

Representations by:

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On behalf of:

The Coventry Diocesan Board of Finance Limited (CDBF)

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Contact via the agent above.

Background:

1. Godfrey Payton represent the CDBF in regard to their land holdings and help the CDBF achieve development on their sustainable sites where and when appropriate.
2. As well as making representations on this Issues and Options consultation on behalf of the CDBF we are making three call for sites representations on two non-Green Belt sites to the west of the established Magna Park Distribution scheme which itself is west of Lutterworth and in the heart of the Golden Triangle:

Both sites are located here west of the A5 and west of Lutterworth:

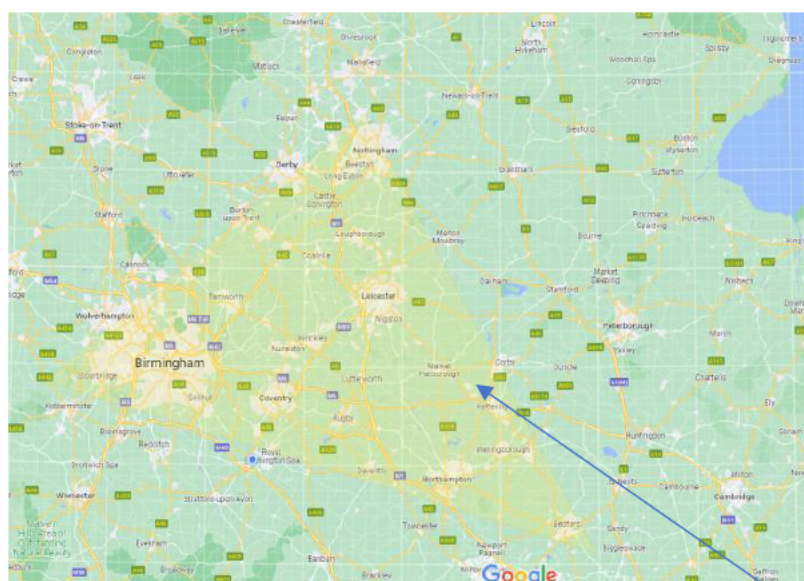


Figure 1 Golden Triangle Map and showing the location of two CDBF sites being submitted for the Call for Sites -both outside the Green Belt -see plan below under point 4.

3. The three sites are:
 - a. Site 1 north of Coal Pit Lane. 36.86 ha / 91.1 acres for major distribution / warehouse scheme immediately west of Magna Park, Lutterworth. Outside the Green Belt.
 - b. Site 2 south of Coal Pit Lane. 4.28 ha / 10.6 acres for Zero Carbon road side related uses to include electric vehicle charging facilities with compressed natural gas (from composted kitchen waste) as a fuel for HGV's from the adjacent Magna Park Distribution Warehouse Development. Outside the Green Belt.
 - c. Site 3. North of Coal Pit Lane and west of Willey within the Green Belt. Proposed use for this 22.9ha / 56 acre site is as a Solar Farm.
4. Three Call for Sites submissions accompany these representations on the Rugby BC Local Plan Consultation Exercise.

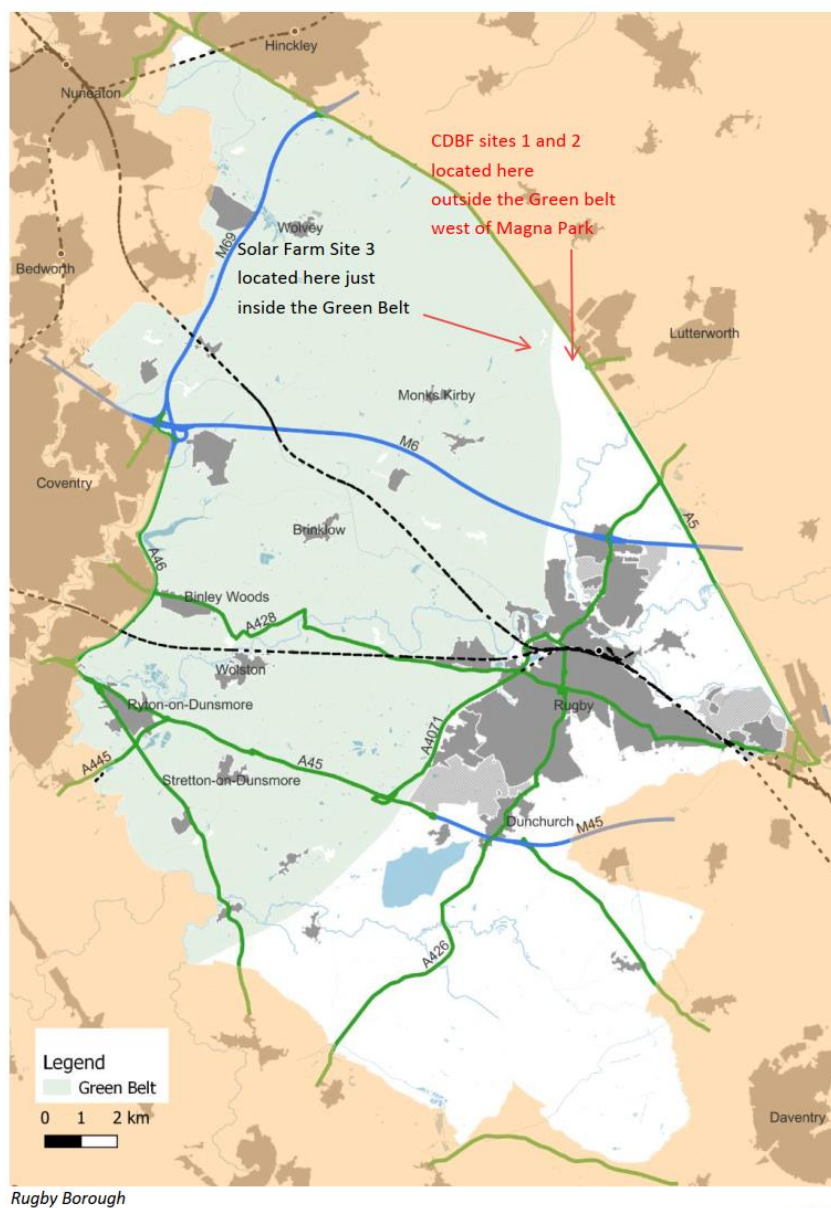


Figure 2. Sites 1 and 2 outside the Green Belt. Site 3 is within the Green Belt about 3km to the west of sites 1 and 2.

5. You will see that we only make representations on the employment land Local Plan questions, the Gypsy and Traveller pitches questions as far as they relate to becoming

part of a large employment site designation and issues relating to sustainable development and the declared Climate Change Emergency as those are all matters we and our client feel able to comment upon sensibly.

6. Our clients own no land or buildings in Rugby town so we have not answered those related questions.

CONSULTATION QUESTIONS

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

It is good to see the following quotes in the Local Plan issues and options consultation document acknowledging the importance of employment uses being planned for the Borough-our underlining:

3.2. We need to think about how we can meet the projected need for employment land to allow the borough's economy to continue to grow.

3.10. 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.

3.11. 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

3.14. Retailers and manufacturers have moved to 'just in time' inventory management, whereby goods are received from suppliers when they are needed rather than being stored on site. Supply chains have become increasingly complex and international. These factors increase the need for warehousing space. At the same time, online retail has rapidly grown as a percentage of all retail sales from 2.7% in January 2007 to 26.6% in January 2023.

3.15. These changes have driven rapid growth in the need for warehouse floorspace. Savills estimates that warehouse floorspace in the UK grew by 32% between 2015 and 2021.

3.16. Rugby Borough sits within the so-called 'Golden Triangle' for distribution. This is an area of the East and West Midlands that has 35% of all UK warehouse floorspace. The Golden Triangle is favoured by transport and distribution businesses because it allows efficient access to large parts of the country via the motorway and rail network. (NB Note both the sites being submitted in the Call for Sites sit within this Golden Triangle)

3.17. The Office for National Statistics ranked Rugby Borough as the local authority district in England and Wales with the highest proportion of business units used for transport and storage. Transport and storage made up 17.5% of business units in the borough in 2021.

3.19. The 2021 Census showed that 3.8% of people aged 16 years and over in employment in Rugby Borough worked in warehousing and support activities for transportation. This is the second highest proportion of any local authority district in England and Wales, after Spelthorne

District which borders Heathrow Airport

3.21. 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.

3.22. National government policy states that local authorities must plan for objectively assessed needs for housing and other uses. This includes warehouses. Local plans must be consistent with national policy.

3.23. National policy in the National Planning Policy Framework (NPPF) says local authorities in their plans should "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."

The above quotes from the Local Plan Issues and Options illustrate the importance to the borough of making provision for employment and distribution uses on well-located sustainable sites within the Golden Triangle and ideally outside of the Green Belt.

It is noted that the *Gross requirement for industrial land (Rugby Borough only) (this includes smaller warehouses of up to 9,000m² in floor area) is between 150.5ha and 218.2ha*

It would be sensible in the CDBF's view to plan for this number of hectares so as the borough derives maximum benefit from the supply of the employment space and consequent employment and economic growth.

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

It would be a sensible approach to build on the area's strengths and locational advantages (being in the heart of the Golden Triangle) in terms of allowing for new sites for large new distribution warehouse schemes.

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

The plan on page 17 shows 8 broad locations for new employment land 6 of which are located in the Green Belt.

Any development in the Green Belt is controversial and debate could get heated and popular support possibly lost as 'very special circumstances' can be difficult to prove and create local heated debate. The latest NPPF issued Dec 2023 is very protective of Green Belts. Para 142 reads as: *142. 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.*

Our underlining.

If sites are available not in the Green Belt then these should be allowed to come forward first.

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

By allocating enough land for development in locations where access is easy for the employees.

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?

Yes we do support allocating sites for a variety of employment uses so as to maximise employment opportunities for the most people.

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

Allocating land for new development within the Green Belt should only need to be done after all non-Green Belt alternatives have been exhausted first. The latest NPPF issued Dec 2023 is very protective of Green Belts.

7. Do you agree with our proposals to remove the primary shopping area and primary and secondary frontage designations in Rugby town centre?

8. Which town centre sites should have site allocation policies and what should they say?

9. Should we introduce a policy that sets out the improvements to streets and spaces we want to see in the town centre?

10. Should we define other local centres outside of the town centre? If yes, which centres should we include?

11. Are there other things the local plan should do to support local centre and town centre regeneration?

12. The council proposes to plan for Gypsy and Traveller pitches based on the ethnic need target of 79 pitches 2022-2037 identified in the GTAA 2022. Do you agree?

13. How can we find sites to accommodate the need for Gypsy and Traveller pitches?

(a) Allocate sites for Gypsy and Traveller pitches as part of new employment land or housing developments?

That could be a dangerous strategy to follow because:

- Most new large sustainable employment or housing schemes have a host settlement nearby. It is likely that the residents of that settlement could not be at all comfortable with an integrated Gypsy and Traveller site being part of the new nearby development. It may mean that resistance to the new employment or housing scheme is higher as a result which may mean members will resist the allocation.
- Any new employment or housing scheme may struggle in viability and deliverability terms if it has as a component part an integrated Gypsy and Traveller site.
- It is interesting to note that the reason the issue has arisen in this Issues and Options consultation is that the preparation of the Gypsy and Traveller Site Allocations DPD had to be abandoned because there was *'a nil response to the call for sites (In October 2022) there is no realistic prospect that this standalone DPD can successfully proceed.'* Quote from Agenda Item 6 of the Cabinet meeting on 23rd October 2023.

(b) Regularise existing unauthorised sites?

(c) Create a new borough or county council-owned site?

(d) Other (please explain).

14. When allocating sites for pitches, what size of site should we be seeking to allocate?

15. Should we adopt a negotiated stopping policy which allows caravans to be sited at a suitable location for an agreed and limited period.

16. The council proposes to introduce a policy to limit concentrations of HMOs within a 100m radius to 10% of dwellings, avoid non-HMO dwellings being sandwiched between two HMOs and avoid three consecutive HMOs on a street. Do you agree with this policy?

17. We also propose to introduce a criteria-based policy that sets clearer standards for parking, refuse storage, and the adequacy of external and internal space for HMOs. Do you support such a policy?

18. Should we show areas of the borough in which wind and/or solar energy will be supported? Is so, where?

Yes and having requirements on new buildings for a % of energy for that building needed to be 'Green' would be a policy supported by the CDBF.

Site 3 submitted with this submission is for a 56 acre Solar Farm use to the west of Willey in the east of the district. This site is in the Green Belt and such is the urgency of Climate Change issues that consideration should be given to allowing solar farms in the Green Belt and an assumption being made in the Local Plan that renewable energy schemes should not have to pass the Very Special Circumstances test. Para 156 on the new Dec 2023 NPPF sets out:

156. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

And

157. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

And

163. When determining planning applications (57) for renewable and low carbon development, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to significant cutting greenhouse gas emissions;

b) approve the application if its impacts are (or can be made) acceptable (58). Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas; and

c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site, and approve the proposal if its impacts are or can be

made acceptable.

All our underlining

19. If some new wind development schemes could be community owned by Rugby Borough residents, would that increase your support for this type of development?

20. We are minded to introduce a policy that supports other zero carbon energy infrastructure including battery energy storage and hydrogen energy infrastructure. Do you agree?

The CDBF would support those types of policies and actively supports and encourages on land it owns renewable electrical generation and battery storage. Indeed one of the sites it is promoting through the Call for Sites would be focused on EV charging for electric vehicles and gas, from composted food waste, as a fuel for HGVs. Site 3 submitted as a Call for Sites submission is for a 56 acre Solar Farm.

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

The CDBF is fully behind BNG+10% however we would urge caution in raising the 10% to another higher level.

BNG+10% is very new and it has yet to pan out what the effect on viability and deliverability of schemes would be.

We would suggest that it would be better to wait and see what BNG+10% effects are on viability and deliverability before considering a higher level.

On the other hand setting a minimum Tree Canopy cover is relatively easy to calculate and work out effects on viability, if any, as trees generally add value to schemes.

22. Should we identify priority locations or allocate sites for biodiversity net gain for sites which are unable to provide all the net gain on site and, if so, where?

See answer to 21. Caution is needed on all BNG matters as it is as yet unclear what effect it will have on deliverability and scheme viability.

23. Would you support the creation of additional country parks as part of delivering biodiversity net gain?

Probably but would need to be close to the people who would benefit from them by being able to walk or cycle to use the new Parks.

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

In an ideal world yes but we repeat caution is needed on all BNG matters as it is as yet unclear

what effect it will have on deliverability and scheme viability. It may be that sites are not available *within close proximity to the development*.

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

Needs careful thought as Future Homes Standards (FHS) applicable from 2025 will apply to all new homes. Compliance with the Future Homes Standard (FHS) will become mandatory in 2025. Its aim is to ensure that new homes built from 2025 will produce 75-80% less carbon emissions than homes built under the current Building Regulations. So already in 2025 there will be a big step towards Net Zero

It may be very difficult to agree a definition of Net Zero.

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

Needs careful thought as it may be very difficult to agree a definition of Net Zero with all the parties involved.

In any event the government has a target for net zero being achieved by 2050 so it could be duplication as the Local plan has a period 2021-2050.

27. Are there other climate change policies we should be introducing?

Consideration of a policy assumption that renewable energy projects such as wind and solar are acceptable within the Green Belt.

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

Needs careful thought as Building Regulations Part G - Water Efficiency covers the same topic and it would not be helpful to duplicate and cause confusion.

29. Should we produce design codes as part of our new local plan?

30. Which areas should design codes cover?

- (a) Borough-wide
- (b) Borough-wide divided into character areas (for examples Rugby town centre, interwar suburb, Victorian terrace, village core)
- (c) only for some neighbourhoods (please specify which),
- (d) only for large new development sites
- (e) other (please specify)

31. How many homes should we be planning for?

- (a) Minimum local housing need
- (b) The HEDNA 2022 need
- (c) Other (please specify)

32. Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Gardens and Biart Place)?

33. Please provide any comments you have on the suitability of any of the broad locations listed above for new housing. Are there any locations that we have missed?

34. Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?

35. Please provide any other comments you have on the type and size of new homes we need.

36. Are there any other issues or policies (not covered by the questions above) that we should cover in the new plan?

37. Do you support our intention to bolster our policies on sustainable travel?

CDBF would support policies that encourage sustainable travel.

38. Do you support a policy protecting stadia as community and sports facilities? If so, which stadia should we protect?