



RUGBY LOCAL PLAN REVIEW
ISSUES AND OPTIONS: OCTOBER 2023
LAND AT BOOTS FARM, STRAIGHT MILE, BOURTON-ON-DUNSMORE

REPRESENTATIONS ON BEHALF OF
MITCHELLS (POTATOES) LTD

JANUARY 2024

REF: PF/10846

CONTENTS

1. Introduction	2
2. Submissions to the Rugby Issues and Options Consultation	3
3. Land at Boots Farm	10

Appendices

Appendix 1 – Red Line Site Plans

Appendix 2 – Concept Plans

1. INTRODUCTION

- 1.1. These representations are made to the Rugby Local Plan Review Issues and Options Consultation, on behalf of Mitchells Potatoes Ltd, who own the site.
- 1.2. The sites are shown on the attached plan (Appendix 1) and an illustrative plan showing how the site could be developed is attached (Appendix 2). Please note two options are shown:
 - The first is for a smaller site (Option 1);
 - The second for a larger site (Option 2).
- 1.3. Call for site proformas are completed for each option.
- 1.4. The representations respond to the following consultation questions:
 - 1 -6
 - 21, 22, 24, and 26.

2. SUBMISSIONS TO THE RUGBY LOCAL PLAN ISSUES AND OPTIONS CONSULTATION

Land for Employment Policies

2.1. With regards to the following questions, the responses are as follows:

1. *How much employment land should we be planning for?*

2.2. The NPPF states: *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. 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 innovation⁴⁴, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”* (Paragraph 85) and that:

“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.” (Paragraph 87 of the NPPF).

2.3. 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.

2.4. The allocation of employment land is supported and it must be ensured enough employment land has been allocated. It is noted that the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 shows three components of future need for employment land. These are shown in the table below:

Type of employment land	Land needed 2021-2041 (in hectares)	Land needed 2021-2050 (in hectares)
Gross requirement for strategic warehousing land across Coventry and Warwickshire (this means land for warehouses of over 9,000m ² in floor area)	551ha	735ha
Net need for office land (Rugby Borough only)	5.2ha (4.2ha with hybrid working)	6.5ha
Gross requirement for industrial land (Rugby Borough only) (this includes smaller warehouses of up to 9,000m ² in floor area)	150.5ha	218.2ha

2.5. We acknowledge the results of the Housing and Economic Development Needs Assessment (2022) however it is considered that the Council should identify further land for employment.

- 2.6. There are benefits of allocating more sites than the total estimated need to give occupiers market choice and flexibility, and to allow a degree of leeway, should particular issues delay delivery on specific sites (e.g., lead-times to undertake infrastructure works; provide power upgrades/connections).
- 2.7. We would welcome the opportunity to further engage on the identified evidence base and how this translates into the identification and allocation of additional employment sites prior to the next stage of consultation on the Local Plan, as recommended in the Planning Practice Guidance (Paragraph: 040 Reference ID: 61-040-20190315).
- 2.8. There are a number of areas where we would particularly welcome a detailed discussion and review of the evidence base:
- input into the new economic strategy which will inform the local plan;
 - assessed through the housing and employment land availability assessment later this year;
 - updated to the latest information is contained in the Rugby Borough Council Authority Monitoring Report 2022-2023 (this records the position as at 31st March 2023);
 - the assumed supply of developable sites position; and
 - approach to suppressed demand.
- 2.9. Paragraph 11 of the Framework requires that for plan making Local Plans strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. Paragraph 85 of the NPPG requires that *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.”* and paragraph 86 states *“That Planning policies should: a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.... d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”*
- 2.10. In order to ensure that the emerging plan contains the necessary level of flexibility that is required additional employment floorspace should be allocated and this should be expressed as a minimum figure. In doing so, this would ensure that the policy was positively prepared, be effective and consistent with national policy, and would enable the Local Plan to be flexible and respond to changing circumstances. The emerging plan should therefore should take account of market signals and set out a clear strategy for allocating sufficient land which is suitable for development in their area.

2. What type of employment land should we be planning for?

- 2.11. It is considered that all types of employment land should be planned for. With regards to the subject site, it is noted that in paragraphs 3.10 to 3.13 recognise a particular need for B2 industrial and light industrial (now use class E(g)(iii)) land and these types of uses could be supported on the Boots Farm site:

“The HEDNA doesn’t split the need for industrial and smaller warehousing land in the borough into different types of employment land. It does, however, recommend that, because of the high demand for warehousing land, we should make specific site allocations for B2 industrial and light industrial (now use class E(g)(iii)) land.”

*Additionally, the **feedback we have received from local businesses is that there is a shortage of ‘grow on space’ in the borough to allow existing businesses to expand and incubator space for new start-ups.***

*Successful business clusters have developed in the borough, in particular the Manufacturing Technology Centre and associated manufacturing uses at Ansty Park. However, **there is an impetus to diversify the borough’s economy and support the development of local skills to meet future business needs.***

*Alongside any review of the Local Plan, Rugby Borough Council is **producing a new economic strategy which will inform the local plan. As part of this Economic Strategy, we will consult with the Coventry and Warwickshire Chamber of Commerce, the Coventry and Warwickshire Growth Hub and Warwickshire County Council, West Midlands Combined Authority and other partners and representatives of the business community to refine our understanding of the employment land we need.*** [emphasis added]

3. Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed).

2.12. There are no specific comments on the broad location however it is noted that additional sites could be added, such as the Boots Farm site, however this would be a non strategic site rather than a strategic site. Non strategic employment land can be identified to meet employment needs elsewhere in the Borough.

2.13. Where non allocated employment land that is close to the strategic road network this can be identified to meet employment needs elsewhere in the Borough this should be allocated, the Boots Farm site is one such location where additional employment land can be brought forward for development.

4. How can we provide more space to allow existing businesses to expand?

2.14. The Borough can facilitate more space to allow existing businesses to expand by the inclusion of positive policies to allow existing business expansion in Green Belt locations and flexible policies in relation to the expansion of existing employment sites.

5. We are minded to allocate sites specifically for industrial (B2) and light industrial (E(g)(iii)) uses. Do you support this and if so, where?

2.15. Yes, this is supported (for the reasons set out in paras 2.11 and 2.13 above). It is also noted that the Issue and Options document states at paragraphs 3.20 to 3.21:

“Although Rugby and the Midlands are an attractive location for warehousing space, it is to recognise that a sizeable proportion of our existing industrial land is used for manufacturing and research and development uses. This is true, for example, of GE Power Conversion, Ansty Park and for part of Prologis Park at Ryton.

*It is the Council’s expectation that the Economic Strategy **will support the expansion of manufacturing, research and development employment land.** Therefore, additional site allocations are likely to be necessary to enable this need to be met and for Rugby to continue*

to be able to attract the next generation of these skilled businesses and jobs.” [emphasis added]

2.16. The subject site is a potential location for these uses) as:

- it would involve the expansion of an existing employment site;
- there are no amenity issues for nearby residents;
- the site is deliverable and is a sustainable and appropriate allocation for new employment to meet the identified needs of the Borough;
- the site is in a sustainable location;
- the site’s location is accessible to existing infrastructure and the proposals will enable easy access to existing and new infrastructure that is proposed;
- the site is available and suitable for the early delivery of employment floorspace;
- the site has been robustly assessed in terms of its planning, physical and environmental context;
- the site is well related to the local highway network with direct access onto the Straight Mile then onto the M45.
- the site has opportunities to link development into existing pedestrian and bus routes within and near to the site;
- the site is regarded as suitable for employment development without having a detrimental visual impact on the neighbouring environment or wider landscape;
- there are a number of green infrastructure assets adjacent to the site which provide an opportunity to create a network that links to assets within the wider area, and contribute to conserving and enhancing the natural environment;
- the site falls within Flood Zone 1, which is the lowest flood risk possible, and therefore the site is not constrained in this regard. On-site SUDS network would control surface water run-off, utilising the existing topography and watercourses; and
- there will be no adverse impact on heritage assets, and their settings will inform the design of the proposed development as necessary.

6. Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?

2.17. With regards to the NPPF (2023) ‘Protecting Green Belt Land’ states at paragraphs 142 and 143 that:

“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.

Green Belt serves 5 purposes:

- (a) to check the unrestricted sprawl of large built-up areas;*
- (b) to prevent neighbouring towns merging into one another;*
- (c) to assist in safeguarding the countryside from encroachment;*
- (d) to preserve the setting and special character of historic towns; and*

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

2.18. Paragraphs 145 and 146 state:

*“Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. **Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.** Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.*

*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, 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 the preceding paragraph, and whether the strategy:*

(a) makes as much use as possible of suitable brownfield sites and underutilised land;

(b) optimises the density of development in line with the policies in [chapter 11](#) of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

(c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

2.19. Paragraph 3.37 of the Issue and options Consultation report sets out the quantity of potential additional employment land the Council consider they need to find to **meet Rugby Borough’s own need** for industrial land. This excludes the Coventry and Warwickshire strategic warehousing need and Rugby Borough’s need for land for offices:

	Plan period 2021-2041	Plan period 2021-2050
Requirement for industrial land (excluding strategic warehousing and offices)	150.5ha	218.2ha
Completions 2021-2023	32.65ha	32.65ha
Total supply already identified	145.26ha	145.26ha
Supply still needing to be found	No additional supply needed	40.29ha

- 2.20. As set out above (paragraph 2.4) the HEDNA (2022) states that the gross requirement for industrial land (Rugby Borough only) (this includes) smaller warehouses of up to 9,000 square metres) is **218.ha** (Land needed 2021-2050).
- 2.21. Having regard to the particular facts of the scale of Council's employment land requirement (and potentially adjoining local authorities' requirements) and an inability to meet this on non-Green Belt land within the Borough it is entirely appropriate that Green Belt boundaries should be subject to a review and revision.
- 2.22. Therefore, it is considered that the need for employment land demonstrates exceptional circumstances and that the changes to the Green Belt (via the Local Plan process) in this location to help meet this need is fully evidenced and justified.

Climate Change Policies

- 2.23. With regards to the following questions:

21. Should we adopt a minimum tree canopy policy for new development?

- 2.24. It is considered that the adoption of a minimum tree canopy policy for new development is overly prescriptive and as such is not required.

24. Should we require developers to prioritise the delivery of biodiversity gain within close proximity to the development?

- 2.25. No there should not be a requirement to prioritise the delivery of biodiversity gain within close proximity to the development. As long as the Council accept that it is not feasible to deliver the required BNG onsite, the location of the offsite biodiversity gains should not affect the determination of whether to approve a Biodiversity Gain Plan. Any insistence by a Council to have the compensation delivered in its area is not supported by legislation. It should be noted that the Statutory Biodiversity Metric already applies a negative weighting to offsite units based on distance from the development site.

26. We are considering requiring all new non-residential developments to be net zero. Do you agree?

- 2.26. Building Regulations control how energy efficient/sustainable a building should be. It is therefore submitted that the Council follows National Policy as differing policies in different Councils only slow down development. The Council also needs to demonstrate that their policies are viable, as too onerous polices which will have a subsequent impact on employment land provision.

28. Should we require non-residential development to meet higher water efficiency standards to reduce water usage?

- 2.27. The BREEAM (Building Research Establishment Environmental Assessment Method) requirements and Building Regulations control the water efficiency standards for non residential development. It is therefore submitted that the Council follows National Policy as differing policies in different Councils only slow down development. The Council also needs to

demonstrate that their policies are viable as too onerous polices which will have a subsequent impact on employment land provision.

3. LAND AT BOOTS FARM

3.1. The section below sets out the merits of the site to demonstrate that it is suitable for development.

Site and Surrounding Area

3.2. The site is located to the north of the Straight Mile (B4453), approximately 1.8km to the west of the A45 and 7.5km to the southwest of Rugby Town Centre. The site is located within an area of countryside designated as Green Belt, which forms part of the wider West Midlands Green Belt. The overall site extends to an area of approximately 5.08ha, and includes a mix use of Class B1 (office/light industry), B2 (General Industry) and B8 (Storage and Distribution), including the headquarters of Mitchells Potatoes Ltd. The use of the site for employment uses (B1/B2/B8) was granted by planning permission R10/1247 which was approved in November 2012.

3.3. The site connects to the wider area via its access onto the Straight Mile (B4453). Further access into and through the site can also be obtained via the existing Bridleway along the existing access road and through the site. Bridleway R163 is adjacent to the western boundary of the site and footpath R163c is to the east of the site and crosses the site access.

3.4. The immediate context and surroundings of the site woodlands and open arable agricultural farmland. To the south of the site are the local needs settlement of Bourton-on-Dunsmore and Frankton. To the east of the site is Heath Farm and further afield towards the A45 is Wyevale Garden Centre. Directly on the opposite side of the road to Wyevale Garden Centre is Bernard’s Nurseries and at the junction with the Straight Mile and A45 is a service station which comprises of a McDonalds Drive Through and Restaurant and Travelodge.

Relevant Planning History

3.5. A summary of a planning history relevant to the site is set out below:

<u>Application Number</u>	<u>Description</u>	<u>Decision</u>	<u>Date</u>
R10/1247	Change of use of existing buildings for purposes within Class B1 Office/ Light Industry), B2 (General Industry) and B8 (Storage and Distribution) together with the car parking provisions (retrospective).	Approved	7 th November 2012
R10/1254	Extension to existing building (retrospective).	Approved	8 th November 2012
R13/0585	Change of use of existing buildings for purposes within Class B1 Office/ Light Industry), B2 (General Industry) and B8 (Storage and Distribution) together with the car parking provisions (retrospective) - Variation of condition 10 attached to approval R10/1247	Approved	22 nd May 2013

	date 07/11/2012 to enable the provision of lorry parking ancillary to the permitted use of the buildings.		
R15/0620	Outline planning permission for the restructuring of existing industrial buildings at Boots Farm for B1c, B2 and B8 uses including demolition of redundant buildings and construction of new buildings; formation of landscape bund; and, alterations to existing access road (all matters with the exception of access reserved).	Approved	28 th July 2017
R18/1684	Outline planning permission for the restructuring of existing industrial buildings at Boots Farm for B1c, B2 and B8 uses including demolition of redundant buildings and construction of new buildings; formation of landscape bund; and, alterations to existing access road (all matters with the exception of access reserved). (Variation of conditions 3, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22 and 23, together with the removal of condition 24, of approved planning permission ref: R15/0620 dated 28/07/2017 to allow the application to be commenced on a phased basis).	Approved	23 rd October 2018 The pre-commencement conditions have been discharged and a lawful commencement of development has occurred, confirmed by Rugby Borough Council's letter dated 3rd February 2022 (Appendix 1).
R19/1372	Reserved matters application for the restructuring of the existing industrial buildings at Boots Farm for layout; scale; appearance and landscaping (Phase One Only).	Approved	22 May 2020
R20/0078	Reserved matters application for the restructuring of the existing industrial buildings at Boots Farm for layout; scale; appearance and landscaping (Phase Two Only).	Approved	27 th April 2020
R23/0421	Open storage and parking of HGV tractor units/trailers and siting of a security hut for a temporary period of 5 years.	Not yet determined	

The Proposal

- 3.6. The proposal is for starter units Industrial (Use Class B2) and Light Industrial (Use Class E(g) iii) totalling 18,000 sqm in floorspace (Option 1) and 60,000 sqm in floorspace (Option 2) and associated car parking and landscaping. This would be incubator or grown into employment floorspace.

- 3.7. The proposal would be accessed from Straight Mile (B4453) using the existing access.
- 3.8. Open space would be provided at the edges of the site and creating generous landscaped buffers.

Suitability of the Site for Employment Development

- 3.9. The area of land proposed for allocation for employment is shown on the attached red line plan. The land is available, suitable and achievable for employment to form a sustainable development as advocated by the National Planning Policy Framework. Some of the land is brownfield and is underdeveloped and some is presently agricultural. It can, however, be developed in a viable manner; and does not have significant development costs associated with it such as contamination or noise mitigation.
- 3.10. There are no third-party land ownership or access matters to complicate the site's delivery. It would therefore be well positioned to contribute to developer contributions if they are proven to be necessary to offset the impact of development.

Transport and Access

- 3.11. The site is located approximately 3km east of the village of Princethorpe and 4km south of Cawston in Rugby Borough. The site is served from the B4453 Straight Mile. The site is currently an employment site for Mitchell's Potatoes and predominantly B8 employment uses.
- 3.12. The site is accessed directly from the B4453 Straight Mile at the southern boundary via a well-established bellmouth priority junction.
- 3.13. The Straight Mile has a 6.5m wide single rural carriageway and an enforced speed limit of 50mph.
- 3.14. The Straight Mile connects with the A45(T) 2km to the north which in turn connects the M1(T) to the east and the M6(T) / M40(T) to the west. To the south the B4453 joins the A423 (ex trunk road) at a ghost island right turn priority junction in the centre of Princethorpe Village. The A423 links Coventry in the north to Banbury in the south.
- 3.15. The B4453 has historically catered for HGV traffic travelling between the A45(T) and A423 including vehicles associated with Rugby Cement, with the B4453 forming part of the agreed routing strategy between Southam and Rugby.
- 3.16. The site is accessible by bus. The nearest bus stops are located to the south of the site access junction by approximately 350m on Main Street in Bourton on Dunsmore. A footpath is situated on the eastern side of Main Street which links directly to the bus stops from the site access.
- 3.17. The following services call at Bourton: 25A | Coventry - Bourton via Baginton, Bubbenhall and Ryton 25 | Coventry - Rugby via Baginton, Ryton & Bourton. The number 25 service passes the site but stops on Main Street.

- 3.18. There are no designated cycle routes within the immediate vicinity of the site. National Route 41 is situated to the south of Bourton on Dunsmore and connects Rugby with Leamington Spa, Southam and Stratford-upon-Avon.
- 3.19. There is adequate space within the site to accommodate the proposed number of units, alongside the necessary roads, parking, landscaping and open space.

Site Access

- 3.20. Site access will be from the Straight Mile as described above, using the existing access. A fully compliant site access junction design is achievable and deliverable. There are no highway safety or traffic capacity issues associated with the development of the site.
- 3.21. The existing bridleway is located along the existing access road and through the site.

Landscape

- 3.22. The site lies adjacent to the west of the existing units at Boots Farm. The site is designated as Green Belt.
- 3.23. In terms of national landscape character, the Countryside Character of England identifies that the site lies within the Dunsmore and Feldon National Character Area (NCA 96).
- 3.24. At a more local level, Warwickshire County Council's Landscape Assessment of the Borough of Rugby which was prepared April 2006 and provides a more localised coverage of the Borough. Within the assessment, the site is identified as being located within the Dunsmore Landscape Character Area (LCA) and more specifically on the boundaries of the Dunsmore Plateau Farmlands and Dunsmore Plateau Fringe.
- 3.25. It is considered that the immediate landscape context is characterised by the rural/agricultural setting associated with Bourton on Dunsmore and its environs. Within this setting the large scale agricultural built form which characterises the site is seen as appropriate, indeed typical of a working agricultural landscape such as this. The site forms part of a wider pattern of small, scattered, farmsteads and smallholdings which are evident across the landscape. Alongside this the regular pattern of large arable fields, bound by a network of established hedgerows, hedgerow trees and woodland blocks, combined with the network of small lanes and major road corridors, creates a compartmentalised landscape. These features combined with the localised topography of the site and its setting also creates a degree of visual containment and enclosed character.
- 3.26. The sensitivity of the landscape character informs the assessment of the effect of the proposals, identifying the capacity and ability of the landscape to integrate the proposed development. It is considered that the landscape, in which the site is set, is of medium sensitivity and has some potential to accommodate change.
- 3.27. The site is located in the Green Belt, the NPPF states (paragraphs 147-148) that:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development

towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

When defining Green Belt boundaries, plans should:

(a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;

(b) not include land which it is unnecessary to keep permanently open;

(c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

(d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

(e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

(f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. “

3.28. It is submitted that the site does not contribute to the openness or other objectives of the Green Belt. For the following reasons the site does not contribute to the purposes on the Green Belt.

Purpose (a) - To check the unrestricted sprawl of large built-up areas - the land does not lie adjacent to a large built-up area which is a town. Therefore, the land is not considered to contribute to checking the unrestricted sprawl of large built-up areas.

Purpose (b) - To prevent neighbouring towns merging into one another - the land lies to the east and west of the existing employment land at Boots Farm. The land is relatively distant from any towns and therefore plays a very limited role in preventing the merging or erosion of the visual and physical gap between Coventry and Rugby.

Purpose (c) - To assist in the safeguarding of the countryside from encroachment - the land largely consists of existing employment/a brownfield site. All of these features are considered to be significant urbanising influences on the countryside within the Green Belt. The surrounding areas are large open fields; however, these fields are relatively enclosed by woodland and tree belt particularly to the west and east. There is a limited relationship between the parcel and the wider countryside.

Purpose (d) – To preserve the setting and special character of historic town - there is no intervisibility with Rugby. The site relates very well in both landscape and visual terms to the existing landscape and that the site represents a logical and easily assimilated potential development.

- 3.29. In summary, allocation of the site would be positively prepared, effective, justified and consistent with National Policy. The combination of complimentary factors such as Rugby's and surrounding authorities unmet employment land need as set out above are considered to constitute the exceptional circumstances to warrant the site being allocated.
- 3.30. The core land-use planning principles require the planning system to 'proactively' drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local communities the country needs. Plans therefore should take account of market signals and set out a clear strategy for allocating sufficient land which is suitable for development in their area. It is clear that the Council need to undertake a full Green Belt review as the employment need identifies the need for a comprehensive review.
- 3.31. The site is sensitively located, and can be master planned to respect and reflect the constraints and setting of the site, including creating defensible Green Belt boundaries.
- 3.32. In summary the site is capable of creating a sustainable form of development, which can respond to its constraints and deliver new employment land.

Heritage

- 3.33. The site is not located within a conservation area.
- 3.34. There are no listed buildings located on the site. The site does not include a scheduled ancient monument.
- 3.35. An Archaeological Desk Based Assessment will form part of any planning application for the site planning application to ensure that any remains of interest are extracted, documented and preserved suitably.

Ecology

- 3.36. There are no statutory or non-statutory designated wildlife sites sufficiently close to the site as to be at risk of development impacts or pose a constraint to the development layout. Boots Spinney to the west is a Woodland Priority Habitat (High Spatial Priority). The site is situated within the SSSI Impact Risk Zone for Draycote Meadows SSSI which is located 2km to the south-east. Draycote Water Local Wildlife Site is located 2.3km to the south-east.
- 3.37. The site has no statutory or non-statutory designations for nature conservation within its boundary. There are no RAMSARs, SPAs, SACs, or NNRs within 5 km of the site. There are no LNRs, WLS' within 2 km of site.
- 3.38. The site primarily comprises agricultural land and is likely to be of limited ecological interest. Additional habitats present within and around the site include trees and hedges on the western boundaries of the site (the Woodland). There are a handful of trees and some hedges to the north and south.

- 3.39. Owing the paucity of valuable habitats, opportunities for protected or notable species within the site are generally very limited. An ecological survey will form part of any planning application on the site.
- 3.40. Therefore, the site is considered to be deliverable for employment purposes, with ecology not posing a prohibiting factor, subject to surveys during the preparation of a planning application.

Flood Risk and Surface Water Drainage, Utilities and Ground Investigation

- 3.41. The site is located within Flood Zone 1 as defined by the Environment Agency's Flood Map. Flood Zone 1 is defined as a low flood risk zone with a risk of flooding less than 1 in 1000 years or 0.1%.
- 3.42. The drainage for the development will be designed in line with current legislation including Sustainable Urban Drainage Systems (SUDS), to attenuate surface water back to greenfield runoff rates, ensuring that the risk of flooding does not increase. It is not considered flood risk (with mitigation) is a constraint to development.
- 3.43. The utilities assessments work undertaken to date conclude that the site is suitable for development and can be serviced by utilities.
- 3.44. The agricultural use of the site indicates that there are likely to be no contamination issues on the site.

Conclusions

- 3.45. It is considered that the site has the capacity to accommodate change and could support an employment development as part of an appropriate extension to Boots Farm, at a scale which is proportionate to the location's sustainability credentials.
- 3.46. It is acknowledged that the release of land would result in the encroachment of Green Belt and undeveloped land. however, employment need demonstrates an exceptional circumstance to amend the Green Belt boundary on the site/in this location.
- 3.47. The allocation of the land for employment will help to meet employment needs and that site should be allocated for employment.
- 3.48. A Concept Plan has been prepared and is attached at **Appendix 2**.
- 3.49. It is considered that the site at provides a great opportunity to deliver employment a sustainable location. The Local Plan Review should allocate the site.

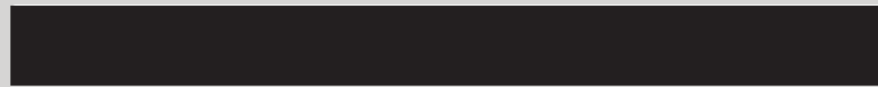
Planning Consultation Document

Expansion of industrial units at;

Boots Farm

Rugby

CV23 9QQ



Continuing the expansion for thriving local businesses

Boots Farm business park is an established site that supports employment in the area for a variety of small businesses. This proposal aims to build on the existing facility to provide both a bio diverse and sustainable solution to Rugby Borough Council's "Incubator" and "grow in to" warehouse requirements.

Located exactly 1 mile south west of the A45/A4071 junction on an existing industrial site (11.3 acre site), Boots farm offers two expansion phases for consideration.

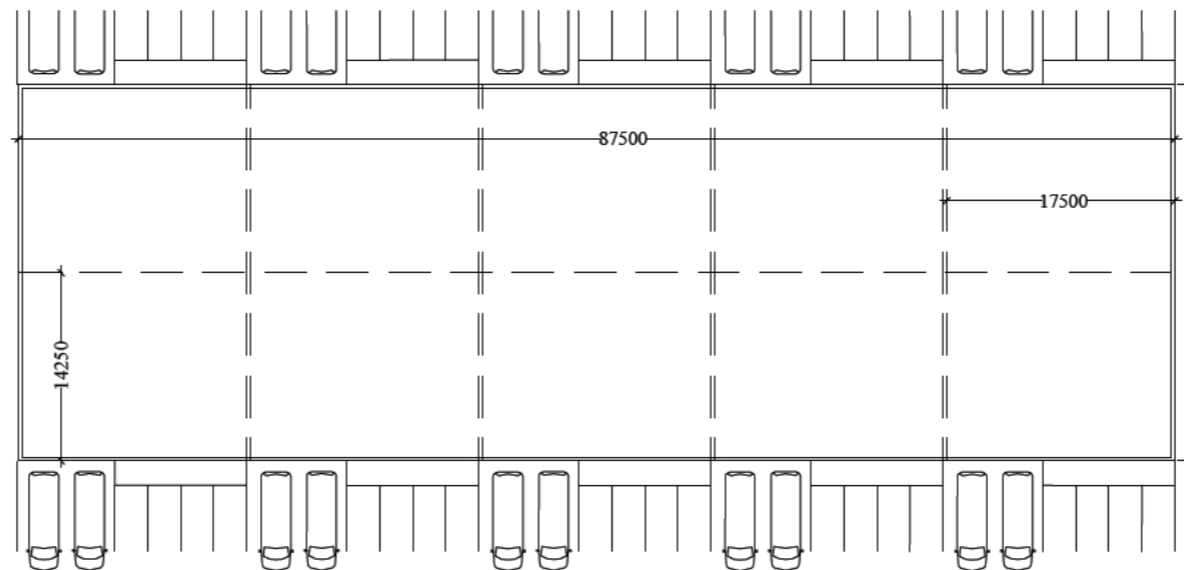
Phase 1 could double the site area to 20 acres with 18,000 sqm GEA of potential new incubator / grow into space (use class B2 and E (g) (iii)).

Phase 2 could increase the site area to nearly 58 acres and provide 60,000 square metres of new warehouse space.

Fit for purpose

An extension to a pre existing B2 and B8 industrial site with a number of well established tenants. The proposal offers Modular units ranging from 250 sqm to 2,500 sqm to allow small businesses the potential to start up and expand their facilities to support their business needs. Due to it's modular nature Tenants have the potential to expand into an array of unit sizes efficiently.

Units are based on a flexible modular system to allow tenants to expand the size of the rental space as their business needs grow.
1/10th = 250sqm Unit or
1/5th = 500sqm ect.



MODULAR UNIT FLOOR PLAN
GEA = 2,500sqm

Situation and minimal impact

The site is situated 500 metres from the road with extensive plantings to the south of the site visual impact of new employment units will be minimal. Spinneys to both the East and West of the site hide the site from view for neighbouring farms. Additional planting along u the East and West border will continue to ensure this.

Environmentally considerate

Phase 1 proposes the continuation of planting trees to create a defensible green belt boundary. Phase 2 proposes to significantly increase it's contribution to improving the local environmental with new planting totalling 10.6 acres of native species. The new plantings will connect 2 existing spinneys enhancing a considerable natural habitat for wildlife and increased bio diversity.

Phase 1 has the potential for 10,000 sqm of solar panels mounted on the roofs of the new units. Phase 2 could provide a potential 40,000 sqm of solar panels and will support Energy efficient lighting and multiple Electric lorry charging points. New units will be heated by Air and Ground source pumps.



Existing industrial units

This site plan shows the industrial units on the site prior to works started for expansion and modernisation in 2022.



Schedule of Existing Accommodation

All areas are gross external

Building 1	971 sq.m.
Canopy	199 sq.m.
Building 2	450 sq.m.
Building 3	1,023 sq.m.
Building 4	155 sq.m.
Building 5	96 sq.m.
Building 6	550 sq.m.
Building 7	210 sq.m.
Building 8	1,725 sq.m.
Building 9	172 sq.m.
Building 10	320 sq.m.
Building 11	969 sq.m.
Building 12	2,415 sq.m.
Building 13	113 sq.m.
Building 14	160 sq.m.
Building 15	607 sq.m.
Building 16	831 sq.m.
Canopy	233 sq.m.
Total	11,199 sq.m.

Expansion of industrial units approved

The approved application R18/1684 established the expansion of industrial units on the site. Improved access, demolition work to old buildings and groundwork's for the first phase is now complete.



Schedule of Accommodation

All areas are gross external

Building 1	971 sq.m.
Building 2	450 sq.m.
Building 3	978 sq.m.
Building 4	113 sq.m.
Building 5	96 sq.m.
Building 6	550 sq.m.
Building 7	210 sq.m.
Building 8	1,416 sq.m.
Building 9A - New	345 sq.m.
Building 9B - New	345 sq.m.
Building 9C - New	345 sq.m.
Building 9D - New	345 sq.m.
Building 10A - New	392 sq.m.
Building 10B - New	348 sq.m.
Building 10C - New	348 sq.m.
Building 10D - New	342 sq.m.
Building 10E - New	421 sq.m.
Building 10F - New	374 sq.m.
Building 10G - New	374 sq.m.
Building 10H - New	512 sq.m.
Building 11 - New	768 sq.m.
Building 12A - New	506 sq.m.
Building 12B - New	506 sq.m.
Building 12C - New	662 sq.m.
Building 12D - New	662 sq.m.
Building 16	831 sq.m.

Total 13,210 sq.m.





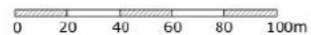
EXTENDED SITE PLAN - Landscaping Plan





0 20 40 60 80 100m

EXTENDED SITE PLAN (60,000sqm of Industrial Units)



EXTENDED SITE PLAN - Landscaping Plan



0 20 40 60 80 100m

EXTENDED SITE PLAN - Low Embodied Energy Units & Transport Hub

All dimensions and levels to be checked on site prior to commencement of works



SITE PLAN

CLIENT

S Mitchell

PROJECT Alterations to;

ADDRESS

Mitchells Potatoes,
Boots Farm,
Rugby,
CV23 9QQ

DRAWING

Planning Consultation -
Proposed Site Phase 1

SCALE

1 : 2500 @ A3

DATE

03 / 01 / 24

DRAWN

S W

CHECKED

S W

SWA Sam
Willoughby
Architects

RIBA #

arb

DRAWING NUMBER

S Mitchell.23.PC.P02