



Our Ref: 333100726/A3/TC/GJ

Date: 2nd February 2024

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

BY EMAIL: localplan@rugby.gov.uk

Dear Sir/Madam,

Rugby Borough Local Plan Issues and Option Consultation

We write on behalf of Tarmac Trading Limited ("Tarmac") in respect of their land interests at the Tarmac Site, Ryton-on-Dunsmore ("the Site" shown on the Location Plan at **Appendix A**. Please note that the Location Plan has been provided at a scale of 1:5,000 rather than 1:1,250 given the size of the Site). in connection with Rugby Borough Council's public consultation on the Issues and Options Local Plan Review.

The Site is considered to be a suitable location for B8 employment development, assisting in meeting the employment needs of Rugby Borough, as well as any unmet employment need arising from Coventry. The Site offers a logical expansion of the established Prologis Park Ryton, which is situated across the A45 from the Site to the southwest.

These representations are accompanied by a Call for Sites submission, which contains further information about the Site, confirming its suitability, availability and deliverability to provide sustainable employment development to address the employment needs of both Rugby Borough and any unmet need arising from Coventry.

We provide detailed responses below in respect of the questions we feel are relevant in the Issues and Options consultation document.

Land for Employment Uses

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

Paragraph 11 of the National Planning Policy Framework (NPPF), which was published in December 2023, highlights that plans and decisions should apply a presumption in favour of sustainable development. Paragraph 11b notes that for plan-making, "*strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas*". Paragraph 20a confirms that the delivery of employment development comprises a strategic policy.

Section 6 of the NPPF regards building a strong, competitive economy. Paragraph 86b illustrates that planning policies should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. Similarly, paragraph 86d highlights that policies should be flexible enough to accommodate needs not anticipated in the plan.

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B8 Employment Use

Regarding the need for strategic warehousing floorspace (defined as over 9,000 sqm floorspace) within the Coventry and Warwickshire area, the Issues and Options document outlines a requirement for 551Ha of land until 2041, and 735ha until 2050, as stated in Paragraph 3.3. This is in line with the recommendations of the Coventry and Warwickshire Housing and Economic Development Needs Assessment, November 2022 (HEDNA).

Rugby Borough will be expected to accommodate a proportion of the 551ha of strategic B8 land required over the period to 2041 (or 735ha to 2050). The HEDNA does not make recommendations for strategic B8 floorspace distribution between the Coventry and Warwickshire Authorities as it does with office and industrial floor space, as such, there is no guidance as to how this requirement should be split between the Authorities.

Paragraph 31 of the NPPF notes that *“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”*

The HEDNA identifies that strategic B8 floorspace could be provided through either new build or the replacement of existing floorspace. Table 10.9 models two scenarios for replacement provision based on a high replacement rate model and a low replacement rate model. Both of these models use the same figure for floor space required to accommodate the growth in tonnage - 125,000sqm, increasing 196,000sqm to account for forecast changes in traffic. Paragraph 10.28 of the HEDNA notes that the uplift has been converted into a need for additional floor space using *“generally accepted ‘conversion factors’*. The HEDNA does not specify what these conversion factors are, as such we are unable to comment on the robustness of this approach and further clarification on how this has been calculated is sought.

It is understood that the Warwickshire Authorities are awaiting the outcome of the West Midlands Strategic Employment Sites Study prior to considering how the floorspace requirement for strategic B8 warehouse use will be split between the Authorities. However, it is noted that Paragraph 11.7 of the HEDNA makes it clear that there is a very strong demand for warehousing in Rugby, as well as in North Warwickshire. Demand within the remaining Districts and Boroughs is lower. Furthermore, Paragraph 3.31 of the Issues and Options document identifies a growing need for B8 floorspace within Rugby Borough. As such, it is considered that Rugby Borough should be looking to accommodate a **significant proportion** of the 551ha of strategic B8 floorspace within its boundary.

Other Employment Uses

The Issues and Options consultation document identifies a requirement for 150.5ha of employment land, excluding offices and strategic B8 warehousing, within Rugby Borough to 2041 (or a requirement for 218.2ha to 2050). This figure includes light industrial (E(g)(iii) use), Industrial (B2 use) and local warehousing of less than 9,000 sqm (B8 use). This is consistent with the conclusions of the HEDNA for Rugby Borough.

The HEDNA calculation for industrial land has been informed by three models: The Labour Demand Model projects a decline in the need for industrial land; the Valuation Office Agency (VOA) model projects a significant increase in industrial floor space demand; the Local Authority Completions model predicts a more significant increase in the demand for industrial land.

Whilst two of the three models predict a significant increase industrial land demands in Rugby Borough, the exact amount of land needed differs between the two models. The HEDNA considers the Completions model to be the most robust for considering industrial floorspace needs. This is because the VOA model cannot differentiate between strategic and local warehousing need.

The HEDNA considers that the Completions model provides the most robust assessment of future industrial floorspace demand, particularly in the short/medium term. However, it also acknowledges a number of limitations with this approach such as the potential for delays in completions. The Completions model suggests a need for 150.5ha of industrial / local warehousing land within Rugby Borough to 2041, and this is the figure which has been taken forward in the Issues and Options Local Plan. This approach is supported. However, it is important to note the limitations of this approach and this figure should be viewed as a **minimum requirement** for Rugby Borough.

We have no comments to make in respect of Office floorspace requirements.

Coventry City

Paragraph 26 of the NPPF stresses the importance of *'joint working between strategic policy-making authorities... In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.'*

In addition to meeting its own employment needs, Rugby Borough will likely be required to assist Coventry City in meeting its employment requirements. Coventry City Council are currently progressing their Local Plan Review, with a call for Sites having closed in late January 2024, and a Preferred Options consultation anticipated in Spring / Summer 2024.

Coventry City's current Local Plan (adopted in December 2017) identified that the City was unable to meet its own employment needs for the Plan Period 2021-2031 in the supporting text to Table 3.1. A shortfall of 241ha was identified. It is therefore considered unlikely that the City Council will be able to meet its own employment needs for the Plan Period to 2041 (which is identified as the Plan Period for Coventry's Local Plan Review). It is therefore considered that Rugby Borough should provide an uplift in employment floorspace to assist in accommodating any unmet employment land arising from neighbouring Coventry. The exact figure to be provided within Rugby Borough will become clear as the Coventry Local Plan Review progresses. It is noted that the timetable for the Coventry City Local Plan Review is running ahead of that for Rugby, as such any unmet employment need from Coventry is likely to be established prior to the next consultation on the Rugby Plan.

The 4th bullet point of HEDNA Paragraph 9.40 acknowledges that there are "*constraints on industrial land supply in Coventry*" and that major employment locations around Coventry such as Prologis Park, fall within Rugby Borough.

The HEDNA figure of 150.5ha industrial and local warehouse requirement for Rugby Borough includes an allowance for contributing towards Coventry City's unmet employment need. Whilst (as discussed above) it is very likely that Rugby Borough will need to contribute towards Coventry's employment needs, the exact figure for this is yet to be established and the figure used in the HEDNA is unclear.

Summary

The HEDNA identifies a requirement for 551ha strategic B8 land during the period to 2041 across Coventry and Warwickshire and an industrial / local warehousing requirement of 150.5ha (including unmet need from Coventry) in Rugby Borough during the period to 2041. These figures have been taken forward by the Issues and Options consultation document and this approach is broadly supported.

In terms of strategic B8 employment, it is clear from the evidence detailed above that there is a significant need for land within Rugby Borough. Whilst the distribution of this land across Warwickshire is yet to be determined, we conclude that Rugby Borough should be accommodating a **significant proportion** of this.

In terms of E(g)(iii), B2 and local B8 uses, a minimum of 150.5ha should be planned for.

We have no comments on the amount of B1 office floorspace to be planned for.

It is currently unclear how much of Coventry's employment land requirements that Rugby Borough will need to contribute towards. Any employment land figures set in the Local Plan must also take account of this.

In light of the above, we are unable to suggest a quantum of employment floorspace that should be provided through the Rugby Borough Plan to 2041. Further evidence is required through the West Midlands Strategic Employment Sites Study and the Coventry City Local Plan Review to enable us to comment further on this.

Any figures for employment need identified in the Local Plan to 2041 must be stated as a *minimum* figure. It is considered that flexibility should be built into the drafting of any policy to allow the expansion of existing employment sites where a local need is identified. This will ensure that the Plan meets the requirements of Paragraph 86d of the NPPF in being flexible enough to accommodate needs not anticipated in the Plan.

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

The HEDNA is clear that there is a need for all types of employment land within Rugby Borough. However, it is evident that there is a greater demand for B8 use than E(g)(iii) and B2 uses. Whilst the Borough should be planning to accommodate these other employment uses over the Plan Period in order to support the industrial / manufacturing sector, there is a clear need to allocate sufficient land for B8 uses.

The adopted Local Plan does not differentiate between strategic and local warehousing provision. It is considered important to provide specifically for local B8 floorspace to support smaller or growing businesses. Given the limited lifespan of B8 units and advancing technology, not including provision for new local B8 floorspace will mean that occupiers looking to move to new premises will be forced to look elsewhere outside the Borough.

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 land surrounding Prologis Park Ryton is identified as one of the potential 'broad locations' for employment growth in the Issues and Options document. It is a highly sustainable and suitable location for further employment development. It is an excellent location given its proximity to the A45, A46, A5 and the M6 and M69 motorways, connecting the Region with the rest of the Country. This is supported by Paragraph 11.24 of the HEDNA which identifies both the M45/A45 Corridor and specifically land around Prologis Park as a potential location to accommodate additional B8 floorspace. Whilst we fully support the 'Prologis Park broad location' as an area for employment growth, it is essential to consider land within this area beyond Prologis' landholdings to ensure that the development potential of land within the 'broad location' is maximised.

It is also considered that land within the 'Prologis Park broad location' is a logical location for contributing towards any unmet employment needs of Coventry due to its proximity to the City. Coventry City's current Local Plan acknowledges in the subtext to Table 3.1 that the City cannot meet its full employment land requirement within its own boundaries for the Plan Period to 2031. The Plan also recognises that the Prologis Park Ryton is considered to form part of the City's employment land supply. Hence, it is suggested that Rugby Borough should allocate additional employment floorspace at this broad location to help meet any unmet employment needs arising from neighbouring Coventry City.

The Tarmac Site Brandon is located across the A45 from the existing Prologis Park site. It therefore offers a natural expansion space for the existing employment facilities within the 'broad location'. The Site has excellent links with Coventry and its labour supply through both the strategic road network and public

transport options. It is therefore a suitable location not only for meeting the employment demands of Rugby, but also that of neighbouring Coventry.

We consider the suitability of the Prologis Park broad location, as well as the Tarmac Site specifically, against the HEDNA locational criteria below:

Road Accessibility – sites should be located where they can be accessed from the strategic road network

'Prologis Park broad location' and the Tarmac Site are located on the strategic highway network. The Tarmac Site is located on the A45 with links to A road infrastructure (A46 and A5) and motorway infrastructure (M6, M45 and M69), connecting the area to the wider West Midlands and to the North and the South through the M6 and M1.

As such, both the 'broad location' and the Tarmac Site meet the requirements of the road accessibility criterion.

Power Supply – sites should be located where there is potential to access sufficient power.

The 'Prologis Park broad location' is an established employment site with high profile occupiers such as JLR and DHL. It is therefore evident that there is significant energy infrastructure in this location.

The Tarmac Site is located on the opposite side of the A45 from Prologis Park. The existing service and utility infrastructure for Prologis Park / Ryton-on-Dunsmore can be extended to serve the Site. Further evidence to support this can be provided if necessary.

As such, both the 'broad location' and the Tarmac Site meet the requirement for access to a sufficient power supply.

Labour Availability – accessibility to labour is an important consideration.

The 'Prologis Park broad location' and the Tarmac Site have excellent access to a wide labour pool. The Tarmac Site is accessible, both via the strategic road network and via public transport including bus routes 25, 25A and 25X which currently stop on the A45, to a number of large settlements such as Rugby and Coventry. More locally, it is located in close proximity to the settlement and local labour pool of Ryton on Dunsmore.

As such, both the 'broad location' and the Tarmac Site meet the requirement for access to labour.

Neighbouring Activities – sites should be located away from incompatible land uses.

The existing Prologis Park is located adjacent to the western boundary of the village of Ryton on Dunsmore, with existing sheds in close proximity to residential dwellings.

The Tarmac Site is located to the north Prologis Park, and abuts the north western boundary of the settlement. There is however potential for acoustic attenuation and a landscaping buffer to be located between any employment buildings and existing dwellings. This could have the potential to include mature tree planting to ensure that any impact is immediate. This will assist in screening the development from existing residential dwellings, as well as having a range of other ecological and landscape benefits. The development of the Site would not therefore bring employment uses any closer to existing dwellings within the village. As such, it is considered to meet the requirements of this locational criterion, having the potential to separate employment from residential land uses.

The 'broad location' and the Tarmac Site meet all of the location criteria for providing new employment floorspace outlined within the HEDNA. They therefore represent a suitable location for employment land growth.

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

Both the HEDNA and Issues and Options document identify that there is a clear need for more employment land within the Borough. The HEDNA identifies that over time, buildings in B8 use will reach the end of their economic life due to technological advances and occupiers outgrowing the spaces. It is therefore critical that additional B8 floorspace is provided to allow business to grow and expand. Paragraph 10.18 of the HEDNA states '*a consequence of this process is that new sites need to be brought forward (or new plots at existing sites) in order to allow occupiers to re-locate to new buildings, thereby releasing the existing facility for refurbishment or demolition.*' It is therefore clear that additional B8 floorspace is required within Rugby Borough to allow existing businesses to expand.

When considering locations for additional B8 or other employment floorspace to allow existing businesses to expand, sites adjacent to existing employment sites would be beneficial in enabling the expansion of existing businesses. Expanding existing employment locations will mean that much of the infrastructure required to support additional floorspace will already be in place, or be capable of being extended.

As detailed in responses to earlier questions, it will be critical to ensure that land is allocated to meet local B8 floorspace requirements to allow existing B8 businesses to expand when current premises are outgrown or meet the end of their useful life. Without this provision, there is a danger that local B8 employment will need to move outside of the Borough to find suitable premises.

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?

The specific allocation of land for industrial and light industrial uses within the Plan is supported to maintain the industrial / manufacturing sector. However, consideration must also be given to the need to specifically allocate land for both strategic and local B8 use too.

The Tarmac Site would be suitable for a strategic or local B8 allocation or a B2 or E(g)(iii) allocation due to its proximity to existing employment sites at Prologis Park and its access to the strategic road network. It is strategically located to serve both Rugby Borough and to address any unmet employment needs arising from Coventry.

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

Paragraph 145 of the NPPF states that '*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.*'

Paragraph 147 goes on to state that '*When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.*'

The HEDNA has identified a specific need for additional employment land within Rugby Borough. In addition, Rugby may need to assist Coventry in meeting its employment needs. As part of the examination of the current Local Plan, alternatives to releasing Green Belt land to meet the employment needs of Rugby and Coventry were assessed. In order to meet these employment needs, a review of Green Belt boundaries was considered to be justified. This situation is likely to remain unchanged and therefore exceptional circumstances exist to warrant a review of Green Belt boundaries in Rugby Borough.

The western part of Rugby Borough is constrained by Green Belt, however it is also a logical location for employment expansion, particularly for B8 use, given its proximity to the strategic highway network and the City of Coventry and its labour pool. As such, it is considered that the western part of the Borough

would promote a sustainable pattern of employment development, in particular through the expansion of existing employment locations such as Prologis Park at Ryton.

The HEDNA's Paragraph 11.26 highlights the necessity for development in the Green Belt to satisfy the identified strategic B8 demand within Warwickshire and Coventry. Given the scale of sites needed to fulfil B8 demand, along with the related transport and infrastructure needs, finding suitable locations for strategic B8 that are not situated within the Green Belt, whilst also being located along key transport corridors, would be difficult.

Paragraph 143 of the NPPF notes that the Green Belt serves five 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.

A brief assessment of the Tarmac Site against each of these criteria is set out below and considered further in the accompanying Green Belt report:

- a) Ryton-on-Dunsmore is not a large built up area. As such, the development of the Site will not lead to the unrestricted sprawl of large built up areas;
- b) Development on the Site would not cause the boundary of Ryton on Dunsmore to be any closer to Coventry than existing and would therefore not cause neighbouring towns to merge;
- c) whilst the development of the Site would lead to the encroachment into the countryside, as would any other Green Belt site, the Site can create new defensible Green Belt boundaries, as discussed below;
- d) Neither Ryton-on-Dunsmore nor Coventry are Historic towns and thus this test does not apply; and
- e) As identified above, Rugby Borough would not be able to meet its employment need by solely allocating in brownfield land, particularly given the likely scale of B8 sites required. Thus green field / Green Belt sites must be considered.

The Tarmac Site is therefore not considered to meet purposes a), b) or e) of the Green Belt (purpose d) does not apply). Whilst there may be some impact in terms of purpose c), this is not unique to the Site and would likely apply to any Green Belt site located within the broad locations for employment growth.

The Site has the ability to create new defensible Green Belt boundaries, in accordance with Paragraph 148f of the NPPF. The western boundary of the Site borders a sewage treatment works and the western boundary is located adjacent to the settlement of Ryton on Dunsmore. Adjacent to the northern boundary of the site lies dense woodland planting at Steetly Meadows. This, coupled with the River Avon beyond, enables the creation of a new defensible Green Belt boundary. The potential for structural planting along the Site edges would further strengthen these new Green Belt boundaries.

Climate Change Policies

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

Whilst recognising the importance of on-site landscaping and BNG concerns, it is considered that landscape impacts should be assessed on a case-by-case basis as per policy NE3 of the adopted Local Plan, or any policy designed to replace it. This will assist in ensuring that policy requirements are not overly restrictive or have an undue impact on site viability.

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?

Following the passing of the Levelling Up and Regeneration Act in 2023, biodiversity net gain is more important than ever. It is anticipated that the Government's requirement for 10% biodiversity net gain on all sites will come into force on 12th February 2024.

A comprehensive and consistent approach to providing biodiversity net gain will deliver greater ecological benefits than a piecemeal approach and will also provide more certainty for developers through a credit-purchase scheme. As such, it is considered that the Local Plan should allocate sites for biodiversity net gain and we are fully supportive of this.

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

As above, a comprehensive biodiversity net gain approach will provide benefits for both Rugby Borough and the planning system. The benefits of a comprehensive approach are considered to be significant. If the delivery of biodiversity net gain was required in close proximity to a development site, this would result in piecemeal / smaller scale net gain sites which would not deliver the ecological benefits of a more comprehensive approach. As such, it is considered that biodiversity net gain should not need to be secured in close proximity of a development site.

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

Carbon Net-Zero is an issue of growing importance. Paragraph 194 of the National Planning Policy Framework requires planning policy and decisions to operate on the assumptions that regulatory regimes are operating effectively, rather than trying to establish these regimes themselves, potentially conflicting with pre-existing framework and further delaying the planning process.

Whilst we are supportive of the principle of low carbon solutions, it is important to establish what 'net zero' is to be base-marked against in order to provide meaningful comment on this question. There is insufficient evidence within the Issues and Options Document to comment further on this. It is requested that additional evidence and information is included within future iterations of the Local Plan Review to enable us to comment further.

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

Whilst we are supportive of the principle of introducing water efficiency standards, insufficient information is provided in the Issues and Options document regarding what these standards are 'higher' than. Further iterations of the Plan should provide additional evidence and information for stakeholders to be able to effectively comment further.

It is understood that an update to Building Regulations will introduce water efficiency standards for non-residential development. In accordance with Paragraph 194 of the NPPF, planning policies should not seek to control emissions where there is a separate control regime. As such, a specific policy on water efficiency standards for non-residential development should not be adopted if this matter is covered by building regulations.

Design coding and guidance

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

Tarmac recognises the importance of good design. This is especially important considering the emphasis on creating 'beautiful places' in the revised NPPF in Section 12.

However, we are not supportive of a Design Code being produced as part of the Local Plan process. It is likely to be difficult to produce a meaningful code that takes account of the design and character areas of the entire Borough. Furthermore, a Design Code is a considerably involved document and its Borough wide preparation would lead to extensive delays to the Local Plan process. The NPPF encourages Local Authorities to adopt Local Plans as quickly as possible. The Issues and Options consultation document notes that the council lacks capacity to do this themselves at present, and would need to seek external resources.

30. Which areas should design codes cover?

Following consideration of the options provided, it is considered that the most appropriate approach for design code coverage would be to require design codes at large new development level. This will ensure that design codes are specific and context-relevant to the areas they target, enabling a sensitive and considerate approach. As detailed above, it would be difficult to achieve this level of discretion if design codes were to be produced at a Borough-wide level.

Other topics

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

Further to our responses to questions in relation to employment floorspace, the lack of consideration for local B8 floorspace provision across the Plan Period gives cause for concern. The HEDNA considers local B8 use alongside general and light industrial uses. Whilst the Issues and Options document considers the need to identify allocations to meet both light and general industrial uses, it does not consider the need to identify sites specifically to meet local warehousing demand.

The HEDNA is clear that B8 buildings have a relatively limited lifespan and the Issues and Options consultation document outlines an aspiration to allow the growth of existing employment businesses. By not allocating land specifically for local B8 provision, existing local businesses who have outgrown their existing premises or are operating out of buildings which have reached the end of their useful life, may be forced to relocate outside of the Borough.

Evidence should be prepared to consider requirements for local B8 floorspace and allocations should be made within the Plan to support this sector.

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

Policies to enhance sustainable travel options within the Borough are supported in principle.

In terms of the Prologis Park broad location for employment floorspace, there are existing bus services that run between Coventry and Rugby (25, 25A, 25X) which currently stop on the A45. Sustainable transport facilities could be enhanced as part of any future development of the Tarmac Site.

Conclusions

We welcome Rugby Borough Council's decision to review their Local Plan and note the various elements where they have committed to being forward looking and proactive. Rugby Borough are committed to providing land for employment growth and note that there may be a need for the Borough to contribute to meeting unmet strategic warehousing land arising from neighbouring Coventry.

The Coventry and Warwickshire HEDNA identifies a need for additional strategic B8 floorspace within Rugby Borough. In addition, a requirement for additional E(g)(iii) and B2 uses are identified. We consider that the best way to accommodate this required growth would be through the allocation of sustainable sites adjacent to existing established employment locations. The Tarmac Site, Brandon provides a sustainable solution and a logical expansion of the Prologis Park Ryton. The accompanying Call for Sites submission confirms that there are no barriers to developing the Site for employment (either B2 or strategic/local B8) use and that the Site is suitable, available and developable.

The Site's proximity to Coventry City Council's boundary and established strategic and public transport links places it in good stead to contribute to meeting the unmet Coventry and Warwickshire need whilst also providing employment floorspace to meet Rugby Borough's demand.

However, we are concerned regarding the lack of consideration to providing specific local B8 allocations within the Local Plan. Further consideration should be afforded to this to support this sector in future iterations off the Plan.

We trust that you will take these comments as helpful in progressing the Local Plan. Should you require any further information, please do not hesitate to contact me as per the details of this letter.

Yours faithfully,

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