Sites creates a recognisable sense of place and overall good landscape value"*; and
- *Land South of Cawston Spinney character area*: "...**ordinary landscape value**. *The landscape is strongly influenced by the adjacent industrial estate, with built form, infrastructure and associated activity exerting a dominant presence that reduces tranquillity and limits scenic and perceptual quality. Although elements of the rural landscape remain, including open fields and hedgerows, these features do not*

*combine to create a distinctive or coherent sense of place. However, towards the boundary with the Cawston Spinney character area, there is a perceptible transition in landscape character, reflecting the increasing influence of woodland and a more enclosed landscape structure beyond the character area”.*

3.15 For ease of reference, the criteria for both ordinary and good landscape value stated within the LSA is provided below (with EDP emphasis):

- **Good:** “Landscapes, or areas of landscape, that have a **recognisable landscape value, likely including multiple positive factors, and potentially creating a distinctive sense of place**. This includes (but is not exclusive to) landscapes that, to a lay person, can be recognised as having: elevated natural and/or cultural heritage interest; scenic and/or perceptual qualities; and/ or a good condition that may feature some detracting factors, but none sufficient to fundamentally undermine its quality (etc.). In some instances, the category may be used for landscapes which feature just one, or a small collection of particularly strong landscape elements while otherwise being of relatively ordinary character (e.g. an area that well illustrates a specific historical land use). The category will include most locally designated or locally valued landscapes where their constituent characteristics and elements are of sufficient quality, and areas within national designations that contribute to, but may not be exemplar of the characteristics and qualities for which they are celebrated”; and
- **Ordinary:** “Landscapes, or areas of landscapes, that **may feature one or more elements of interest or quality, but are generally of a common typology**, and a character not warranting particular celebration. This will include the majority of landscapes, including many rural and peri-urban environments. In some scenarios, the category may be used where a **landscape features both positive and negative elements which balance to a broadly net neutral position**. The ordinary category may be applied to specific areas of both nationally designated or locally designated/valued landscapes, when those localities' character is not deemed to make meaningful contributions to the wider value and significance of these landscapes, or where character may markedly differ from the qualities for which they are primarily protected”.

3.16 It is clear then that, to meet the LSA criteria of ‘good’, a landscape must include ‘multiple positive factors’ and potentially create a ‘distinctive sense of place’. In considering this in detail, **Table EDP 3.1** below considers the LSA judgements of landscape value against each of the nine criteria within Landscape Institute Technical Note 02/21, with EDP commentary.

**Table EDP 3.1:** Key Judgements Relating to Landscape Value

	<b>Cawston Spinney Character Area</b>	<b>Land South of Cawston Spinney Character Area</b>	<b>EDP Commentary</b>
<b>Natural Heritage</b>	<i>“Cawston Spinney character area makes a strong contribution to landscape value, owing to the presence of ancient and semi-natural woodland, its inclusion within a LWS, and its ecological, perceptual, and structural importance within the surrounding landscape.”</i>	<i>“Land South of Cawston Spinney character area makes a weak to moderate contribution to landscape value, reflecting the influence of industrial development, limited internal structure, and locally increased ecological value adjacent to Cawston Spinney.”</i>	Elements of higher value, and with “perceptual, and structural importance within the surrounding landscape” relate only to the woodland itself. The Site is entirely arable land with limited internal structure. Land immediately adjacent to the woodland might have some locally increased ecological value, though no evidence is provided for this, nor does this attribute extend into the Site.
<b>Cultural Heritage</b>	<i>“Cawston Spinney character area makes a moderate contribution to cultural heritage. While it contains the statutory Grade II Listed Building Cawston Farmhouse, the limited number of heritage assets within the area constrains its overall contribution.”</i>	<i>“Land South of Cawston Spinney character area makes a weak contribution to cultural heritage. The area is dominated by industrial infrastructure, and historic features and patterns are largely compromised, limiting its heritage value.”</i>	While Cawston Spinney makes some contribution to cultural heritage, it is clear that the Site, as arable land, makes a limited contribution.
<b>Landscape Condition</b>	<i>“Cawston Spinney character area makes an elevated moderate contribution, tending towards strong. Well-established woodland blocks, generally intact hedgerows, and a coherent landscape framework provide structure and ecological value.”</i>	<i>“Land South of Cawston Spinney character area makes a moderate contribution, tending towards the lower end of the scale. While field patterns remain legible, and the area includes a green lane, limited tree cover and fragmented hedgerows weaken overall structural integrity. However, the area retains sufficient landscape framework to approach moderate contribution.”</i>	While the woodland itself is a ‘well-established woodland block’, the entirety of the Site would be considered to include ‘limited tree cover and fragmented hedgerows weaken overall structural integrity’.

	<b>Cawston Spinney Character Area</b>	<b>Land South of Cawston Spinney Character Area</b>	<b>EDP Commentary</b>
<b>Distinctiveness</b>	<i>“Cawston Spinney character area- moderate-to-strong contribution. Large woodland blocks, undulating topography, and historic farmsteads provide a recognisable and characterful sense of place.”</i>	<i>“Land South of Cawston Spinney character area- weak-to-moderate contribution, closer to weak. Industrial influence, simplified field patterns, and limited tree cover reduce distinctiveness, though basic field structure maintains a minimal connection to the regional character.”</i>	The site is not woodland and does not contain a <i>“historic farmsteads provide a recognisable and characterful sense of place”</i> . Across the Site, there is an <i>“industrial influence, simplified field patterns, and limited tree cover reduce distinctiveness, though basic field structure maintains a minimal connection to the regional character”</i> .
<b>Recreational</b>	<i>“Cawston Spinney character area- moderate to strong contribution, leaning towards strong. Woodland paths and public rights of way are well used for walking and dog walking, and the wooded setting provides a high-quality recreational experience.”</i>	<i>“Land South of Cawston Spinney character area – moderate contribution. While public rights of way remain in use, the diversion of a footpath through industrial development reduces the quality of the recreational experience compared with the other character areas”.</i>	Public Rights of Way are present within and adjacent to the Site, though it is questioned whether land outside of the woodland can be described as providing a ‘high-quality experience’.
<b>Perceptual (scenic)</b>	<i>“Cawston Spinney character area – moderate to strong contribution, leaning towards strong. Despite some disruptive views from exposed northern areas, enclosed woodland, strong natural edges, and filtered views provide a visually rich and immersive scenic experience across much of the character area.”</i>	<i>“Land South of Cawston Spinney character area – weak contribution. The dominance and frequent visibility of industrial development, combined with simplified field patterns and limited vegetation, significantly reduces scenic quality and visual appeal.”</i>	While views within the woodland itself might be enclosed, there is limited evidence to justify why land outside of the woodland would be considered to provide a ‘visually rich and immersive scenic experience across much of the character area’. Across the entire Site, ‘frequent visibility of industrial development, combined with simplified field patterns and limited vegetation’.

	<b>Cawston Spinney Character Area</b>	<b>Land South of Cawston Spinney Character Area</b>	<b>EDP Commentary</b>
<b>Perceptual (wildness and tranquillity)</b>	<i>“Cawston Spinney character area – moderate to strong contribution, tending towards strong. Enclosed woodland areas provide a strong sense of seclusion and calm, with birdsong and limited intrusion creating locally high levels of tranquillity, despite some disturbance at more exposed edges.”</i>	<i>“Land South of Cawston Spinney character area – weak contribution. The dominance of industrial infrastructure, associated activity, and artificial lighting significantly reduces perceived tranquillity, with limited buffering from vegetation or landform.”</i>	Again, there is limited evidence provided to justify why land outside of the woodland, within the more open areas, would be considered to provide locally high levels of tranquillity. Furthermore, though it is acknowledged that <i>“despite some disturbance at more exposed edges”</i> , this does not appear to have been considered in the overall judgement.
<b>Associations</b>	<i>“All three character areas make a weak contribution to landscape value, as there are no known associations with notable people, events, cultural works, scientific achievements, or other factors that influence perceptions of the landscape.”</i>	<i>“All three character areas make a weak contribution to landscape value, as there are no known associations with notable people, events, cultural works, scientific achievements, or other factors that influence perceptions of the landscape.”</i>	No differentiation between each parcel.
<b>Functional</b>	<i>“Cawston Spinney character area makes strong contribution. Ancient and semi-natural woodland and Local Wildlife Sites provide important ecosystem services, habitat connectivity, and a key role in the local green infrastructure network.”</i>	<i>“Land South of Cawston Spinney character area makes moderate contribution. Industrial development limits functional landscape elements, though boundary hedgerows and peripheral trees provide some ecological and connective value.”</i>	Again, there is limited evidence provided to justify why land outside of the woodland, within the more open areas, would be considered to provide <i>“important ecosystem services, (and) habitat connectivity”</i> .

- 3.17 It is clear that, overall, while the Cawston Spinney woodland itself provides a strong contribution to landscape value, there is limited evidence provided as to why land beyond the woodland edge to the south is considered to meet the same criteria. Though the LSA acknowledges that there may be areas of higher landscape value adjacent to the woodland edge, there is little evidence provided as to why this judgement of landscape value should extend as far as the boundaries of the defined character area where land is privately owned arable land with strong visual associations with adjacent logistics-built form.
- 3.18 Notably, the character of the Site will change further as the development of land associated with the wider south-west Rugby allocation is progressed.
- 3.19 Overall, EDP do not agree that the entire Cawston Spinney character area defined by the LSA meets the 'good' criteria, as land beyond the woodland itself does not meet the criteria of including "*multiple positive factors, and potentially creating a distinctive sense of place*". In defining the character areas as shown, the LSA has over emphasised the value of the landscape beyond Cawston Spinney which has, inevitably, inflated the overall judgement of landscape sensitivity.

### **Susceptibility to Change**

- 3.20 The LSA does not define a specific development scenario in order to consider susceptibility to change, only considering 'residential' and 'commercial' development. However, in considering a 'commercial' development, for each defined character area, the LSA concludes that:

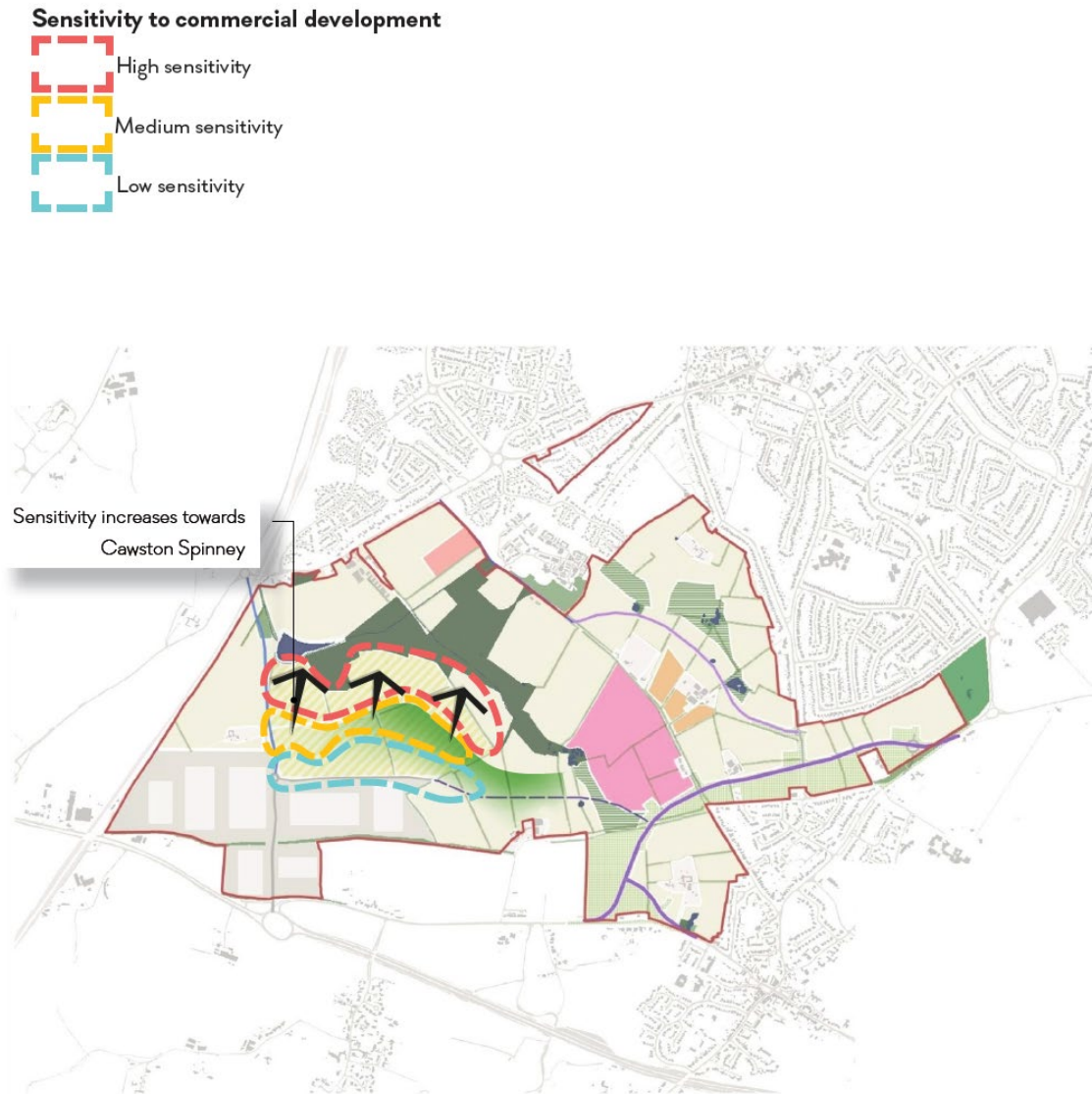
- Cawston Woodland: "*The area immediately south of the woodland edge has high susceptibility to commercial development. Large-scale built form would be incongruous with the existing landscape, altering baseline character and affecting landscape and ecological features that contribute positively to the character, setting, and integrity of the Cawston Spinney character area*"; and
- South of the Woodland: "*Parts of the character area are already developed for commercial use, with the Iron Mountain Industrial Estate occupying land to the south and south-west. In these areas, large-scale built form is a defining feature of the baseline landscape. While this reduces susceptibility to change, further commercial development could intensify built form and extend industrial influence. As such, land within and immediately adjoining the existing industrial estate from the north is assessed as having medium susceptibility to commercial development*

*In contrast, the safeguarded land located immediately south of Cawston Spinney character area performs a buffering function between industrial development and the edge of Cawston Spinney character area. The introduction of commercial development within the northern portion of the area could undermine this role and result in an incongruous extension of industrial character towards the spinney. Such change could give rise to notable adverse effects on landscape character and on the setting and integrity of Cawston Spinney. Accordingly, this zone is assessed as having high susceptibility to commercial development*".

- 3.21 Under GLVIA3, susceptibility concerns the ability of a landscape to accommodate a type of development without undue harm to its key characteristics. Considerations of susceptibility should therefore refer to inherent landscape attributes and explain why those characteristics may be sensitive to a defined category of development (e.g., large-scale commercial development). The LSA appears to go beyond this, moving into effect-based reasoning and predicting outcomes, including that *“The introduction of commercial development within the northern portion of the area could undermine this role and result in an incongruous extension of industrial character towards the spinney.”* In relation to residential development, the LSA also suggests mitigation measures that might *“reduce the contrast with surrounding agricultural land.”* Such commentary extends beyond assessing inherent susceptibility and instead begins to anticipate the likely effects of development which, under GLVIA3 and the August 2024 Clarifications provided by the Landscape Institute, should be appropriately addressed at LVIA stage (this has been provided within TBBD’s application which, as above, has not been reviewed by the LSA).
- 3.22 Overall, the judgements of susceptibility within the LSA are unclear, particularly as there appears to be a level of judgment of the effects arising from development having informed the level of susceptibility.

#### **Landscape Sensitivity**

- 3.23 In assessing landscape sensitivity, the LSA defines three different levels of sensitivity across the Site though, again, the boundaries between each area are unclear.
- 3.24 The LSA concludes that (refer to **Image EDP 3.2**) (with EDP emphasis);
- *“The southernmost portion of the area, assessed as having ordinary landscape value and medium susceptibility to commercial development, is classified as having **medium to low sensitivity**. A professional judgement of low sensitivity is applied, reflecting the established baseline created by the adjacent industrial estate, where large-scale commercial development is already a defining characteristic of the landscape.*
  - *Further north, within the transitional zone between the Land South of Cawston Spinney and the Cawston Spinney character areas, the combination of ordinary landscape value and high susceptibility results in an overall **medium sensitivity**, reflecting the area's role in mediating between the industrial landscape to the south and the more enclosed, wooded character of Cawston Spinney.*
  - *Within the Cawston Spinney character area, the landscape has good value and high susceptibility. While the sensitivity matrix indicates **high to medium sensitivity**, our **professional judgement is to classify this portion of land as high sensitivity**, reflecting the intact landscape condition and the area's role in protecting the ecological and landscape integrity of the spinney”.*
- 3.25 Notably, the overall sensitivity for the southernmost portion of the area has been assessed downwards, with the Cawston Spinney character area being assessed upwards.



**Image EDP 3.2:** Extract from LSA summary of landscape sensitivity.

## **Section 4**

### **Conclusions**

- 4.1 The Site does not lie within, or contain, any nationally or locally designated landscapes and it does not represent, in a perceptual or physical sense, a landscape of any great importance or distinct character.
- 4.2 It is clear that, overall, while Cawston Spinney itself provides a strong contribution to landscape value, there is limited evidence provided as to why land beyond the woodland edge to the south, is considered to meet the same criteria. Though the LSA acknowledges that there may be areas of higher landscape value adjacent to the woodland edge, there is little evidence provided as to why this judgement of landscape value should extend as far as the boundaries of the defined character area, where land is privately owned arable land with strong visual associations with adjacent logistics-built form. Though there are features of higher value within the local context most notably Cawston Spinney, EDP consider the value and susceptibility of the Site itself, to be low, leading to an overall low sensitivity.
- 4.3 EDP's review shows that, though the LSA post-dates the drafting of the Council's Proposed Submission Local Plan (Reg 19), there is a notable correspondence between defined character areas and policy extents. Sensitivity boundaries appear to correspond closely with indicative built development extents within policy which, as set out above, were determined prior to the publication of the LSA. While such alignment is not inherently inappropriate, there is limited evidence within the LSA to demonstrate that these boundaries are independently derived from landscape character analysis rather than reflecting allocation geometry or policy-defined edges. Where assessment units mirror planning boundaries without clear landscape justification, there is a risk that the sensitivity framework may be influenced, or perceived to be influenced, by policy structuring rather than intrinsic landscape characteristics.
- 4.4 EDP's judgement of landscape and visual sensitivity is aligned with those published character assessments prior to the issue of the LSA, not all of which have been reviewed by the LSA. Essentially, the LSA is an outlier in this case. Though there are features of higher value within the local context, most notably Cawston Spinney, EDP concur with the findings of the RBC Landscape Sensitivity Assessment (March, 2025) and consider the value and susceptibility of the Site itself to be low, leading to an overall low sensitivity.
- 4.5 It appears that the reduction in the quantum of floorspace within the Site allocation was set out prior to the issue of the LSA, and there is no evidence which justifies the shape, size and capacity of the indicative development area.



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