

Development Strategy
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

Date: 2 February 2024

Dear Sir/Madam,

Re: Rugby Local Plan Review Regulation 18 Issues and Options: October 2023 – Representations on behalf of Moto Hospitality Limited

Introduction

We act on behalf of Moto Hospitality Limited (Moto) and have been instructed to submit representations to the above Local Plan consultation.

The Moto Motorway Service Area (MSA) relevant to this consultation is the Rugby MSA, located at Junction 1 of the M6. Specifically, the following representations are made in respect of land adjacent to the north of the MSA, which is approximately 12.14ha in size and is currently being earmarked as a potential site for a ground-mounted solar farm to assist in Moto's Electric Vehicle (EV) charging points roll out and additional HGV parking that is urgently needed to cater for demand.

We are aware of L&Q Estates' representations for the wider land to the north of Junction 1 to be promoted as a mixed-use strategic allocation, including employment, housing and community infrastructure. We are supportive of each other's proposals and both parties have agreed to fully consider each other's proposals in their respective future development plans. However, it should be noted that both schemes will be subject to independent and separate planning applications.

These representations should be read alongside the completed Call for Sites Proforma and Red Line boundary plan enclosed to this letter.

Moto Sustainability Aspirations

Moto has an ambition to become a net positive business by 2050 by putting more back into the environment than they take out. Two of Moto's strategic priorities towards achieving their vision to 'brighten people's journeys through life' are to be achieved by:

- Leading the transition to clean energies; and
- Building a more sustainable future

The impact of climate change will be one of the greatest challenges to UK businesses over the coming decade. To address these challenges and to deliver sustainable business growth, Moto will reduce carbon, maximise energy and water efficiency and keep waste to a minimum within their operations and across their supply chains.

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To achieve this, Moto has developed five key goals to tackle climate change:

- Moto will lead the national transition to EV
- Moto will reduce negative environmental impacts and improve use of natural resources
- Moto will futureproof our sites through innovation and design
- Moto will provide safe environments for colleagues and customers
- Moto will help our customers to be more sustainable through our services and facilities

Transport currently accounts for a third of UK emissions and its decarbonisation requires significant technological and behavioural innovation. The Government announced in November 2020 that the sale of new petrol and diesel cars will be banned by 2030, which is now only 6 years away.

To achieve these targets, it is imperative that suitable infrastructure is provided to support electric vehicles. The National Grid's current demand stands at 334.2 TWh. This means the UK would need to increase its electricity production by around 100TWh to meet the charging demands of electric vehicles.

The National Grid's ability to meet even current demand for power is also becoming increasingly challenging. By 2025, Moto alone will need two and a half times as much power as it currently uses in order to service the growing number of Ultra Rapid EV Charging Points required. This is why Moto is committed to finding alternative and sustainable solutions for closing the power deficit.

In that context, Moto has set out an ambitious development strategy to bring forward solar farms on land adjacent to their MSA which will generate electricity to power the electric chargers at their services. Given the Government's support for electric vehicles, it is necessary for service stations to transform so that they can continue to provide an important service for customers.

Moto is proud to be leading the EV revolution on the UK motorway network, as the company strives to encourage more sustainable driving by making it easier for EV drivers to recharge their electric cars. Moto's aim is for all drivers to feel confident enough to switch to electric vehicles, safe in the knowledge that they do not need to worry about driving range anywhere in the UK, and Moto is proud to be leading the charge.

Improving HGV parking facilities

In addition to the EV charging points roll out, based on gathered evidence, there is an identified need for additional HGV parking at Rugby MSA as the site is currently over the 'critical' need based on the current utilisation levels of HGV parking at the services.

The evidence is derived from Department for Transport recent National survey of lorry parking 2022, which outlines that on site utilisation levels of parking over 85% demonstrate critical level of need for additional parking.

Summary

Therefore, based on Moto's development needs and aspirations to provide solar farms to power new EV charging points additional HGV parking on land directly adjacent to the north of the Rugby MSA, it is imperative that the land in question is safeguarded for such purposes.

The below commentary will address the relevant sections of the Rugby Local Plan Review Issues and Options consultation document in light of the above.

Potential Strategic Employment Locations and Land for Housebuilding

The table on page 16 and map on page 17 identifies potential strategic employment locations for the borough, one of which around M6 Junction 1, where the Moto Rugby MSA is located.

Similarly, Section 9 outlines the Borough's housing land supply, and housing supply targets needed for the future. The map on page 52 identifies the land around M6 Junction 1 for a potential housing location.

The land directly to the north of Rugby MSA is an area where Moto may potentially plan to expand.

Paragraph 3.41 states that at this stage these are broad locations, not sites. Therefore, we have no 'in-principle' objection to potential new employment and housing sites around M6 Junction 1, as long as the site directly to the north of the Rugby MSA is safeguarded for Moto to expand, in order to improve their offer and services.

The National Planning Policy Framework (NPPF) states in section 6 that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt and that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

This is particularly pertinent given the 'critical' need for additional HGV parking and considering the Government's targets for electric vehicles, where the expansion of Moto Rugby MSA will significantly improve the infrastructure for electric vehicles.

Zero Carbon Energy Sources

On 18 July 2019 Rugby Borough Council adopted a motion to declare a climate emergency. As such, the Council need to update the Local Plan to contribute to reducing carbon emissions and encouraging sustainable development and alternative energy sources.

Paragraph 7.14 states that the biggest reduction to greenhouse gas emissions can be achieved by installing more solar and wind electricity generation. Paragraph 7.16 outlines that the main renewable energy technologies likely to be workable in the borough are solar and wind energy.

Paragraph 7.21 then goes on to state that the Council could take a more supportive stance to both solar and wind energy, including identifying areas in which they would support new wind and solar energy generation. The paragraph then identifies potential locations such as along the A5 and motorways, including highway verges and central reservations.

We are highly supportive of the Council's stance regarding solar energy and encourage policies promoting the installation of solar farms and identifying potential locations along motorways. This approach would tie into Moto's aspirations for the future development of the Rugby MSA, where plans to install a solar array to power EV charging points are in the pipeline.

Implementing policy encouraging the development of renewable energy would also tie in with the objectives of the NPPF, where paragraph 160 states *"to help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development; and b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development."*

Question 18

In order to deliver Moto's EV charging points and contribute to Government's strategic EV charging targets, the neighbouring field to the north and west of the main MSA building is suitable for a ground mounted solar development.

Policy and designation encouraging solar energy would help support the development of a solar farm at Moto Rugby MSA, but also help the Borough meet its targets regarding renewable energy and sustainable development.

Conclusion

In conclusion, Moto are committed to the Moto Rugby MSA site and have plans to develop adjacent sites to the north in the near future. The planned developments will not only bring a benefit to the local economy and improve Moto's offer at Rugby MSA, but also help the Government meet their EV targets, and help the Borough meet their renewable energy goals.

We request that these representations are taken into account in the emerging Local Plan process and that Moto Hospitality and Rapleys are engaged in the future consultation stages.

Yours faithfully,

Rapleys LLP

Appendix 1 – Call for Sites Proforma

Call for Sites Proforma

Housing and Economic Land Availability Assessment (HELAA)

Call for Sites Proforma

- Please complete this form if you would like to suggest proposals for future land use and development within Rugby Borough on sites capable of delivering 5 or more homes, or sites larger than 0.25ha.
- The sites will be assessed as part of the HELAA and used as an evidence base document for the Local Plan preparation process.
- Please complete a separate form for each site. Complete each section clearly and legibly to the best of your knowledge. If you require more space, please use Section 9, or append additional pages.
- You must attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site and details of site ownership.

Data Protection Disclaimer

Details submitted to the council as part of a call for sites will help inform the HELAA and assist in identifying land for development to contribute to a land supply to meet local need. The submitted information will not be confidential as it will be published as part of a comprehensive land assessment via published reports available for public consumption. This information will also be shared with other parties, including employees of the council, other council departments and third parties, such as the Planning Inspectorate and other Local Planning Authorities.

Details provided in Section 1 will be kept and stored confidentially by the Council. Details in Section 2, the names of which should match those provided in Section 1, will be made publicly available as established above. As such, only names of organisations/agents/applications will be made public where it has been clearly declared through this submission form. No other details, such as addresses or contact information, will be made available.

By submitting this form to the Council, you are providing consent for us to retain your details on our Planning Policy as part of the Call for Sites process, the HELAA and to enter your details to our consultation database so that we may contact you in future to advise on the Local Plan preparation process.

1. Your Confidentially Held Details

Title		Name	
Organisation (if relevant)	Rapleys LLP		Representing Moto Hospitality
Address	York Street, York House, Manchester		
Postcode	M2 3BB	Telephone	
Email			
Signature	—		
Date	02.02.2024		

2. Your Publicly Viewable Details	
Name/Organisation	
Status in relation to site	Planning Agent
Representing (if applicable)	Moto Hospitality

3. Site Location			
Site Name	Moto Rugby Motorway Service Area		
Site address (inc. postcode if known)	M6 Junction 1, 1 Leicester Road, Rugby, CV23 0EZ		
OS Grid Easting	451230	OS Grid Northing	279549
Total Site Area	12.14ha	Developable Area	c.11.14ha
<p>Please attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site. The area of the site you wish to be formally assessed should be enclosed by a red line. Any other relevant land under your ownership should be enclosed by a blue line</p>			

4. Site ownership (please mark as appropriate and/or provide details)				
Do you own the site?	Yes – sole owner	Yes – part owner	Yes – acting on behalf of the owner(s)	No
Is the site available?	Yes – immediately	Yes – In 5-10 years	Yes – 11+ years	No
Have you notified the landowner/other landowners that you have submitted the site?			Yes	No
Other relevant information e.g. is there a promotion / option agreement, is a developer on board etc.			Yes	

5. Site Constraints (on site or at boundary – please mark as appropriate and/or provide details)	
Current/previous use	Arable land and agricultural buildings
Adjacent land uses	Arable and Motorway Service Area to the south
Planning History	No planning history on site

Existing Infrastructure	Electricity	Gas X	Mains Sewer	Mains Water	Telecoms
Access from Highway	Yes – Classified Road		Yes – Unclassified Road		No
Highway Works	N/A				
Ransom Strips/ third party land required etc.	N/A				
Legal Issues	N/A				
Existing Occupiers	N/A				
Public Access/Rights of Way	Bridleway on the southern boundary				
Ecology/Wildlife Designations and other known issues	Yes – Details:		Reports/Mitigation Strategy:		No
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)					No
Land Contamination /	Yes – Details:		Reports/Mitigation Strategy:		No
	Yes – Details:		Reports/Mitigation Strategy:		No

Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	<p>Yes – Details: No within site. Grade II Heath Farmhouse lies 800m to the north in Churchover</p> <p>Immediately east of the site across the A426 lies the Scheduled Monument 'bowl barrow 470 metres south west of Coton House'</p>	Reports/Mitigation Strategy:	No
Flooding			Flood Zone 1
Other Physical Constraints (flooding, topography)	Yes – Details:	Reports/Mitigation Strategy:	No
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc)	Yes – Details:	Reports/Mitigation Strategy:	No
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	Yes – Details:	Reports/Mitigation Strategy:	No
Other Knowns Issues/Constraints	<p>Green Belt is c. 1.5km to the west of the site</p> <p>Land covered by the Strategic Green Infrastructure Network (Policy NE2) lies towards the western boundary of the site.</p>		

6. Site Accessibility (please provide distance as measured from the middle of the site “as the crow flies” and utilise journey planner to determine walking time)			
Distance to closest bus stop (m/km)	955m	Walking time to closest bus stop (mins)	20 min
Distance to closest amenities (m/km)	Within 200m	Walking time to closest amenities (mins)	Within 5 min
Distance to closest rail station (m/km)	c. 4.3km	Walking time to closest rail station (mins)	60 min
Any known issues with public transport – frequency of services etc	N/A	Any known issues with amenities e.g. limited capacity at schools, GPs etc	N/A
Other accessibility issues relevant to the nature of the proposal			

7. Previous site promotional work (please cross reference with Section 5 where relevant)		
Has any work been undertaken to promote the site and/or to overcome constraints?	Yes	No
If yes, please provide more details and copies of reports where available:		
Have any viability appraisals been undertaken?	Yes	No
If yes, please provide more details and provide copies of reports where available:		
Are there any specific or immediate intentions to start development?	Yes – pre-application submission is being prepared	No
If yes, please provide more details (such as Pre-application discussions)		

8. Proposal Details (please mark as appropriate and/or provide details)					
Description of Proposed Development	Erection of ground mounted solar farm & HGV parking				
Proposed Land Use	Residential	Employment	Retail	Mixed	Other Renewable Energy HGV Parking
Site capacity/density (homes/floor space)			Details of mixed/other land uses	5-7MW	
Potential Development	For sale/marketed for development		Negotiations with developer	In control of developer	Ready for release by owner
Development time scales	Short term (within 5 years)		Medium term (6-10 years)	Long term (11-15 years)	Beyond (16+ years)
Development Timescale/Phasing (incl. build-out rates)	Construction and operation takes about 1 year from planning consent				

9. If the site fits the criteria for a brownfield site are you happy for us to include it on the relevant LPA brownfield land register (tick as appropriate)	
Yes	No
	N/A

10. Additional information e.g. relevant evidence, other constraints and challenges, market desirability, planned infrastructure, opportunities etc

Appendix 2 – Redline Boundary Plan

OVERALL SITE AREA
 121,405M2 / 12.14Ha / 30A

El Sub Sta

Track

Rev	Date	Description	Drawn	Checked

Drawing Date: **Feasibility**



Construction Consultants

PROJECT
 Rugby MSA
 Additional HGV Parking

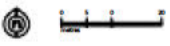
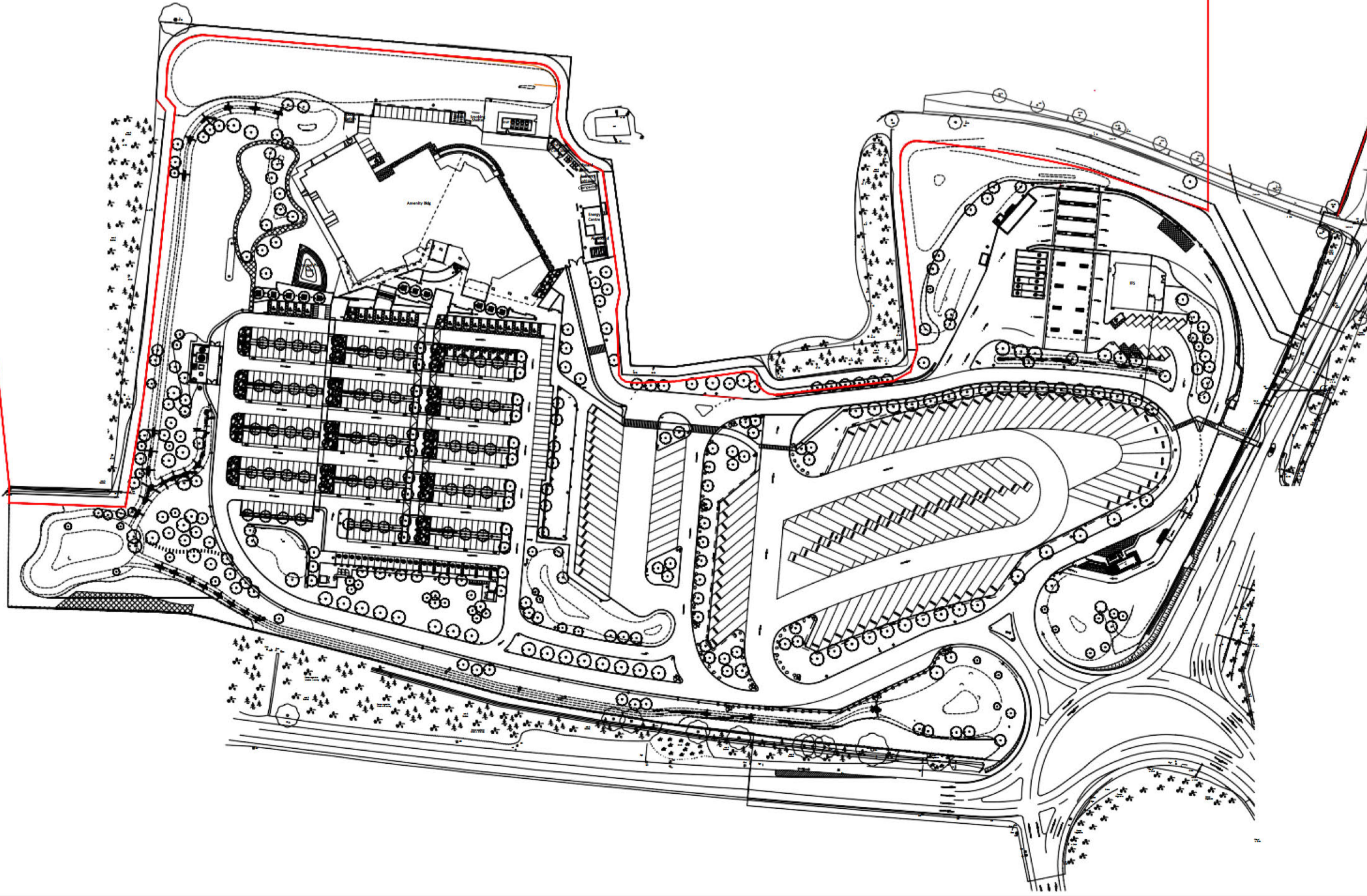
CLIENT
 Moto Hospitality Ltd

TITLE
 Site Layout - As Proposed Boundary

SCALE
 1:1000 @ A1

DATE
 June 2023

DRAWN BY	CHECKED BY	DRAWING No.	REV
.....	7691_15	F









Moto Rugby Local Plan Representation - Final Draft

Final Audit Report

2024-02-02

Created:	2024-02-02
By:	
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