



JANUARY 2024

# Rugby Borough Local Plan

## Representations on Issues & Options draft (Regulation 18)

Iceni Projects Limited on behalf of  
GLP

January 2024

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ON BEHALF OF GLP

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Rugby Borough Local Plan

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# 1. INTRODUCTION

- 1.1 The following representations relate to the Rugby Borough Local Plan Issues and Options October 2023 Document (which was approved for consultation between 30 October 2023 and 2 February 2024) and are made on behalf of GLP who have commercial land interests to the west of the Magna Park strategic warehousing development, in the north east of the borough. A Location Plan is provided at Appendix 1.
- 1.2 The site (Land Opposite MP Lutterworth) borders the A5 to the south/ east and is adjacent to the large strategic distribution / logistics development at Magna Park located in Harborough District. To the west is the village of Willey and to the south is agricultural land, beyond which is Coal Pit Lane which connects to the A5 in the east. A small section of the site as identified in the enclosed plans is situated within Harborough District.
- 1.3 The site comprises approximately 23 ha of agricultural land that is outside the Green Belt and located wholly within Flood Zone 1. It is also free from any ecological, historical or Neighbourhood Plan designations. Additionally, the site is located approximately 200m from the village of Willey, which is obscured by a large hedgerow that borders the site to the west, and approximately 2.5km (3 minute drive) from Lutterworth, which affords easy access to a wide range of services, facilities, shops and a working population of approximately 8,000 people according to the 2021 Census.
- 1.4 It is noted that the Issues and Options consultation will form part of the Rugby Local Plan Review which was agreed on 14 December 2022 to comprise a full update of the adopted Local Plan 2011-2031 policies. GLP understand that one of the reasons for this review is the emergence of future needs for homes and employment land, particularly for warehouse uses, through the Coventry and Warwickshire Housing and Economic Needs Assessment 2022 and agree with this decision to conduct a full review and the employment needs figures that support it.
- 1.5 GLP seek to deliver a logistics scheme at Land Opposite MP Lutterworth which will provide a significant contribution towards the 551 – 735 ha gross requirement for strategic warehousing land across Coventry and Warwickshire. GLP's interests focus on the land identified in Appendix 1 although there is potential for this parcel to come forward in a coordinated manner with other surrounding land opposite Magna Park. However, the subject land is not reliant on other landholdings for its delivery and is able to function independently.
- 1.6 A plan showing illustrative development parcels is enclosed at Appendix 2 in addition to the following technical work:
- Transport Appraisal prepared by AECOM (Appendix 3)

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- Preliminary Landscape and Visual Appraisal prepared by FPCR (Appendix 4)
  - Preliminary Ecological Appraisal prepared by FPCR (Appendix 5)

1.7 Further details regarding the development potential of this site and the relevant constraints and opportunities are provided in the accompanying Call for Sites submission.

1.8 GLP is one of the UK's leading industrial and logistics providers and have a long history of delivering successful employment schemes in the Midlands. Completed schemes at Magna Park in Harborough (289,983 sqm) and Magna Park in Corby (409,046 sqm) are considered to be some of the most successful employment schemes in the country, in recent years accommodating both local employment and strategic warehousing developments.

1.9 GLP welcome the opportunity to work with Rugby Borough Council (RBC) and the local community in considering Land Opposite MP Lutterworth.

1.10 In this context, we set out below our comments on the draft Local Plan document published by the Council, to ensure the forthcoming Plan is sound and legally compliant.

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## 2. REPRESENTATIONS ON THE DRAFT LOCAL PLAN (ISSUES & OPTIONS VERSION)

2.1 We set out below our comments on the specific consultation questions within the draft Local Plan document.

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

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2.2 GLP note the findings of the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA 2022) and in particular the significant requirement for employment land across Coventry and Warwickshire.

2.3 The table in paragraph 3.3 of the consultation document carries through the conclusions of the HEDNA, summarising that there is a gross requirement for strategic warehousing land across Coventry and Warwickshire of 551 ha between 2021-2041 and 735 ha between 2021-2050. This is in addition to the 150.5 – 218.2 ha of industrial land identified at paragraph 3.37 of the consultation document.

2.4 We support the recognition of the need identified by the evidence base in the emerging Rugby Local Plan, and we strongly encourage the Council to ensure that needs are met in full in order to ensure the Plan is positively prepared, in accordance with paragraph 35 of the NPPF. This will include ensuring a coordinated approach to meeting sub-regional needs for strategic warehousing, and that Rugby plans for an appropriate share of the strategic and any unmet needs arising from other authorities in Coventry and Warwickshire.

2.5 Paragraph 85 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Rugby Borough and the other Warwickshire Authorities are uniquely placed as the focal point for all strategic warehousing in the country. As stated in paragraph 3.16 of the consultation document, Rugby sits within the so-called “Golden Triangle” for distribution which comprises 35% of all UK warehouse floorspace. Furthermore, paragraph 3.19 states that as of the 2021 census, “3.8% of people aged 16 years and over in employment in Rugby Borough worked in warehousing and supported activities for transportation”. Given the proven suitability of this location for strategic warehousing and the local reliance on the sector for work, significant weight should be placed on the social and economic benefits of maximising the delivery of employment land to ensure that the population retains a steady supply of employment opportunities which will maintain and grow the prosperity of the region for years to come.

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- 2.6 Rugby has an important role to play by providing employment opportunities for the wider region and is well placed to take a significant share of the identified regional B8 need including unmet need arising from Coventry. Having regard to the key criteria for strategic B8 development identified at paragraph 11.22 of the HEDNA, the Borough has good access to the strategic rail and road network, close proximity to an active workforce and is relatively unconstrained. Consequently, planning for a significant quantum of the identified strategic B8 need in Rugby Borough will allow the area to *“build on its strengths, counter any weaknesses and address the challenges of the future”* and be in accordance with paragraph 85 of the NPPF. Paragraph 85 continues to state that building on an area’s strengths is *“particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential”*.
- 2.7 We understand that the Council are engaged in the preparation of a West Midlands Strategic Employment Sites Study and an Economic Study that are expected at some time in 2024. We support the production of this new and up-to-date evidence in accordance with paragraph 31 of the NPPF and eagerly await their publication. GLP would appreciate further clarification from the Council on publication dates.
- 2.8 Against this identified need, Rugby should be seeking to ensure sufficient new sites are identified (taking account of any pipeline supply). Additionally, the Council should ensure that enough land is brought forward for occupiers to have choice and variety in market for strategic warehousing and allocate enough to account for an element of slow/ non-delivery to ensure supply is robust and needs will as a minimum be met.
- 2.9 In terms of the timescales for the employment strategy, we encourage the Council to plan for the longer term (i.e. up to 2050), to ensure a robust, long-term strategy is set out. This is particularly important should the Council consider it necessary to release Green Belt land in order to meet identified needs, given the requirement for Green Belt boundaries to be permanent (as set out at paragraph 145 of the NPPF).
- 2.10 Until the further evidence base has been prepared by the authorities, it is difficult to determine precisely how much of the identified 551 – 735 ha of strategic logistics need should/ can be planned for within Rugby Borough. However, given the significant locational advantages and reliance on the sector highlighted above, and the availability of suitable sites such as the Land Opposite MP Lutterworth, we strongly encourage the Council to plan for a substantial quantum of the overall sub-regional need, and to ensure that needs are met in full across Coventry and Warwickshire in a coordinated manner.

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

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- 2.11 GLP advise the Council to recognise the long-term need for large strategic warehousing in Rugby as evidenced by the HEDNA and asks the Council to plan accordingly. The proposed approach to differentiating between strategic warehousing and local industrial development would appear to be logical, thereby ensuring sufficient space is planned for to accommodate both local and strategic needs.
- 2.12 The HEDNA 2022 states that 735 ha of strategic warehousing land is required across Coventry and Warwickshire between 2021 and 2050 and that currently *“The VOA trends for net floorspace changes are high in North Warwickshire and Rugby, driven by warehousing developments and demand”* (paragraph 11.7). These have been *“more pronounced in recent years as influenced by strong demand for both manufacturing and warehousing/logistics space”* (ibid).
- 2.13 Whilst the HEDNA is clear in stating that *“B8 demand is very strong [in the sub-region]”* (paragraph 11.11), there is also compelling evidence as to the size these units should be. Paragraph 10.11 states that *“just over 2.2 million square metres of large-scale warehouse floor space is located in the Coventry and Warwickshire study area. This represents around 30% of the West Midlands region total which has a larger mean size per unit (20,969 sqm) compared with the national average (20,918 sqm)”*. The Coventry and Warwickshire study area is therefore considered a prime location for large strategic warehousing developments and therefore sites able to accommodate larger warehouses should be prioritised.
- 2.14 The type of sites allocated to meet this larger, strategic warehousing need should reflect the specific requirements of this sector. This includes having good access to the strategic road or rail network, with few constraints and being a sufficient size to accommodate larger units. This reflects the key locational criteria identified at paragraph 11.22 of the HEDNA. GLP considers that sites should be at least 20ha in order to make a meaningful contribution to the sub-area employment need.
- 2.15 It is also helpful to consider the sequential approach suggested by paragraph 11.19 of the Warehousing and Logistics in Leicester and Leicestershire Growth Study (April 2021 (amended March 2022)), which sets out the following sequential approach:
1. Extension of existing strategic distribution sites, both rail-served and road-only connected.
  2. Identifying suitable new strategic distribution sites on previously developed land which meet the site selection criteria
  3. Identifying sustainable new strategic distribution sites on greenfield land which meet the site selection criteria.
- 2.16 The extension of existing strategic distribution sites would include the extension of Magna Park, which is a key strategic site directly adjacent to the borough boundary.



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

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- 2.17 Paragraph 3.40 of the consultation document indicates that the broad locations have been identified having regard to access to the strategic road network and a local workforce. However, there is no further explanation as to whether the Council has followed a robust and logical methodology in selecting potential broad locations for growth at this stage, or whether any other reasonable alternatives were identified and subsequently dismissed. We therefore encourage the Council to ensure it considers all reasonable alternatives as it prepares its site selection methodology, and carries out a detailed assessment based on a robust methodology, in order to ensure the emerging strategy is justified in accordance with the requirements of paragraph 35 of the NPPF.

Paragraph 11.24 of the HEDNA identifies key potential corridors within the sub-region that could accommodate strategic B8 development, and we note that some of the broad locations identified at paragraph 3.40 appear to broadly align with these key corridors. However, it is unclear to what extent the strategic locations have been informed by, or align with, the HEDNA in this regard. For example, the emerging Plan omits consideration of the land to the west of Magna Park Lutterworth as a potential location, despite it being within the A5 corridor and adjacent to an existing major employment site which accommodates strategic warehousing uses. Given the land opposite MP Lutterworth sits outside the Green Belt, this option should be considered in the first instance before examining the potential to release suitable Green Belt sites, in accordance with paragraph 146 of the NPPF.

- 2.18 We encourage the Council to ensure it takes into account the following considerations when selecting potential locations for strategic employment development, having regard to paragraph 11.22 of the HEDNA and the relevant provisions of the NPPF:

**1. Options for non-Green Belt development** – Paragraph 146 of the NPPF requires the Council to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development before concluding that Exceptional Circumstances exist to amend Green Belt boundaries. Therefore, potential allocations on non-Green Belt land should be given first consideration in the site selection process.

**2. Proximity to existing employment areas and workforce** – Proximity to labour is an important consideration and sites that can offer local and regional employment should be prioritised when selecting allocations. Proximity to Magna Park as an established and exemplar existing employment area is unrivalled.

**3. Road and rail accessibility** – One of the main reasons for the success of major employment schemes such as Magna Park and DIRFT is their proximity to strategic

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infrastructure. This is particularly important when planning for B8 strategic warehouses where their success is dependent on being able to transport goods quickly.

**4. Site size** – As mentioned in above, GLP consider that a minimum site size be imposed for commercial site submissions to avoid piecemeal development and ensure that meaningful contribution is made to the borough’s employment land requirement.

**5. Key constraints and compatibility of neighbouring uses** – Consideration of any key constraints and sensitivity of neighbouring uses.

**6. Power supply** – Sites should be located where there is potential to access sufficient power. This is an important consideration given the potential for increased automation, electrification of vehicle fleets, and systems for chilled goods.

2.19 The figure on page 17 of the consultation document highlights that the broad locations for development identified are focussed around existing large employment sites, reflecting the fact that many existing sites already benefit from many of the locational advantages identified above. It is notable that the only existing large employment area which does not have a potential location for growth identified adjacent to it is Magna Park Lutterworth. We therefore consider that this omission should be addressed and the land to the west of Magna Park Lutterworth should be considered as a potential broad location for growth.

2.20 Paragraph 11.24 of the HEDNA states that the A5 corridor is a *“key potential corridor within the sub-region which could accommodated strategic B8 development”*. Whilst there is a reference to *“potential issues of capacity and the prospect/ funding of dualling of the road”* paragraph 8.2 of the enclosed Transport Appraisal prepared by AECOM (Appendix 3) confirms that the existing stub arm on the A5/ Mere Lane roundabout *“could be enlarged without any significant impact on the existing roundabout or disruption to traffic flows on the A5”*.

2.21 Additionally, AECOM provided a Transport Assessment for a refuelling facility with ancillary retail (application 20/02075/OUT) at a site immediately east of the Mere Lane Junction which was approved in 2023. This included an assessment of the capacity of the A5/Mere lane junction and the A5/A4303/B4027/Coal Pit Lane (Cross in Hand) roundabouts which revealed that both could operate within capacity *“up to 2032”* (paragraph 4.2 and 4.3).

2.22 Paragraph 4.4 states that *“the results of the assessments were accepted by both the local highway authority (Leicestershire County Council) and National Highways, and indicate that there is capacity in the network within the vicinity of the site to accommodate additional traffic generated by development on Land Opposite MP Lutterworth”*.

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### Suitability of Land Opposite Magna Park Lutterworth

- 2.23 The site identified at Appendix 1 has the potential to deliver a significant strategic employment site of approximately 23 ha, located immediately adjacent to the existing Magna Park Lutterworth strategic employment area.
- 2.24 The site is not located within the Green Belt, and is therefore sequentially preferable when considering broad locations for growth compared to potential options identified that sit within the Green Belt, having regard to paragraph 146 of the NPPF.
- 2.25 Furthermore, the site is located within a key potential growth corridor as identified by the HEDNA, adjacent to the A5, and thus well served by the strategic road network. The location of the site adjacent to the existing Magna Park Lutterworth site also ensures that it will benefit from synergies in terms of existing infrastructure, whilst it is well located in terms of a local workforce in Lutterworth to the east as well as Rugby a short distance to the south. The site has the potential to form a modest western extension to Magna Park and benefit from the existing Magna Park infrastructure provision, including HGV parking facilities; education; research; innovation; well-being; recreation and public transportation. Through the recent delivery of Magna Park North and South, GLP have demonstrated how the original Magna Park can be successfully extended to form a unique logistics cluster under single management.
- 2.26 As discussed in the accompanying Call for Sites submission, the site is relatively unconstrained and presents a good opportunity for development which could deliver significant strategic scale employment land in the early years of the Plan.
- 2.27 The enclosed Transport Appraisal (Appendix 3) has been prepared by AECOM to identify the opportunities and constraints related to potential future employment-based development at the site. This confirms that the existing access to the site could be enlarged to accommodate HGV movements without any significant impact to existing traffic flows along the A5 and that recent assessments of the Mere Lane and Cross in Hand roundabouts have shown that sufficient capacity exists to accommodate further development at this location.
- 2.28 Additionally, the note outlines that *“GLP has been involved in discussions with National Highways regarding improvements at Gibbet Hill roundabout, and National Highways, in conjunction with Leicestershire and Warwickshire County Councils, are developing an improvement scheme for the junction to address existing congestion that occurs during peak periods. It is understood that the scheme is likely to be included in National Highways’ RIS3 programme. GLP has previously provided contributions towards these junction improvement works.”* (paragraph 8.5)
- 2.29 Furthermore, the Preliminary Landscape and Visual Appraisal included at Appendix 4 confirms that the site and surrounding landscape are not covered by any landscape quality designations at either

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a national or local level. Visually, the site is confirmed to be *“very well-contained in all directions”* (paragraph 4.4) with existing mature wooded tree belts immediately to the west of the site and alongside Coal Pit Lane to the south effectively limiting view from the wider and more rural landscape in these directions.

- 2.30 In Landscape and visual terms, the site has *“potential to successfully accommodate proposed employment development as part of a comprehensive scheme”* and that the proposed development would deliver some new and beneficial landscape that would encompass existing and new habitats, pedestrian routes and links across and beyond the site.
- 2.31 A Preliminary Ecology Appraisal of the site has also been produced by FPCR. This finds that there are *“no statutory designated ecological areas within 10km of the site”* (paragraph 3.1) and that there are no *“nationally important sites designated for ecological reasons”* within 2km. The report concludes that *“the habitats present within and around the Site do not pose an ‘in principle’ constraint to the commercial development at the site”* (paragraph 4.1) and that *“development at the Site has the potential to increase the overall diversity of habitats present from the modified grassland monoculture that presently dominates”*. Additionally, the report finds that *“it is considered unlikely there are any protected or notable species or habitats present that cannot be accommodated (...) within the on-site green infrastructure”*.
- 2.32 GLP support the Council’s recognition that additional allocations will be needed to meet the increasing demand for B8 strategic warehousing in the Borough. Due to its location, scale and limited number of constraints we consider that Land Opposite MP Lutterworth as an opportunity to capture the success and employment/ economic benefits of Magna Park within Rugby Borough, which may have been overlooked, given the development to date has been the other side of the borough boundary, in Harborough District. In the context of a strategic cross-boundary B8 need, this is a key location for Rugby to make a significant contribution to the identified need, building on the significant investment that has already taken place in Harborough District.
- 2.33 Consequently, we consider that the Land Opposite MP Lutterworth should be identified and assessed as an option within the Council’s forthcoming site selection process. We will be pleased to provide further details as necessary to assist the Council with this exercise.

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

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- 2.34 To provide more space to allow existing businesses to expand the Council must allocate land in sustainable, well connected areas that are in close proximity to where existing and emerging businesses are located.

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- 2.35 Development should be focused around existing employment sites (such as Magna Park Lutterworth) to take advantage of existing transport links; economies of scale and proximity to labour. Additionally, land should continue to be safeguarded for employment uses in these areas and capital should be invested into maintaining critical infrastructure e.g. roundabout/ junction improvements.
- 2.36 The Council should also ensure that there is sufficient supply for both local industrial and strategic B8 employment land within the borough. This will enable to Council to “*diversify the borough’s economy and support the development of local skills to meet future business needs*” (consultation document paragraph 3.12).

**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?**

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- 2.37 GLP support the principle of allocating sites specifically for industrial (B2) and light industrial (E(g)(iii)) uses as this will ensure that strategic need is separated out and planned for. This will enable the Council to ensure specific locational requirements of different sectors are identified and addressed, in accordance with paragraph 87 of the NPPF.

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

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- 2.38 Paragraph 146 of the NPPF requires the Council to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to amend Green Belt boundaries.
- 2.39 We note that the Council has not yet considered whether exceptional circumstances exist to justify releasing land for employment development, or undertaken a detailed assessment of Green Belt boundaries. In the first instance, in accordance with paragraph 146 of the NPPF, we encourage the Council to identify and assess non-Green Belt options for delivering employment development, before moving on to consider Green Belt options.
- 2.40 In this regard, the Land Opposite MP Lutterworth is a suitable non-Green Belt site which can make a significant contribution towards the need for strategic B8.

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

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- 2.41 Any requirements for specific tree canopy cover within new developments should be carefully considered and based on appropriate evidence. In particular, evidence would be required to establish the justification for any such requirement, as well as the practical and viability implications.

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**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?**

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- 2.42 GLP agree that the Council should identify priority locations/ allocate sites for biodiversity net gain offsetting purposes.
- 2.43 It would be useful for the Council to assess and identify land in the borough that could be used for biodiversity offsetting purposes. This could create a register of sites and landowners that developers could review if their sites are unable to achieve a 10% biodiversity net uplift on site.
- 2.44 This would be particularly useful for sites that currently have a high biodiversity value, as the ability to achieve biodiversity net gains will vary according to the biodiversity value found on each site prior to development, and will be especially difficult to achieve if the site has an above average value to begin with.
- 2.45 Therefore, to avoid sites being rendered undevelopable or severely restricted in their capacity, we consider that as part of any comprehensive BNG strategy, it will be important for Rugby BC, in conjunction with Natural England, to establish a strategy for delivering off-site biodiversity enhancements.

It could be extremely difficult to secure Section 106 contributions for off-site habitat creation if new locations have not been identified for biodiversity credits to be spent and improved for these purposes.

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

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- 2.46 We would question whether it is necessary for biodiversity gain to be delivered in close proximity to a specific development. There may be circumstances where it would be most appropriate/ beneficial from a biodiversity perspective to enhance land that is not particularly close to an individual site, and the Council should ensure that a lack of availability of offset land in a local area will not prevent development coming forward.

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

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- 2.47 GLP supports sustainable development that minimises carbon emissions. However, any requirement for all new non-residential developments to be net zero should be fully justified, having regard to paragraph 35 of the NPPF, and informed by a viability appraisal.

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

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- 2.48 Similar to the response to question 26, GLP requests that if a requirement for developments to meet higher water efficiency standards is adopted, that such proposals are fully justified and informed by viability appraisal.

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

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- 2.49 Design codes are useful for giving specific areas an identity. RBC should ensure that these codes are not overly prescriptive and that the function of the building is not compromised by a requirement to meet an excessively high design standard.

- 2.50 Paragraph 134 of the NPPF states that *“all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code.”* Furthermore, it confirms that *“national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes”*.

- 2.51 Local design policies should avoid being overly prescriptive as each site should be considered on its own merits. Local design guides or codes should only be a guide and allow sufficient flexibility to encourage appropriate design responses on a site-by-site basis. Where design guides and codes are overly prescriptive, we consider there is a risk of delaying planning applications or stifling development by making them unviable due to excessive cost arising from a prescriptive approach to design which may not be appropriate for the local area.

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### **3. SUMMARY AND CONCLUSIONS**

- 3.1 We have provided above our comments on behalf of GLP on the Issues & Options (Regulation 18) draft of the emerging Rugby Borough Local Plan. In particular, we have highlighted that Rugby Borough is well placed to meet a significant portion of the identified need for strategic B8 development within the sub-region, and that in this context, the Land Opposite MP Lutterworth presents a significant opportunity to deliver employment growth.
- 3.2 Due to its location, scale and limited number of constraints we consider that the Land Opposite MP Lutterworth provides an opportunity to deliver a significant portion of the strategic warehousing need identified and to capture the success and employment/ economic benefits of Magna Park within Rugby borough. The location of the site outside the Green Belt means first consideration should be given to this option before exploring the potential for Green Belt release. Additionally, the supporting assessments enclosed with these representations have identified no major landscape, transport / access or ecological constraints for the site.
- 3.3 This location has been excluded from the Council's list of potential broad locations for strategic employment growth to date. Having regard to the evidence presented above and in the enclosed Call for Sites submission, we encourage the Council to consider this location as a reasonable alternative in its forthcoming site selection exercise, and to identify the site as a draft allocation in due course.
- 3.4 GLP support the Council's recognition that additional allocations will be needed to meet the increasing demand for B8 strategic warehousing in the Borough and look forward to further engagement with Rugby Borough Council as the Plan progresses.



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## **A1. LOCATION PLAN**

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## **A2. ILLUSTRATIVE DEVELOPMENT PLOTS**

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### **A3. PRELIMINARY TRANSPORT APPRAISAL**

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## **A4. PRELIMINARY LANDSCAPE AND VISUAL APPRAISAL**

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## **A5. PRELIMINARY ECOLOGICAL APPRAISAL**