

Rugby Borough Council Local Plan
Issues and Options Consultation
Representations in Respect of Land Promotion at
Rugby East

February 2024

Contents

Clause	Subject	Page
1.	Executive Summary	3
2.	How much land should Rugby Borough Council be planning for?	8
3.	What type of employment land should Rugby Borough Council be planning for? Should sites be specifically allocated for industrial (B2) and light industrial (E(g)(iii)) uses?	18
4.	Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed).	22
5.	Are there any exceptional circumstances that mean Rugby Borough Council should amend the Green Belt boundaries to meet the need for employment land?	28
6.	Conclusions	33
	Appendices 1. Red line plan of promotion site 2. Illustrative Masterplans Accompanying Documents Rugby East Vision Document (Document 1) Marrons 2024 (Document 2) LSH (Document 3) Building and Land Supply Assessment (Document 4) Broad Locations Assessment (Document 5) A Call for Sites Form (Document 6)	

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1. Executive Summary

1.1 Rugby Borough Council (RBC) have commenced a review of their Local Plan with the publication of an Issues and Options Consultation Material (IOCM) and a Call for Sites process. These representations, prepared by Stoford Properties Ltd (hereafter ‘Stoford’) are prepared in response to the consultation and in support of our promotion of 136ha of employment land to the north of Houlton, that we refer to as ‘Rugby East’. A red line plan of our promotion land is included at **Appendix 1** to these representations.

1.2 These representations are accompanied by:

- A Vision Document – that sets out our vision for development and summarises technical work, including illustrative masterplan for the development of the site **(Document 1)**
- An Employment Needs Assessment (Marrons, 2024) **(Document 2)**
- A Report of Employment Land Evidence (LSH, 2024) **(Document 3)**
- Building and Land Supply Assessment **(Document 4)**
- An Assessment of the Council’s Broad Locations for Development **(Document 5)**
- A Call for Sites Form **(Document 6)**

1.3 The Council sets out a series of questions for respondents to consider. These can broadly be summarised as:

- i. How much employment land is required?
- ii. What types of employment land should the Borough be planning for?
- iii. The Suitability of the Broad Locations?
- iv. Whether there are any Exceptional Circumstances that justify the release of land from the Green Belt?

1.4 We address these questions in the subsequent sections of these representations.

Key Points

Our key points can be summarised as follows:

- i. **How much employment land is required?**

1.5 Stoford have commissioned advice from Marrons and Lambert Smith Hampton (LSH) to assist in addressing this question. **Based upon a Past Completions Scenario, we consider the Local Plan should look to provide for at least 403 hectares of employment land by 2041, and 547ha by 2050 to meet Rugby’s needs.** These figures are set out in the table below, alongside those presented by the Council. Our view is that the figure should not be split into industrial land with units below 9,000sqm, and industrial land with units over 9,000sqm, because this is not reflective of how the market operates in Rugby.

Type of employment land	Land needed 2021-2041 (in hectares)	Land needed 2021-2050 (in hectares)
RBC estimated Gross requirement for strategic warehousing land across Coventry and Warwickshire (this means land for warehouses over 9000 sqm in floor area)	551 ha (RBC to accept a share of this figure)	735 ha (RBC to accept a share of this figure)
RBC estimated Net need for office land (Rugby Borough only)	5.2 ha (4.2ha with hybrid working)	6.5 ha
RBC estimated Gross requirement for industrial land across (Rugby Borough Only) (this this includes smaller	150.5 ha	218.2 ha

warehouses of up to 9000 sqm in floor area)		
Stoford estimated total employment land requirement for RBC (based on past completions model) – Marrons	403	547
Stoford estimated employment land requirement for RBC (market led scenario) – LSH	875	1,190

- 1.6 We accept that the Council is yet to agree a proportion of the strategic land figures set out within the Coventry and Warwickshire HEDNA (HEDNA) November 2022. However, our figure of 403ha (by 2041) is some 252.5ha above the Council’s figure of 150.5ha for what it considers to be its **own** needs for that same period. Therefore, the Council should be aiming in our view, to meet at least 252.5ha of the 551ha of strategic need that the HEDNA suggests is required by 2041 (i.e. Stoford’s figure of 403ha combined needs minus 150.5ha local needs = 252.5ha residual; which would be in our view, the Council’s contribution towards strategic needs.) Within our supporting material (Marrons 2024, **Document 2**) we highlight some of the shortcomings with the HEDNA (notably its failure to utilise completions data beyond 2019). Therefore, the strategic need figures that it identifies of 551ha (to 2041) and 735ha (to 2050) across Coventry and Warwickshire are going to be much higher in reality and thus higher than those proportions being distributed in the coming months as the constituent authorities prepare their Local Plans.
- 1.7 With this in mind we also report figures from leading market agents LSH, who have analysed market activity since 2015 within Rugby and the Warwickshire Authorities for us. Acknowledging that forecasting future requirements by assessing past completions trends, is in reality only retelling a story of reactions to available land supply, by contrast, LSH consider market intelligence and explore take up rates across a range of unit sizes, and confirm that land requirements, if accounting for market demand, would be double those being reported by Marrons, for Stoford.
- 1.8 In response to the question of how much land is required, at Section 2 we set out our rationale for advocating a figure of 403ha to 2041, and 547ha to 2050 as a minimum requirement that the Local Plan should require and allocate land for.
- 1.9 Our comments relate to:
- a) The proportion of the strategic need (Coventry and Warwickshire) that we consider should be met within Rugby (i.e. 34%) **(see paragraphs 2.36 to 2.37)**
 - b) The role that Rugby Borough may have in meeting the needs of Coventry, who are unable to meet their own industrial needs, which Marrons (**Document 2**) consider are short by at least 87ha, and given this, Coventry will be unable to meet its share of the strategic warehousing needs figure too. **(see paragraphs 2.37 to 2.40)**
 - c) The potential (or not) for replacement land to form a component within a future land supply within Rugby Borough **(see paragraphs 2.7 to 2.9)**
 - d) The failure of the HEDNA and the IOCM to take account of completions beyond 2019 **(see paragraphs 2.9 to 2.15)** and instead rely on a period 2011-2019 for past completions and then using these to forecast to 2041/20250.
 - e) The inaccurate (duplicate) recording of completions within the Rugby AMR for 2016/17 and 2017/18 **(see paragraph 2.13)**
 - f) The assumed supply for 2022/23 stated within the IOCM is short of what is noted in the AMR **(see paragraphs 2.21 to 2.23)**
 - g) Delivery and Availability - the evidence of completions and take up within Rugby, being strongly correlated to units over 9,000sqm/100,000sqft, and consequently there being a significant shortfall of credible development land **(see paragraphs 2.16 to 2.20)**
 - h) The market evidence that demonstrates significantly higher levels of demand within Rugby is more than is reflected within past completions **(see paragraphs 2.28 to 2.34)**

- i) The evidence expected from the West Midlands Strategic Employment Site Study (WMSESS) 3, and other published evidence

ii. **What types of employment land should the Borough be planning for?**

1.10 This question within the IOCM is prompted by paragraphs 3.10 to 3.13 of the Consultation Material.

1.11 The text states:

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.

1.12 However, when we examined the HEDNA for further details there are only two such references, and neither of them are evidence that points to a split is warranted between B2 and light industrial land, from warehousing.

1.13 Our analysis of the existing industrial estate stock that accompanies these representations (**Document 4**) illustrates a mixed pattern of uses across each industrial area and is reflective of how the market operates. LSH also provide further market intelligence to support our view that specific allocations should not be kept aside for B2 or Eg(iii) uses – and this is based upon the demand for floorspace. This is particularly the case where land is in such short supply – LSH note in their report (**Document 3, page 3**) that Rugby has just 1.6 years supply based upon current rates of demand for floorspace.

1.14 Deal evidence is also a helpful indicator of the size of units being taken up in Rugby (Source LSH **Document 3**). Average unit size is increasing. This is reflective of the trend towards B8 uses, but also, the need to ensure flexibility within uses, allowing units to support both manufacturing of goods and storage/distribution within the same facility if required. Examples of this are evident within the completions to date that are recorded within Rugby's Annual Monitoring Reports (AMRs) – DC1,3,4,5,6 and at Prologis Park for example are B2/8 units and Tritax Symmetry – a B1/B8 unit.

1.15 We do not support the suggestion to control the supply of employment land through the use of unit size. Where smaller units (and across the B1/2/8 sector) have been delivered, this is often on smaller sites and in secondary locations. This should not be the premise for strategic allocations.

1.16 We consider there is strong evidence for the type of floorspace to be planned for, pointing to the B8 sector as a lead. LSH advise on the following key points in their Executive Summary (**Document 3**)

The limited supply of development land within the defined Rugby Local Authority area for both strategic and non-strategic requirements.

The logistics sector continues to witness significant change.

Rugby as a location at the centre of the recognised Golden Triangle remains a preferred central distribution location.

Demand remains strong in these locations and the average unit size has increased in line with market trends.

At present there is 1.6 years of supply based on historic average take-up figures over the last five years. The key strategic sites of Symmetry Park, Rugby and Prospero Park, Ansty are now effectively fully developed.

There will not be sufficient supply within the local Rugby Authority area to cater for current and future demand especially during the period 2026 – 2041.

iii. The Suitability of the Broad Locations

- 1.17 We have assessed the Broad Locations presented within the IOCM (**Document 5**).
- 1.18 The potential broad locations identified by the Council at 'M6 Junction 2 (north of junction)', 'Ansty Business Park Expansion/A45 Walsgrave Junction' and 'Prologis Park Ryton Expansion' are located on the edge of Coventry, and in the same way as the existing strategic employment sites at Ryton and Ansty would meet the employment needs of Coventry opposed to those of Rugby Borough. They are not suitable allocations therefore, to meet Rugby's needs.
- 1.19 Of the Broad Locations not located within the Green Belt, the Location listed as 'North of Houlton' is preferable because it has direct access to the strategic road network, benefits from frequent, local bus services that can be diverted into the site, and has accessibility to the new railway station, Rugby Parkway. Within this Broad Location, we are promoting our site, 'Rugby East.'
- 1.20 The proximity of Rugby Parkway not only adds to the sustainability credentials of our site, 'Rugby East' but also provides access to a larger pool of potential labour. This represents a logical extension to Rugby Town amid a receiving landscape that is influenced by the A5, M1, DIRFT, wind turbines and future phases of Houlton. Rugby East also represents a logical extension to the urban area, including an area of land previously allocated within the Houlton Sustainable Urban Extension.

iv. Whether there are any Exceptional Circumstances that justify the release of land from the Green Belt?

- 1.21 The preparation of a Local Plan provides the appropriate mechanism for considering whether land should be released from the Green Belt for development purposes; where; and whether there are alternatives to doing so. Regard should be taken of Green Belt boundaries and the need to retain a sense of permanence from one Plan review to the next, where possible. To release Green Belt, Exceptional Circumstances will need to be demonstrated.
- 1.22 We explore what the Exceptional Circumstances might be. The Planning Practice Guidance (PPG) confirms that strategic logistics facilities with a national or regional remit are likely to require **significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour**. Policy-making authorities are encouraged to engage with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies.
- 1.23 LSH highlight that there is a shortfall of land (just 1.6 years supply based on current take up rates) (**Document 3, page 3**) within Rugby and therefore this PPG reference to 'significant amounts of land' being required is heightened. Good access to the strategic transport network is also key – a feature that favours the land known as Rugby East, that Stoford are promoting through this Local Plan review, and is within the Broad Location of 'A5 north of Houlton' as identified within the IOCM.
- 1.24 Rugby's strategic road network consists of motorways and A roads, with only the A5, A45, M45 and A426 being located outside of the Green Belt. This provides excellent opportunities for Broad Locations such as A5 north of Houlton (as set out within our accompanying Vision Document – **Document 1**) to be allocated for development without requiring the release of any Green Belt land, whilst benefiting from an access directly onto the A5. Very few Broad Locations identified by the Council can offer this combination of non-Green Belt designation and direct A Road or Motorway junction access. This is one of the factors that sets Stoford's promotion land apart from other sites being considered by the Council. In addition, the site is adjacent the urban area of Houlton, which will comprise c.6,200 new homes and will be within commuting distance of the committed railway station (Rugby Parkway) that is being led by the County Council. The station's opening will coincide with Stoford's site (subject to planning permission). This places our site at the top of any hierarchy in our view, where significant site size, location, road access and availability of labour is required. In addition, the southern end of our site was allocated for mixed-use development within the adopted Local Plan as part of the Rugby Radio Station Sustainable Urban Extension. Our

enquiries have confirmed the availability of power to the site. We also note that the proposals at our site would create almost 5,000 new jobs, with over a third of these in managerial, professional and technical occupations.

- 1.25 We (see Marrons Report, **Document 2**) consider that there will also be a requirement for this Local Plan to allocate additional needs beyond the 403ha/547ha that we have stated is a minimum requirement to meet Rugby's own needs, in order to assist Coventry in their delivery of employment land.
- 1.26 Given Rugby's location within the Golden Triangle and its position on the strategic road network, it has and will continue to experience a high demand for large scale (strategic) logistics floorspace, the need for which can only be met in a limited geography in order to serve national logistics operations. This same geography is also heavily constrained by Green Belt which tightly constrains the Metropolitan Areas of Birmingham and Coventry.
- 1.27 Our evidence (see Marrons, **Document 2** paragraph 5.3) asserts that Coventry has relied upon neighbouring authorities such as Rugby to assist in the delivery of its employment land requirements, and we envisage this will remain the case within this Local Plan review. **We consider that at least 45ha-60ha of land will be needed within Rugby to meet Coventry's needs.** On the basis that this need is located on sites close to the City, this would necessitate the release of Green Belt land. We do not consider that Green Belt land is needed for release to meet Rugby's *own* requirements, or *their* contribution to the wider strategic B8 needs that are outlined within the HEDNA because there are suitable sites within locations identified (see plan at paragraph 5.19), including controlled by Stoford, 'Rugby East', to address this requirement.

2. Consultation Question 1 - How much employment land should Rugby Borough Council be planning for?

2.1 Stoford have commissioned advice from Marrons and LSH to assist in addressing this question. Based upon a Past Completions Scenario, **we consider the Local Plan should look to provide for at least 403 hectares of employment land (excluding offices) by 2041, and 547ha by 2050.** These figures are set out in the table below, alongside those presented by the Council. Our view is that the figure should not be split into industrial land with units below 9,000sqm, and industrial land with units over 9,000sqm, because this is not reflective of how the market operates in Rugby.

2.2 We accept that the Council is yet to agree a proportion of the strategic land figures set out within the Coventry and Warwickshire HEDNA (HEDNA) November 2022. However, our figure of 403ha (by 2041) is some 252.5ha above the Council's figure of 150.5ha for what it considers to be its own needs for that same period. Therefore, the Council should be aiming in our view, to meet at least 252.5ha of the 551ha of strategic need that the HEDNA suggests is required by 2041. Within our supporting material (Marrons 2024, **Document 2**) we highlight some of the shortcomings with the HEDNA (notably its failure to utilise completions data beyond 2019) and therefore the strategic needs figure of 551ha (to 2041) and 735ha to 2050 across Coventry and Warwickshire are going to be much higher in reality and thus higher than those proportions being distributed in the coming months as the constituent authorities prepare their Local Plans.

2.3 We also report figures from leading market agents LSH, who have analysed market activity since 2015 within Rugby and the Warwickshire Authorities. Acknowledging that forecasting future requirements by assessing past completions trends, is in reality only retelling a story of reactions to available land supply, by contrast, LSH consider market intelligence and explore take up rates across a range of unit sizes, and confirm that land requirements, if accounting for market demands, would be double those being reported by Marrons (**Document 2**), for Stoford.

Type of employment land	Land needed 2021-2041 (in hectares)	Land needed 2021-2050 (in hectares)
RBC estimated Gross requirement for strategic warehousing land across Coventry and Warwickshire (this means land for warehouses over 9000 sqm in floor area)	551 ha (RBC to share this figure)	735 ha (RBC to share this figure)
RBC estimated Net need for office land (Rugby Borough only)	5.2 ha (4.2ha with hybrid working)	6.5 ha
RBC estimated Gross requirement for industrial land across (Rugby Borough Only) (this this includes smaller warehouses of up to 9000 sqm in floor area)	150.5 ha	218.2 ha
Stoford estimated total employment land required within RBC (based on past completions model) - Marrons	403	547
Stoford estimated employment land required within RBC (market led scenario) - LSH	875	1,190

2.4 Within the following paragraphs we set out our rationale for advocating a figure of 403ha to 2041, and 547ha to 2050 as a minimum requirement that the Local Plan should require and allocate land for. Our comments relate to:

- a. The proportion of the strategic need (Coventry and Warwickshire) that we consider should be met within Rugby (i.e. 34%) **(see paragraphs 2.36 to 2.37 below)**
- b. The role Rugby Borough may have in meeting the needs of Coventry, who are unable to meet their own industrial needs, which Marrons (**Document 2**) consider are short by at least 87ha, and given this, Coventry will be unable to meet its share of the strategic warehousing needs figure too. **(see paragraphs 2.37 to 2.40 below)**
- c. The potential (or not) for replacement land to form a component within a future land supply within Rugby Borough **(see paragraphs 2.7 to 2.9 below)**
- d. The failure of the HEDNA and the IOCM to take account of completions beyond 2019 **(see paragraphs 2.9 to 2.15 below)**
- e. The inaccurate (duplicate) recording of completions within the Rugby AMR for 2016/17 and 2017/18 **(see paragraph 2.13 below)**
- f. Supply – the assumed supply for 2022/23 is short of what is noted in the **AMR (see paragraph 2.21 to 2.23)**
- g. Delivery and Availability - the evidence of completions and take up within Rugby, being strongly correlated to units over 9,000sqm/100,000sqft, and consequently there being a significant shortfall of credible development land **(see paragraphs 2.16 to 2.20 below)**
- h. The market evidence that demonstrates significantly higher levels of demand within Rugby is more than is reflected within past completions **(see paragraphs 2.28 to 2.34 below)**

What the Issues and Options Consultation Material (ICOM) sets out

- 2.5 The Council’s evidence base for determining how much employment land is required to be planned for, is the HEDNA November 2022, and evidence stemming from the Borough’s past completions, as monitored and recorded within the published Annual Monitoring Reports (AMRs).
- 2.6 The Council presents the following data at section 3.3 of their IOCM.

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 over 9000 sqm in floor area)	551 ha	735 ha
Net need for office land (Rugby Borough only)	5.2 ha (4.2ha with hybrid working)	6.5 ha
Gross requirement for industrial land across (Rugby Borough Only) (this this includes smaller warehouses of up to 9000 sqm in floor area)	150.5 ha	218.2 ha

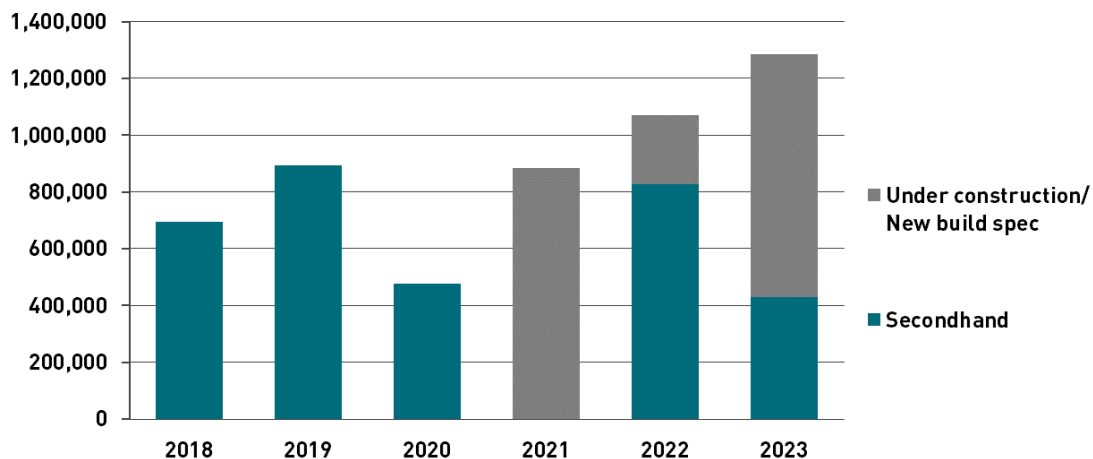
Replacement Floorspace

- 2.7 The consultation material cites the HEDNA for this data and explains that this projected requirement for industrial land is based on projecting forward past trends for gross industrial and smaller warehouse floorspace delivery. This accounts for the figures of 150.5ha and 218.2ha. Paragraph 3.4 of the consultation material advises that in the Council’s view, some of these requirements will be met by redeveloping land that is already in industrial use (i.e. replacement rates’). However, there is no evidence for this and we therefore object to this statement.
- 2.8 The AMRs record completions, albeit not distinguishing between greenfield and previously developed land. It is acknowledged that the two allocated sites at Prologis Park, Ryton and Rolls Royce, Ansty Park were previously developed and thus support the theory of a supply of redeveloped land within the future plan period, however both sites were allocated to meet Coventry’s needs, not Rugby’s (paragraph 4.16 Rugby Adopted Local Plan, 2019). Therefore, these do not provide evidence to support the

150.5ha/218.2ha (i.e. Rugby Borough needs/ units up to 9,000sqm) being delivered on anything other than new sites. If the Council wishes to rely on the contribution of brownfield land/redeveloping existing industrial areas as part of their future land supply, then evidence is necessary to support this.

2.9 As part of these representations, we have included an analysis of existing industrial areas that demonstrates a healthy supply of businesses within existing industrial areas across the Borough (**Document 4**) with no evidence of redevelopment on the horizon. The accompanying data supplied by LSH includes details of available stock over the last five years. An extract is included below for ease. It is our view, that for the replacement stock theory to be applied, it would apply to available secondhand stock – because where stock is in active use (under lease) then there can be no certainty with regards its availability for redevelopment. In 2023 for example, there was 429,062sqft of secondhand floorspace available (**Document 3 Appendix 2**). However, as a single figure this is misleading because it is only representative of two available units – DC1, Prologis Park, Rugby, and a 52,000sqft units at Cosford Lane, Swift Valley Industrial Estate. Both units are now refurbished. Prologis Park DC1 was built in 2015/16 and typical of investments like this, has recently been refurbished. This will ensure the stock remains part of the Plan pipeline and refurbishment is a far more efficient option than redevelopment. Available older stock is also unlikely to be in a cluster of locations that would make redevelopment of that stock, a viable option to serve new market requirements/larger footprints. The LSH data (**Document 3 Appendix 2**) identifies within the 2015-2023 period, just one year where second hand stock was taken up – 79,000sqft within the 50-99,000sqft bracket; and in respect of deals over 50,000sqft, the stock is being refurbished rather than replaced – e.g. The Range took 211,000sqft of existing stock at Swift Valley Central in 2015, and a further 100,000sqft was let at Swift 100 in 2017; and a further 99,000sqft to Highspeed Services Ltd in 2022 on a ten year lease. These older industrial estates are established and have tenants across varying leases. It is not feasible to rely on a replacement floorspace scenario as source of future land supply, when the option to refurbish and upgrade existing stock is available – especially when the supply of new stock and land is so curtailed. This scenario is also eroding the current industrial stock base and pricing out smaller businesses that then cannot afford to pay the rents of new stock in alternative locations.

RUGBY LOCAL AUTHORITY AVAILABILITY (SQ FT) 50K+ SQ FT UNITS



Source: LSH (**Document 3, page 18**)

The importance of considering more recent completions data

- 2.10 Our representations focus essentially on two of the elements of employment land as advised within the Consultation Material – these being the Rugby Industrial Land Figure (150.5ha/218.2ha) and the Strategic Land Figure for Coventry and Warwickshire of 551ha/735ha, with the former figures for each relating to a period to 2041 and the latter, relating to 2050.
- 2.11 The Rugby Industrial Land Figure of 150.5ha/218.2ha is calculated by projecting forwards past trends of delivery. However, the period used by the Council (relying on the HEDNA) is 2011-2019, and therefore

omits more recent completions data i.e. 2019-2023. Stoford commissioned Marrons to provide supporting evidence to these representations.

2.12 Paragraph 6.38 of the Marrons (**Document 2**) report highlights that the HEDNA assessed completions between 2011-19 and calculated an average of 14.8ha per annum within Rugby Borough of which 13.9ha relates to industrial land (strategic and non-strategic). The remaining 6% falls within office use.

2.13 At paragraph 6.39, Marrons (**Document 2**) note that if completions were calculated over the most recent ten year period, ending 2022-23, and excluding office uses, would give an average of 16.1ha per annum. It is also important to note that Marrons found an error within the Rugby AMR data that has fed into the HEDNA, whereby some site completions within the 2016/17 and 2017/18 AMRS were duplicated. Further details of this error are contained within Appendix 2 to the Marrons report (**Document 2**). The Council will need to take account of this is correcting future published completions data.

2.14 Marrons (**Document 2**) conclude at paragraph 6.41

A simple extrapolation of the current annual average 10 year completion figure of 16.1ha, would suggest that the Council should be planning for at least 322ha of strategic and non-strategic industrial employment land over the period to 2041, which after allowing for a 5 year margin of flexibility (as per the HEDNA assumption) would increase to 403ha. This figure increases to 547ha by 2050.

Their recommendations are presented in the two tables below, taken from their report. Marrons use figures derived from their own analysis, and also from LSH. A third, comparison figure from Deloitte is referenced too.

Separately, Deloitte note in its Transforming Logistics Paper, 2022, that the UK logistics market is projected to grow at a compounded annual growth rate of 6.3%, with road freight and haulage seen as a particular area of growth. Application of this level of growth to existing industrial stock within Rugby over the 20-year period to 2041 results in an increased demand for employment land (assuming a plot ratio of 0.4, and a flexibility margin of 5 years) totalling 1,156ha, increasing to 2,212ha by 2050.

Extract from Marrons (2024) (Document 2), Table 10.1 Rugby, Total Forecast Industrial Land Needs 2021-2041

Industrial Land Growth Scenarios - Rugby	Non-Strategic - General Industrial (ha)	Strategic (ha)	Total (ha)
Rugby Local Plan Review	150.5	Rugby to meet as yet unspecified proportion of 551ha	Unspecified (upwards of 150.5ha)
Past Completions HEDNA 2011-2019	150.5	187*	337.5
Past Completions 2014-2023 (AMR)	403		
LSH Forecast Demand - Rugby	875		
Deloitte Sector Based Forecast - Rugby	1,156		

Extract from Marrons (2024) (Document 2), Table 10.2 Rugby, Total Forecast Industrial Land Needs 2021-2050

Industrial Land Growth Scenarios - Rugby	Non-Strategic - General Industrial (Ha)	Strategic (ha)	Total (ha)
Rugby Local Plan Review	218.2	Rugby to meet as yet unspecified proportion of 735ha	Unspecified (upwards of 218ha)
Past Completions HEDNA 2011-2019	218.2	250*	468.2
Past Completions 2014-2023 (AMR)	547		
LSH Forecast Demand - Rugby	1,190		
Deloitte Sector Based Forecast - Rugby	2,212		

Notes for the above Tables:

*Rugby's distribution of identified Coventry and Warwickshire wide strategic need amounts to 34% based upon past distribution (2011-2019)

All scenarios assume an additional five year flexibility margin as per HEDNA assumption.

- 2.15 We consider it to be appropriate to include data from the past four years (2019-2023) when using past trends to forecast. The completions in 2019-20 as an example, are as a result of pre Covid/Brexit planning permissions being built out, and not something to be dismissed as an anomaly. The completions data (n.b. corrected for 2016/17 and 2017/18 within the data below, from that presented in the AMRs) is summarised within the Marrons report (Table 6.3) (Document 2) and extracted for ease below.

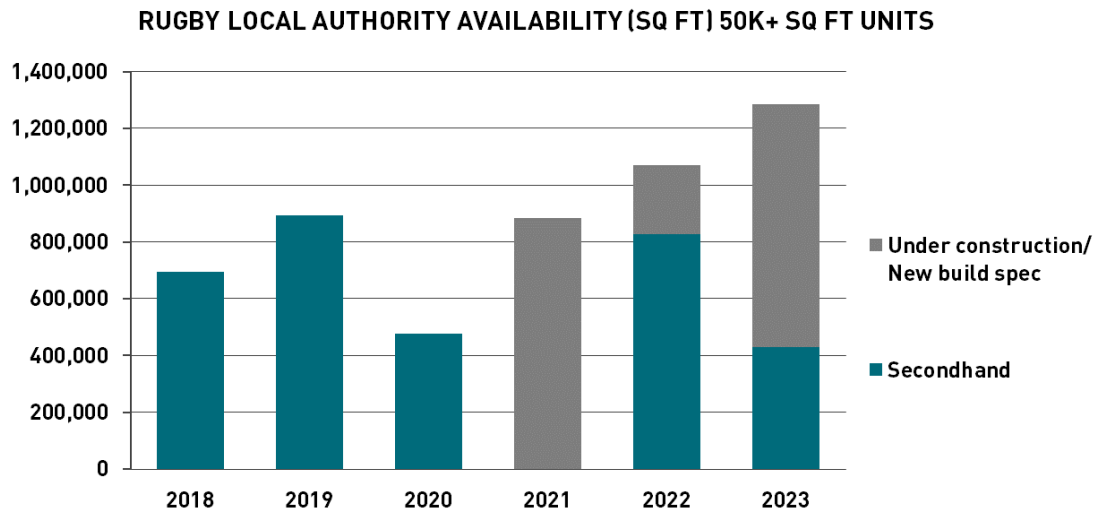
Year	All Completions (ha)	Completions (excluding B1 office only schemes) (ha)
2013/14	9.4	9.4
2014/15	33.7	29.7
2015/16	7.1	4.1
2016/17	51.5	51.5
2017/18	3.3	3.3
2018/19	3.0	1.4
2019/20	31.1	31.1
2020/21	0.4	0.4
2021/22	2.1	0.0
2022/23	30.6	30.6
Average per annum	17.2	16.1

Source: Rugby Borough Council AMRs 2013/14 to 2022/23
Detail set out in Marrons, 2024 Appendix 2 (Document 2)

Delivery and Availability – driving the need for larger footprints and greater choice

- 2.16 The data shows a 'lumpy' pattern of delivery that is reflective of a small number of large sites completing in certain years, and then periods of very little activity in the intervening years. In 2022/23 for example, 16.7ha were completed on the Prologis, Ryton site, and 13.9ha across three other sites; however this was the first completion of floorspace at Ryton since 2016/17. The former Rolls Royce site saw 6.4ha completed in 2022/23 and compared to 2.1ha at Rolls Royce the previous year and no other completions elsewhere within the Borough in 2021/22.

- 2.17 Depending on a small number of ‘infrastructure hungry’ sites, this can give rise to these patterns of delivery, but equally serve to give rise to issues in available supply too for new investors and occupiers. The LSH data illustrates the absence of new stock being available in the 2018-2021 period, where new build stock was essentially occupier driven and therefore not available to the wider market. This is also a reflection of the Local Plan that was adopted in 2019, and therefore the resultant supply of new sites can be seen to be delivering in years 2021 onwards.



Source: LSH (**Document 3**, page 18)

- 2.18 In summary, we consider it is important to reflect the market conditions when forecasting for the Plan period, and we do not consider that this has been done in the work to date that supports the Local Plan IOCM. The failure to consider completions data from 2019 is one factor, and the profound changes in the market since both the Covid pandemic and Brexit (see Marrons, paragraph 5.39 and details within Section 4, Marrons (**Document 2**)). The pattern of occupiers requiring increased footprint is a factor driven by these two occurrences, with greater on-shoring and a general response to an increase in online expenditure. However, the Local Plan appears to suggest that Rugby’s industrial needs are for footprints of 9,000sqm or less and that anything above that, is part of a wider, strategic need. We consider that perhaps RBC’s view of what size represents a ‘large footprint’ (i.e. RBC appear to use a threshold of 9,000sqm) is perhaps historic and not representative of actual market evidence.
- 2.19 In reality, the take up of units over 50,000sqft totalled 7.2m sqft of floorspace between 2015 and 2023 (and 2018 had no take up of this unit size), thus the average per annum is higher (i.e. nearer to 900,000sqft) than the 803,000sqft of floorspace (units over 50,000sqft) that took place (**Document 3, Appendix 2**). Take-up between 50,000sqft and 99,000sqft was low, given the absence of such stock. Floorspace take-up within Rugby is therefore considered to be predominantly above 100,000sqft/9,000sqm, given that between 2015 and 2023, LSH recorded only 274,000sqft of take-up in units between 50,000sqft and 99,000sqft (**Document 3, Appendix 2**).
- 2.20 Looking at units over 100,000sqft (i.e. over 9,000 sqm) the LSH take up over the 2015-2023 period equates to an average of 766,000sqft per annum. What these figures demonstrate is a clear market demand for units over 100,000sqft /9,000sqm within Rugby and as a result, the Council’s approach set out in their Consultation Material to separate Rugby’s Industrial Needs and Wider Strategic Needs is not accurate. The Council must view the market as a whole.
- Supply – the assumed supply for 2022/23 is short of what is noted in the AMR**
- 2.21 The Draft Local Plan Review asserts that it has a supply of 145ha of industrial land. However, reference to the AMR 2022/2023 confirms planning permissions (not yet under construction) to be 19ha short of that assumed in the Draft Local Plan.

2.22 The IOCM illustrates this point and within the extracts below, we compare this with an extract from the AMR 2022-23:

In terms of future supply, the Authority Monitoring Report shows 115.08ha of land with planning permission which is not yet under construction. Most of this is made up by three sites: Prospero Ansty at the former Rolls Royce site (9.58ha), Tritax Symmetry which forms part of the South West Rugby strategic allocation (40.7ha) and the former Rugby Radio Station Site allocation (31ha).

Source: Issues and Options Consultation Material (ICOM) Para 3.36

Employment Land Overview (ha)

	Hectares	Total
A	Local Plan Requirement 2011-2031	208
B	Delivery 2011-2022	130.8
C	Delivery in 2022-23	30.55
D	Under Construction	30.18
E	Delivery and Under Construction to date (B+C+D)	191.53
F	Remaining Requirement (A-E)	16.47
G	With planning permission not started	95.88

Source: AMR 2022-23, page 8

2.23 It is therefore evident that the figures within paragraph 3.36 of the Consultation Material are some 19ha short in terms of the actual employment land supply. The figure at row G within the above table, taken from the Issues and Options will need to be corrected by the Council in the next iteration of the Plan.

2.24 There is a further inconsistency in terms of measuring supply, when the Council's figures for completions and construction towards meeting the adopted Local Plan (2011-2031) are considered. Paragraph 3.34 of the IOCM states:

The Authority Monitoring Report 2022-23 shows substantial progress to meeting the 2011-2031 requirement for employment land with 191.53ha of the target 208ha either already built or under construction. (paragraph 3.34, Issues and Options Consultation Material (ICOM))

2.25 However when the AMRs for each year from 2011 are assessed and added together (see Appendix 2 of Marrons, 2024 (Document 2)), the evidence points to there being only 183ha of completions and sites under construction and not the 191.5ha claimed in the IOCM. As such there remains an outstanding requirement of 20.5ha against the current Local Plan requirement. The IOCM does not record this and this should be corrected in future iterations of the Plan.

2.26 The errors that we have identified in how the Council has calculated and/or recorded its supply, have led to a compounded error that is then taken forwards in the following table that is extracted from the IOCM.

	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

Source: Issues and Options Consultation Material (IOCM), page 15

The compounded errors in the above table are:

- i. The figure of 150.5ha presented by the Council (above) is based upon Rugby AMR data for past completions. Marrons (2024) (**Document 2**) Appendix 2 have highlighted duplication in sites being recorded within those AMRs and therefore this figure requires adjustment.
- ii. The figure of 32.65ha of completions between 2021-2023 is not justified. The majority of units within this 32.65ha (in excess of 25ha of the 32.65ha) represents land where the completion relates to units that are over 9,000sqm. This is the threshold beyond which the Council considers local needs (i.e. non-strategic) are met. It is inappropriate to therefore count units over 9,000sqm, as contributing towards the requirement of 150.5ha, if the basis for local needs is to be capped at 9,000sqm. (see also Marrons, 2024 para 9.5-9.6 (**Document 2**))
- iii. The supply figure of 145.26ha should be reduced by 19.12ha (see Marrons 2024, para 9.3 (**Document 2**)) and consideration should be made with regards to reducing this further to exclude sites within that supply, that are strategic in nature - given this is a supply being measured against the progress towards meeting non-strategic needs. For example, South West Rugby is included within the supply figure, albeit it is a site of 40.7ha and identified as a strategic allocation within the Plan.

2.27 Many sites that the Council relies upon are meeting wider needs – including Coventry, and therefore the supply is not available for Rugby, as the Plan asserts.

Take up/Demand Trends are Higher than Past Completions Suggest

2.28 Our supporting evidence from LSH presents take-up data as a market signal, indicates a higher level of demand for floorspace, than a simple assessment of past completions might otherwise suggest. Based upon current take up projections over the last 5 years LSH note there to be only 1.6 years of supply, and therefore after 2026 it is difficult to identify any credible development opportunity to meet either strategic or non-strategic occupier requirements.

2.29 Land allocated in Local Plans has been taken up faster than has been anticipated, as evidenced by the Coventry and Warwickshire Chamber of Commerce Employment Land Report published in 2023 see paragraphs 6.4-6.7 of Marrons (**Document 2**) alongside the conclusion that the HEDNA requirements should be increased by some 20%. Our own analysis alongside LSH, also explores the relationship between Local Plan annual land requirements, consented land and take up.

2.30 As illustrated below, 904,376sqft of floorspace was taken up in 2023 (measuring deals of over 50,000sqft) – represented by just three units – Apollo I and II at Ansty, and Unit 661 at Castle Mound Way, totalled 20.5ha of land. Some four times more than the Local Plan requirement had set out to deliver. Ansty Park, which accounted for 6.35ha of the land taken up, is of course a site allocated to meet the needs of Coventry. We turn to this point later in these representations, but it is indicative of the scale of need (annually) that the Local Plan review will need to consider.

2022/2023	Local Plan requirement (ha) (P/A)	Supply as of 2021 (ha)	Consented 2022/2023 (ha)	Completed 2022/2023 (ha)	Take-up (sq ft) 2022
Rugby	5.5	126.06	40.17*	13.9	904,376
Coventry	4.9			16.7	

*Full and Reserved Matters only with the exception of 5.25ha of the 40.17 which was a hybrid permission. 2.15ha of 5.25ha is full element.

Source: Rugby AMR and LSH Data (**Document 3**)

2.31 In the previous year (2021/22), take-up also outstripped the Local Plan requirements. This 1.562 m sqft was across 7 units; 4 at Symmetry Park, 2 at Prologis Park (which serves Coventry) and 1 at Swift Valley.

This amounts to a land area of 31.58ha; of which, Symmetry Park was 19.21ha; Swift Valley was 2.85ha and thus together serving Rugby with 22.06ha (again, more than 4 times the Local Plan requirement) and 9.52ha at Prologis Park serving Coventry.

2021/2022	Local Plan requirement (ha) (P/A)	Supply as of 2021 (ha)	Consented 2021/2022 (ha)	Completed 2021/2022 (ha)	Take-up (sq ft) 2022
Rugby	5.5	134.6	22.1*	2.1	1,562,065
Coventry	4.9	16.7	29.38*	0	

*Full and Reserved Matters only
Source: AMR and LSH Data (**Document 3**)

2.32 The 2020-2021 monitoring year was one where the pandemic was biting hard, and with demand high – but stock low (due to the unforeseen nature of the demand and shift in online retail), the Borough still saw levels of take up that were far higher than the Local Plan requirement.

2.33 Some 789,813sqft of floorspace was taken up (measured on units over 50,000sqft only) and was across four units, three of which were at Prologis Park and serve Coventry’s needs (17.8ha). 173,639sqft was taken at Rugby, Mill Road (3.63ha). Again, four times more land was taken up in this year, than the Local Plan considered was required.

2020 / 2021	Local Plan requirement (ha) (P/A)	Supply as of 2020 (ha)	Consented 2020 / 2021 (ha)	Completed 2020 / 2021 (ha)	Take – up (sqft) 2021
Rugby	5.5	Unknown	54.97*	0.4	789,813
Coventry	4.9	Unknown	15.89*	0	

*Outline application/s
Source: AMR and LSH Data (**Document 3**)

2.34 In short, what this snapshot of three years illustrates (nb. Further historic take up data is within our accompanying LSH information – **Document 3**) is that if take up continues to outstrip land available, the opportunities within Rugby will be unduly suppressed and investment constrained.

The relationship with Coventry and the City’s unmet needs

2.35 The adopted Local Plan makes provision for meeting some of Coventry’s employment needs via the allocation of land at Prologis Park, Ryton and Ansty Park. Rugby allocated 98ha to meet the City’s needs between 2011-2031, averaging 4.9ha per annum.

2.36 The Coventry and Warwickshire Authorities have yet to determine where the identified strategic warehousing need (551ha to 2041, 735ha to 2050) that the HEDNA advises is required, should be met. We (together with Marrons and LSH) have taken the approach of exploring the distribution of these figures, based upon the demand for warehousing. We have relied upon the strategic completions data within Table 9.15 of the HEDNA. On this basis, completions over the 2011-2019 period within Rugby amount to 34% of all strategic completions across Coventry and Warwickshire. Applying this percentage to the HEDNA figures of 551ha and 735ha, gives a range of 187ha to 250ha of strategic warehousing land to be met within Rugby by 2041 and 2050 respectively. Table 9.1 of our Marrons Report 2024 (**Document 2**) outlines this.

2.37 Marrons set out at paragraph 9.21 of their Report (**Document 2**), that Coventry City Council has an unmet general industrial shortfall of at least 87ha and this was confirmed by the Council’s own consultation earlier

in 2023 on their Issues and Options stage of their Local Plan. Paragraph 9.22 (**Document 2**) suggests that Rugby should plan to meet 45ha of Coventry's strategic needs by 2041, 60ha by 2050.

- 2.38 Within our concluding tables at Section 9 of the Marrons 2024 Report (**Document 2**), we reflect the proportion of strategic needs (based on completions 2014-2023) and apportion them at 16.1ha per annum, plus a five year margin (as per the HEDNA) to give an industrial needs requirement of 403ha to 2041 and 547ha to 2050 to meet Rugby's needs. The needs of Coventry- which we consider to be 45ha to 2041, and 60ha to 2050, are in addition to this.
- 2.39 The allocated sites of Prologis Park and Ansty Park have been used up far more quickly than was anticipated. Our analysis of existing industrial estates that accompanies these representations (**Document 4**) illustrates the land that is left within each allocated site. Marrons (**Document 2**) also comment on this point at paragraph 1.14 of their report. Prologis Park is full, and the last four units at Ansty Park are under construction. This is at 2024, with 7 years still remaining of the Rugby Local Plan period.
- 2.40 If the 4.9ha annual requirement for meeting Coventry's needs is extrapolated over the remaining 7 years of the Local Plan, (in order to continue to satisfy take-up trends) this would support a further 34.3ha (4.9ha x 7 years) of land being made available in Rugby, to meet demand arising from occupiers looking for a location like Ryton or Ansty. In addressing later questions posed by the Council, in terms of whether there are any exceptional circumstances in which the Green Belt should be released to meet employment needs, we consider this point further.

3. Consultation Question 2 - What type of employment land should Rugby Borough be planning for? and Consultation question 5 – Should sites be specifically allocated for industrial (B2) and light industrial (E(g)(iii)) uses?

3.1 This question within the IOCM is prompted by paragraphs 3.10 to 3.13.

The text states:

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.

3.2 However when we examined the HEDNA for further details there are only two such references, and neither of them are evidence that a split between B2 and light industrial land, from warehousing. Paragraph 15.9 of the HEDNA simply states:

Iceni's consultation exercise suggests that whilst B8 demand is very strong, there is a need for separate allocations for E(g)(iii)/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector. There is a strong manufacturing sector in the sub-region which needs to be provided for.

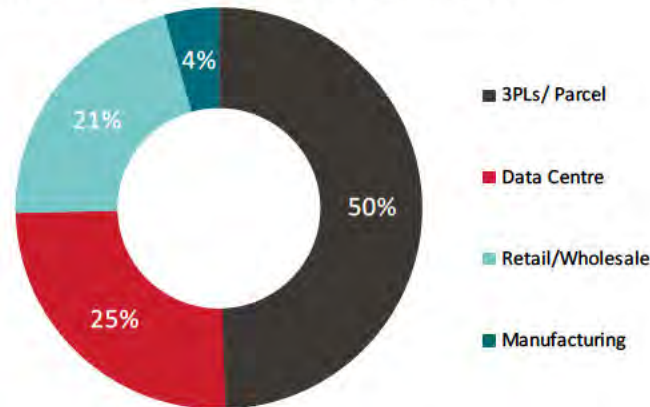
And paragraph 11.11 states:

Consultation suggests that whilst B8 demand is very strong, and that there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector. There is a strong manufacturing sector in the sub-region which needs to be provided for.

3.3 Neither amount to evidence. This would be required if the Council were to allocate specific sites for B2 or Eg(iii) uses. The difficulty is however, that delivering such specific uses is challenging because the funding market will require confidence that occupiers will want to occupy the proposed development with such restrictions – and in turn, occupiers will want the flexibility to operate as per their business model- which could be a B2/B8 or B8/Eg(iii), but knowing that B8 uses can form part of their proposals is essential.

3.4 Our analysis of the existing industrial estate stock that accompanies these representations (**Document 4**) illustrates a mixed pattern of uses across each industrial area. LSH also provide further market intelligence to support our view that specific allocations should not be kept aside for B2 or Eg(iii) uses – based upon the demand for floorspace and shown in the diagram overleaf. This is particularly the case where land is in such short supply – LSH note in their report that Rugby has just 1.6 years supply based upon current rates of demand for floorspace.

RUGBY LOCAL AUTHORITY TAKE-UP BY SECTOR 2020-2023



Source: LSH, Document 3

- 3.5 Deal evidence is also a helpful indicator of the size of unit is being taken up in Rugby (Source LSH **Document 3, Appendix 2**). Average unit size is increasing. This is reflective of the trend towards B8 uses, but also, the need to ensure flexibility within uses, allowing units to support both manufacturing of goods and storage/distribution within the same facility if required. Examples of this are evident within the completions to date – DC1,3,4,5,6 and at Prologis Park for example are B2/8 units and Tritax Symmetry – a B1/B8 unit.
- 3.6 Where smaller units, and across the B1/2/8 sector have been delivered, this is often on smaller sites and in secondary locations. One example is at Lawford Road, Rugby. The site, Stepnell Park has delivered 85,474 sqft across 10 units, granted in 2017 and completed in 2020.

Average deal size (sq ft)

	UK	Midlands	Rugby LA
2015	122,878	128,198	177,696
2016	151,488	169,497	188,459
2017	132,082	145,974	225,402
2018	168,013	203,319	No deals
2019	142,932	197,171	178,951
2020	168,275	185,904	196,602
2021	160,442	171,756	197,453
2022	158,614	169,033	223,152
2023	139,941	175,180	301,459

	UK	Midlands	Rugby LA
2015-2016	136,583	149,791	181,732
2022-2023	151,827	171,330	246,644
Change	11%	14%	36%

Source: LSH page 13 (**Document 3**)

3.7 The LSH accompanying data also indicates where units over 50,000sqft are considered (equivalent to just 4,645sqm) and in the period since 2015, the smallest individual take up was Appollo I, at 70,389sqm, and this was as a B2/B8 pre let. **(Document 3, Appendix 3)**

3.8 This evidence points towards the demand for floorspace being larger and being on a flexible Use Class basis across offices/industrial and warehousing. We consider that there is strong evidence for the type of floorspace to be planned for, **pointing to the B8 sector as a lead. LSH advise on the following key points in their Executive Summary (Document 3)**

The limited supply of development land within the defined Rugby Local Authority area for both strategic and non-strategic requirements.

The logistics sector continues to witness significant change with demands for more bespoke and efficient new units which offer strong ESG credentials and can benefit from advancements in technological change.

Rugby as a location at the centre of the recognised Golden Triangle remains a preferred central distribution location.

From our review of average historic take-up in the Rugby Local Authority area we believe it is clear that demand remains strong in these locations and the average size of units has increased in line with market trends.

At present there is 1.6 years of supply based on historic average take-up figures over the last five years.

The key strategic sites of Symmetry Park, Rugby and Prospero Park, Ansty are now effectively fully developed with the last remaining plots being speculatively developed at each location. Conservative assumptions would suggest all of these units would be let within 18 months of practical completion (mid 2026). At the Rugby Radio Mast site (now known as Houlton) there is an absolute prohibition on developing any new industrial accommodation over 5,000 sq m (see decision notice).

We believe there will not be sufficient supply within the local Rugby Authority area to cater for current and future demand especially during the period 2026 – 2041 where we can see no new significant development coming forwards.

3.9 When planning for what type of employment land might be required, it is helpful to also consider the comments from LSH as leading market agents, where they outline future trends and influences within the sector. Their evidence (page 9, **Document 3**) lists the following key trends/influences:

Take up will continue to stabilise and remain at healthy levels with sustained occupier demand and investor sentiment

Technological innovations and environmental concerns will drive cost efficiency – this will impact on buildings, site layouts and could drive the net/gross site development ratio too, as occupier seek to deliver improved working environments

Increased on shoring/near shoring in place of relying on stretched global networks

Buildings will continue to be large and more bespoke/specialised to generate operational efficiencies

Online retail will continue to grow and increase logistics demand and need for efficiencies

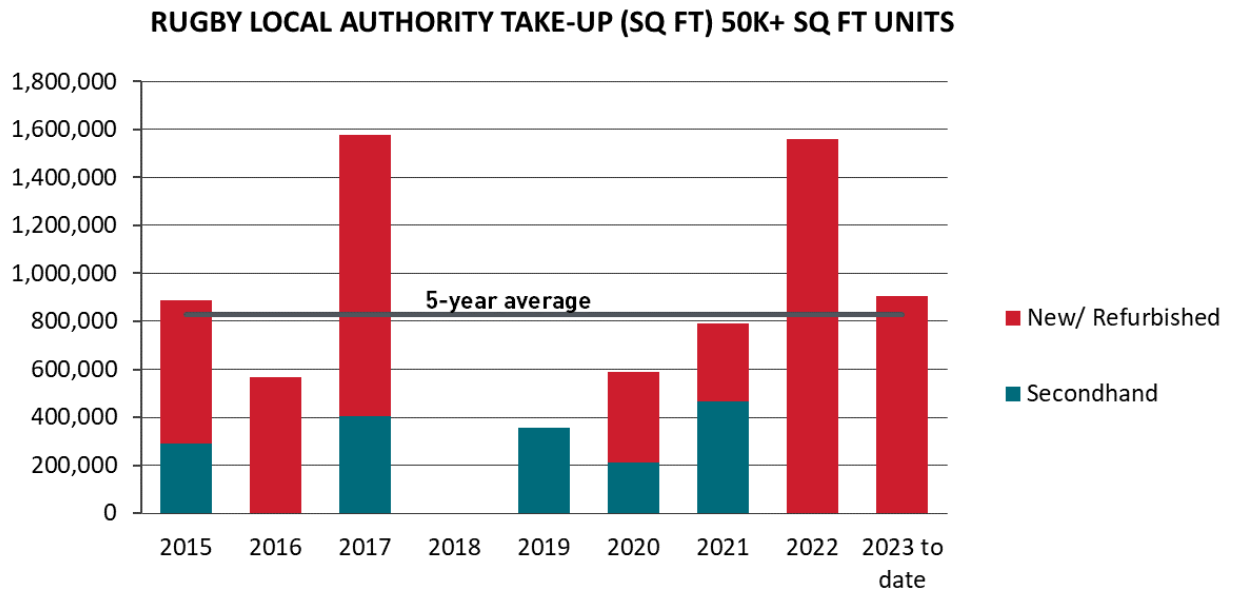
The UK logistics market is projected to grow at a compounded annual growth rate of 6% (Deloitte – see earlier at paragraph 2.14) and with more conservative estimates still at circa 4% annually.

3.10 We believe that it is critical that these market signals are considered and acted upon by plan makers, if the future supply of employment land is to deliver the right types of land, by way of size, location and use. LSH highlight the consequence of limiting stock and land supply, on Page 13 of **Document 3** where they note:

It is clearly noticeable that there was no new registered take-up in the Rugby area over the period 2018-2020, highlighting the lack of available stock and no new stock under

construction for the period 2018-2020, as shown in the availability chart below. This lack of stock would hinder occupier demand and take up.

It is our assertion with a good supply of new logistics units to the Rugby area occupier take-up levels should be well in excess of 1,500,000 sq ft per annum and probably significantly higher with new build to suit commitments.



Source: LSH Page 13, Document 3

3.11 LSH also supply details of market enquiries around Rugby and its hinterland, providing further evidence of the very strong levels of interest for logistics around Rugby, identifying enquires from 80,000- 800,000sqft, totalling circa 9,000,000sqft of floorspace within Appendix 2 (**Document 3**). In addition, the tables on page 14/15 of the LSH report (**Document 3**) illustrate the nature of take up (i.e. larger B8 footprints) within Rugby over the last 8 years. With only 6 units available that were over 50,000sqft within Rugby (LSH Page 17) - and with this position likely to change before the summer of 2024 (units under offer), there is very little in the market to serve future demand. We offer this evidence in counter to the Local Plan suggestions that specific land should be identified for B2 and or Eg(iii) uses, when there is a clear demand for logistics floorspace that is not being provided for at the scale that is needed.

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

4.1 Paragraph 3.40 of the IOCM, and the accompanying map on page 16 identifies eight potential broad locations to accommodate future employment development. Stoford have assessed potential sites within these Broad Locations and included this within our submissions (**Document 5**) to assist the Council in forming a view on which sites to allocate.

4.2 As set out in the IOCM at paragraphs 3.38 and 3.39:

“Land for large-scale manufacturing and distribution uses needs to have good access to A-roads and motorways. This will avoid inappropriate routing of HGVs through residential areas and country lanes. Large scale employment locations should be close to existing settlements to allow staff access to work. Remote rural locations should therefore be avoided.”

4.3 The Government (PPG) adds to this list of requirements and confirms that strategic logistics facilities with a national or regional remit are likely to require **significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour.**

4.4 It is notable that five of the eight broad locations are in the Green Belt and not well related to the urban area of Rugby.

4.5 The updated NPPF (December 2023) was strengthened in respect of Local Plan reviews and the consideration of Green Belt. Paragraph 145 of the NPPF states that:

“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.”

4.6 Rugby is fortunate in that it has a large expanse of land that includes the A5, A45, M45 and A426 located outside the Green Belt. This provides the Council with the opportunity to fully meet its own needs without the release of Green Belt land.

4.7 Based upon a Past Completions Scenario, we consider the Local Plan should look to provide for at least 403 hectares of employment land (excluding offices) to 2041, and 547ha to 2050. Our Site, ‘Rugby East’ is outside of the Green Belt and with direct A5 access extends to some 136ha, principally for B2/B8 uses with ancillary offices. Combined with other non-Green Belt locations this could provide sufficient land to meet the Local Plan requirement, inclusive of strategic B8 needs without the release of Green Belt land. The following plan illustrates the potential for this to be achieved.

4.8 Owing to this, the potential Green Belt sites identified in our Broad Locations Assessment (**Document 5**) are considered unsuitable and unjustified for release to meet Rugby’s own requirements, or Rugby’s contribution to the wider strategic B8 needs outlined within the HEDNA because Exceptional Circumstances are not demonstrated. As can be seen on the plan below this includes the following Green Belt Broad Locations - M6 Junction 2 (north of junction), Ansty Business Park Expansion/A45 Walsgrave Junction, Prologis Park Ryton Expansion A45/A4071 Junction, and South of Hinckley. We explore the role that these Green Belt locations may have in meeting Coventry’s unmet needs, in other sections of our representations.



Plan identifying the IOCM Broad Locations, overlaid with the Green Belt

- 4.9 In our accompanying Broad Locations Assessment (**Document 5**) Stoford have analysed potential sites within each of the Broad Locations with regards to their suitability, achievability, and availability against much of the example criteria contained within Appendix 1 of the Housing and Economic Land Availability Assessment – Methodology for Coventry and Warwickshire (February 2022). The requirements of the PPG as referred to above were also considered.
- 4.10 To provide an accurate assessment of each Broad Location it has been necessary to define site boundaries based on the description of each Broad Location within the IOCM alongside previous Call for Sites submissions.
- 4.11 Our evidence (Marrons paragraph 5.3, **Document 2**) asserts that Coventry has previously relied upon neighbouring authorities such as Rugby to assist in the delivery of its employment land requirements, and we envisage this will remain the case within this Local Plan review. We consider that at least 45ha-60ha of land will be needed within Rugby to meet Coventry’s needs, plus the potential to meet a proportion of unmet (general industrial) non-strategic needs which would appear to total at least 87ha by 2041 and 154ha by 2050. On this basis we consider that the Broad Locations can be largely considered in two categories. Those that have the potential to meet Rugby’s assessed need (including those of a strategic nature) and those locations that have the potential to assist Coventry City in meeting their unmet needs - close to the city boundaries and necessitating the release of Green Belt land. Given the nature of the Rugby urban area, no one location can meet both Rugby’s and Coventry’s needs.
- 4.12 In our view, the South of Hinckley Broad Location in the Green Belt would serve to meet the needs of Hinckley and Bosworth which, unlike Coventry is not a tightly constrained authority and is not constrained by Green Belt. Thus, there are no Exceptional Circumstances to warrant Green Belt release within Rugby’s administrative boundaries. There are also significant highway capacity issues on the A5 west of that site in addition to junctions with the A47 and M69. A detailed assessment of this site is included in our accompanying Broad Location Assessment (**Document 5**)
- 4.13 In response to the IOCM question 3, a summary position on the suitability of each site to meet Rugby and Coventry’s needs is included below, with more detail contained in the Broad Location Assessment

(Document 5). Given each site’s suitability is considered in turn, there is an element of repetition in the assessment – for example where sites are poorly located in respect of public transport links etc.

Potential Sites to meet Rugby’s needs

A5 North of Houlton (Rugby East)

- 4.14 We are promoting land to the north of Houlton and we consider it to be suitable to meet Rugby’s employment needs. It is not constrained by the Green Belt and is located immediately adjacent to Houlton (Rugby Radio Station Sustainable Urban Extension (SUE)) which once complete, will provide c.6,200 new homes alongside 16ha of employment land, schools, and community facilities. Part of the land that we are promoting, inside our southern boundary, formed part of the previous allocation for the SUE within the adopted Local Plan. As such, our site at Rugby East can be considered as a further extension to this allocation.
- 4.15 When viewed from the north, the site will be set against a backdrop of Houlton (once completed), DIRFT and strategic highways including the A5 and M1.



Image illustrating the area of within ‘Rugby East’, that was also allocated as part of the Rugby Radio Station Sustainable Urban Extension

- 4.16 There is an existing footpath / cycleway linking the site directly to Houlton and further west towards Rugby Town which provides sustainable connections.
- 4.17 Very few Broad Locations identified by the Council can offer the combination of a non-Green Belt designation and direct A Road or Motorway junction access. This is one of the factors that sets Stoford’s promotion land apart from other sites being considered by the Council. In addition, the land being promoted by Stoford has a committed railway station (Rugby Parkway) that is being delivered (led by the County Council) and will coincide with the opening of Stoford’s site (subject to planning permission) and widen access to labour. This places our site at the top of any hierarchy in our view, where significant site

size, location, road access and availability of labour is required. Our enquiries have confirmed the availability of power to the site.

- 4.18 In addition, local bus services serving Houlton can be diverted into the site, providing sustainable options for journeys to work for local residents. Only land North of Houlton (Rugby East) where Stoford has land control, provides for **both** strategic road access and rail access for commuters within acceptable travel distances.
- 4.19 The floodplain is limited to the southern end of the site and built form can avoid this and incorporate the areas into planned green infrastructure.

Safeguarded Land within South West Rugby Allocation

- 4.20 This Broad Location is also suitable to meet Rugby's employment needs. It is not constrained by the Green Belt and is located within Homestead View (South West Rugby Sustainable Urban Extension) which once complete, will provide c.5,000 new homes alongside 35ha of employment land, schools, community facilities, and a new link road. Thus, it will be a location which provides sustainable commuting opportunities. Whilst it comprises Best and Most Versatile agricultural land, no other significant constraints were identified.

A45/A4071 Junction

- 4.21 This Broad Location is entirely unsuitable for allocation. It is within the Green Belt for which there are no Exceptional Circumstance because it would not serve Coventry's unmet needs due to its central location within the Borough. There are no bus stops within the wider area that can be easily and readily accessed on foot and sustainable access to Homestead View, once complete will be difficult across the A4071.

M6 Junction 1 - North East of M6 Junction 1 (option 7a in Document 5)

- 4.22 The IOCM identifies land at the M6 Junction 1 as a potential Broad Location for development. Stoford's view is that the land to the north east of the junction to be unsuitable for development on the basis of its disconnect with any pedestrian infrastructure to promote sustainable means of commuting to work. The nearest bus stops are inaccessible on the southern side of M6 motorway. It is therefore considered to be an unsustainable location. There is the potential to design around the residential development at the centre of the site with robust mitigation.

M6 Junction 1 - North West of M6 Junction 1 (option 7b in Document 5)

- 4.23 The IOCM identifies land at the M6 Junction 1 as a potential Broad Location for development. Stoford's view is that land to the north west of the junction is broadly unsuitable. The development potential of this site is limited to that adjacent to the A426 due to its levels which are very steep. There are no bus services at Churchover and no suitable pedestrian infrastructure to reach bus stops on the southern side of M6 motorway. Thus, it is therefore considered to be an unsustainable location.

M6 Junction 1 - Land at and adjacent to Cosford, Cosford Lane (option 7c in Document 5)

- 4.24 The IOCM identifies land at the M6 Junction 1 as a potential Broad Location for development. Stoford's view is that land at and adjacent to Cosford could be suitable subject to appropriate highway mitigation and careful design to avoid adverse impacts on the onsite heritage assets including Shrunken Village Scheduled Ancient Monument at the centre of the site and the Grade II Listed Building. Whilst the Site does not have direct access to the strategic road network, our transport consultant, Our highways consultant BWB has advised that possible connections via Overview Way might be possible but are heavily constrained.

Potential Sites to assist Coventry City in meeting their needs**North East of M6 Junction 2 (Crownier Fields Farm and Home Farm)**

- 4.25 The IOCM identifies land at the M6 Junction 2 as a potential Broad Location for development. Land to the north east of the junction is within the Green Belt. Within our response to Question 6 of the IOCM later in these representations, we consider that at least 45ha-60ha of land will be needed to be allocated within Rugby to meet Coventry's needs. Sites close to the City's boundaries are best placed to meet this need albeit they would necessitate the release of Green Belt land. Therefore, there may be justification for the Council to amend Green Belt boundaries to assist Coventry City in meeting their unmet needs, but not for meeting Rugby's own needs or its contribution to the HEDNA strategic B8 requirement.
- 4.26 Notwithstanding this overarching point, the land northeast of junction 2, M6 is unsustainable. The nearest bus stops are beyond the acceptable walking distances for commuting, the bus services are poor and infrequent, and the nearest railway station is beyond the preferred maximum cycling distance for commuting. Diverting bus services into the site would lengthen what are already long and unattractive journeys into Coventry and Nuneaton, and they do not serve Rugby. Coupled with this, BWB have advised of highway capacity issues on the A46 Coventry Bypass and Hinckley Road.

North West of M6 Junction 2

- 4.27 The IOCM identifies land at the M6 Junction 2 as a potential Broad Location for development. Land to the northwest of the junction is within the Green Belt. The land is in the Green Belt however, as discussed at question 6 within these representations, we consider that at least 45ha-60ha of land will be needed within Rugby to meet Coventry's needs. Sites close to the City's boundaries are best placed to meet this need, which would necessitate the release of Green Belt land. Therefore, there may be justification for the Council to amend Green Belt boundaries to assist Coventry City in meeting their unmet needs, but not for meeting Rugby's own needs.
- 4.28 Notwithstanding this overarching point, our transport consultant, BWB has advised that the site has significant severance issues for vehicular access and that there is no available or probable point of access.

Ansty Business Park Expansion / A45 Walsgrave Junction

- 4.29 This Broad Location is within the Green Belt. Within our response to question 6 of the IOCM we consider that at least 45ha-60ha of land will be needed within Rugby to meet Coventry's unmet needs, and that sites close to the City's boundaries are best placed to meet this need. This would necessitate the release of Green Belt land. Therefore, there may be justification for the Council to amend Green Belt boundaries to assist Coventry City in meeting their unmet needs, but not for meeting Rugby's own needs.
- 4.30 Careful design and siting of buildings would be required to mitigate for any harm on the on-site Grade II Listed Building and adjacent, significant heritage assets at Combe Abbey.
- 4.31 Our transport consultant, BWB has advised of significant highway capacity issues on A46 Coventry Bypass and Ansty Interchange. Further investigation would be required to understand if these capacity issues can be resolved with appropriate mitigation.

Prologis Park Ryton Expansion - West of Prologis Park

- 4.32 The Broad Location is located within the Green Belt. Within our response to question 6 of the IOCM we consider that at least 45ha-60ha of land will be needed within Rugby to meet Coventry's unmet needs. Sites close to the City are best placed to meet this need. This would necessitate the release of Green Belt land. Therefore, there may be justification for the Council to amend Green Belt boundaries to assist Coventry City in meeting their unmet needs, but not for meeting Rugby's own needs.
- 4.33 Notwithstanding this overarching point, BWB has advised of significant highway capacity issues on A45. Further investigation would be required to understand if these capacity issues can be resolved with appropriate mitigation.

Prologis Park Ryton Expansion - East of Prologis Park

- 4.34 The Broad Location is located within the Green Belt. Within our response to question 6 of the IOCM we consider that at least 45ha-60ha of land will be needed within Rugby to meet Coventry's unmet needs. Sites close to the City are best placed to meet this need, which would necessitate the release of Green Belt land. Therefore, there may be justification for the Council to amend Green Belt boundaries to assist Coventry City in meeting their needs, but not for meeting Rugby's own needs.
- 4.35 The nearest bus stop is beyond the acceptable walking distance of 400m and bus services are infrequent and unlikely to divert successfully. BWB has advised of significant highway capacity issues on A45.
- 4.36 Based on our assessment we consider that Broad Locations 'A5 north of Houlton' and 'Safeguarded land within the South West Rugby allocation' are most suitable to meet Rugby's assessed needs. We consider that Broad Locations at 'Ansty Business Park Expansion/A45 Walsgrave Junction' and 'Prologis Park Ryton Expansion' – both subject to appropriate highway mitigation are most suitable to assist Coventry City in meeting their needs.

5. Consultation Question 6 - Are there any Exceptional Circumstances that mean Rugby Borough Council should amend the Green Belt boundaries to meet the need for employment land?

5.1 The preparation of a Local Plan provides the appropriate mechanism for considering whether land should be released from the Green Belt for development purposes, where and whether there are alternatives to doing so. Also, regard should be taken of Green Belt boundaries and seeking to retain some permanence from one Plan review to the next, where possible.

5.2 The NPPF (December 2023) requires that the preparation and implementation of plans and the application of policies in the Framework deliver against its three sustainability objectives (economic, social and environmental). The economic objective of the NPPF is:

“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity and by identifying and coordinating the provision of infrastructure;”

5.3 In *‘building a strong, responsive and competitive economy’*, Section 6 requires that account is taken of local business needs and wider opportunities for development. Policies should 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. Critically paragraph 87 requires that recognition should also be given to addressing specific locational requirements of different sectors within planning policies, including:

“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.”

5.4 Government national PPG (reference ID2a-026 and 031, 2019) requires local authorities to prepare a robust evidence base to understand existing business needs, which encompass functional market areas, and for Local Enterprise Partnerships to play a key role in this process. The guidance requires that in gathering evidence to plan for business uses, local authorities will need to liaise closely with the business community, take account of the Local Industrial Strategy and understand current and future requirements.

5.5 In assessing business needs the guidance confirms assessment of the following:

Best fit functional economic area;

Existing stock of land for employment uses within the area;

Recent pattern of employment land supply and loss;

Evidence of market demand;

Wider market signals; and any evidence of market failure.

5.6 More specifically, the guidance also confirms the critical role the logistics industry plays *“in enabling an efficient, sustainable, and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities”*, something that has been brought into sharp focus during the COVID-19 pandemic. Importantly, the guidance also recognises that the logistics industry *“has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial uses)”*.

- 5.7 The guidance confirms that strategic logistics facilities with a national or regional remit are likely to require **significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour**. Policy-making authorities are encouraged to engage with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies.
- 5.8 LSH have highlighted that there is a shortfall of land (just 1.6years supply based on current take up rates) within Rugby and therefore this reference to ‘significant amounts of land’ being required is heightened. Good access to the strategic transport network is also key – a feature that favours the land known as Rugby East, that Stoford are promoting through this Local Plan review, and is within the Broad Location of ‘A5 north of Houlton’ as identified within the IOCM.
- 5.9 Rugby’s strategic road network consists of motorways and A roads, with only the A5, A45, M45 and A426 being located outside of the Green Belt. This does provide excellent opportunities for Broad Locations such as ‘A5 north Of Houlton’ (as set out within our accompanying Vision Document – **Document 1**) to be allocated for development and not require the release of any Green Belt land, whilst benefiting from an access directly onto the A5. Very few Broad Locations identified by the Council can offer this combination of non-Green Belt designation and direct A Road or Motorway junction access. This is one of the factors that sets Stoford’s promotion land apart from other sites being considered by the Council. In addition, the land being promoted by Stoford has a committed railway station (Rugby Parkway) that is being delivered (led by the County Council) and will coincide with the opening of Stoford’s site (subject to planning permission). This places our site at the top of any hierarchy in our view, where significant site size, location, road access and availability of labour is required. In addition, the site is located on the edge of the urban area (and includes land on the southern boundaries that was allocated within the adopted Local Plan as part of the Rugby Radio Station Sustainable Urban Extension). Our enquiries have also confirmed the availability of power to the site.
- 5.10 Stoford’s are promoting land that extends to some 136ha, principally for B2/B8 uses with ancillary offices. Our evidence base prepared by Marrons (**Document 2**) sets out a minimum range of needs for Rugby of between 403ha (to 2041) and 547ha (to 2050). The Masterplan Options within our Vision Document (**Document 1**) highlights (section 7) that having regard to place making, green infrastructure and biodiversity net gain, our net developable area for employment uses would be circa 86ha of land.
- 5.11 The assessments of need are based on gross land requirements, because a net to gross plot ratio has been factored in (akin to the HEDNA). If the Council were to agree with our assessment of need for Rugby and as a minimum plan for 403ha, the Local Plan would need to allocate 3 sites that were as large as that being promoted by Stoford, to meet needs to 2041, and 4 sites in total, by 2050.
- 5.12 This excludes any unmet needs that Coventry may identify and require from Rugby. We turn to these below.
- 5.13 The plan overleaf illustrates the potential for this to be achieved outside of the Green Belt, where 3 of the 8 Broad Locations have potential to be considered further. Stoford have assessed potential sites within these Broad Locations and included this within our submissions (**Document 5**) to assist the Council in forming a view on which sites to allocate. ‘Rugby East’ provides for both strategic road access and rail access for commuters within acceptable travel distances.

Meeting Coventry’s Needs

- 5.14 We (Marrons Report, (**Document 2**)) consider that there will also be a requirement for this Local Plan to allocate additional needs beyond the 403ha/547ha that we have stated is a minimum requirement for Rugby, in order to assist Coventry in their delivery of employment land.
- 5.15 Given Rugby’s location within the Golden Triangle and its position on the strategic road network, it has and will continue to experience a high demand for large scale (strategic) logistics floorspace, the need for which can only be met in a limited geography in order to serve national logistics operations. This same geography is also heavily constrained by Green Belt which tightly constraints the Metropolitan Areas of

Birmingham and Coventry. The revised NPPF (December 2023) was strengthened in respect of Local Plan reviews and the consideration of Green Belt. Paragraph 145 of the NPPF states that *“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.”*

- 5.16 For some authorities within the Golden Triangle e.g. Coventry, this change to the NPPF will be problematic and significant, however in the case of Rugby, there is a large quantum of land located on and adjacent to the strategic highway network which is not constrained by Green Belt and provides the Council with the opportunity to both fully meet demand and not require the need for exceptional circumstances to be explored unless meeting the unmet needs of Coventry for example.
- 5.17 The benefits of being located centrally within the Golden Triangle to Rugby are significant, both in terms of direct job creation, as well as to the wider supply chain, and as is clear in Government Policy it is essential that the local authority ensures that this demand is met in full, where Green Belt releases are not required. Rugby Borough can achieve this, where it is not required to meet Coventry’s unmet needs. It is these unmet needs that assert pressure on the Green Belt – either on Coventry’s side of the administrative boundary, or on its neighbours.
- 5.18 Coventry is a tightly constrained authority in terms of its administrative boundaries and the Green Belt. This of course being the purpose of the Green Belt – to prevent the encroachment of Coventry and urban sprawl into the hinterland authorities. The strategic road network that serves Coventry so well – namely the A45, A46, M6 and M69 junction is edged with Green Belt land and historically this has led to releases of Green Belt in neighbouring authorities in order to maintain the City’s inner boundaries with the Green Belt, but ‘grow on’ sites located just beyond and within areas such as Ansty Park and Prologis Park, Ryton.
- 5.19 Such sites have been popular, naturally. They are closely associated with the City boundary and to local residents and businesses, and may often be considered to be part of the City itself.



RBC Broad Locations overlaid with the Green Belt

- 5.20 Both sites are now full, despite there being 7 years still to run on the adopted Rugby Local Plan. Both sites have bus services and direct road connections linking to Coventry, and relationships with the University for example or major City employers such as Jaguar Land Rover.
- 5.21 Our evidence (Marrons paragraph 5.3 (**Document 2**)) asserts that Coventry has relied upon neighbouring authorities such as Rugby to assist in the delivery of its employment land requirements, and we envisage this will remain the case within this Local Plan review. We consider that at least 45ha-60ha of land will be needed within Rugby to meet Coventry's needs. On the basis that this need is located on sites close to the City, this would necessitate the release of Green Belt land. We do not consider that Green Belt land is needed for release to meet Rugby's own requirements, or their contribution to the wider strategic B8 needs that are outlined within the HEDNA because there are suitable sites within locations identified (see above plan), including 'Rugby East', to address this requirement.
- 5.22 Finally, we are aware of a current planning application that has been submitted for the development of land within the Green Belt to meet the needs of the Fraser Group. The Group operate from a Headquarters in Mansfield. They seek a new site to expand their operations. They include a site search within their planning application that extends across a broad area of the West Midlands and are not specific on the need for the site being met within Rugby, Coventry or Warwickshire. As such it is clearly not an occupier with needs arising from within Coventry and Warwickshire, and neither is there a specific locational reason why the occupier needs to be located on Green Belt land located on the outskirts of Rugby.
- 5.23 Planning application R23/1027 is made in respect of 112 ha of Green Belt land. The campus style development is to meet a specific requirement that the Frasers Group states has arisen and they say is of national significance and merits the release of Green Belt land. This scale of development is outside of any need that has been assessed within the HEDNA, or considered more locally by the Council. Stoford have objected to this application because we do not consider that Very Special Circumstances have been demonstrated to allow it. However, should the application be approved, given it is not part of the assessed needs of Rugby, nor Coventry and Warwickshire, and has been designed to meet a specific requirement for the Frasers Group it must not be a quantum of land that is deducted from the Local Plan requirements at Rugby, or from the distribution of land stemming from the HEDNA.
- 5.24 As mentioned above, the site is on the outskirts of Rugby Borough and has no relationship to the Rugby urban area and therefore the spatial strategy of the adopted plan, and it does not serve the economically active proportion of Rugby's population. It would be at odds with all evidence that currently points to the need for this Local Plan Review to allocate sufficient employment land to meet the existing and future needs of Rugby and the proportion of those needs that Rugby should address, that stem from Coventry and Warwickshire.
- 5.25 In summary, we recommend that Rugby works with other Warwickshire Authorities, alongside Coventry to understand what needs arise from the City, that cannot be met within the City boundaries and how this might relate to land outside of them.
- 5.26 Paragraph 24 of the NPPF outlines the duty which local planning authorities are under to cooperate with each other on strategic matters which cross administrative boundaries. Paragraph 26 goes on to states:
- "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. 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."**
- 5.27 This is significant given Rugby's adjacency to Coventry, a tightly constrained authority area which is unable to meet its employment land needs.
- 5.28 It is important to note in this respect that the strategic warehousing need identified within the Coventry and Warwickshire HEDNA originates from the Coventry and Warwickshire functional economic market

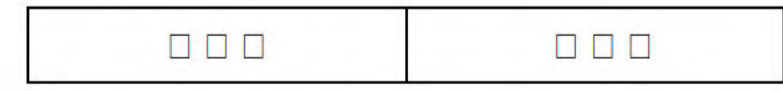
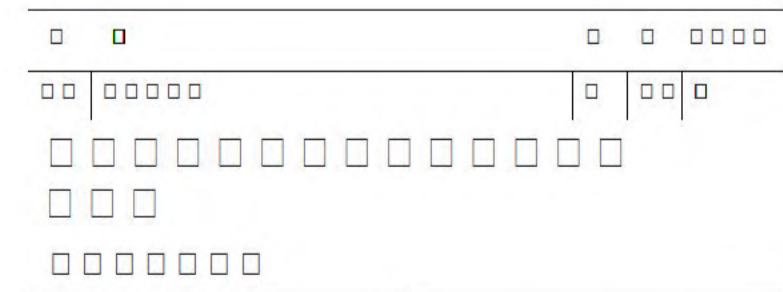
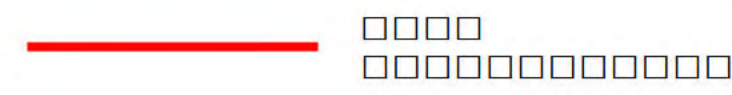
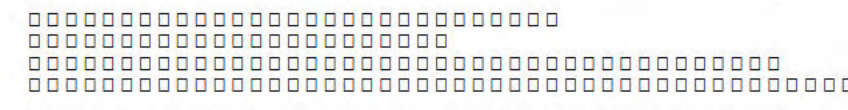
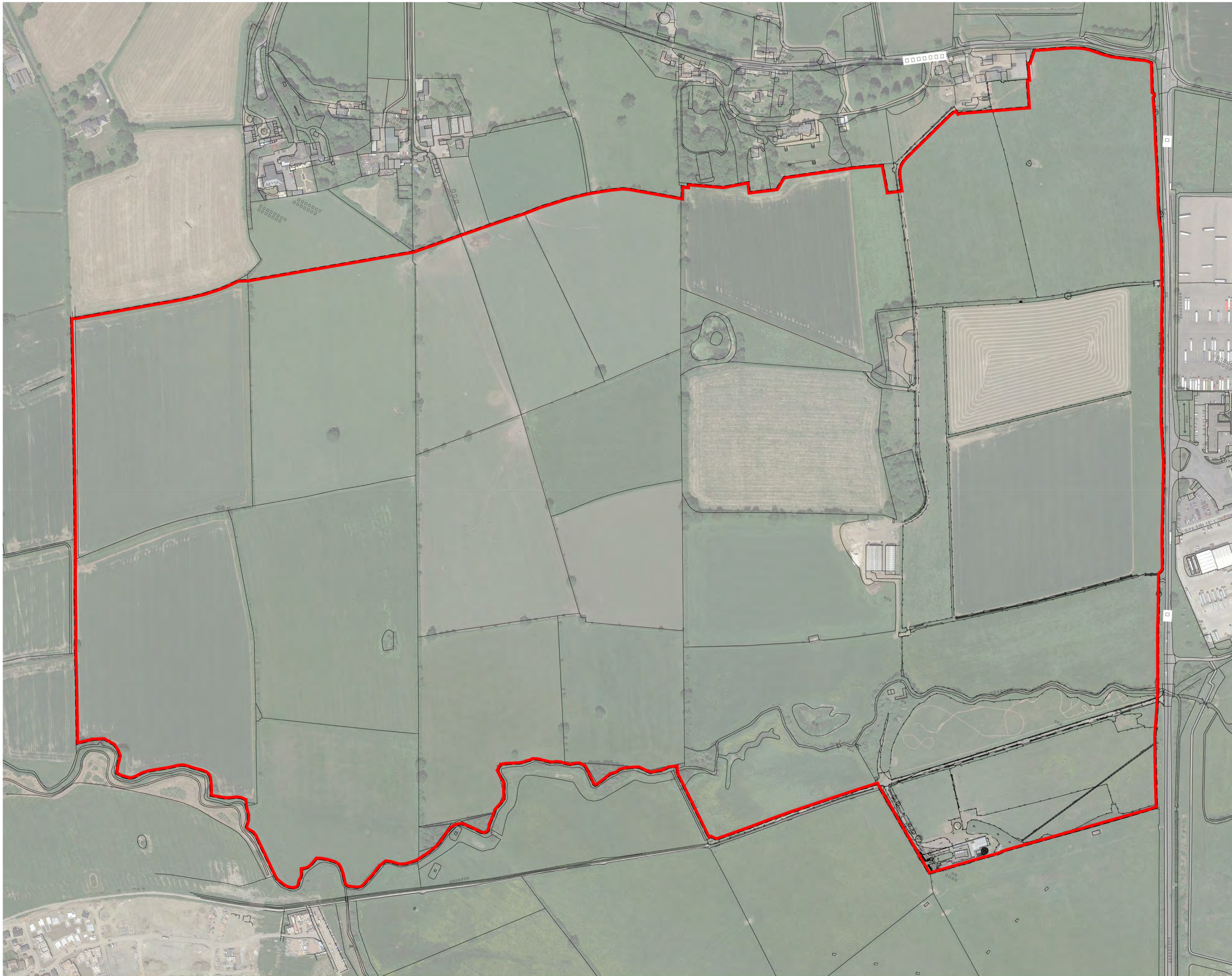
area, and reflects the locational advantage that the area brings to logistics operators amongst other factors such as labour supply. It is essential that the Coventry and Warwickshire authorities collectively plan to meet that strategic need in full at the very least (accounting for unmet needs in surrounding authorities where necessary). It would be entirely inappropriate to assume that the identified strategic need could be met elsewhere and outside of the function economic market within which that need exists. Given the Warwickshire area is also constrained by Green Belt, those authorities (like Rugby) that are able to allocate non Green Belt land towards meeting a higher proportion of this need, should therefore do so.

6. Conclusions

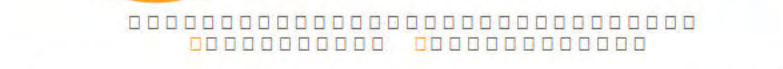
- 6.1 These representations to the IOCM set out our responses to the key questions posed by the Council, and they are accompanied by a suit of supporting documents. As a leading national developer of industrial floorspace, with land control of circa 136ha on the edge of Rugby's urban area, we consider that our site known as 'Rugby East' presents an exciting opportunity for the Council to embrace. A review of the opportunities that Rugby East can deliver are explored within our Vision Document (**Document 1.**)
- 6.2 The Council's IOCM explores a number of issues and potential options. The first issue relates to the quantum of employment land that will be required. Our evidence presents a minimum range of 403-547ha, which is based upon past completions being projected forwards. Marrons (**Document 2**) sets out the calculations behind this range and states that in reality, and once further data is available, this range is likely to be much higher.
- 6.3 LSH provide market intelligence (**Document 3**) with regards to demand (take up) that points to just 1.6 years of industrial land supply within the Borough based upon take up trends, and a demand for larger buildings beyond those which the IOCM states are equivalent to 'local needs' i.e. 9,000sqm.
- 6.4 We consider that Rugby can allocate sufficient non Green Belt land to meet the needs within this Local Plan Period (which we advocate are a minimum of 403-547ha)

APPENDIX 1

Red Line Plan



STOFORD



APPENDIX 2

Illustrative Masterplans



- Dimensions are in millimeters, unless stated otherwise.
 - Scaling of this drawing is not recommended.
 - It is the recipient's responsibility to print this document to the correct scale.
 - All relevant drawings and specifications should be read in conjunction with this drawing.

Schedule of Accommodation

Total GIA	-	3,286,348 ft² (305,309 m²)
Site Area	-	335.35 acres 135.71 ha
Net Developable Area	-	137.66 acres 55.71 ha
Site Density GIA	-	22.68%

Plot 100		
Unit 110 GIA	-	274,368 ft ² (25,489 m ²)
Plot Area	-	11.26 acres 4.56 ha
Unit 120 GIA	-	571,551 ft ² (53,098 m ²)
Plot Area	-	21.30 acres 8.62 ha

Plot 200		
Unit 210 GIA	-	301,403 ft ² (28,001 m ²)
Plot Area	-	12.79 acres 5.17 ha

Plot 300		
Unit 310 GIA	-	155,094 ft ² (14,409 m ²)
Plot Area	-	7.13 acres 2.88 ha
Unit 320 GIA	-	413,873 ft ² (38,450 m ²)
Plot Area	-	18.60 acres 7.53 ha
Unit 330 GIA	-	256,647 ft ² (23,843 m ²)
Plot Area	-	11.87 acres 4.80 ha

Plot 400		
Unit 410 GIA	-	171,385 ft ² (15,922 m ²)
Plot Area	-	7.19 acres 2.91 ha
Unit 420 GIA	-	1,005,317 ft ² (93,396 m ²)
Plot Area	-	41.34 acres 16.73 ha
Unit 430 GIA	-	136,710 ft ² (12,701 m ²)
Plot Area	-	6.19 acres 2.50 ha

Potential Development Floor Space -
 3,300,000 sqft / 306,575m²

-  Bus Stops
-  Pedestrian / Cycle Links
-  Central Hub
-  Green Infrastructure
-  Other route with Public Access

rev amendments by ckd date
 Site at Lilbourne Road, A5,
 Rugby
 Masterplan - Regional Needs Plan
 Information Container LOD: LOD 100

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50m SCALE 1:2500



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 - Scaling of this drawing is not recommended.
 - It is the recipient's responsibility to print this document to the correct scale.
 - All relevant drawings and specifications should be read in conjunction with this drawing.

Schedule of Accommodation

Total GIA	-	2,864,052 ft² (266,077 m²)
Site Area	-	335.35 acres 135.71 ha
Net Developable Area	-	128.42 acres 51.97 ha
Site Density GIA	-	19.59%






Plot 100		
Unit 110 GIA	-	185,081 ft ² (17,194 m ²)
Plot Area	-	8.22 acres 3.33 ha
Unit 120 GIA	-	130,291 ft ² (12,104 m ²)
Plot Area	-	6.41 acres 2.60 ha
Unit 130 GIA	-	183,228 ft ² (17,022 m ²)
Plot Area	-	8.09 acres 3.27 ha
Unit 140 GIA	-	137,762 ft ² (12,798 m ²)
Plot Area	-	6.01 acres 2.43 ha

Plot 200		
Unit 210 GIA	-	301,403 ft ² (28,001 m ²)
Plot Area	-	12.79 acres 5.17 ha

Plot 300		
Unit 310 GIA	-	155,094 ft ² (14,409 m ²)
Plot Area	-	7.13 acres 2.88 ha
Unit 320 GIA	-	212,255 ft ² (19,719 m ²)
Plot Area	-	8.93 acres 3.61 ha
Unit 330 GIA	-	188,171 ft ² (17,482 m ²)
Plot Area	-	8.36 acres 3.38 ha
Unit 340 GIA	-	256,647 ft ² (23,843 m ²)
Plot Area	-	10.87 acres 4.40 ha

Plot 400		
Unit 410 GIA	-	171,385 ft ² (15,922 m ²)
Plot Area	-	7.19 acres 2.91 ha
Unit 420 GIA	-	110,693 ft ² (10,284 m ²)
Plot Area	-	4.93 acres 2.00 ha
Unit 430 GIA	-	103,150 ft ² (9,583 m ²)
Plot Area	-	5.10 acres 2.06 ha
Unit 440 GIA	-	151,593 ft ² (14,083 m ²)
Plot Area	-	7.70 acres 3.12 ha
Unit 450 GIA	-	170,801 ft ² (15,868 m ²)
Plot Area	-	8.28 acres 3.35 ha
Unit 460 GIA	-	269,788 ft ² (25,064 m ²)
Plot Area	-	12.22 acres 4.95 ha
Unit 470 GIA	-	136,710 ft ² (12,701 m ²)
Plot Area	-	6.19 acres 2.50 ha

Potential Development Floor Space -
 2,900,000 sqft / 269,415m²

-  Bus Stops
-  Pedestrian / Cycle Links
-  Central Hub
-  Green Infrastructure
-  Other route with Public Access

rev amendments by ckd date

Site at Lilbourne Road, A5,
 Rugby
 Masterplan - Local Needs Plan

Information Container LOD: **LOD 100**

STOFORD


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50m SCALE 1:2500

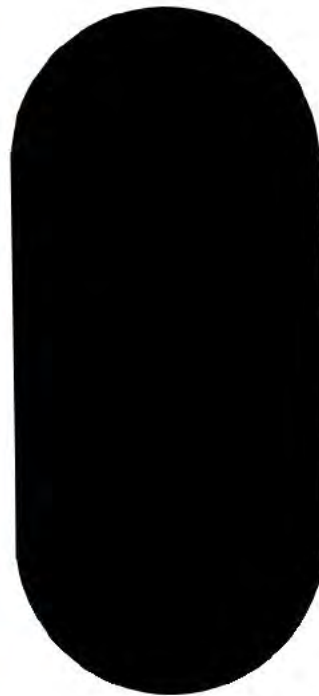


EMPLOYMENT NEEDS ASSESSMENT

RUGBY

STOFORD PROPERTIES LIMITED

JANUARY 2024





CONTENTS

1. NON TECHNICAL SUMMARY	3
2. INTRODUCTION.....	8
3. NATIONAL PLANNING POLICY REVIEW.....	9
4. DRIVERS OF CHANGE IN THE LOGISTICS MARKET	13
5. LOCAL PLAN POLICY REVIEW	15
6. EMPLOYMENT LAND NEED EVIDENCE REVIEW	20
7. INDUSTRIAL PROPERTY MARKET REVIEW	31
8. COVENTRY'S UNMET NEEDS.....	33
9. SUMMARY OF SUPPLY AND DEMAND POSITION.....	34
10. CONCLUSIONS	39

APPENDICES

APPENDIX 1 – Annual Monitoring Report Review – Rugby 2022/23

APPENDIX 2 – Review of completed employment sites – Rugby 2011 - 2023



1. NON TECHNICAL SUMMARY

- 1.1 This Employment Needs Assessment has been prepared by Marrons on behalf of Stoford Properties Limited.
- 1.2 The purpose of this Report is to assess, based upon current evidence, the extent of the employment land needs within Rugby, and the wider functional economic market area of Coventry and Warwickshire.
- 1.3 The Council has decided to proceed with a full update of its Adopted Local Plan (2011 – 2031). This decision followed, amongst other things, new evidence of future needs for homes and employment land, particularly warehousing uses. In respect of employment needs, the Issues and Options consultation draws attention to more recent evidence which establishes both non-strategic employment needs within Rugby, and broader strategic needs which for the time being have been identified only across the Coventry and Warwickshire functional economic market.
- 1.4 The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 forms the core piece of evidence informing the Council's employment land requirement.
- 1.5 In respect of general (non-strategic) industrial land requirements, the HEDNA measures future growth based upon past long-term completions over the period 2011 – 2019. Based upon this calculation, general industrial need over the period to 2041 stands at 150.5 hectares (ha), increasing to 218.2ha by 2050. The Council considers that it has a sufficient identified supply to broadly meet this need to 2041, albeit as we note in doing so the Council include a number of strategic sites which meet strategic need (which in itself is additional to non-strategic need). The point being the Council are double counting its supply for both non-strategic and strategic purposes.
- 1.6 The HEDNA also assesses strategic warehousing need across Coventry and Warwickshire, basing its calculations on the same past completion period for the first 10 years of the plan and a slightly lower level of growth reflective of traffic demand in the second half of the plan period. Strategic needs within Coventry and Warwickshire total 551ha to 2041, increasing to 735ha to 2050.
- 1.7 Evidence has yet to be published determining the distribution of this strategic need. However, an assessment based upon past completions would indicate that 34% should be met by Rugby, equating to 187ha of strategic needs by 2041, and increasing to 250ha by 2050. This means that based upon evidence presented within the HEDNA the Council should be planning to meet an industrial need equivalent to at least 337.5ha by 2041, and 468.2ha by 2050.



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- 1.8 However, the HEDNA bases its calculations of need on past completions over the period 2011 – 2019, but acknowledges that the shift towards ecommerce arising from the Covid pandemic has accelerated demand for logistics space.
- 1.9 This Report undertakes an assessment of the latest completions trends over the past 10 years (2014 – 2023). The assessment shows average annual completions to be 16% *greater* than the level of completions assessed by the HEDNA. On the basis that the Council should be planning based upon the most recent 10-year trend, Rugby’s strategic and non-strategic industrial land needs total 403ha by 2041, increasing to 547ha by 2050.
- 1.10 Notwithstanding this, past completions will always be constrained to past evidence, and as such will not reflect unconstrained, policy off need.
- 1.11 Market evidence presented by Lambert Smith Hampton (LSH) and appended to our client’s representations demonstrates a significantly higher level of demand than reflected in past completions. LSH consider that with a good supply of new logistics floorspace, take up levels should be well in excess of 1.5m sq ft. per annum, and probably significantly higher with new build-to-suit commitments. Assuming a prudent plot ratio of 0.4 this equates to annual demand for 35ha, or 875ha over the 20-year period to 2041 (including a 5 year margin of flexibility). This increases to 1,190ha by 2050 (including flexibility margin).
- 1.12 Furthermore, LSH consider that this is compounded by a lack of supply in recent years, and at present there exists an active requirement for 9m sq ft. of floorspace (with requirements ranging from 80,000 to 800,000 sq ft.). Based upon a plot ratio of 0.4, this equates to current active requirements occupying an area equivalent to 209ha (representing an immediate requirement).
- 1.13 LSH conclude by confirming there to be a significant shortfall in the availability of credible development land in Rugby Borough over the next 20 years, and as a consequence the area will not be able to provide for projected occupier demand. Based upon current take-up projections over the last 5 years, it considers there to be only 1.6 years of supply, and therefore after 2026 it is difficult to identify any credible development opportunity to meet either strategic or non-strategic occupier requirements.
- 1.14 This market assessment is consistent with the findings of the Coventry and Warwickshire Chamber of Commerce Employment Land Report published in 2023. This recommends allocating 20 per cent more land than recommended by HEDNA calculations to provide scope for more variety in the quality and quantity of land. It also concludes that insufficient employment land has been allocated in the Local Plans in Coventry and Warwickshire historically, and the land which has been allocated has been used up far faster than anticipated. In addition, the report states that establishing future need for employment land based on projections of suppressed past take up



rates will always underestimate the true requirement for employment land.

- 1.15 Separately, Deloitte note in its Transforming Logistics Paper, 2022, that the UK logistics market is projected to grow at a compounded annual growth rate of 6.3%, with road freight and haulage seen as a particular area of growth. Application of this level of growth to existing industrial stock within Rugby over the 20-year period to 2041 results in an increased demand for employment land (assuming a plot ratio of 0.4, and a flexibility margin of 5 years) totaling 1,156ha, increasing to 2,212ha by 2050.
- 1.16 We set out the various scenarios discussed in the table below, both over the period to 2041 and 2050.

Table 1.1 Rugby, Total Forecast Industrial Land Needs 2021 - 2041

Industrial Land Growth Scenarios - Rugby	Non-Strategic (General Industrial) ha	Strategic ha	Total ha
Rugby Local Plan Review	150.5	Rugby to meet as yet unspecified proportion of 551ha	Unspecified (upwards of 150.5ha)
Past Completions (HEDNA) 2011 – 2019	150.5	187*	337.5
Past Completions 2014 – 2023 (AMR)		403	
LSH Forecast Demand - Rugby		875	
Deloitte Sector Based Forecast - Rugby		1,156	

Note: * Rugby's distribution of identified Coventry & Warwickshire wide strategic need amounts to 34% based upon past distribution (2011 – 2019)
All scenarios assume an additional 5 year flexibility margin as per HEDNA assumption

Table 1.2 Rugby, Total Forecast Industrial Lane Needs 2021 - 2050

Industrial Land Growth Scenarios - Rugby	Non-Strategic (General Industrial) ha	Strategic ha	Total ha
Rugby Local Plan Review	218.2	Rugby to meet as yet unspecified proportion of 735ha	Unspecified (upwards of 218.ha)
Past Completions (HEDNA) 2011 – 2019	218.2	250*	468.2
Past Completions 2014 – 2023 (AMR)		547	
LSH Forecast Demand - Rugby		1,190	
Deloitte Sector Based Forecast - Rugby		2,212	

Note: * Rugby's distribution of identified Coventry & Warwickshire wide strategic need amounts to 34% based upon past distribution (2011 – 2019)
All scenarios assume an additional 5 year flexibility margin as per HEDNA assumption

- 1.17 As demonstrated by the market evidence presented within this Report, there exists a significant



level of unmet occupier demand for industrial floorspace within Rugby, and it is essential that this demand is not constrained by a limited supply of potential sites.

- 1.18 There is also a growing need to ensure there is a sufficient supply of sites to meet replacement stock requirements arising from aged stock that is no longer fit for purpose. Furthermore, it is essential that the Council adequately account for employment sites lost to other uses, such as residential development, and ensure sufficient sites are brought forward to address these losses.
- 1.19 In addition, analysis of Coventry's stated employment land position from its Issues and Options Local Plan consultation earlier this year demonstrates that it is unable to meet its own general industrial needs, leading to a shortfall of at least 87ha which will have to be met elsewhere by 2041.
- 1.20 On this basis it is reasonable to assume that Coventry is also unable to meet its strategic warehousing needs, and as such it may also be appropriate that Rugby plans to meet that unmet need. Various scenarios demonstrate that Rugby and Coventry's combined strategic warehouse need equates to approximately 43% of the Coventry and Warwickshire share. On this basis, and without accounting for more recent completions, it is reasonable to assume based upon evidence within the HEDNA that Rugby should plan to meet a proportion of what we consider will amount to Coventry's strategic needs amounting to approximately 45ha by 2041, increasing to 60ha by 2050.
- 1.21 In summary therefore Rugby's strategic and non-strategic industrial needs are as follows:

Past completions, whilst constrained, indicate a need of between 337.5ha and 403ha to 2041 (the lower figure reflecting HEDNA evidence, the higher reflecting more recent completions), and between 468.2ha to 507ha to 2050;

Demand evidence, presented by LSH, would suggest that subject to a good supply of sites, take up levels could amount to at least the equivalent of +35ha per annum. This equates to 875ha to 2041, and 1,190 to 2050;

Current active requirements occupy an area equivalent to 209ha (representing an immediate requirement);

Market forecasts by Deloitte suggest stock growth of 6.3% per annum – equating to growth of 1,156ha by 2041, and 2,212 by 2050;

It is also appropriate for Rugby to meet a proportion of Coventry's unmet strategic needs (approximately 45ha by 2041, increasing to 60ha by 2050), plus the potential to meet a proportion of unmet (general industrial) non-strategic needs which would appear to total at least 87ha by 2041 and 154ha by 2050.

- 1.22 As a consequence of the above, Rugby Borough Council should plan for a significant increase in



its employment land supply to account for both general industrial and strategic warehouse requirements, and ensure that demand is not constrained by limited supply.

- 1.23 It is clear that this figure should *exceed* 337.5ha by 2041 based upon evidence presented within the Council's HEDNA, however given more recent evidence both in respect of past completions and occupier demand data the level of identified need far exceeds this, and there is a clear risk at the present time that supply will be severely constrained in a short space of time (LSH estimates 1.6 years).



2. INTRODUCTION

- 2.1 This Employment Needs Assessment has been prepared by Marrons on behalf of Stoford Properties Limited.
- 2.2 The purpose of this Report is to assess, based upon current evidence, the extent of the employment land needs within Rugby, and the wider functional economic market area of Coventry and Warwickshire.
- 2.3 Section 3 of this Report examines national planning policy associated with employment growth, whilst Section 4 provides an overview of the national logistics market. Section 5 summarises draft local planning policy, and section 6 includes a review of the employment needs evidence base.
- 2.4 Section 7 of the Report provides an overview of the industrial property market within which Rugby operates, whilst section 8 includes a review of neighbouring Coventry's likely levels of unmet need. Section 9 provides a summary of the supply and demand situation within Rugby.



3. NATIONAL PLANNING POLICY REVIEW

- 3.1 The National Planning Policy Framework (NPPF) (December 2023) requires that the preparation and implementation of plans and the application of policies in the framework deliver against its three sustainability objectives (economic, social and environmental). The economic objective of the NPPF is:

“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity and by identifying and coordinating the provision of infrastructure;”¹

- 3.2 In ‘*building a strong, competitive economy*’, Section 6 requires that account is taken of local business needs and wider opportunities for development. Policies should 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. Critically paragraph 87 requires that recognition should also be given to addressing specific locational requirements of different sectors within planning policies, including:

“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.”

- 3.3 Government national Planning Practice Guidance (PPG) requires local authorities to prepare a robust evidence base to understand existing business needs, which encompass functional market areas, and for Local Enterprise Partnerships to play a key role in this process. The guidance requires that in gathering evidence to plan for business uses, local authorities will need to liaise closely with the business community, take account of the Local Industrial Strategy and understand current and future requirements.

- 3.4 In assessing business needs the guidance confirms assessment of the following:

- Best fit functional economic area;
- Existing stock of land for employment uses within the area;
- Recent pattern of employment land supply and loss;
- Evidence of market demand;

¹ Paragraph 8a, National Planning Policy Framework, December 2023



Wider market signals; and any evidence of market failure.²

- 3.5 More specifically, the guidance also confirms the critical role the logistics industry plays “*in enabling an efficient, sustainable, and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities*”, something that has been brought into sharp focus during the COVID-19 pandemic. Importantly, the guidance also recognises that the logistics industry “*has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial uses)*”.³
- 3.6 The guidance confirms that strategic logistics facilities with a national or regional remit are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Policy-making authorities are encouraged to engage with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies.
- 3.7 Local authorities are also required to assess the extent to which land and policy support is required for other forms of logistics requirements, including ‘last mile’ facilities serving local markets.
- 3.8 Given Rugby’s location within the Golden Triangle and its position on the strategic road network, it has and will continue to experience a high demand for large scale (strategic) logistics floorspace, the need for which can only be met in a limited geography in order to serve national logistics operations. This same geography is also heavily constrained by Green Belt which tightly constraints the Metropolitan Areas of Birmingham and Coventry. The revised NPPF (December 2023) was strengthened in respect of Local Plan reviews and the consideration of Green Belt. Paragraph 145 of the NPPF states that “*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.*”
- 3.9 For some authorities within the Golden Triangle e.g. Coventry, this change to the NPPF will be problematic and significant, however in the case of Rugby, there is a large quantum of land located on and adjacent to the strategic highway network which is not constrained by Green Belt and provides the Council with the opportunity to both fully meet demand and not require the need for exceptional circumstances to be explored.
- 3.10 The benefits of being located centrally within the Golden Triangle to Rugby are significant, both in terms of direct job creation, as well as to the wider supply chain, and as is clear in Government

² Paragraph ID2a-026, PPG, 2019

³ Paragraph ID2a-031, PPG, 2019



Policy it is essential that the local authority ensures that this demand is met in full, where Green Belt releases are not required.

- 3.11 Paragraph 24 of the NPPF outlines the duty which local planning authorities are under to cooperate with each other on strategic matters which cross administrative boundaries. Paragraph 26 goes on to states:

“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. 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.”

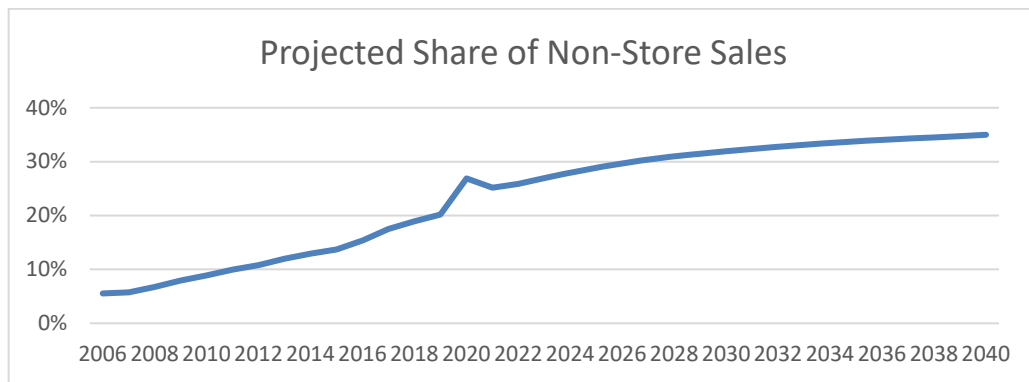
- 3.12 This is significant given Rugby’s adjacency to Coventry, a tightly constrained authority area which is unable to meet its employment land needs.



4. DRIVERS OF CHANGE IN THE LOGISTICS MARKET

- 4.1 This section of the Report considers evidence presented by the British Property Federation and Savills in its report, 'Levelling Up – the Logic of Logistics Demand for logistics' (2022), as well as more recent evidence presented by Lambert Smith Hampton (LSH), on behalf of our client.
- 4.2 Demand for logistics floorspace within the UK is significant. This is fueled by growth in online retail, exit from the EU (disrupting the supply chain), the onset of the COVID pandemic, and other global factors which place an increased focus on the need for onshore logistics infrastructure to provide supply chain security.
- 4.3 The following graph displays the growth in non-store (ecommerce) sales in past years, and forecast into future years. The impact of the COVID pandemic in speeding up the transition from store to non-store spending is clear.

Figure 4.1 Projected Growth in Non-Store Sales



Source: Experian

- 4.4 As the BPF Report, Levelling Up – the Logic of Logistics highlights, it is not just ecommerce driving growth for industrial and logistics floorspace – these are identified in the graphic below. Combined, these growth drivers, each competing for space, are placing unprecedented demand for premises. In January 2022 Savills reported that 55.1 million sq ft. of warehouse floorspace had been transacted in the prior year, a +86% increase on the long term average.

Figure 4.2 Industrial and Logistics Growth Drivers



- 4.5 The BPF Report also highlights a longer standing under-supply of logistics floorspace across UK markets, evidenced by significant increases in rental growth. The Report references rental growth of +61% across England between 2011 and 2021, more than double inflation. LSH note that whilst the pace of rental growth has been easing since the heights of 2021, unlike other property sectors, it remains firmly in positive territory. Across the 60 key markets in the UK, average prime rents for 50,000 sq ft. units increased by 8% over the 12 months to the end of Q3 2023.
- 4.6 LSH report that in 2023 there remains a clear focus on demand for high quality space, which continues to drive rental growth. LSH note that whilst occupier demand is back to pre-pandemic levels, this reflected high inflation, and a steady stream of interest rate hikes which resulted in a deterioration in activity. However, the West Midlands was the most resilient region.
- 4.7 In respect of UK-wide supply, LSH confirm that supply remains tight, equivalent to only 1.2 years of average take-up and an availability rate of just 4.3%.
- 4.8 The BPF Report notes that during periods of suppressed demand (i.e. under supply) rental growth peaks. It considers that equilibrium in the market is established when availability of floorspace stands at 8% of stock.
- 4.9 LSH consider that take-up will continue to stabilise following the Covid and Brexit peak and remain at healthy levels with sustained occupier demand and investor sentiment.
- 4.10 It states that:

“a new era of logistics will occur with significant sectoral pressure over the next 10 years driven primarily by technological innovations and environmental concerns. Increased demands on ever improving cost efficiency and the relentless growth of the online retail sector will be balanced by environmental concerns, climate change pressures, brand loyalty and demands for better



working environments.

An increased awareness on supply chain security will lead to more onshoring / near shoring in place of relying on stretched global networks affected by wars / conflicts and natural disasters. This has increased post Brexit and is linked to manufacturing commitments in the UK.

Units will continue to be larger and more bespoke / specialised to generate operational efficiencies offering greater warehouse volumes. Haunch heights of 18-21m will become more common place on large units compared to the traditional 15m. Greater areas of open space will be required with an attractive business environment.

On-line retail as a proportion of high street shopping will continue to grow and increase logistics demand and need for efficiencies (delivery slots). The current 25% (2023) share of the UK retail market is predicted to increase to circa 30% by 2027. In the USA there are some 300 million internet shoppers – 91% of the population.”⁴

- 4.11 Deloitte note in its Transforming Logistics Paper, 2022, that the UK logistics market is projected to grow at a compounded annual growth rate of 6.3%, with road freight and haulage seen as a particular area of growth.⁵

Department for Transport (DfT) Paper ‘Future of Freight: A Long Term Plan’ (June 2022)

- 4.12 In particular, the DfT recognise that when the Government will succeed in achieving their vision for the future success of logistics and freight, there will be “*an increase in site allocations for freight and supply infrastructure being adopted in Local Plans to reflect the needs of the sector, alongside more robust and agile policies, where needed, to meet specific local needs.*”⁶
- 4.13 The DfT ran a call for evidence between 4th July and 6th October 2023 to inform its vision of reforming the interaction between freight and logistics sector and the planning system in England.
- 4.14 The logistics sector continues to play an increasingly important role in the national economy and the recognition of this sector in the Government’s national vision demonstrates it remains a clear priority to be planned for.

⁴ Pages 9, 10, LSH Rugby Employment Land Evidence, January 2024 – appended to client representations.

⁵ Page 3, Deloitte, Transforming logistics: A sector fit for the future, 2022

⁶ Page 80, Future of Freight: a long-term plan, June 2022



5. LOCAL PLAN POLICY REVIEW

- 5.1 This section of the Assessment reviews the draft Rugby Local Plan Review Issues and Options Consultation published in October 2023.

Rugby Local Plan Review Issues and Options (October 2023)

- 5.2 The Council has decided to proceed with a full update of its Adopted Local Plan (2011 – 2031). This decision followed, amongst other things, new evidence of future needs for homes and employment land, particularly warehousing uses.
- 5.3 The Adopted Local Plan (Adopted June 2019) identified a requirement to meet 208ha of employment land over the Plan period, which included 98ha to contribute Coventry's unmet needs. Within Rugby, identified need totalled 110ha, and was based upon employment evidence prepared in 2015. The Adopted Plan identifies that in addition to meeting the quantitative need for employment land in Rugby, a proportion of this land must meet a qualitative demand for employment sites which provide for smaller units (5,000 – 50,000 sq ft.), and it considers this especially important in accommodating demand from firms requiring floorspace in this size band for B1c, B2 and ancillary B8 employment units.
- 5.4 The Council's Local Plan Review is informed by the Coventry and Warwickshire Housing and Economic Development Needs Assessment prepared in 2022 (HEDNA). As identified in the Issues and Options Plan, the HEDNA identifies three components of employment land needs, 1) the net needs for office land totalling 5.2ha by 2041, increasing to 6.5ha by 2050; 2) the gross requirement for industrial land totalling 150.5ha by 2041, increasing to 218.2ha by 2050, and 3), the gross requirement for strategic warehousing land across Coventry and Warwickshire totalling 551ha by 2041 and 735ha by 2050. The strategic warehousing need is not distributed across respective Warwickshire authorities by the HEDNA. We examine the robustness of these figures later within this Report.
- 5.5 Whereas the HEDNA, paragraph 11.18 only goes as far as saying, when using gross completions to derive need that, "*some of the forecast need may occur on recycled existing industrial premises*", as we set out later within this Report the level of replacement stock required in the coming years is significant and as such a reliance on recycled premises maybe unfounded and also not recognisant of market signals.
- 5.6 The Local Plan Review notes that whilst the HEDNA does not split the need for industrial and smaller warehouse land, it is recommended that the Council should make specific site allocations for B2 industrial and light industrial land. Paragraph 3.11 of the HEDNA goes on to confirm that feedback from local businesses indicates a shortage of 'grown on space' to allow existing



businesses to expand and incubator space for new start-ups.

- 5.7 The Local Plan Review confirms that the Council is in the process of producing a new economic strategy which will inform the Local Plan, and paragraph 3.21 of the Local Plan Review considers that it is the Council's expectation that the Economic Strategy will support the expansion of manufacturing, research and development employment land, and that additional site allocations are likely to be necessary to enable this need to be met. It is therefore important in this respect that the Borough provides a sufficient level of employment land to balance each of these competing priorities, including providing sufficient employment land to meet both strategic and non-strategic warehousing demand.
- 5.8 In setting out the reasons for the high need for warehousing, the Local Plan Review correctly identifies Rugby Borough's role within the Golden Triangle, meaning that it is optimally located in providing logistic operators with an efficient means of accessing large parts of the Country via the strategic road and rail network.
- 5.9 As noted in paragraph 3.17 of the Local Plan Review, Rugby is identified as having the highest proportion of business units used for transport and distribution (17.5% in 2021).
- 5.10 The Council also confirm in paragraph 3.22 the importance of planning for large warehouses, with reference to national planning policy, including the need to address the specific locational requirements of different sectors, which includes making provision for storage and distribution operations at a variety of scales and in suitably accessible locations.
- 5.11 In respect of identifying how the strategic warehousing needs may be met across individual authorities, paragraph 3.28 states that a new West Midlands Strategic Employment Sites Study will update the position on the supply of sites. The Council consider that this will provide a clearer picture of how much more land needs to be found across Coventry and Warwickshire to meet the need for strategic warehousing.
- 5.12 It is important to note in this respect that the strategic warehousing need identified within the Coventry and Warwickshire HEDNA originates from the Coventry and Warwickshire functional economic market area, and reflects the locational advantage that the area brings to logistics operators amongst other factors such as labour supply. It is essential that the Coventry and Warwickshire authorities collectively plan to meet that strategic need in full at the very least (accounting for unmet needs in surrounding authorities where necessary). It would be entirely inappropriate to assume that the identified strategic need could be met elsewhere and outside of the function economic market within which that need exists. Given the Warwickshire area is also constrained by Green Belt, those authorities that are able to allocate non Green Belt land towards meeting a higher proportion of this need, should therefore do so.



- 5.13 We undertake a series of scenarios assessing the reasonable distribution of strategic warehousing need later within this Report.
- 5.14 In respect of the supply, the Council, in paragraph 3.34 of the Local Plan Review assert that the 2022/23 Rugby Council Annual Monitoring Report (AMR) shows substantial progress to meeting the 2011-2031 requirement for employment uses, with 191.53ha of the target of 208ha either already built or under construction. However, reference to the 2022/23 AMR asserts that whilst the Council has met all but 2.7ha of Coventry's need (totaling 98ha), it has yet to meet some 13.8ha of Rugby's own needs.⁷
- 5.15 Our own assessment of supply since 2011, using information set out within each AMR (attached in Appendix 2), would suggest that after accounting for 30.18ha of employment land under construction, sites delivered and under construction to date only amounts to 183ha. As such there remains an outstanding requirement of 20.5ha.
- 5.16 It must also be remembered that the level of need identified in the Adopted Local Plan (208ha) originated from a 2015 evidence base, and bears no reflection of current needs – hence the reason why the Council are seeking to review its Plan. It would therefore be wrong to assume that needs to 2031 have been broadly met.
- 5.17 Furthermore, given that the Council's latest employment land need calculations are predicated on past completions, it would seem appropriate to incorporate these most recent completions referenced for the year 2022-23 into account when calculating future needs – we deal with this later within this report, albeit noting that these are constrained by a requirement derived from evidence prepared in 2015.
- 5.18 Paragraph 3.36 of the Local Plan Review refers to future supply as set out in the 2022/2023 AMR and goes on to confirm that 115ha of land has planning permission and is not yet under construction. It confirms this to mostly be made up of three sites (Prospero Ansty – 9.58ha, Tritax Symmetry SW Rugby allocation – 40.7ha and the former Rugby Radio Station allocation – 31ha). As a consequence, and accounting for completions between 2021 and 2023 said to total 32.65ha, the Council consider is has already identified supply of 145.26ha to set against the future plan requirement of 150.5ha to 2041, and 218.2ha to 2050.
- 5.19 As a result it does not consider that it is required to find any further sites to meet the need requirement by 2041, and a further 40ha is required by 2050.
- 5.20 However, the 2022/2023 AMR clearly sets out planning permissions not yet under construction to

⁷ Page 11, Rugby Borough Council Annual Monitoring Report 2022-2023



total only 95.88ha⁸, some 19ha less than reported in the draft Local Plan calculation

- 5.21 Furthermore, it is important to note that firstly the requirement identified by the Council within this calculation excludes strategic warehousing requirements, some of which may well be met by the identified supply (noting that the Council has included the SW Rugby “strategic” allocation of 40.7ha within its calculation of supply to meet non-strategic needs), and secondly the requirement identified by the Council fails to account for recent completions within its calculation, meaning it is not reflective of more recent demand. Thirdly, the committed supply of 115ha (which we calculate to total 95.88ha) across these three sites was in response to meeting a need that was identified for a period to 2031. It is unreasonable to now effectively double count this supply and stretch it into serving a further ten year period to 2041. It also takes no account of the time required to open up and deliver strategic employment sites – hence, sites like Ansty, Rugby Radio Station and SW Rugby (allocations in the 2019 Local Plan) have planning permission, but given the Plan has been in place for under 5 years, it is not unreasonable for these sites to have not completed yet. Data from LSH that has informed this Report confirms they will deliver by 2031.
- 5.22 Furthermore, analysis of the planning permissions under construction as set out in the 2022/2023 AMR (totaling 95.88ha) includes a large number of sites which meet a strategic logistics need – we calculate those elements to total 58.9ha.
- 5.23 These sites, as listed in the AMR include:
- Tritax Symmetary, Land North of Coventry Road – 40.7ha net, comprising a series of reserve matters approvals for units exceeding 100,000 sq ft., with the remainder of the site capable of delivering build to suit units of between 100,000 sq ft. and 1 million sq ft.
- Rolls Royce, Prospero, Ansty – 9.56ha net, comprising a series of units each exceeding 100,000 sq ft.
- Land North and East of Castle Mound Way, Rugby – 8.61ha, comprising one single unit of 250,000 sq ft.⁹
- 5.24 These sites will not help fulfil the general industrial (non-strategic) needs identified by the Council. As a consequence the Council is 91.6ha short of meeting general industrial (non-strategic) need by 2041, and 159.3ha short of meeting needs by 2050.
- 5.25 Notwithstanding, the Local Plan Review details a number of potential strategic employment locations, which will be the subject of more detailed analysis once the Council has undertaken its

⁸ Employment Land Overview table, Page 8, Rugby Borough Council Annual Monitoring Report 2022-2023

⁹ Pages 9-11, Rugby Borough Council Annual Monitoring Report 2022-2023



employment land availability assessment. It should however be noted that in doing so the Council should also plan how best it might meet Coventry's unmet employment land needs, in addition to its own strategic and non-strategic needs.

Summary

- 5.26 In recognition that the Local Plan is approaching five years since adoption, the Council are consulting on its Local Plan Review. In respect of employment needs, the Issues and Options consultation draws attention to more recent evidence which establishes both non-strategic employment needs within Rugby, and broader strategic needs which for the time being have been identified only across the Coventry and Warwickshire functional economic market.
- 5.27 In respect of non-strategic employment needs the Council suggest that they have a sufficient identified supply, albeit as we note in doing so the Council include a number of strategic sites which may meet strategic need (which in itself is additional to non-strategic need). The point being the Council are potentially double counting its supply for both non-strategic and strategic purposes.
- 5.28 In addition the Council welcomes recent levels of completions as meeting future identified need, yet as we highlight it is important that those recent completions feature in any calculation of need – at present they do not.
- 5.29 In respect of strategic employment land needs identified across the Coventry and Warwickshire functional economic market area, the Council await the publication of the new West Midlands Strategic Employment Sites Study. The Council consider that this will provide a clearer picture of how much more land needs to be found across Coventry and Warwickshire to meet the need for strategic warehousing. It is important to note in this respect that the strategic warehousing need identified within the Coventry and Warwickshire HEDNA, originates from Coventry and Warwickshire functional economic market area, and reflects the locational advantage that the area brings to logistics operators amongst other factors such as labour supply. It would be entirely inappropriate to assume that the identified strategic need could be met elsewhere and outside of the function economic market within which that need exists.
- 5.30 We review the Council's employment need evidence in the following section of this Report.



6. EMPLOYMENT LAND NEED EVIDENCE REVIEW

- 6.1 This section of the Assessment reviews the Council's underlying employment needs evidence. This is in the form of the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) published in 2022. We set this in the context of the West Midlands Local Industrial Strategy, and employment land evidence from the Coventry and Warwickshire Chamber of Commerce below.

The West Midlands Local Industrial Strategy (WMLIS) (2019)

- 6.2 The West Midlands Local Industrial Strategy (WMLIS) highlights the significant growth in productivity within the West Midlands over recent years, with productivity increasing, during 2018, at twice the rate of the UK average. The WMLIS highlights the acute shortage of large scale strategic sites that can have the greatest net additional impacts on growth and jobs. The LIS states that:

“These issues are most severe in Coventry and Warwickshire, but across the region there is a significant gap in good quality employment land” (pg. 63)

- 6.3 With regard to identifying employment land, the WMLIS referred to the West Midlands Strategic Employment Site Study, which would identify the £10bn worth of existing opportunities in identified investor-ready sites.

Coventry and Warwickshire Chamber of Commerce produced an Employment Land Report 2023

- 6.4 Coventry and Warwickshire Chamber of Commerce produced an Employment Land Report (CWELR) which sets out a detailed assessment of the current pool of employment land presently available in Coventry and Warwickshire. There is 98.3 hectares of “oven-ready” employment land which is immediately available across the whole sub-region and only one immediately available site of strategic scale (25ha+). The report highlights that there is a further 47 hectares, on top of the 98.3ha, likely to be available in the next 12 months, with 177 hectares at the advanced stage (allocated Local Plan Sites – timing dependent on ownership, infrastructure and demand).¹⁰
- 6.5 In addition, there is a potential 249ha of strategic sites which may contribute to the employment land supply, but the report notes due to constraints they these are unlikely to proceed at this stage or the sites already have a dedicated user, so they do not form part of the open market. The CWELR states that Coventry and Warwickshire are sorely lacking sufficient serviced land, both qualitatively and quantitatively, to encourage inward investment into the sub-region. The report

¹⁰ Page 4, Coventry & Warwickshire Employment Land Report, Coventry & Warwickshire



continues to emphasise bringing forward the right land for logistics in locations close to road and rail infrastructure.

- 6.6 The CWELR recommends allocating 20 per cent more land than recommended by HEDNA calculations to provide scope for more variety in the quality and quantity of land. The CWELR suggests that employment land should be given equal priority to housing land which is currently not a requirement.
- 6.7 The report concludes that insufficient employment land has been allocated in the Local Plans in Coventry and Warwickshire historically, and the land which has been allocated has been used up far faster than anticipated. In addition, the report states that establishing future need for employment land based on projections of suppressed past take up rates will always underestimate the true requirement for employment land.

Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA, 2022)

- 6.8 The HEDNA seeks to quantify the need for additional housing and employment floorspace across the wider housing and functional economic market area of Coventry and Warwickshire. In doing so, with the exception of strategic B8 land, it establishes need across each local authority area.
- 6.9 In considering employment land needs, the HEDNA utilises a range of different forecasting techniques, the first of which is a labour demand model which draws upon forecasts from Cambridge Econometrics (dated March 2021). Section 6 of the HEDNA summarises the economic growth potential of Coventry and surrounding local authority areas based upon these forecasts.
- 6.10 In summary it expects GVA across Coventry and Warwickshire to grow by 1.4% per annum over the period to 2043, which paragraph 6.11 confirms is slightly below longer term trends. Paragraph 6.12 confirms that total employment has grown at 1% per annum over the period since 1981, but the March 2021 Cambridge Econometrics forecast suggests growth of only 0.5% per annum.
- 6.11 Based upon the March 2021 Cambridge Econometrics forecast, Table 6.5 confirms that Rugby is set to grow by 7,800 jobs over the period 2019 – 2043, amounting to growth of 325 jobs per annum (a growth rate of 0.58% per annum). Over the plan period 2021 – 2041 this would appear to amount to 6,500 jobs.
- 6.12 However, we would express caution in placing too great a reliance on economic growth forecasts prepared during the COVID pandemic, particularly as the HEDNA notes that across the Coventry and Warwickshire functional economic market job growth is forecast at half that experienced over the longer term trend.



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- 6.13 This is particularly important given the ambitions of the Coventry and Warwickshire SEP Update 2016 which targeted growth in the local economy of 3.3% GVA per annum in order to bridge the gap with the wider national economy.
- 6.14 If employment within Coventry were to grow at a rate of 1% per annum (mirroring long term past growth of the functional economic market), this would amount to job growth of 558 per annum. Over the 20 year plan period this would amount to a further 11,160 jobs within Rugby.
- 6.15 In establishing employment land needs, as summarised above, the HEDNA adopts a number of different techniques. Table 11.2 of the HEDNA details the recommended levels of employment land need within Rugby across various uses including over the period to 2041: offices 5.2ha, general industrial 150.5ha plus a further 551ha of strategic B8 land which is as yet to be distributed across the Coventry and Warwickshire local authority areas. Over the period to 2050 the level of need increases to 6.5ha for offices, 218.2ha general industrial and 735ha of strategic B8 land across the functional economic market area.
- 6.16 For the purposes of establishing office floorspace need the HEDNA adopts a labour demand approach – essentially drawing upon the Cambridge Econometrics forecasts as detailed above. Table 9.4 of the HEDNA confirms an employment land need for offices of 3.3 ha to 2041, which is supplemented by a margin for flexibility of 1.9 ha (Table 11.1). However, as detailed above, in calculating office needs the HEDNA adopts a Cambridge Econometrics forecasts prepared during COVID which shows job growth of approximately 0.58% per annum, whereas longer term past trends would suggest growth of 1% should be pursued, which would have the effect of almost doubling office land need.
- 6.17 In calculating general industrial employment land need the HEDNA opts instead to draw upon past floorspace trends. This shows a higher level of need, than compared with a labour demand method, and is a more appropriate measure of industrial/ logistics demand given increased levels of automation within the sector, and significantly different levels of employment dependent on the nature of the logistics operation (meaning a job based approach to measuring need is less accurate).
- 6.18 In doing so the HEDNA assesses industrial floorspace change as reported by the Valuation Office (VOA), and separately past completions. Importantly however the HEDNA notes that the implications of assessing future delivery based on past supply trends would see future provision continuing to be concentrated in North Warwickshire. It notes that whilst North Warwickshire remains an attractive location for warehousing and logistics development, there is a case for seeking a broader spread of industrial land provision between the authorities within the sub-region (HEDNA, page 209).



- 6.19 In respect of past completions the HEDNA assesses the level of completions in employment uses over the period 2011 – 2019. This is said to amount to 133.6ha in Rugby, some 14.8ha per annum. Table 9.12 considers that 6% of this figure relates to E (g) uses (offices), whilst 53% relates to strategic sites. The remaining amount (41%) is assumed to relate to non-strategic industrial land.
- 6.20 Once extrapolated, Table 9.15 of the HEDNA confirms this to amount to 19.1ha of office land, 120.4ha of non-strategic industrial, and 157.4ha on strategic industrial land over the period to 2041. Strategic B8 need under this method of calculation across Coventry and Warwickshire equates to 457.6ha over the period to 2041. It is clear from this exercise that strategic warehousing needs within Rugby, or at least its proportion of the wider strategic needs across the functional economic market area amount to approximately 34% of that figure (i.e. 157.4ha / 457.6ha)
- 6.21 Whilst the HEDNA continues to adopt a labour demand approach in its assessment of office based need, it adopts past completions as a means of establishing need for non-strategic industrial need, and as we detail below it also draws upon past completions (in part) in calculating strategic need.
- 6.22 In respect of non-strategic industrial land, Table 11.1 of the HEDNA goes on to outline an additional margin of flexibility (amounting to an additional 5 years of need) totaling 30.1ha (this is assumed to relate to the period to 2041).
- 6.23 As detailed in Table 11.2, it concludes that general industrial need (non-strategic) totals 150.5ha to 2041 (i.e. 120.4ha based upon past completions, plus a 30.1ha margin).

Strategic B8 Need

- 6.24 The HEDNA goes on to undertake a separate assessment of strategic B8 need across the functional economic market area. This assessment is detailed in section 10 of the HEDNA. The HEDNA explains that a series of replacement growth scenarios were considered in establishing strategic warehousing needs which comprises two components, replacement build – reflecting the functional obsolescence of existing stock, and growth build – accommodating the link between new warehouses and growing traffic volumes. Based upon a preferred plot ratio of 0.35 this resulted in a range of between 356 – 483ha of need over the period to 2041 (across C&W). The HEDNA opts for a mid-point of 410ha. However, it goes on to consider that there are factors which point to the potential to see stronger demand than this, noting the shift towards ecommerce which has arisen from the Covid pandemic, which has accelerated previous trends.
- 6.25 As such the HEDNA considers it appropriate to plan for future development in line with completion trends (2011-2019) over the first 10 years, with the subsequent decade (2031 – 2041) then seeing slower growth in line with traffic growth and replacement demand modelling.
- 6.26 As a result the HEDNA assumes strategic needs based on completion trends over the first 10



years of the plan totaling 229ha, with traffic growth and replacement demand reflecting growth of 207ha in the latter 10 years of the Plan. It determines that total need over the period to 2041 totals 436ha. This figure is then increased to provide a 5 year flexibility margin by a further 115ha leading to a strategic B8 employment land requirement across C&W of 551ha by 2041, and 735ha by 2050.

- 6.27 If the HEDNA were to base these calculations on past completions (2011 – 2019) across the whole 20 year plan period this would increase to 573ha (to 2041).
- 6.28 Notwithstanding, as we detail below, more recent completion figures do now exist, and paint a picture of significantly higher levels of demand than is reflected in the past completion trends used within the HEDNA.

Distribution of Strategic (large scale) Warehousing Needs

- 6.29 The Coventry and Warwickshire authorities have yet to determine where the identified strategic warehousing need (551ha/ 735ha to 2041 and 2050 respectively) should be met. It is concerning to note, as detailed in earlier within this Report that Rugby Borough Council consider that this need may be in part met outside of Coventry and Warwickshire, particularly given that this is where the need arises and Coventry and Warwickshire is a functional economic market area. It is therefore essential that the identified need is met by these authorities.
- 6.30 In respect of where this need may be met it would seem logical to base this upon the demand for warehousing. In the absence of more recent published completions data across Coventry and Warwickshire, we have relied upon the strategic completions data reported in Table 9.15 of the HEDNA. On this basis completions over the period 2011 – 2019 within Rugby amount to 34% of all strategic completions across C&W. Undertaking a similar exercise using large scale warehousing stock shows that Rugby accommodates 19% of all floorspace across C&W, whilst an equivalent assessment using labour demand shows a similar percentage (19%), within Rugby.
- 6.31 Whilst the latter scenarios help frame the range, it is considered that completions provide the most appropriate method. This results in a need for Rugby to meet 187ha to 2041, increasing to 250ha by 2050.
- 6.32 However, as detailed in Table 6.1 below, we have also included figures for Coventry. This is important, given issues faced by Coventry in meeting its own non-strategic industrial land needs, as detailed later within this Report. As such it is necessary to understand the extent to which Rugby may be required to also meet Coventry's unmet strategic needs. As can be seen from the following table, whichever scenario is tested, collectively Rugby and Coventry would be required to meet approximately 43% of all strategic warehousing needs across the functional economic



market area. Based upon the HEDNA evidence this amounts to between 236ha to 2041 and 314ha to 2050.

Table 6.1 – Strategic Warehousing Distribution Scenarios

	Large scale floorspace		Strategic Completions pa		Labour demand	
	000s sqm	%	ha	%	000s	%
Rugby	431	19%	7.9	34%	14.7	19%
Coventry	505	23%	1.9	8%	17.8	24%
Coventry and Rugby Combined	936	42%	9.8	43%	32.5	43%
Total Coventry and Warwickshire	2244		22.9		75.6	

Source: C&W HEDNA 2022, tables 10.3, and 9.15

6.33 Therefore, in addition to the identified need within the HEDNA for Rugby to meet general (non-strategic) industrial needs totaling 150.5ha by 2041 and 218.2ha by 2050, based upon the distribution of past completions (2011 – 2019) it will also be necessary to meet an additional 187ha of strategic employment land needs by 2041, increasing to 250ha by 2050.

6.34 In addition Coventry's strategic employment needs are likely to total 45ha by 2041, increasing to 60ha by 2050. It is reasonable to assume that Rugby will need to meet at least a proportion of these.

Table 6.2 Summary of Industrial Needs - Rugby

	Employment Land Requirement (ha)	
	2041	2050
General Industrial (non-strategic)	150.5	218.2
Strategic (distributed based upon past strategic completions within Rugby)	187	250
Total Industrial Need - Rugby	337.5	468.2
Proportion of Coventry's Strategic need (distributed based upon past strategic completions within Coventry)	45	60

6.35 However, as we detail below, more recent 10 year completions data within Rugby indicates a higher level of growth, and should be accounted for in calculations of need.

More Recent Completions Data

6.36 It is important to note that the industrial employment land need figures established through the HEDNA (both non-strategic and strategic) are based upon past completion trends over the period 2011 – 2019. We also note that reference in the Local Plan Review to high levels of recent completions (2022/23), as well as paragraph 10.42 of the HEDNA which notes “*the shift towards e-commerce which has arisen from the Covid-19 pandemic, which has accelerated previous*



trends".

- 6.37 As such we consider it appropriate to assess the implications of future employment needs based upon the most recent available completions data.
- 6.38 As detailed in the HEDNA, it assessed completions over the period 2011 – 2019, confirming them to amount to an average of 14.8ha per annum, of which 94% (i.e. 13.9ha) relates to industrial employment land (strategic and non-strategic). The remaining 6% falls within office use.
- 6.39 The following Table 6.3 summarises completions over the most recent 10 year period, ending 2022/2023. These figures are derived from each of the Council's AMRs, and excluding some duplication of completions during the years 2016/17 and 2017/18. This shows an average annual level of completions totaling 17.2ha, representing a 16% increase in the average rate of completions compared to that assessed within the HEDNA. Excluding B1 only schemes, this figure reduces to an average of 16.1ha.
- 6.40 This suggests that the HEDNA evidence does not truly reflect the profound changes to market conditions experienced since both the Covid pandemic and Brexit, a point which appears to have been recognised in paragraph 10.42 of the HEDNA. Furthermore, as noted in the 2022/2023 AMR (page 9), there was a total of 30.2ha of employment land currently under construction, suggesting that completions in 2023/2024 will continue to remain high, increasing the 10 year average once again.
- 6.41 A simple extrapolation of the current annual average 10 year completion figure of 16.1ha, would suggest that the Council should be planning for at least 322ha of strategic and non-strategic industrial employment land over the period to 2041, which after allowing for a 5 year margin of flexibility (as per the HEDNA assumption) would increase to 403ha. This figure increases to 547ha by 2050.



Table 6.3 Employment Land Completions - Rugby

Year	All Completions (ha)	Completions (excluding B1 office only schemes) ha
2013/14	9.4	9.4
2014/15	33.7	29.7
2015/16	7.1	4.1
2016/17	51.5	51.5
2017/18	3.3	3.3
2018/19	3.0	1.4
2019/20	31.1	31.1
2020/21	0.4	0.4
2021/22	2.1	0.0
2022/23	30.6	30.6
Average pa	17.2	16.1

Source: Rugby Borough Council, AMRs 2013/14 – 2022/23
Detail set out in Appendix 2

6.42 Notwithstanding, past completions will always be constrained to past evidence, and as such will not necessarily reflect true, unconstrained demand. As we set out later within this Report, market evidence presented by LSH demonstrates a significantly higher level of demand than reflected in past completions. LSH consider that with a good supply of new logistics floorspace, take up levels should be well in excess of 1.5m sq ft. per annum, and probably significantly higher with new build to suit commitments. Assuming a prudent plot ratio of 0.4 this equates annual demand for 35ha, or 875ha over the 20 year period to 2041 (including a 5 year margin of flexibility). This increases to 1,190ha by 2050 (including flexibility margin).

Replacement Stock

- 6.43 The HEDNA also recognises the importance of accounting for the replacement of aged stock. Large scale logistics operators require modern units, with immediate access to the strategic road network. Access to power and a large labour force are also other key locational factors.
- 6.44 According to CoStar, 40% of existing industrial and logistics stock within Rugby, totaling 6.7m sq ft. is over 30 years old. A period of 30 years represents the useful economic life of a modern warehouse building¹¹. Beyond this period they become functionally obsolete, as they tend not to be able to accommodate modern automated stock handling equipment, or transport equipment such as double stack trailers. Buildings reaching the end of their useful economic life and are no longer suitable for their original designed use, necessitating a more modern direct replacement.

¹¹ [General Report Template \(nwleics.gov.uk\), Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change, April 2021 \(amended March 2022\) Leicester and Leicestershire Authorities, Final Report - paragraph 8.11](#)



6.45 The following Table 6.4 summarises existing floorspace by size band and age, and confirms that there is a greater proportion of smaller units within Rugby that are becoming obsolete. It will however be important for the Council to ensure that any replacement stock meets the needs of existing occupiers.

Table 6.4 Age of Existing Stock

Floorspace (sq ft)	All	>30 yrs old	% >30 yrs old
<75,000	4,080,471	2,453,959	60%
75,001 - 100,000	869,581	603,166	69%
100,001 - 250,000	6,013,041	1,600,407	27%
250,001 - 350,000	2,758,662	301,597	11%
>350,000	2,923,873	1,772,525	61%
Total	16,645,628	6,731,654	40%

Source: CoStar

6.46 The volume of floorspace over 30 years old increases to 8.2m sq ft. by 2041.

6.47 The HEDNA considers that as calculations of need have been undertaken based upon past completions these reflect gross employment land additions, which will incorporate replacement stock. Whilst this may be the case, this assumes that stock replacement remains at a steady rate which is consistent with past trends. As stock levels increase as will the rate of replacement stock.

6.48 A consequence of this process is that new sites need to be brought forward in order to allow occupiers to re-locate to new buildings, thereby releasing the existing facility for refurbishment or demolition. This process allows those existing sites which may be adjacent to or within urban areas but poorly suited for logistics operations (due to poor road network, irregular site etc.) to be released for other more appropriate uses, including housing.

6.49 It is estimated that the employment land necessary to accommodate all of the existing stock older than 30 years totals 178ha at current levels, increasing to 192ha by 2041 as further stock ages¹². Whilst clearly much replacement stock will be developed on existing employment land, existing occupiers seeking larger units with closer proximity to the strategic road network may require alternative sites. Smaller business may continue to rely upon existing industrial areas and their redevelopment, to meet smaller/ medium sized requirements.

Summary

6.50 The Coventry and Warwickshire HEDNA 2022 forms the core piece of evidence informing the Council's employment land requirement. The HEDNA assesses the need for office, general industrial (including non-strategic warehousing), and strategic warehousing land requirements

¹² Assuming a plot ratio of 0.4



across Coventry and Warwickshire, the functional economic market area within which Rugby operates.

- 6.51 In respect of office land requirements the HEDNA adopts a labour demand approach, determining a requirement for 5.2ha to 2041 and 6.5ha to 2050 (both figures include a 5 year flexibility margin). It is however important to note that an assessment of need based upon past completions would equate to a need for 19.1ha to 2041. This would suggest that the HEDNA labour demand based assessment of office needs is likely to constrain office market demand within Rugby, and that a higher requirement should be planned for.
- 6.52 In respect of general (non-strategic) industrial land requirements the HEDNA measures future growth based upon past long term completions over the period 2011 – 2019. Based upon this calculation general industrial need over the period to 2041 stands at 150.5ha, increasing to 218.2ha by 2050.
- 6.53 The HEDNA also assesses strategic warehousing need across Coventry and Warwickshire, basing its calculations on the same past completion period (2011 – 2019) and a slightly lower level of growth reflective of traffic demand in the second half of the plan period. Strategic needs within Coventry and Warwickshire total 551ha to 2041, increasing to 735ha to 2050.
- 6.54 Whilst the HEDNA does not seek to establish where that strategic floorspace need may be met across the functional economic market area, an assessment based upon past completions would indicate that 34% should be met by Rugby. In addition it is also clear that Coventry is unable to meet its employment needs due to its tightly constrained boundaries, and insufficient sites, and as such it is appropriate that Rugby plans to meet part of that need. Various scenarios demonstrate that Rugby and Coventry's combined strategic warehouse need equates to approximately 43% of the Coventry and Warwickshire share. On this basis, and as set out in Table 6.2 above, it is reasonable to assume based upon evidence within the HEDNA that Rugby should plan for a total of approximately 337.5ha of strategic and non-strategic industrial land to 2041, increasing to 468.2ha by 2050. As we detail in the later sections of this Report, there may also be a requirement for Rugby to assist in meeting Coventry's general industrial (non-strategic) employment land needs.
- 6.55 The HEDNA bases its calculations of need on past completions over the period 2011 – 2019, but acknowledges that the shift towards ecommerce arising from the Covid pandemic has accelerated demand for logistics space. As set out in Table 6.3 above, an assessment of the latest completions trends over the past 10 years (2014 – 2023) show average annual completions to be 17.2ha per annum, some 16% greater than the level of completions assessed by the HEDNA (14.8ha). On the basis that the Council should be planning based upon the most recent 10 year trend (16.1ha per annum after excluding B1 only schemes), Rugby's strategic and non-strategic industrial land



needs total 403ha by 2041 increasing to 547ha by 2050.

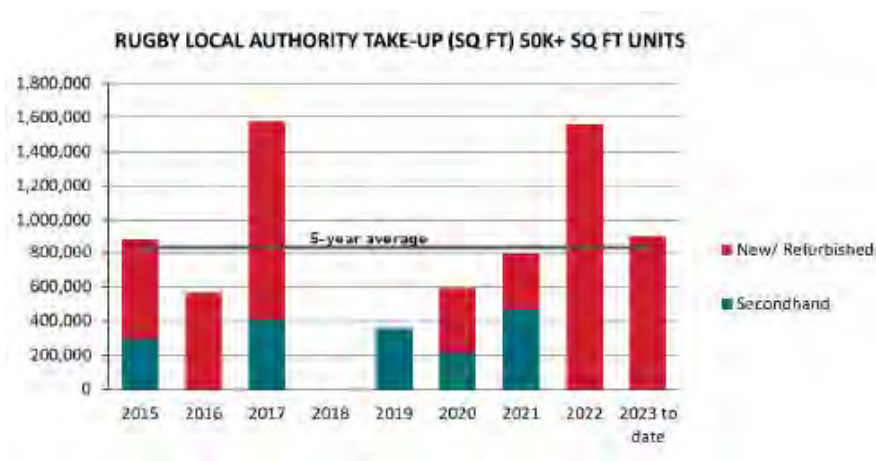
- 6.56 The following section of this Report reviews the industrial market data sourced from LSH, and serves to emphasise the significant level of occupier demand which exists for industrial floorspace within Rugby.



7. INDUSTRIAL PROPERTY MARKET REVIEW

- 7.1 Within this section of the Report we review evidence presented by Lambert Smith Hampton (LSH), on behalf of our client, on the Rugby property market.
- 7.2 LSH confirm that the logistics market in Rugby has grown significantly over the last 20 years in line with rapid expansion of the logistics sector nationally, and the strong location and employment benefits that this centrally located area offers. LSH consider that it remains one of the most popular industrial areas in the UK.
- 7.3 Rugby has a vacancy rate of 4.3% for units above 50,000 sq ft., and 4.1% for units >100,000 sq ft. – both rates lower than the West Midlands average. LSH forecast rental growth in Rugby to outperform the West Midlands region over the next four years.
- 7.4 Occupier and developer interest remains very strong for Rugby and the surrounding area given its very strong locational appeal. Review of take up data confirms the trend for specialist logistics units increasing in size over the last decade, with the figures for Rugby considerably higher than the national average highlighting the emphasis on logistics demand given its central location.
- 7.5 As summarised in Figure 7.1 below, LSH calculate average take up over the period 2015 – 2023 to equate to 826,000 sq ft. per annum. Take up over the year 2022 totalled 1.56m sq ft., almost double that of the previous year, whilst take up in 2023 has continued to see healthy levels of demand totaling 900,000 sq ft. By contrast average take up over 2015-2016 was 639,000 sq ft. per annum. There was no new registered take up in Rugby over the period 2018 – 2020, highlighting the lack of available stock and no new stock under construction for the period 2018 – 2020. This lack of stock would hinder occupier demand and take up.

Figure 7.1 Rugby Take Up 50,000 sq ft.+ units



Source: LSH



- 7.6 LSH consider that with a good supply of new logistics units to the Rugby area, occupier take up levels should be well in excess of 1.5m sq ft. per annum, and probably significantly higher with new build to suit commitments. As detailed earlier within this Report assuming a prudent plot ratio of 0.4 this equates annual demand for 35ha, or 875ha over the 20 year period to 2041 (including a 5 year margin of flexibility). This increases to 1,190ha by 2050 (including flexibility margin).
- 7.7 LSH detail current active occupier requirements focused around the Rugby area/ M6 totalling 9m sq ft. (ranging from 80,000 to 800,000 sq ft.). Based upon a plot ratio of 0.4, this equates to current active requirements occupying an area equivalent to 209ha (representing an immediate requirement).
- 7.8 LSH conclude by confirming there to be a significant shortfall in the availability of credible development land in Rugby Borough over the next 20 years, and as a consequence the area will not be able to provide for projected occupier demand. Based upon current take up projections over the last 5 years, it considers there to be only 1.6 years of supply, and therefore after 2026 it is difficult to identify any credible development opportunity to meet either strategic or non-strategic occupier requirements.
- 7.9 Separately, and as detailed above, Deloitte note in its Transforming Logistics Paper, 2022, that the UK logistics market is projected to grow at a compounded annual growth rate of 6.3%¹³, with road freight and haulage seen as a particular area of growth. Application of this level of growth to existing industrial stock within Rugby (totaling 16.6m sq ft. – as detailed in Table 6.4 above) over the 20 year period to 2041 results in an increased demand for employment land (assuming a plot ratio of 0.4, and a flexibility margin of 5 years) totaling 1,156ha, increasing to 2,212ha by 2050.

¹³ Page 3, Transforming Logistics: A sector fit for the future, 2022



8. COVENTRY'S UNMET EMPLOYMENT LAND NEED

- 8.1 The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) identifies a need for 8.5ha of office space, and 147.6ha of (non-strategic) general industrial land within Coventry. In addition a further 551ha has been identified as needed across Coventry and Warwickshire to meet strategic B8 demand – as detailed above an exercise to distribute this strategic logistics need across the various Coventry and Warwickshire authority areas has yet to be published.
- 8.2 Meanwhile, Coventry City Council's employment land evidence, contained within its Housing and Economic Land Availability Assessment 2023 (HELAA) identifies an employment land supply at March 2023 of 60.35ha (Table 4).
- 8.3 However, paragraph 3.63 of the HELAA, Table 6 attempts to compare this existing level of supply broken down by land type (and only totaling 59.63ha) with need as identified in the HEDNA (totaling only 12.8ha based upon labour demand only). As a result the table concludes there to be an over-supply across each employment land type. In doing so the HELAA has incorrectly drawn across the wrong figures from the HEDNA, and significantly understated the level of need identified, totaling 147.6ha of general industrial (non-strategic) need to 2041, increasing to 214ha by 2050. This figure excludes any strategic warehousing needs which Coventry may need to meet.
- 8.4 An extract of Table 6 of the HELAA has worked its way into the Draft Coventry Local Plan (Table 5), and results in the City Council concluding within its Non-Technical Summary Issues and Options Consultation document that it has a sufficient supply of employment land (despite referencing the correct need figure of 147.6ha (page 4)).
- 8.5 As a consequence the City faces a significant shortfall in the future provision of employment land necessary to meet identified need, being in excess of 87ha (excluding any further strategic B8 needs which may also be required to be met).
- 8.6 We would encourage Rugby Borough Council to continue joint working with its neighbouring authorities in ensuring employment land needs of Coventry can be met, where possible within close proximity to Coventry City and accessible to its resident workforce. However in some Authorities this may give rise to the consideration of Green Belt land for which exceptional circumstances will need to be evidenced and justified,



9. SUMMARY OF SUPPLY AND DEMAND POSITION

Supply

- 9.1 The Local Plan Review references three sites which the Council considers largely contribute to planning permissions for 115ha of employment land as set out in its 2022/2023 AMR. The sites, Prospero Ansty – 9.58ha, Tritax Symmetry SW Rugby allocation – 40.7ha and the former Rugby Radio Station allocation – 31ha, are coupled with completions totaling 32.65ha over the period 2021 – 2023.
- 9.2 However, a review of the 2022/2023 AMR confirms these figures to be incorrect, as reported planning permissions (not yet to be under construction) only total 95.88ha.
- 9.3 Accounting for completions between 2021 and 2023 said to total 32.65ha, the Council consider it has already identified supply of 145.26ha to set against the future plan requirement of 150.5ha to 2041, and 218.2ha to 2050, however the latest AMR would suggest identified supply to be 19.12ha less than reported in the Draft Local Plan
- 9.4 Furthermore, analysis of the planning permissions under construction as set out in the 2022/ 2023 AMR (totaling 95.88ha) includes a large number of sites which meet a strategic logistics need – we calculate those elements to total 58.9ha.
- 9.5 These sites, as listed in the AMR include:
- Tritax Symmetry, Land North of Coventry Road – 40.7ha net, comprising a series of reserve matters approvals for units exceeding 100,000 sq ft., with the remainder of the site capable of delivering build to suit units of between 100,000 sq ft. and 1 million sq ft.
- Rolls Royce, Prospero, Ansty – 9.56ha net, comprising a series of units each exceeding 100,000 sq ft.
- Land North and East of Castle Mound Way, Rugby – 8.61ha, comprising one single unit of 250,000 sq ft.
- 9.6 These sites will not help fulfil the general industrial (non-strategic) needs identified by the Council. As a consequence, the Council is significantly short of meeting growing general industrial needs.
- 9.7 It is essential that both the completions (2021-2023), and the identified supply only relate to floorspace capable of meeting general industrial need and not strategic need. On the face of it the sites identified by the Council are strategic sites, and therefore in many cases will at least in part



meet a strategic need, meaning that general industrial needs will remain unmet. Further explanation is required from the Council on how the supply figures for meeting general industrial (non-strategic) sites have been compiled.

- 9.8 Notwithstanding, it is clear from the evidence presented that Rugby will also be accountable for meeting future strategic needs generated within the functional economic market area. Given its proximity to neighbouring Coventry, it is also likely to face increasing demand as a result of Coventry's unmet need. Whether planned or not, Rugby is likely to face an increased demand for floorspace as result of constrained supply within Coventry.
- 9.9 As such it is entirely appropriate for the Council to plan for a higher level of supply than currently appears to be the case.

Need and Demand

Rugby General Industrial and Strategic Warehousing

- 9.10 As set out above, Tables 11.2 and 11.3 of the HEDNA demonstrate a need for 150.5ha general industrial (non-strategic) employment land needs by 2041, increasing to 218.2ha by 2050 within Rugby.
- 9.11 Tables 11.2 and 11.3 of the HEDNA also demonstrate a Coventry and Warwickshire wider strategic employment land need of 551ha to 2041 increasing to 735ha by 2050. Whilst the HEDNA does not seek to establish where that strategic floorspace need may be met across the functional economic market area, an assessment based upon past completions would indicate that 34% should be met by Rugby. As such it is reasonable to assume that Rugby should plan to meet around 187ha of strategic level warehousing need by 2041, increasing to 250ha by 2050.
- 9.12 In combination, and based upon the HEDNA evidence the Council should be planning to meet strategic and non-strategic needs totaling 337.5ha by 2041, increasing to 468.2ha by 2050.



Table 9.1 Summary of Industrial Needs – Rugby (excluding unmet needs from Coventry)

	Employment Land Requirement (ha)	
	2041	2050
General Industrial (non-strategic)	150.5	218.2
Strategic (34% distributed to Rugby based upon past completions)	187	250
Total Industrial Need	337.5	468.2

Source: C&W HEDNA Tables 9.14, 9.15, 11.2, 11.3

- 9.13 However, the assessment of warehousing need (both strategic and non-strategic) within the HEDNA is based upon past completions within Rugby over the period to 2019, and it is clear that completions since 2019 have been higher.
- 9.14 Evidence published within the Council's AMRs indicates that over the 10 year period to 2023, annual completions have grown at a rate 16% higher than over the period 2011 – 2019 (as assessed within the HEDNA).
- 9.15 On the basis that the Council should be planning based upon the most recent 10 year trend, Rugby's strategic and non-strategic industrial land needs total 403ha by 2041 increasing to 547ha by 2050. This does not assume that strategic needs are constrained in the latter part of the plan to account for forecast freight movement. Whilst this is assumed within the HEDNA, this would appear to reflect a constraint that would artificially suppress need, particularly as the HEDNA considers in paragraph 10.42 there to be a number of factors which indicate that demand will be stronger than reported traffic growth scenarios.

Table 9.2 Comparison of Industrial Needs Based on More Recent Completions – Rugby

Growth Scenarios – Past Trends	Employment Land Requirement (ha)	
	2041	2050
HEDNA derived industrial needs (strategic and non-strategic) – past completions 2011 - 2019	337.5	468.2
Industrial needs (strategic and non-strategic) – past completions 2014 - 2023	403	547

- 9.16 Separately, evidence presented by LSH confirms a significant and sustained level of occupier demand within Rugby for strategic warehouse space, exacerbated by a lack of supply in recent years (particularly over the period 2018 – 2020. At present there exists an active requirement for 9m sq. ft. of floorspace (with requirements ranging from 80,000 to 800,000 sq ft.). Based upon a plot ratio of 0.4, this equates to current active requirements occupying an area equivalent to 209ha (representing an immediate requirement).
- 9.17 LSH consider that with a good supply of new logistics, take up levels should be well in excess of



1.5m sq. ft. per annum, and probably significantly higher with new build to suit commitments. Assuming a prudent plot ratio of 0.4 this equates annual demand for 35ha, or 875ha over the 20 year period to 2041 (including a 5 year margin of flexibility). This increases to 1,190ha by 2050 (including flexibility margin).

- 9.18 LSH consider that based upon current take up over the last 5 years, there remains only 1.6 years of supply within Rugby.
- 9.19 Separately, and as detailed above, Deloitte note in its Transforming Logistics Paper, 2022, that the UK logistics market is projected to grow at a compounded annual growth rate of 6.3%, with road freight and haulage seen as a particular area of growth. Application of this level of growth to existing industrial stock within Rugby (totaling 16.6m sq ft. – as detailed in Table 6.4 above) over the 20 year period to 2041 results in an increased demand for employment land (assuming a plot ratio of 0.4, and a flexibility margin of 5 years) totaling 1,156ha, increasing to 2,212ha by 2050.

Offices

- 9.20 Whilst the focus of this assessment has been on industrial and warehousing need it is clear in respect of office floorspace demand that the HEDNAs assessment of office need is based upon an assessment of labour demand, whereas past completions would suggest a far higher level of growth. Notwithstanding, it is also important to note that whilst ancillary to the main function of the site, many strategic warehousing occupiers including a not insignificant amount of office related employment on their sites, including in finance and operations functions. As such it is not unreasonable to assume that strategic warehouses sites could assist in meeting the Council's office floorspace requirements.

Coventry's Unmet Needs

- 9.21 In addition, analysis of Coventry's stated employment land position from its Issues and Options Local Plan consultation early this year demonstrates that it is unable to meet its own general industrial needs leading to a shortfall of at least 87ha, which will have to be met elsewhere.
- 9.22 On this basis it is reasonable to assume that Coventry is unable to meet its strategic warehousing needs, and as such it may also be appropriate that Rugby plans to meet that unmet need. Various scenarios demonstrate that Rugby and Coventry's combined strategic warehouse need equates to approximately 43% of the Coventry and Warwickshire share. On this basis, and without accounting for more recent completions, it is reasonable to assume based upon evidence within the HEDNA that Rugby should plan to meet a proportion of what we consider will amount to Coventry's strategic needs amounting to approximately 45ha by 2041, increasing to 60ha by 2050.



9.23 In summary therefore Rugby's strategic and non-strategic industrial needs are as follows:

Past completions, whilst constrained, indicate a need of between 337.5ha and 403ha to 2041 (the lower figure reflecting HEDNA evidence, the higher reflecting more recent completions), and between 468.2ha to 507ha to 2050;

Demand evidence, presented by LSH, would suggest that subject to a good supply of sites, take up levels could amount to at least the equivalent of +35ha per annum. This equates to 875ha to 2041, and 1,190 to 2050;

Current active requirements occupy an area equivalent to 209ha (representing an immediate requirement);

Market forecasts by Deloitte, suggest stock growth of 6.3% per annum – equating to growth of 1,156ha by 2041, and 2,212 by 2050;

It is also appropriate for Rugby to meet a proportion of Coventry's unmet strategic needs (approximately 45ha by 2041, increasing to 60ha by 2050), plus the potential to meet a proportion of unmet (general industrial) non-strategic needs which would appear to total at least 87ha by 2041 and 154ha by 2050.



10. CONCLUSIONS

- 10.1 This assessment has been prepared on behalf of Stoford Properties Limited. The purpose of this Report is to assess, based upon current evidence, the extent of the employment land needs within Rugby and the wider functional economic market area of Coventry and Warwickshire.
- 10.2 The National Planning Policy Framework (NPPF) seeks to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right place and at the right time to support growth. The NPPF places significant emphasis on the need to address the specific locational requirements of different sectors including storage and distribution operations.
- 10.3 Given Rugby's location within the Golden Triangle and its position on the strategic road network, it has and will continue to experience a high demand for large scale (strategic) logistics floorspace, the need for which can only be met in a limited geography in order to serve national logistics operations. The benefits of this to Rugby are significant, both in terms of direct job creation, as well as to the wider supply chain, and as is clear in Government Policy it is essential that the local authority ensures that this demand is met in full. Strategic warehousing occupiers can also assist in providing office floorspace, which whilst ancillary to the main purpose of the site will offer finance and operational office related jobs.
- 10.4 Furthermore, the NPPF requires effective and on-going joint working between local authorities in ensuring development needs are met. This is significant given Rugby's adjacency to Coventry, a tightly constrained authority area which is unable to meet its employment land needs.
- 10.5 The Council has decided to proceed with a full update of its Adopted Local Plan (2011 – 2031). This decision followed, amongst other things, new evidence of future needs for homes and employment land, particularly warehousing uses. In respect of employment needs, the Issues and Options consultation draws attention to more recent evidence which establishes both non-strategic employment needs within Rugby, and broader strategic needs which for the time being have been identified only across the Coventry and Warwickshire functional economic market.
- 10.6 In respect of non-strategic employment needs the Council suggest that they have a sufficient identified supply, albeit as we note in doing so the Council include a number of strategic sites which meet strategic need (which in itself is additional to non-strategic need). The point being the Council are double counting its supply for both non-strategic and strategic purposes.
- 10.7 In addition the Council welcomes recent levels of completions as meeting future identified need, yet as we highlight it is important that those recent completions feature in any calculation of need – at present they do not.



- 10.8 In respect of strategic employment land needs identified across the Coventry and Warwickshire functional economic market area, the Council await the publication of the new West Midlands Strategic Employment Sites Study. The Council consider that this will provide a clearer picture of how much more land needs to be found across Coventry and Warwickshire to meet the need for strategic warehousing. It is important to note in this respect that the strategic warehousing need identified within the Coventry and Warwickshire HEDNA, originates from Coventry and Warwickshire functional economic market area, and reflects the locational advantage that the area brings to logistics operators amongst other factors such as labour supply. It is essential that the Coventry and Warwickshire authorities collectively plan to meet that strategic need in full at the very least (accounting for unmet needs in surrounding authorities where necessary). It would be entirely inappropriate to assume that the identified strategic need could be met elsewhere and outside of the function economic market within which that need exists.
- 10.9 The Coventry and Warwickshire HEDNA 2022 forms the core piece of evidence informing the Council's employment land requirement. The HEDNA assesses the need for office, general industrial (including non-strategic warehousing), and strategic warehousing land requirements across Coventry and Warwickshire, the functional economic market area within which Rugby operates.
- 10.10 In respect of office land requirements the HEDNA adopts a labour demand approach, determining a requirement for 5.2ha to 2041 and 6.5ha to 2050 (both figures include a 5 year flexibility margin). It is however important to note that an assessment of need based upon past completions would equate to a need for 19.1ha to 2041. Furthermore, we note that the labour demand scenario was generated during the Covid pandemic and may not be reflective of long term patterns of growth. This would suggest that the HEDNA labour demand based assessment of office needs is likely to constrain office market demand within Rugby, and that a higher requirement should be planned for.
- 10.11 In respect of general (non-strategic) industrial land requirements the HEDNA measures future growth based upon past long term completions over the period 2011 – 2019. Based upon this calculation general industrial need over the period to 2041 stands at 150.5ha, increasing to 218.2ha by 2050. We summarise in Tables 10.1 and 10.2 below.
- 10.12 The HEDNA also assesses strategic warehousing need across Coventry and Warwickshire, basing its calculations on the same past completion period for the first 10 years of the plan and a slightly lower level of growth reflective of traffic demand in the second half of the plan period. Strategic needs within Coventry and Warwickshire total 551ha to 2041, increasing to 735ha to 2050.
- 10.13 Whilst the HEDNA does not seek to establish where that strategic floorspace need may be met



across the functional economic market area, an assessment based upon past completions would indicate that 34% should be met by Rugby, and equating to 187ha of strategic needs by 2041, increasing to 250ha by 2050. This means, based upon evidence presented within the HEDNA that the Council should be planning to meet an industrial need equivalent to at least 337.5ha by 2041, and 468.2ha by 2050.

- 10.14 However, the HEDNA bases its calculations of need on past completions over the period 2011 – 2019, but acknowledges that the shift towards ecommerce arising from the Covid pandemic has accelerated demand for logistics space. An assessment of the latest completions trends over the past 10 years (2014 – 2023) show average annual completions to be 16% greater than the level of completions assessed by the HEDNA. On the basis that the Council should be planning based upon the most recent 10 year trend, Rugby strategic and non-strategic industrial land needs total 403ha by 2041 increasing to 547ha by 2050.
- 10.15 Notwithstanding, past completions will always be constrained to past evidence, and as such will not reflect unconstrained, policy off need.
- 10.16 Market evidence presented by LSH demonstrates a significantly higher level of demand than reflected in past completions. LSH consider that with a good supply of new logistics floorspace, take up levels should be well in excess of 1.5m sq ft. per annum, and probably significantly higher with new build to suit commitments. Assuming a prudent plot ratio of 0.4 this equates annual demand for 35ha, or 875ha over the 20 year period to 2041 (including a 5 year margin of flexibility). This increases to 1,190ha by 2050 (including flexibility margin).
- 10.17 Furthermore, LSH consider that this is compounded by a lack of supply in recent years, and at present there exists an active requirement for 9m sq ft. of floorspace (with requirements ranging from 80,000 to 800,000 sq ft.). Based upon a plot ratio of 0.4, this equates to current active requirements occupying an area equivalent to 209ha (representing an immediate requirement).
- 10.18 LSH conclude by confirming there to be a significant shortfall in the availability of credible development land in Rugby Borough over the next 20 years, and as a consequence the area will not be able to provide for projected occupier demand. Based upon current take up projections over the last 5 years, it considers there to be only 1.6 years of supply, and therefore after 2026 it is difficult to identify any credible development opportunity to meet either strategic or non-strategic occupier requirements.
- 10.19 Separately, Deloitte note in its Transforming Logistics Paper, 2022, that the UK logistics market is projected to grow at a compounded annual growth rate of 6.3%, with road freight and haulage seen as a particular area of growth. Application of this level of growth to existing industrial stock within Rugby (totaling 16.6m sq ft. – as detailed in Table 6.4 above) over the 20 year period to



2041 results in an increased demand for employment land (assuming a plot ratio of 0.4, and a flexibility margin of 5 years) totaling 1,156ha, increasing to 2,212ha by 2050.

10.20 We set out the various scenarios discussed in the table below, both over the period to 2041 and 2050.

Table 10.1 Rugby, Total Forecast Industrial Land Needs 2021 - 2041

Industrial Land Growth Scenarios - Rugby	Non-Strategic (General Industrial) ha	Strategic ha	Total ha
Rugby Local Plan Review	150.5	Rugby to meet as yet unspecified proportion of 551ha	Unspecified (upwards of 150.5ha)
Past Completions (HEDNA) 2011 – 2019	150.5	187*	337.5
Past Completions 2014 – 2023 (AMR)		403	
LSH Forecast Demand - Rugby		875	
Deloitte Sector Based Forecast - Rugby		1,156	

Note: * Rugby's distribution of identified Coventry & Warwickshire wide strategic need amounts to 34% based upon past distribution (2011 – 2019)
All scenarios assume an additional 5 year flexibility margin as per HEDNA assumption

Table 10.2 Rugby, Total Forecast Industrial Lane Needs 2021 - 2050

Industrial Land Growth Scenarios - Rugby	Non-Strategic (General Industrial) ha	Strategic ha	Total ha
Rugby Local Plan Review	218.2	Rugby to meet as yet unspecified proportion of 735ha	Unspecified (upwards of 218.ha)
Past Completions (HEDNA) 2011 – 2019	218.2	250*	468.2
Past Completions 2014 – 2023 (AMR)		547	
LSH Forecast Demand - Rugby		1,190	
Deloitte Sector Based Forecast - Rugby		2,212	

Note: * Rugby's distribution of identified Coventry & Warwickshire wide strategic need amounts to 34% based upon past distribution (2011 – 2019)
All scenarios assume an additional 5 year flexibility margin as per HEDNA assumption

10.21 As demonstrated by the market evidence presented within this Report, there exists a significant level of unmet occupier demand for industrial floorspace within Rugby, and it is essential that this demand is not constrained by a limited supply of potential sites.

10.22 There is also a growing need to ensure there is a sufficient supply of sites to meet replacement stock requirements arising from aged stock that is no longer fit for purpose. Furthermore, it is



essential that the Council adequately account for employment sites lost to other uses, such as residential development, and ensure sufficient sites are brought forward to address these losses.

- 10.23 In addition, analysis of Coventry's stated employment land position from its Issues and Options Local Plan consultation early this year demonstrates that it is unable to meet its own general industrial needs leading to a shortfall of at least 87ha, which will have to be met elsewhere by 2041.
- 10.24 On this basis it is reasonable to assume that Coventry is also unable to meet its strategic warehousing needs, and as such it may also be appropriate that Rugby plans to meet that unmet need. Various scenarios demonstrate that Rugby and Coventry's combined strategic warehouse need equates to approximately 43% of the Coventry and Warwickshire share. On this basis, and without accounting for more recent completions, it is reasonable to assume based upon evidence within the HEDNA that Rugby should plan to meet a proportion of what we consider will amount to Coventry's strategic needs amounting to approximately 45ha by 2041, increasing to 60ha by 2050

Summary

- 10.25 As detailed within this assessment there are a number of components which make up Rugby's industrial employment land needs, including general (non-strategic) industrial requirements, a proportion of Coventry and Warwickshire's strategic warehousing needs, and a potential requirement to meet Coventry's unmet strategic and non-strategic employment land needs. We calculate Rugby's industrial land requirements to total at least 337.5ha to 2041, and 468.2ha by 2050.
- 10.26 The Draft Local Plan Review asserts that it has a supply of 145ha of industrial land. However, reference to the Amr 2022/2023 confirms planning permissions (yet to be under construction) to be 19ha short of that assumed in the Draft Local Plan.
- 10.27 There remains therefore a significant shortfall to meeting identified future industrial needs. Furthermore, many of the sites relied upon by the Council's as having planning permission or identified completed sites meet a strategic logistics need, highlighting the shortfall in general industrial (non-strategic) sites.
- 10.28 However, more recent 10 year completion trends indicate identified need to be higher (403ha by 2014 increasing to 547ha by 2050), whilst unconstrained demand forecasts providing by LSH indicate a need for 875ha by 2041 and 1,190ha by 2050. Market evidence provided by Deloitte frames these scenarios in much higher levels of market growth.
- 10.29 Based upon current take up projections over the last 5 years LSH note there to be only 1.6 years



of supply, and therefore after 2026 it is difficult to identify any credible development opportunity to meet either strategic or non-strategic occupier requirements.

- 10.30 It is also important to note the findings of the Coventry and Warwickshire Chamber of Commerce Employment Land Report published in 2023. This recommends allocating 20 per cent more land than recommended by HEDNA calculations to provide scope for more variety in the quality and quantity of land. The CWELR suggests that employment land should be given equal priority to housing land which is currently not a requirement.
- 10.31 The report also concludes that insufficient employment land has been allocated in the Local Plans in Coventry and Warwickshire historically, and the land which has been allocated has been used up far faster than anticipated. In addition, the report states that establishing future need for employment land based on projections of suppressed past take up rates will always underestimate the true requirement for employment land.
- 10.32 As a consequence the Council should plan for a significant increase in its employment land supply to account for both general industrial and strategic warehouse requirements, and ensure that demand is not constrained by limited supply.
- 10.33 It is clear that this figure should exceed 337.5ha by 2041 based upon evidence presented within the Council's HEDNA, however given more recent evidence both in respect of past completions and occupier demand data the level of identified need far exceeds this, and there is a clear risk at the present time that supply will be severely constrained in a short space of time (LSH estimates 1.6 years).

APPENDIX 1 – Annual Monitoring Report Review – Rugby 2022/23

Employment Land Overview (hectares)

A	Local Plan requirement 2011-2031	208
B	Delivery 2011 - 2022	130.8
C	Delivery in 2022-2023	30.55
D	Under Construction	30.18
E	Delivery and Under Construction to date (B+C+D)	191.53
F	Remaining Requirement (A-E)	16.47
G	With planning permission not started	95.88

Employment Land - Completions						
2022-2023						
Reference Number	Site	Use Class	Floorspace (sqm)	Site Area (hectares)	Status	LSH Summary
R17/2019	Former Peugeot Site C (Prologis Park), Oxford Road, Ryton, CV8 3EA	B2/B8	45,275	16.7	Complete	<p>Prologis Park, Ryton, Coventry CV8 3LF</p> <p>Planning description: Application for Reserved Matters for Units DC8 & DC9 relating to appearance, landscaping, layout, and scale, including ancillary car parking, loading areas, gatehouse, associated road infrastructure, sprinkler tanks and pump house, against outline planning permission R16/2561 (for the redevelopment of the southern part of the former Peugeot Works site for Class B2 (general industry) & Class B8 (warehouse, storage & distribution) uses, together with ancillary offices, gatehouses, car parking, associated road infrastructure and landscaping, including importation of material to raise ground levels (REVISED SCHEME TO R14/2236 WITH NEW ACCESS)).</p> <p>Two unit speculative scheme: Available summer 2021 - DC8 / 147,300 sq ft / Let to Furnolic / Let Q4 2021 / £7.50 psf Available summer 2022 - DC9 / 330,770 sq ft / Let to Ceva/DHL / Let Q1 2022 / £7.50 psf</p> <p>Other takeup: DC1 / Jaguar Heritage Trust DC2 / DHL DC5 / LEVC DC6 / DHL DC7 / Jaguar Land Rover</p> <p>Availability DC4 / 166,820 sq ft / £8.50 psf - believed to be under offer</p>
R20/1026	Tritax Symmetry, Land North of Coventry Road, Thurlaston	B1a B8	1,817 27,950	5.5	Complete	<p>Symmetry Park, Rugby CV23 9JR</p> <p>Planning description: Full planning application for the erection of 2 logistics units development comprising a total of 30,435 sqm (327,599 sq.ft.) (measured GEA) of Class B8 floorspace of which 1,817.2 sq.m (measured GIA) (19,560 sq. ft.) comprises Class E(g)(i) ancillary office floorspace (measured GIA) with associated infrastructure including lorry parking, landscaping including permanent landscaped mounds, sustainable drainage details, sprinkler tank pump houses, gas and electricity substations, temporary construction access from Coventry Road, temporary marketing suite and temporary stockpile area for additional soil disposal.</p> <p>Unit 1 & 2 Let to Iron Mountain collar and cap of £8 - £9.50 psf Q1 2022.</p> <p>They have taken a futher two units at the site: Iron Mountain, 2022 Q1, Unit 3, 394,640 sq ft - collar and cap of £8 - £9.50 psf Iron Mountain, 2022 Q1, Unit 4, 251,281 sq ft - collar and cap of £8 - £9.50 psf</p> <p>The remaining balance of the site has the capability to offer bespoke design & build facilities to suit individual occupier requirements between 100,000 – 1 million sq ft to meet an occupation date during 2024. Detailed planning has been granted for three buildings: Unit 5 (390,694 sq ft), Unit 6 (338,064 sq ft) and Unit 7 (170,473 sq ft) ready Q3 2024 guiding £10.00 per sq ft (speculatively developed).</p>

R21/1165	Rolls Royce, Ansty Aerodrome, Combe Fields Road, Combe Field, Coventry, CV7 9JR	B2/B8	46,500	6.35 (part of outline permission R19/1540 below)	Complete (replaces R21/0784)	Prospero Ansty Park, Coventry CV7 9JU Planning description: Erection of three commercial units for flexible use within Use Classes B2 & B8 use (with ancillary uses), and associated works, including supporting infrastructure, landscaping and re-profiling works for the remainder of Plot 1. Let as a two unit scheme: Apollo I - 70,389 sq ft / Let to Polestar / Q4 2023 / 10 year term / £10.95 psf Apollo II - 174,594 sq ft / Let to Staircraft / Q2 2023 / 15 year term / £9.25 psf
R20/0919	Land on West Side of A5, Watling Street, Clifton upon Dunsmore, Rugby, CV23 0AJ	B1a B2 B8	732 1,501 895	2	Complete	Alcohols Ltd Planning description: Demolition of existing buildings. Erection of three buildings and use of site for purposes of an alcohol distillery and hydrocarbon warehouse (Use Classes B2 and B8) and on office building (Use Class B1a). Plus external tank farms; sprinkler tanks and pumphouse; access; parking and servicing; earthworks and landscaping; drainage; fencing. In occupation 2023
Total Completions			124,670	30.55		

Employment Land - Under Construction (U/C)						
2022-2023						
Reference Number	Site	Use Class	Floorspace (sqm)	Site Area (hectares)	Status	LSH Summary
R21/0525	Rolls Royce, Prospero Ansty (Plot 5)	B8	27,900 (part of R19/1540 below)	16.3 (part of R19/1540 below)	Under Construction	Prospero Ansty Park, Coventry CV7 9JU Planning description: Erection of building and use for Class B8 (storage and distribution) of the Town and Country Planning (Use Classes) Order 1987 (as amended) with PV roof panels, including ancillary offices. Primary vehicular access from Pilot Way (Ansty Park), secondary vehicular access from Combe Fields Road, access road, car parking, cycle parking, lorry parking, service areas, drainage, landscaping, demolition of existing buildings, ground remodelling, associated works and temporary use of land for deposition of soil arisings. Apollo V - 300,039 sq ft / PC Q1 2024 / guiding £10.50 psf
R22/0485	Plot 3, Ansty Aerodrome, Combe Fields Road, Combe Fields, Coventry, CV7 9JR	B2/B8	15,922 (part of R19/1540 below)	6.43 (part of R19/1540 below)	Under Construction	Prospero Ansty Park, Coventry CV7 9JU Planning description: Erection of one commercial unit for flexible use within Use Classes B2 (General Industrial) and B8 (Storage and Distribution) of the Town and Country Planning (Use Classes) Order 1987 (as amended) and associated development including drainage, earthworks, highways, car parking, HGV parking, service yard and landscaping. Apollo III - 171,378 sq ft / PC Q1 2024 / guiding £10.50 psf
R22/0491	Plots 6 and 7, Ansty Aerodrome, Combe Fields Road, Combe Fields, Coventry, CV7 9JR	B2/B8	35,739 (part of R19/1540 below)	7.45 (part of R19/1540 below)	Under Construction	Prospero Ansty Park, Coventry CV7 9JU Planning description: Erection of one commercial unit for flexible use within Use Classes B2 (General Industrial) and B8 (Storage and Distribution) of the Town and Country Planning (Use Classes) Order 1987 (as amended) and associated development including drainage, earthworks, highways, car parking, HGV parking, service yard and landscaping. Apollo VI - 268,371 sq ft / PC Q1 2024 / guiding £10.50 psf Apollo VII - 116,322 sq ft / PC Q1 2024 / guiding £10.50 psf
Total Under Construction			79,561	30.18		

Approved Planning Applications for New Employment Uses						
Approved 2022-2023						
Reference Number	Location	Use Class	Floorspace (sqm)	Site Area (hectares)	Status	LSH Summary
R22/0551	Land North and East of Castle Mound Way, Castle Mound Way, Rugby	B8	26,421	8.61	Full Planning Permission (replaces R20/0272)	Equities Park, Rugby M6/J1 Planning description: Application for full planning permission for storage and distribution floorspace (Class B8 use), with ancillary offices, gatehouse, associated car parking, HGV parking, landscaping and infrastructure. Newlands Developments / full planning permission / one single unit at 250,000 sq ft. Detailed planning consent no achieved for a unit of 250,000 sq ft.

R22/0803	Zone C - Land North of Coventry Road, Coventry Road, Thurlaston	B8	59,997 (part of R16/2569 below)	15.91 (part of R16/2569 below)	Approval of Reserved Matters (R16/2569)	Symmetry Park, Rugby CV23 9JR Planning description: Erection of two buildings within Class B8 with ancillary office; ancillary structures including gatehouses; with associated access roads; servicing yards; car parking and cycle shelter; external plant and access details for the continuation of the spine road north of Northampton Lane and the access road to the east of the site; landscaping details; security fencing. Approval of reserved matters (access, appearance, layout, scale and landscaping) relating to R16/2569. Unit 3 (394,649 sq ft) and Unit 4 (251,281 sq ft) let to Iron Mountain subject to a collar and cap of £8 - £9.50 psf / Q1 2022
R21/0789	SW Rugby, Zone D, Land North of Coventry Road	B8	50,965 (part of R16/2569 below)	15.8 (part of Outline Permission R16/2569 below)	Approval of Reserved Matters (R16/2569)	Symmetry Park, Rugby CV23 9JR Planning description: Erection of 50,965 square metre building (GEA, floorspace) within Class B8 with ancillary office; ancillary structures; with associated access roads; servicing yard; car parking and cycle shelter and compound; external plant and access details for the continuation of the spine road north of Northampton Lane; landscaped embankments with landscaping details; the provision for a noise attenuating fence on top of the embankment; security fencing. Approval of reserved matters (access, appearance, layout, scale and landscaping) relating to R16/2569. Zone D is now being delivered to provide three buildings: Unit 5 (390,694 sq ft), Unit 6 (338,064 sq ft) and Unit 7 (170,473 sq ft) guiding £10.00 per sq ft ready to occupy Q3 2024 (speculatively developed).
R21/0790	SW Rugby, Eastern part of Zone D - Tritax Symmetry, Land North of Coventry Road	B8	35,600 (part of R16/2569 below)	6.08 (part of Outline Permission R16/2569 below)	Approval of Reserved Matters (R16/2569)	Symmetry Park, Rugby CV23 9JR Planning description: Erection of a building within Class B8 with ancillary office; ancillary structures; with associated landscaping & landscape bund, access roads; servicing yard; car parking and cycle shelter and compound; external plant; acoustic fencing; security fencing. Approval of reserved matters (access, appearance, landscaping, layout and scale) relating to R16/2569. (Alternative scheme). Zone D is now being delivered to provide three buildings: Unit 5 (390,694 sq ft), Unit 6 (338,064 sq ft) and Unit 7 (170,473 sq ft) ready Q2 2024 guiding £10.00 per sq ft ready to occupy Q3 2024 (speculatively developed).
R20/0422	Land South of A5 (Watling Street) Adjacent to M69 Junction 1	B2/B8 B1	1,858 5,672	5.25	Hybrid Application	Stretton Point, Hinkley, Leicestershire Planning description: Full application for erection of a roadside services facility comprising a petrol filling station, drive through restaurant (class A1/A3/A5) with new vehicular access (via A5 Watling Street), together with internal roads, car/cycle parking, drainage works, earthworks, landscaping and other associated infrastructure. Outline application for erection of class B1 and flexible class B1/B2/B8 units with access via the A5 (Watling Street) together with the construction of internal roads, vehicle and cycle parking, drainage works, earthworks, landscaping and other associated infrastructure Indicative masterplan as per the Design and Access Statement: Plot 1 / Sui Generis/A1/A3 Plot 2 / B2 B8 / 20,000 sq ft Plot 3 / B1 / 35,550 sq ft Plot 4 / B1 / 25,500 sq ft
R22/0966	Unit 17 Europark, Watling Street, Newton	B8	2,070	0.25	Full Planning Permission	Unit 17 Europark, Watling Street, Newton Planning description: Change of use from Sui Generis to B8 storage yard and retention of portacabin.
R21/0664	Land off Parkfield Road, Parkfield Road, Rugby	B8	1,408	0.32	Full Planning Permission	Unit 4, Parkfield Business Park Rugby Planning description: Erection of a steel clad portal frame building as a storage facility falling within Use Class B8, with associated ancillary two storey offices with external works, yard and vehicle parking, including roof mounted photo-voltaic panels. Unit 4 - 15,156 sq ft
R22/0462	6 Paynes Lane, Rugby, CV21 2UH	E/B2/B8	1,130	0.19	Full Planning Permission	6 Paynes Lane, Rugby, CV21 2UH Planning description: Change of use from Auction House to a mixed use of classes E(g)(i), B2 and B8 and replacement timber fencing 9,928 sq ft unit / Let to Tools With A Mission
R22/0380	Rugby Radio Station, A5 Watling Street, Clifton upon Dunsmore	B1/B8	12,161 (part of R17/0022 below)	3.67 (part of R17/0022 below)	Approval of Reserved Matters (R17/0022)	Rugby Radio Station Planning description: Erection of a commercial unit, comprising of offices (Use Class B1), assembly areas associated with light industry (Use Class B1), storage and distribution facilities (Use Class B8), and other ancillary requirements and associated works, including supporting infrastructure and other operational requirements, landscaping, re-profiling works, temporary stockpiling of materials, and temporary haul routes for construction purposes, (application for reserved matters approval (outside of a key phase) of appearance, landscape, layout and scale against outline planning permission (R17/0022 dated 28th June 2017). Commercial unit for WAGO Limited

Total App 22/23*	38,559	14.62	
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*does not include Reserved Matters as these will have been counted at Outline Stage (final figure for site accounted for when complete)

Extant Permissions pre 1 April 2022						LSH Summary
Reference Number	Location	Use Class	Floorspace (sqm)	Site Area (hectares)	Status	
R16/2569	SW Rugby - Tritax Symmetry, Land North of Coventry Road	B8	156,733 (adjusted from total 186,500 as 29,767 complete)	40.7 (adjusted from total 46.2 as 5.5 complete)	Outline	<p>Symmetry Park, Rugby CV23 9JR</p> <p>Planning description: Outline planning application for up to 186,500 sq m of buildings for Use Class B8 (Warehousing and Distribution), with ancillary Use Class B1(a) (Offices), land for a fire station (0.4 hectares) with site infrastructure including energy centre, vehicle parking, landscaping, and sustainable drainage system. Demolition of Station Farmhouse and outbuildings. All matters reserved except means of access from A45/M45 junction up to and including the link to the crossing of the Northampton Lane right of way.</p> <p>Extending to a total of 111 acres, Symmetry Park, Rugby has an outline planning permission to deliver up to 2 million sq ft of logistics floor space. Initial site infrastructure works for the first phase started in 2021. Tritax Symmetry has since exchanged an agreement for lease with Iron Mountain on circa 1 million sq ft across four units on a state-of-the-art logistics space forming their first UK Campus, subject to a collar and cap of £8 - £9.50 psf. Units 1 and 2 are reaching practical completion with units 3 and 4 currently under construction.</p> <p>The remaining balance of the site has the capability to offer bespoke design & build facilities to suit individual occupier requirements between 100,000 – 1 million sq ft to meet an occupation date during 2024. Detailed planning has been granted for three buildings: Unit 5 (390,694 sq ft), Unit 6 (338,064 sq ft) and Unit 7 (170,473 sq ft) ready Q3 2024 guiding £10.00 per sq ft (speculatively developed).</p>
R17/0022	Rugby Radio Station, A5 Watling Street, Rugby, CV23 0AS	B1/B2/B8	106,000	31	Outline	<p>Rugby Radio Station</p> <p>Planning description (R17/0022): Outline application for an urban extension to Rugby for up to 6,200 dwellings together with up to 12,000sq.m retail (A1), up to 3,500sq.m financial services (A2) and restaurants (A3 - A5), up to 3,500sq.m for a hotel (C1), up to 2,900sq.m of community uses (D1), up to 3,100sq.m assembly and leisure uses (D2), 31 hectares (up to 106,000sq.m) of commercial and employment space (B1, B2 and B8), and ancillary facilities; a mixed use district centre and 3 subsidiary local centres including retention and re-use of the existing buildings known as 'C' Station (Grade II listed), 'A' Station and some existing agricultural buildings; a secondary school and 3 primary schools; public art; green infrastructure including formal and informal open space and amenity space; retention of existing hedgerows, areas of ridge and furrow and grassland; new woodland areas, allotments and areas for food production, wildlife corridors; supporting infrastructure (comprising utilities including gas, electricity, water, sewerage, telecommunications, and diversions as necessary); sustainable drainage systems including ponds, lakes and water courses; a link road connecting the development to Butlers Leap, estate roads and connections to the surrounding highway, cycleway and pedestrian network; ground remodelling; any necessary demolition and any ground works associated with the removal of any residual copper matting, with all matters reserved for future determination except the three highway junctions on the A428, the two junctions on the A5 and the link road junctions at Butlers Leap and Hillmorton Lane - Variation of conditions 5,6,7,63 64 and 81 of the outline planning permission R11/0699 dated 21/05/2014 to cover minor material changes to the approved Parameter Plans and Development Specification and to reflect approvals already granted pursuant to the outline planning permission and the latest land control position; removal of condition 73 and consequent renumbering of conditions 74 - 81 inclusive.</p> <p>As per the planning documents condition 50: No individual B8 employment unit shall exceed 5000m² (GEA) and at no time shall any of the units be amalgamated to create larger units nor shall any mezzanine floors be constructed within any of the units. Reason: To ensure that a range of B8 units of a suitable size are provided in order to maintain a vibrant and mixed local economy.</p>

R19/1540	Rolls Royce, Prospero Ansty	B1/B2	33,939 (Adjusted from 160,000 total as 126,061 Complete or Under Construction) with a maximum of 20,000 B1a/b.	9.56 net (28.76 gross) (Adjusted from 46.1 Net/65.3 Gross total as 36.54 Complete or UnderConstruction)	Outline	<p>Prospero Ansty Park, Coventry CV7 9JU</p> <p>Planning description: Outline planning application for a new employment area (Prospero Ansty) including the redundant/surplus parts of the Rolls-Royce Ansty manufacturing and testing site, comprising B1a, B1b, B1c & B2 floorspace (up to 160,000 m², of which no more than 20,000 m² is for B1a and/or B1b), hotel (C1) (up to 4,500 m²), retail (A1/A3) (up to 250 m²); including car & cycle parking, structural landscaping, new access roads, any necessary demolition (including demolition of "4 shop"), ground remodelling, drainage infrastructure, provision & replacement of utilities & service infrastructure and other associated works</p> <p>Industrial at the site: Apollo I - 70,389 sq ft / Let to Polestar / Q4 2023 / £10.95 per sq ft Apollo II - 174,594 sq ft / Let to Staircraft / Q2 2023 / £9.25 per sq ft Apollo III - 171,378 sq ft / PC Q1 2024 / Guiding £10.50 Apollo V - 300,039 sq ft / PC Q1 2024 / Guiding £10.50 Apollo VI - 268,371 sq ft / PC Q1 2024 / Guiding £10.50 Apollo VII - 116,322 sq ft / PC Q1 2024 / Guiding £10.50 Unit 2 - 490,000 sq ft / Let to Meggit PLC / Q1 2020 One D&B plot available for circa 150,000 sq ft unit</p>
Total Extant (pre 1 April 2022)			296,672	81.26		

Policy ED1: Protection of Rugbys Employment Land (hectares)

Reference Number	Use Class	Loss Approved
R22/1309	B2	0.11

Completions against Coventry's Need (hectares)

	Amount
Delivery in 2022-23	16.7
Under Construction in 2022-2023	0
Cumulative Delivery and Under Construction between 2011-23	95.3
Land Area requirement remaining	2.7

Employment Land on Local Plan Allocations (hectares)

Allocation	Allocated Site Area	Use Class	Approvals 2011-2022	Approvals 2022-2023	Delivered
Coton Park East	7.5	B1/B2/B8	0	8.61 (supersedes R20/0272)	0
South West Rugby	35	B8	46.2 (larger site area approved due to density requirements)	0 (37.79 Reserved Matters)	5.5
Houlton (former Rugby Radio Station)	16	B1/B2/B8	16	0 (3.67 Reserved Matters)	0

APPENDIX 2 – Review of completed employment sites – Rugby 2011 - 2023

Year	Ref	Decision	Site	Use	Size ha	Rugby ha	Coventry (unmet needs) ha
2011/12	-	-	-	-	0		
2012/13	-	-	Unit DC2 - Prologis Ryton (ref in 2013/14 AMR)	B8	6.7		6.7
2013/14	R11/0246	27/06/2011	Zone C (Plot 1) Central Park	B2	2.4	2.4	
2013/14	R13/0440	20/05/2013	Unit DC4 - Prologis Ryton (Site B),London Road (A45)	B2/B8	3.6		3.6
2013/14	R13/1359	28/08/2013	Unit DC5 - PrologisRyton (Site B), London Road (A45)	B2/B8	3.4		3.4
2014/15	R11/1918	05/09/2013	Zone B, Central Park	B1/B2	1.5	1.5	
2014/15	R13/1645	15/11/2013	Rolls Royce / University of Birmingham HTRC,Zone 4 Ansty Park	B1	2.0		2.0
2014/15	R13/1591	23/10/2013	MTC Aerospace, Zone 5 Ansty Park	B1	1.9		1.9
2014/15	R13/2311	12/02/2014	RG-1, Rugby Gateway, LeicesterRoad	B8	5.1	5.1	
2014/15	RBC/13CV	23/12/2013	Malpass Farm – First Phase (Eastern ProcessBuilding)	B2	5.0	5.0	
2014/15	R13/0440	20/05/2013	Unit DC3 - Prologis Ryton (Site B),London Road (A45)	B2/B8	4.8		4.8
2014/15	R13/1088	23/12/2013	Unit DC6 - Prologis Ryton (Site B),London Road (A45)	B2/B8	13.4		13.4
2015/16	R12/0190	21/03/2014	MTC Academy,Zone 3/4 Ansty Park	B1	3.0		3.0
2015/16	R14/1703	27/10/2014	RG-4 Rugby Gateway,Leicester Road	B8	4.1	4.1	
2016/17	R15/1463	29/10/2015	RG-2 Rugby Gateway,Leicester Road	B8	6.1	6.1	
2016/17	R15/1467	21/10/2015	RG-3 Rugby Gateway,Leicester Road	B8	4.3	4.3	
2016/17	R15/1453	29/09/2015	RG-5 RugbyGateway, Leicester Road	B8	16.0	16.0	
2016/17	R14/2343 ³	24/02/2015	London TaxiCompany, Zone 6 Ansty Park	B2	8.7		8.7
2016/17	R14/0491 ³	30/04/2014	Unit DC1 - Prologis Ryton,London Road (A45)	B2 / B8	3.4		3.4
2016/17	R14/0217 ³	17/02/2015	Unit DC7 -Prologis Ryton, London Road(A45)	B2 / B8	6.7		6.7
2016/17	R15/1623	10/09/2015	Zone C (Plots 2 and 3) CentralPark, Castle Mound Way	B2 / B8	6.2	6.2	
2017/18	R17/1827	28/12/2017	Royal Mail Rugby Delivery Office, MillRoad, Rugby.	B8	0.4	0.4	
2017/18	R15/0394	02/11/2015	Land at Zone 2 Ansty Park,Airfield Drive.*	B1, B2 & B8	2.9		2.9
2018/19	R18/0981	28/08/2018	Ansty Park, Land at Zone One,Airfield Drive, Rugby, CV7 9DR	B1	1.7		1.7
2018/19	R15/0984	05/05/2015	Britvic Soft Drinks Ltd, Aventine Way, Brownsover,Rugby.	B8	1.0	1.0	
2018/19	R18/0523	28/09/2018	Unit 1, Central Building, Parkfield, Newbold, CV211QJ	B8	0.4	0.4	
2019/20	R17/1829	-	Meggitt, Rolls Royce, Ansty Aerodrome, Combe Fields Road, Coventry, CV7 9JR	B2	26.0	**	
2019/20	R17/1367	-	Stepnell Ltd, Lawford Road, Rugby, V21 2UU	B1/B2/B8	5.1	5.1	
2020/21	R19/1105	-	Dollman Farm, Houlton, Rugby, CV23 1AL	B1	Unknown		
2020/21	R19/0072	-	Unit 1, Parkfield Business Park, Rugby Western Relief Road, CV21 1QJ	B8	0.4	0.4	
2021/22	R19/1512	-	Rolls Royce, Coombe Fields, Coventry, CV7 9JR	B1a/ B1b	2.1	2.1	
2022/23	R17/2019	-	Former Peugeot Site C (Prologis Park), Oxford Road, Ryton, CV8 3EA	B2, B8	16.7		16.7
2022/23	R20/1026	-	Tritax Symmetry, Land North of Coventry Roa, Thurlaston	B1a, B8	5.5	5.5	
2022/23	R21/1165	-	Rolls Royce, Ansty Aerodrome, Combe Fields Road, Coombe Field, Coventry, CV7 9JR	B2, B8	6.4	6.4	
2022/23	R20/0919	-	Land on west side of A5, Watling Street, Clifton Upon Dunsmore, Rugby, CV23 0AJ	B1a	2.0	2.0	
Total					178.8	74.1	78.7
Total (B1b/B2/B8 plus B1 where mixed use)					168.1		
Total 2013/14 to 2022/23					172.2		
Total (B1b/B2/B8 plus B1 where mixed use) 10 years 2013/14 to 2022/23					161.5		

** not counted against requirement as replacement

RUGBY EMPLOYMENT LAND EVIDENCE

January 2024

PREPARED FOR

STOFORD

STOP GUESSING START KNOWING

CONTENTS

- EXECUTIVE SUMMARY
- INTRODUCTION
- SITE & MARKET ASSESSMENT REPORT
- NATIONAL MARKET OVERVIEW
- QUARTER 4 2023 / YEAR END
- FUTURE TRENDS / INFLUENCES TO LOGISTICS SECTOR IN THE UK
- LOCAL AUTHORITY DATA
- REVIEW OF MARKET TRENDS – AVERAGE UNIT SIZE
- OCCUPIER DEMAND
- SUMMARY OF RUGBY LOGISTICS MARKET
- KEY DEVELOPMENT SITES
- CONCLUSION

APPENDIX 1 RUGBY UPDATED MARKET ASSESSMENT REPORT

APPENDIX 2 ENQUIRIES

APPENDIX 3 RUGBY BOROUGH COUNCILS ANNUAL MONITORING REPORT WITH COMMENTS

EXECUTIVE SUMMARY

- This report highlights the limited supply of new build development land within the defined Rugby Local Authority area for both strategic and non-strategic requirements.
- The logistics sector continues to witness significant change with demands for more bespoke and efficient new units which offer strong ESG credentials and can benefit from advancements in technological change.
- Rugby as a location at the centre of the recognised golden triangle remains a preferred central distribution location.
- From our review of average historic take-up in the Rugby Local Authority area we believe it is clear that demand remains strong in these locations and the average size of units has increased in line with market trends.
- At present there is 1.6 years of supply based on historic average take-up figures over the last five years.
- The key strategic sites of Symmetry Park, Rugby and Prospero Park, Ansty are now effectively fully developed with the last remaining plots being speculatively developed at each location. Conservative assumptions would suggest all of these units would be let within 18 months of practical completion (mid 2026). At the Rugby Radio Mast site there is an absolute prohibition on developing any new industrial accommodation over 5,000 sq m (see AMR).
- We believe there will not be sufficient supply within the local Rugby Authority area to cater for current and future demand especially during the period 2026 – 2041 where we can see no new significant development coming forwards.

INTRODUCTION

LSH are providing additional information for use by Marrons & Stoford Developments Limited in preparation of their submission to support the development of land north of Houlton, promoted by Stoford as Rugby East.

LSH have reviewed all of the identified planning applications contained within Rugby Borough Council's Annual Monitoring Report (AMR) and have provided relevant additional comments. This document is contained as Appendix 3 of this report.

SITE & MARKET ASSESSMENT REPORT

LSH provided their initial report in December 2022. An update to this report was provided in September 2023. This report is attached as Appendix 1.

NATIONAL MARKET OVERVIEW

LSH are providing their Q3 2023 Industrial & Logistics Market Report. Additional slides have been added with our view on year-end figures (which will be reported in early 2024) together with a slide on future trends / influences in the UK logistics sector.

UK OCCUPIER MARKET UPDATE

Amid a challenging economic backdrop, UK industrial & logistics occupier demand has slowed in 2023 but a clear focus of demand on high quality space continues to drive rental growth.

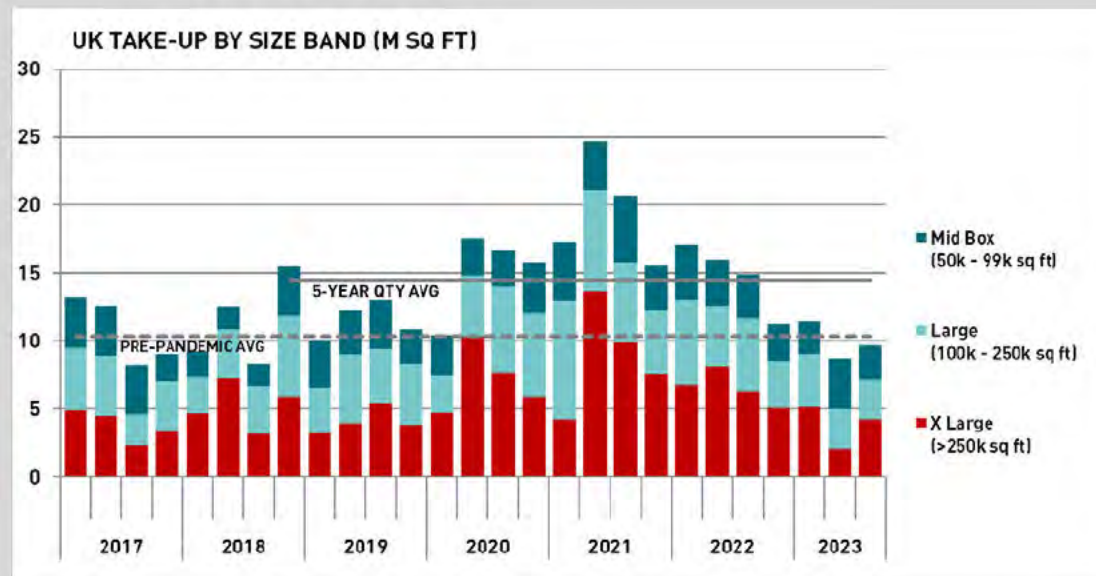
DEMAND

For units over 50,000 sq ft, UK take-up reached 29.8m sq ft in the first three quarters of 2023, down 31% on the five-year average for the period. Activity was closer in line with pre-pandemic levels, with take-up only 4% below the average seen prior to 2020. On a rolling annual basis, occupier demand was back to the pre-pandemic average with 41m sq ft of take-up over the period to the end of Q3 2023.

That said, persistently high inflation and a steady stream of interest rate hikes over the first half of 2023 were reflected in a deterioration of activity, with Q2 take-up at a five-year low. Positively, Q3 saw a rebound in demand with take-up 11% up on Q2 at 9.7m sq ft, albeit still 7% below the pre-pandemic average.

Subdued activity at the larger end of the market weighed most heavily take-up. There has been a lack of 'mega deals' with a complete absence of transactions above 750,000 sq ft, compared with seven during the previous three quarters.

The strong focus on demand for quality space continued apace in 2023. Occupiers' increasingly discerning attitudes around quality, ESG credentials and energy efficiency was reflected in grade A space accounting for 70% of take-up in 2023 to the end of Q3.



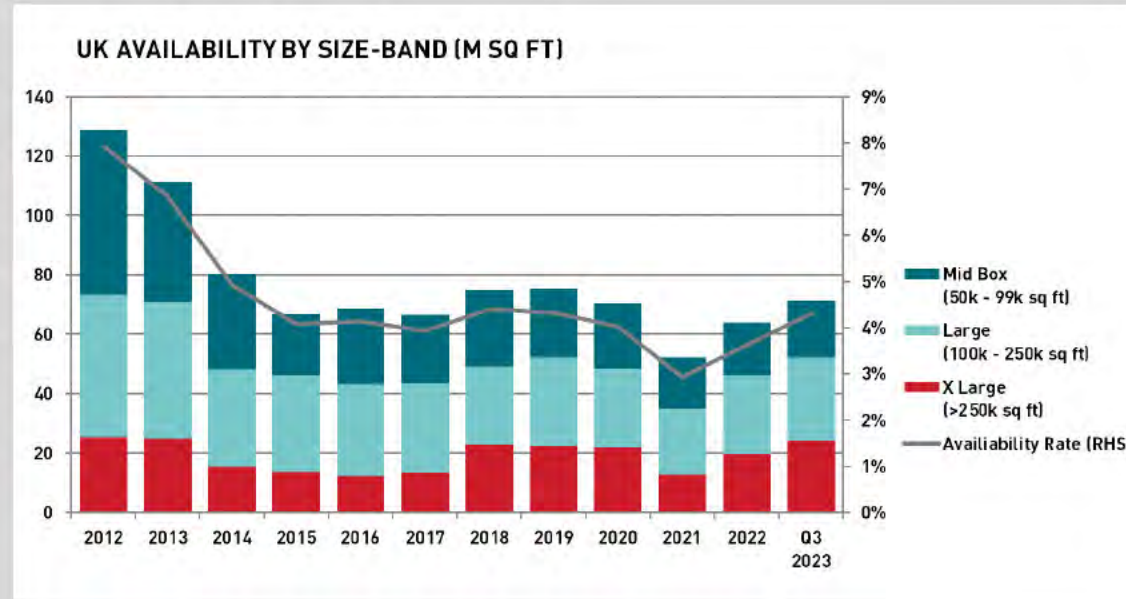
Having been key to the boom in 2021, the retrenchment of retail-led activity has been the key drag on recent take-up. More specifically, Amazon's changing role in market has been especially key – having acquired over 25m sq ft between 2020 and 2022, the online behemoth was behind less than 1m sq ft in 2023 to date and instead has been actively disposing of space.

With retail's easing in demand since the pandemic-boom, the sectors now contribute much more evenly to demand. Manufacturing accounted for a significant 30% of take-up in Q1-Q3, followed by retail and wholesale at 29% and third-party logistics operators at 25%.

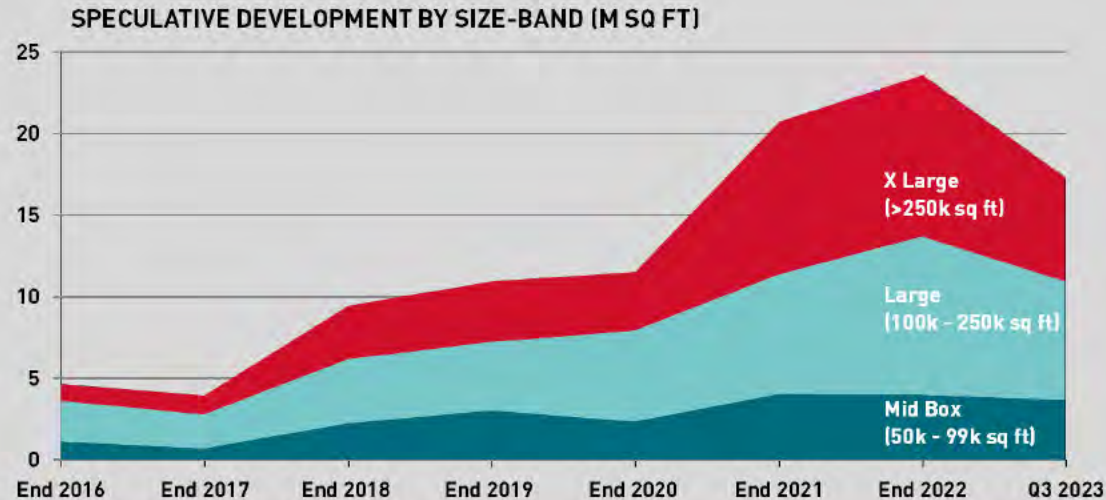
The slowdown in activity since the pandemic has been witnessed across the UK. However, among the UK's 11 regions, the West Midlands was the most resilient with take-up in 2023 to the end of Q3 only 2% below trend. While this was boosted by several larger deals, including Sainsbury's' 661,348 sq ft letting of Rugby 661 and Syncreon's 598,050 sq ft pre-let at SEGRO Park Coventry, the mid box sector recorded the strongest activity compared to trend, up 8% on its five-year average.

SUPPLY

UK-wide supply has continued its upward trajectory since hitting an all-time low at the end of 2021. For units above 50,000 sq ft, supply increased by 12% since the beginning of the year to the end of Q3, reflecting both speculative development and secondhand space coming back to the market. Supply remains tight in its historic context, equivalent to only 1.2 years of average take-up and an availability rate of 4.3%.



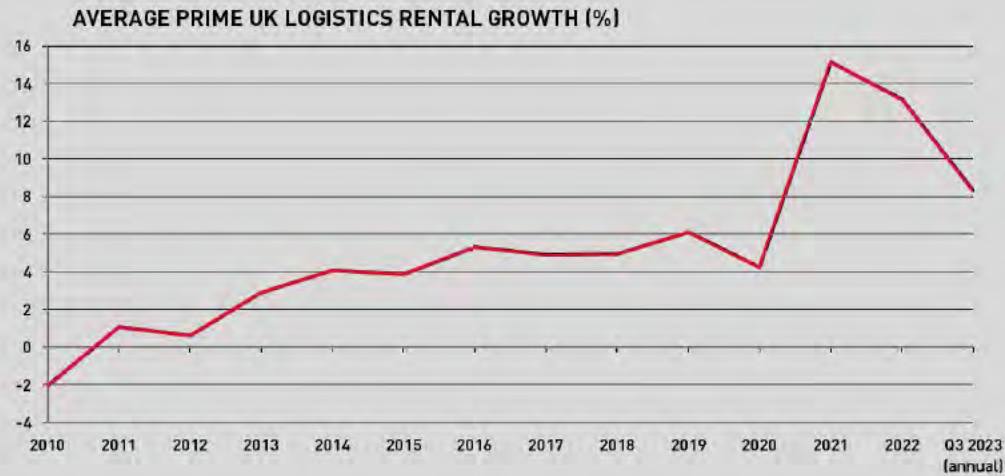
The development pipeline is likely to help keep a lid on supply, easing any fears of potential oversupply in the market. Challenges surrounding cost of finance and construction along with the market dynamics are weighing heavily on development appetite. Speculative development under construction at the end of Q3 totalled 17.3m sq ft, falling 27% from the all-time high at the end of 2022.



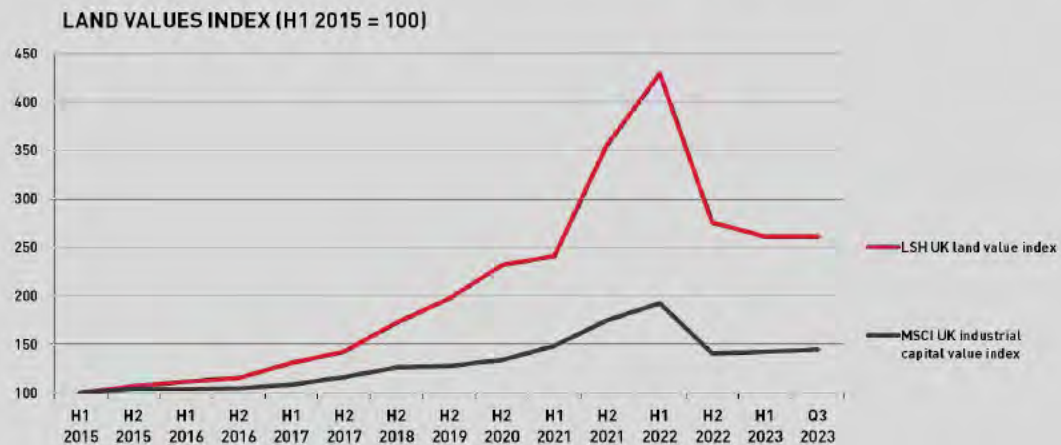
RENTS AND LAND VALUES

The pace of rental growth has been easing since the heights of 2021 but, unlike other property sectors, it remains firmly in positive territory. Across the UK's 60 key markets, average prime rents for 50,000 sq ft units increased by 8% over the 12 months to the end of Q3 2023, down from the peak of 15% in 2021. In Q3 itself, prime rents increased by 2% on average.

Given occupiers' preference for quality space with strong ESG credentials, and a slowing in the development pipeline, growth rates are forecast to continue easing as opposed to falling in absolute terms, but nonetheless compare favourably with other property sectors in the current climate.



While the turbulence in the financial markets impacted heavily on land values in the second half of 2022, a degree of stability returned in 2023. According to LSH's UK industrial land value index, prevailing sentiment indicates that average values have now stabilised following the sharp fall of 36% in H2 2022, to falling 5% in H1 2023 and flat-lined in Q3.



QUARTER 4 2023 / YEAR END

- Take up across the UK will be ahead of the long-term average at circa 40m sq ft (units above 50,000 sq ft) and circa 25m sq ft for units of 100,000 sq ft.
- Occupier demand remains consistently strong with high levels of enquiries.
- Approximately 70% of take up will be for new or Grade A accommodation highlighting a corporate drive for more efficient larger and sustainable premises.
- Limited BTS large scale commitments in 2023 with majority of take up in new modern units.
- Continued rental growth with record rents in many regions on new deals.
- Online retail growth manufacturing and 3PL's dominate market activity.
- Vacancy rates nationally have increased to circa 6% from record low of 3% at the peak of Covid but now in line with the longer term average and still not of concern. There are significant areas of undersupply in key regions especially with the lack of new stock.
- Reduced levels of speculative development starts will lead to increased shortages in 2024/25.
- Midlands take up is a consistent strong performer at some 40% of UK take up with West Midlands second only to East Midlands.

FUTURE TRENDS / INFLUENCES TO LOGISTICS SECTOR IN THE UK

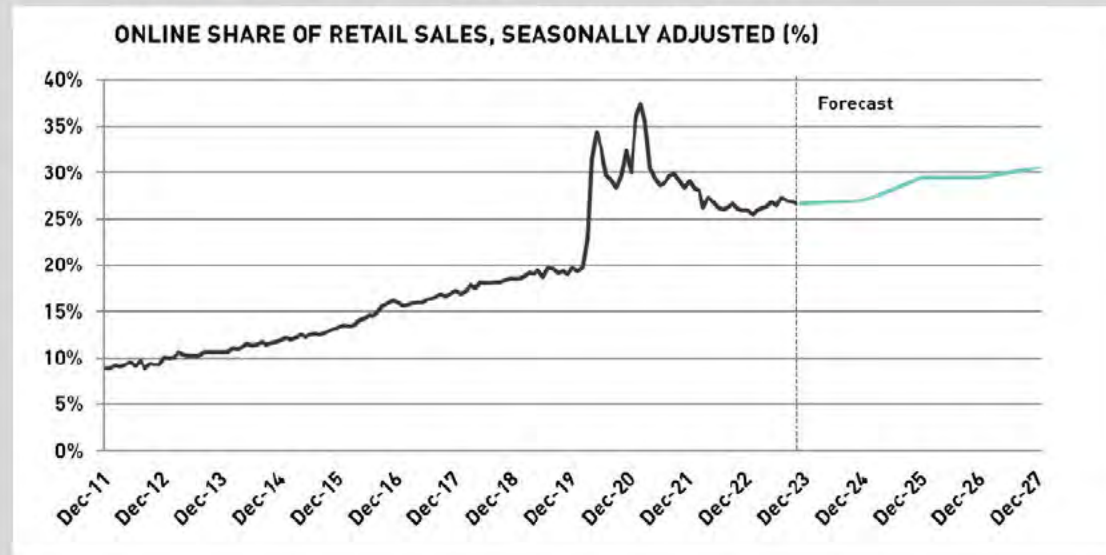
Take up will continue to stabilise following Covid & Brexit peak and remain at healthy levels with sustained occupier demand and investor sentiment.

A new era (Renaissance!) of logistics will occur with significant sectoral pressures over the next 10 years driven primarily by technological innovations and environmental concerns. Increased demands on ever improving cost efficiency and the relentless growth of the online retail sector will be balanced by environmental concerns, climate change pressures, brand loyalty and demands for better working environments.

An increased awareness on supply chain security will lead to more onshoring / near shoring in place of relying on stretched global networks affected by wars / conflicts and natural disasters. This has increased post Brexit and is linked to manufacturing commitments in the UK.

Units will continue to be larger and more bespoke / specialised to generate operational efficiencies offering greater warehouse volumes. Haunch heights of 18-21m will become more common place on large units compared to the traditional 15m. Greater areas of open space will be required with an attractive business environment.

On-line retail as a proportion of high street shopping will continue to grow and increase logistics demand and need for efficiencies (delivery slots). The current 25% (2023) share of the UK retail market is predicted to increase to circa 30% by 2027. In the USA there are some 300 million internet shoppers – 91% of the population.



The UK logistics market is projected to grow at a compounded annual growth rate of 6.3% (Deloitte) with more conservative estimates still at circa 4% annually.

Increased demand from occupiers to reduce their carbon footprint & provide more sustainable buildings with better ESG and CSR credentials, better working environments.

Environmental impact is a big factor for logistics companies. Positive perception affects customers and increases brand loyalty.

The logistics industry has stated it is aiming to have zero greenhouse emissions by 2040.

Consideration of alternative fuel use and removal of natural gas to sites.

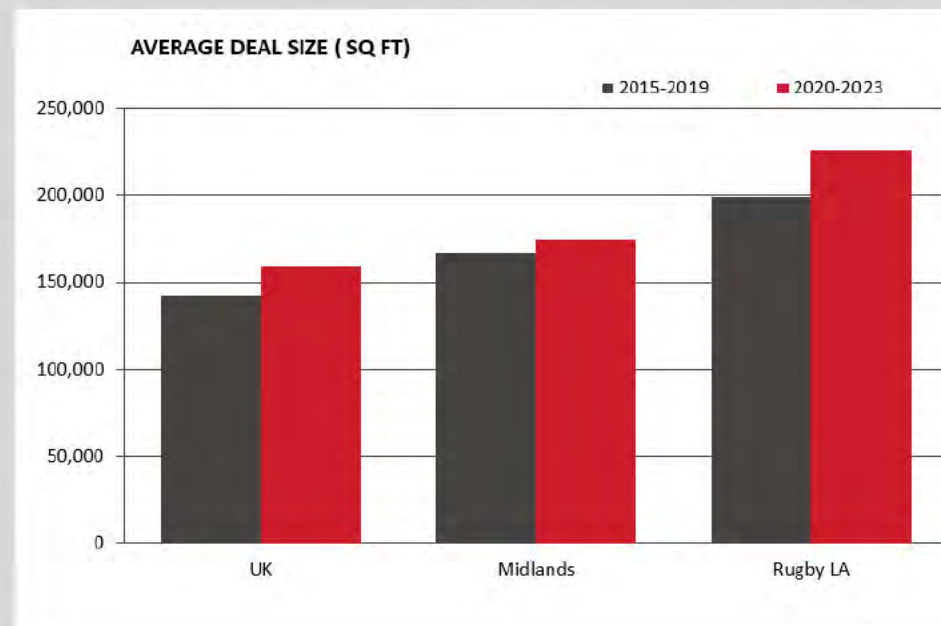
Digitalisation and innovation will be key drivers to provide more efficient faster cheaper and more cost-effective logistics offers. According to Allied Market Research the digital logistics market will develop at a 23% annual rate over the next few years. In the USA it began at \$2.92billion in 2020 and is predicted to grow to \$22.9 billion by 2030. This will inevitably flow through to the UK logistics industry.

Increased pressure to ensure supply chains are tightly integrated and data driven and optimised for speed and effectiveness.

Increased reliance on artificial intelligence (AI) and machine learning (ML) will revolutionise predictive analytics and supply chains.

REVIEW OF MARKET TRENDS – AVERAGE UNIT SIZE

LSH Research covers UK logistics activity from 2015 onwards. The graph and tables below summarise the changes over this period of recorded deals.



This data clearly illustrates the trend of specialist logistics units increasing in size over the last decade with businesses seeking larger premises to drive greater cost efficiencies across their supply chain. The figures for the Rugby Local Authority area over this period have been higher than the national average highlighting the emphasis on logistics demand given its central location.

The average deal size across the UK in 2015 was 122,878 sq ft whilst for the Rugby Local Authority the figure was 177,696 sq ft (44.6% above UK average).

In 2023 the average size of a UK deal has increased to 139,941 sq ft whilst the corresponding figure for the Rugby Local Authority area was 301,459 sq ft (115.4% above the UK average). This clearly illustrates the growing trend for larger units and recent commitments to the area.

In the tables below we detail average deal size take-up over the period 2015-2023 as well as contrasting average deal size for 2015-2016 against 2022-2023. Whilst the UK average deal size shows an 11% increase in size over this period, there has been a 36% increase in unit deal size for the Rugby Local Authority area.

AVERAGE DEAL SIZE (SQ FT)

	UK	Midlands	Rugby LA
2015	122,878	128,198	177,696
2016	151,488	169,497	188,459
2017	132,082	145,974	225,402
2018	168,013	203,319	No deals
2019	142,932	197,171	178,951
2020	168,275	185,904	196,602
2021	160,442	171,756	197,453
2022	158,614	169,033	223,152
2023	139,941	175,180	301,459

AVERAGE DEAL SIZE (SQ FT)

	UK	Midlands	Rugby LA
2015-2016	136,583	149,791	181,732

2022-2023	151,827	171,330	246,644
Change	11%	14%	36%

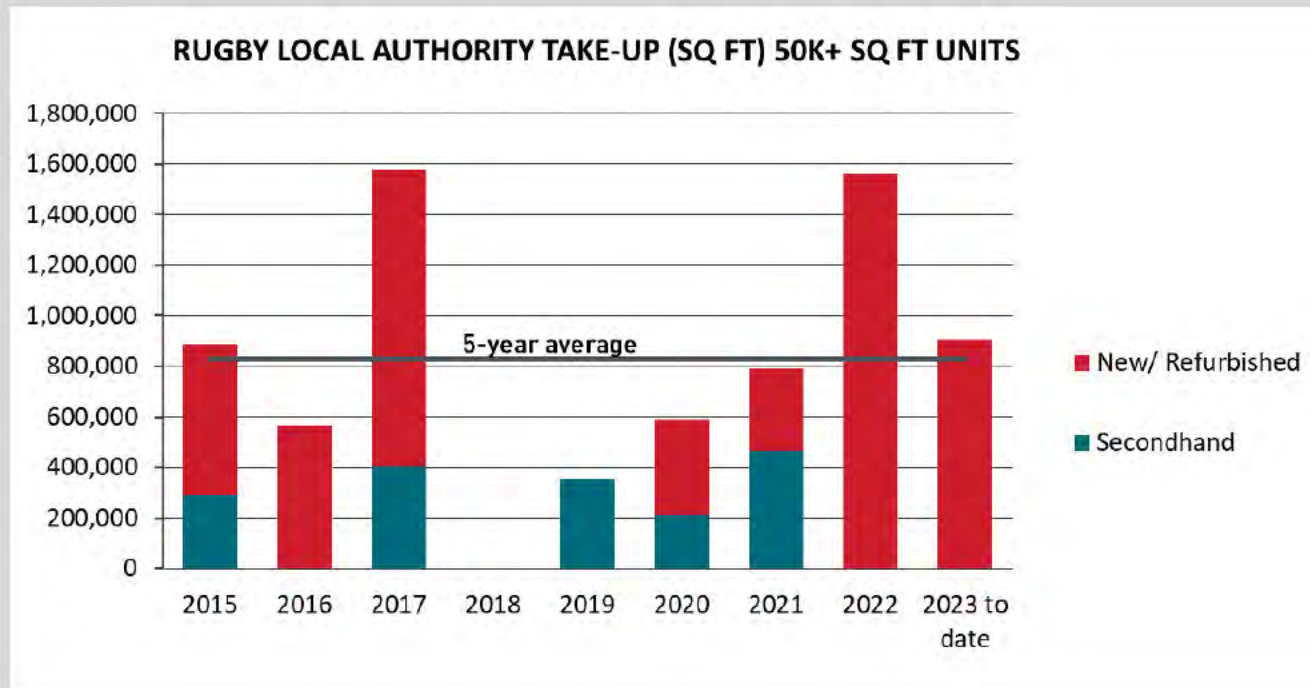
OCCUPIER DEMAND – RUGBY LOCAL AUTHORITY

We provide historic take up figures from LSH Research below and within the amended Rugby AMR (Appendix 3).

This illustrates annual take-up over the period 2015-2023 against the 5-year average take-up figure of 826,714 sq ft. The bar chart and table below clearly demonstrate the change in annual take-up. It should be noted that all take-up over 2022-2023 has been in the new/Grade A sector and take-up levels has been very healthy. There was a considerable increase in take-up in 2022 (post Covid) at 1,562,065 sq ft, almost double the take-up of the previous year being primarily the Iron Mountain Campus pre-let at Symmetry Park. 2023 has continued to see healthy levels of demand with take-up of 904,376 sq ft, 9% above the 5-year average. By contrast average, take-up over 2015-2016 was 639,000 sq ft per annum, driven by commitments to the new speculative development at Rugby Gateway (Roxhill / SEGRO) and Prologis Park, Ryton. It is clearly noticeable that there was no new registered take-up in the Rugby area over the period 2018-2020, highlighting the lack of available stock and no new stock under construction for the period 2018-2020, as shown in the availability chart below. This lack of stock would hinder occupier demand and take up.

It is our assertion with a good supply of new logistics units to the Rugby area occupier take-up levels should be well in excess of 1,500,000 sq ft per annum and probably significantly higher with new build to suit commitments.

A summary schedule of current active occupier requirements focussed around the Rugby area/M6 is included as Appendix 2. This highlights the very strong levels of enquiries for logistics units around Rugby with a total of circa 9,000,000 sq ft of current active identified enquiries in a size range from 80,000 – 800,000 sq ft.



RUGBY LA TAKE-UP 50,000 SQ FT UNITS

Please note the notable deals column which demonstrates the majority of take-up in each year over an 8-year period was for new/Grade A quality larger units.

	New/ Refurbished	Second-hand	No. of Deals	Notable Deals	5-year average
2015	598,141	290,337	5	Hermes - pre let Rugby Gateway and DHL - pre let Rugby Gateway circa 500,000 sq ft Circa 56.27% - New/Grade A	826,714
2016	565,378		3	JLR - letting Prologis Park, Ryton circa 470,000 sq ft Circa 83.13% - New/Grade A	826,714
2017	1,175,436	402,379	7	Meggitt Ansty Park, Coventry circa 440,000 sq ft Network Rail, Prologis Park Ryton circa 300,000 sq ft Amazon Rugby Gateway circa 235,000 sq ft	826,714

				(Circa 975,000 sq ft) Circa 61.79% - New/Grade A	
2018			0		826,714
2019		357,901	2	Second hand lettings	826,714
2020	376,563	213,242	3	Amazon, Prologis Central Park Rugby circa 377,000 sq ft Circa 63.91% - New/Grade A	826,714
2021	322,100	467,713	4	DHL - Prologis Park Ryton circa 300,000 sq ft Circa 37.98% - New/Grade A	826,714
2022	1,562,065		7	Iron Mountain campus – Symmetry Park Rugby four buildings circa 1,000,000 sq ft DHL - Prologis Park Ryton 331,000 sq ft (Circa 1,331,000 sq ft) Circa 85.20% - New/Grade A	826,714
2023 to date	904,376		3	J Sainsbury at Central Park, Rugby circa 661,000 sq ft Staircraft and Polestar at Ansty Park, Coventry circa 173,000 sq ft and 70,000 sq ft Circa 100% - New/Grade A	826,714

	New/ Refurbished	Second-hand	5-year average
2015	598,141	290,337	826,714
2016	565,378		826,714
2017	1,175,436	402,379	826,714
2018			826,714
2019		357,901	826,714
2020	376,563	213,242	826,714
2021	322,100	467,713	826,714
2022	1,562,065		826,714
2023 to date	904,376		826,714

SUMMARY OF RUGBY LOGISTICS MARKET

Overview

The logistics market in Rugby has grown significantly over the last 20 years in line with the rapid expansion of the logistics sector nationally and the strong location and employment benefits that this centrally located area offers. It remains one of the most popular industrial areas in the UK.

In the 1990's Kingspark Developments with various institutional funds developed out greenfield land around Brownsover between Rugby town centre and Junction 1 of the M6 with units ranging from 50-350,000 sq ft. These remain popular and well let although now offer more dated and smaller accommodation as the logistics sector has evolved.

Notable developments in the early 2000's have included Prologis' development of the Central Park site adjacent to the motorway junction where larger units have been provided initially with the relocation of publisher Pearson Group from Magna Park Lutterworth to new bespoke premises. This was followed by Roxhill and SEGRO securing the Rugby Gateway site of 111 acres in 2013 and securing planning for 1.8m sq ft of new development. The scheme which sits adjacent to Junction 1 of the M6 was fully let within 3 years with notable occupiers including Hermes (Evri) DHL, fashion retailer H&M and Amazon.

To the south of Rugby town centre Tritax have successfully developed out their Symmetry Park site which secured the notable pre-let to Iron Mountain taking 1,000,000 sq ft across four units. Tritax now intend to speculatively develop out the rest of the site with 3 new units.

Occupier & developer interest remains very strong for Rugby and the surrounding area given its very strong locational appeal. Against very competitive bidding French owned Barjane Developments have just secured a 5-acre site on Central Park where they will offer a build to suit for up to 100,000 sq ft. In addition, on land to the south of Central Park Newlands Developments have secured detailed planning permission for a 250,000 sq ft unit and are intending to speculatively develop out this unit in 2024. The recent letting of the former 20-year-old Gap unit of 661,000 sq ft on Central Park by Prologis to J Sainsbury clearly highlights the appeal of the location. Within the Borough there is limited land to offer new larger bespoke facilities which is the focus of most active logistics companies.

Supply

For units above 50,000 sq ft, there is 1.3m sq ft of supply in the Rugby local authority across six speculative units which are currently available but subject to strong interest (Prologis Rugby and Ansty Park). This is equivalent to 1.6 years of supply based on the 5-year average take-up levels. All supply is grade A specification, with 67% comprising of new build speculative space and the remaining 33% is existing refurbished space.

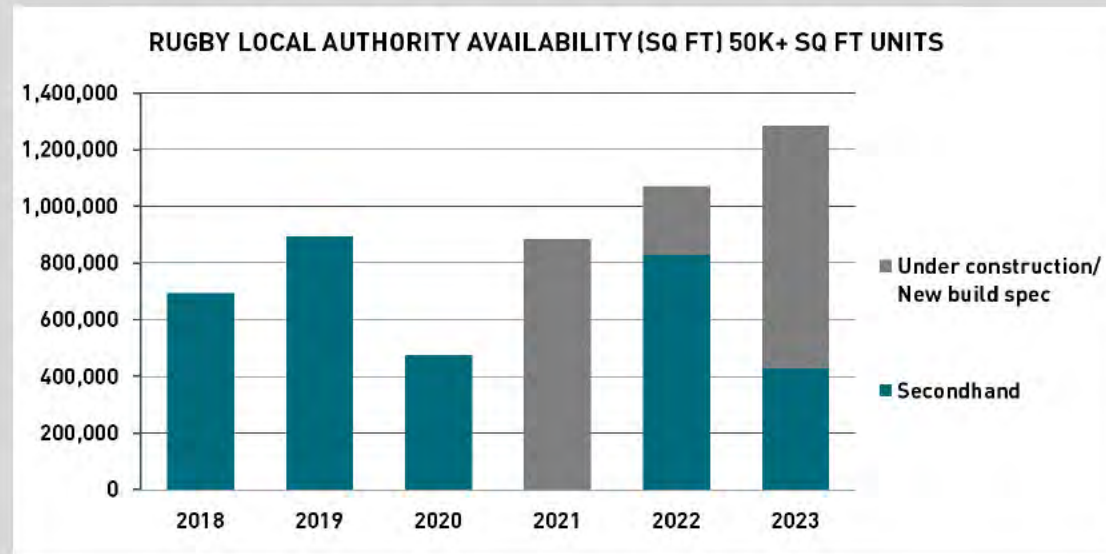
Speculative development under construction totals 856,109 sq ft in Rugby, equating to 67% of supply, as at year end 2023. This is all located at JD.com's Phase Two of Apollo, Ansty Park across four units which is due for completion in Q1 2024. We understand a decision has just been made to speculatively build out the remaining three plots at Symmetry Park adding Unit 5 (390,694 sq ft), Unit 6 (338,064 sq ft) and Unit 7 (170,473 sq ft) to supply with PC Q3 2024, no announcement has yet been made.

The largest unit currently available in Rugby is 376,563 sq ft of fitted space at DC1 Prologis Rugby Central Park, which was rumoured to previously be under offer but is now the subject of strong interest.

RUGBY LOCAL AUTHORITY AVAILABILITY - 50,000 SQ FT PLUS UNITS

Unit	Postcode	Sq ft	Grade	Status	Developer	Quoting rent (per sq ft)
Cosford Lane, Swift Valley Industrial Estate	CV21 1QN	52,499	Existing Refurbished	Under refurbishment		£9.50
Apollo VII Ansty Park Phase 2	CV7 9JU	116,322	New build Spec	Under Construction	JD.com	£10.50
Apollo III Ansty Park Phase 2	CV7 9JU	171,377	New build Spec	Under Construction	JD.com	£10.50
Apollo VI, Ansty Park Phase 2	CV7 9JU	268,371	New build Spec	Under Construction	JD.com	£10.50
Apollo V, Ansty Park Phase 2	CV7 9JU	300,039	New build Spec	Under Construction	JD.com	£10.50
DC1 Prologis Rugby Central Park	CV23 0WB	376,563	Existing Refurbished	Available Vacant	Prologis	£9.50

Supply has increased by 20% since the end of 2022, driven by the speculative development. However, second-hand supply has fallen by 48% since the end of 2022. Overall, the market has tight supply, particularly given the majority of availability is located at Ansty Park which is close to the border with Coventry. However, an announcement has just been made to spec build the remaining three plots at Symmetry Park adding Unit 5 (390,694 sq ft), Unit 6 (338,064 sq ft) and Unit 7 (170,473 sq ft) to supply with PC Q3 2024.



Vacancy Rates

Rugby has a vacancy rate of 4.3% for units above 50,000 sq ft, below the West Midlands average of 4.7% and in line with the UK average. For units of 100,000+ sq ft, the availability rate is lower at 4.1% in Rugby. These figures are sourced from CoStar.

	50k-99k sq ft units	50k+ sq ft units	100k+ sq ft units
Rugby LA	5.8%	4.3%	4.1%
West Midlands	5.9%	4.7%	4.3%
UK Average	4.7%	4.3%	4.1%

Rents

Rugby's prime rent for a circa 50,000 sq ft unit stands at £10.00 per sq ft at the end of Q3 2023, increasing 5.3% over the last 12 months. This compares with the average of the key West Midlands markets at £8.81 per sq ft, increasing 4.4% over the last 12 months, and the average of the UK's 60 key markets at £11.80 per sq ft, increasing 8.3% over the period.

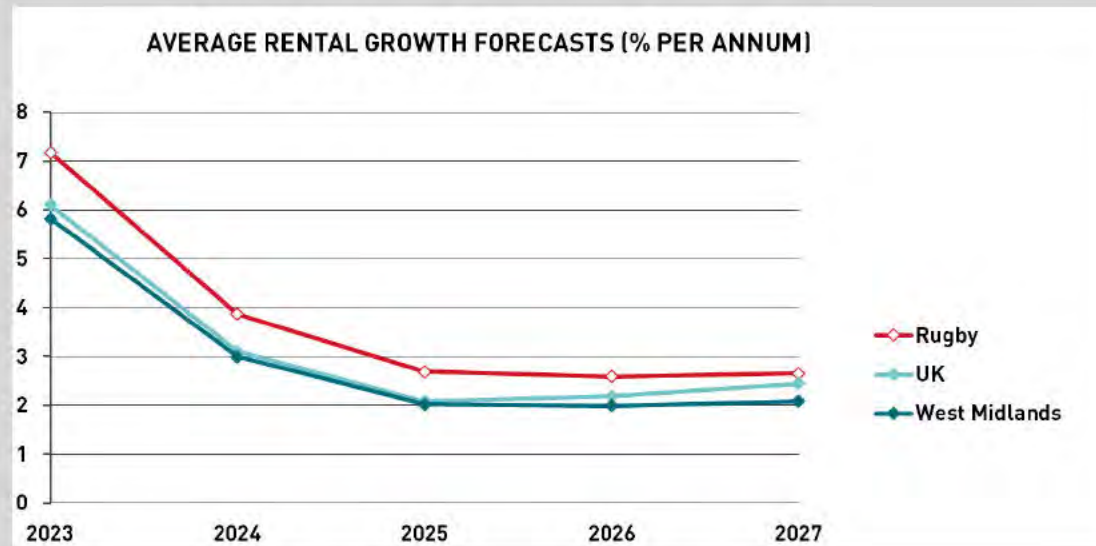
Rugby's prime rent for a circa 100,000 sq ft unit stands at £9.75 per sq ft at the end of Q3 2023, increasing 2.6% over the last 12 months. This compares with the average of the key West Midlands markets at £8.44 per sq ft, increasing 4.7% over the last 12 months, and the average of the UK's 60 key markets at £11.21 per sq ft, increasing 8.2% over the period.

A new record rent has been achieved in December 2023 following Polestar's 70,389 sq ft letting at Apollo I Prospero Ansty Park at £10.95 per sq ft on a ten-year term.

PRIME RENTS (PER SQ FT) - Q3 2023

	50k sq ft unit	100k sq ft unit
Rugby	£10.00	£9.75
West Midlands	£8.81	£8.44
UK Average	£11.80	£11.21

Independent forecasts from RealFor show average rental growth projections for Rugby to outperform the West Midlands and UK average over the next four years. Note, these forecasts include all sizes and quality of industrial assets. Average rental growth in Rugby is forecast at 2.9% per annum over the period 2024-2027, compared to the West Midlands average at 2.3% and UK average at 2.5%.



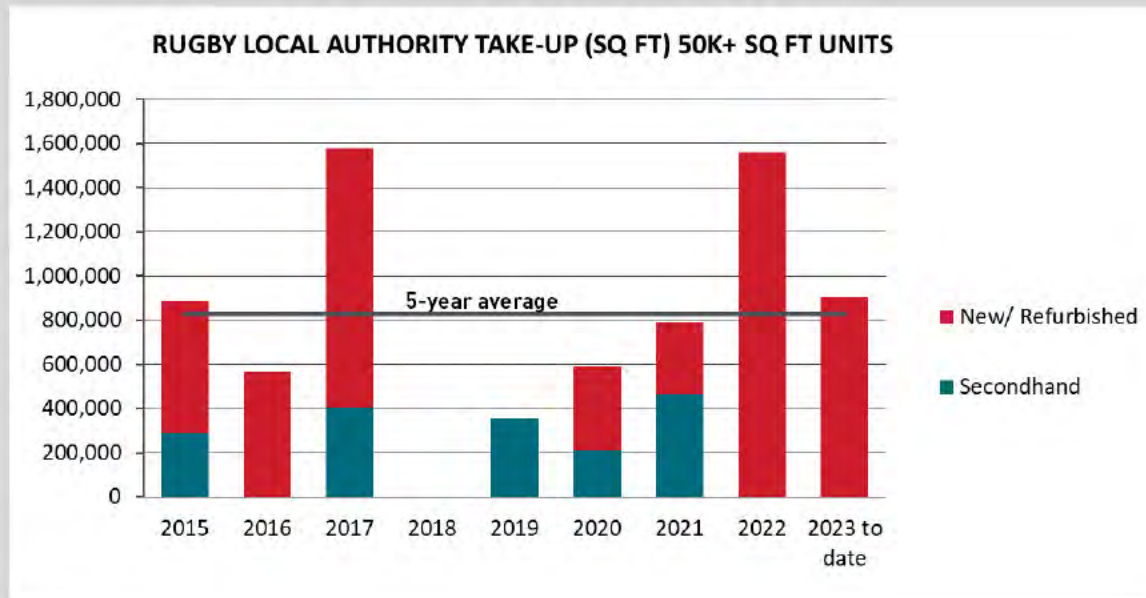
LATEST DEALS IN RUGBY LA

Quarter	Address	Unit	Postcode	Sq ft	Grade	Term	Rent (psf)
2023 Q4	Apollo I Prospero Ansty Park	Polestar	CV7 9JU	70,389	New build Spec	10	£10.95
2023 Q2	Apollo II Prospero Ansty Park	Staircraft/ Travis Perkins	CV7 9JU	172,639	New build Spec	15	£9.25
2023 Q2	Rugby 661, Castle Mound Way	J Sainsbury	CV23 0WA	661,348	Existing Refurbished	10	£9.00
2022 Q4	DC4 Prologis Park Ryton	DHL Express (UK) Ltd	CV8 3LF	165,200	Existing Refurbished	10	£9.50
2022 Q2	SwiftBox, Swift Valley Business Park	HighSpeed Services Ltd	CV21 1HG	99,492	Existing Refurbished	10	£6.95
2022 Q2	DC9, Prologis Park Ryton	DHL	CV8 3LF	330,770	New build Spec	10	£7.25
2022 Q1	Unit 1 Symmetry Park Rugby	Iron Mountain	CV23 9JR	134,420	New build Spec	15	Collar and cap of £8.00 - £9.50
2022 Q1	Unit 2 Symmetry Park Rugby	Iron Mountain	CV23 9JR	186,262	New build Spec	15	Collar and cap of £8.00 - £9.50
2022 Q1	Unit 4 Symmetry Park Rugby	Iron Mountain	CV23 9JR	251,281	New build Spec	15	Collar and cap of £8.00 - £9.50
2022 Q1	Unit 3 Symmetry Park Rugby	Iron Mountain	CV23 9JR	394,640	New build Spec	15	Collar and cap of £8.00 - £9.50

Demand

For units above 50,000 sq ft, take-up in the Rugby local authority in 2023 to date totalled 904,376 sq ft, 9% above the five-year annual average. This was across three deals with the largest being Sainsbury's 661,348 sq ft letting at Rugby 661. While a combination of limited supply options in the Rugby local authority and the challenging economic environment have weighed on activity, the market has proved resilient.

The table above highlights that 7 deals were registered in 2022 for circa 1,500,000 sq ft whilst 3 transactions have completed up to Q3 2023 for circa 900,000 sq ft. This illustrates the reduced transactional activity across the sector in the light of economic headwinds and also the lack of larger scale options in the Rugby area. In contrast to the UK market transaction levels at around 100 deals per annum are in line with pre Covid acquisition trends.



KEY DEVELOPMENT SITES

Review of identified key development sites with Rugby Council area.

Symmetry Park Rugby

Scheme	Tritax Symmetry Park
Website	https://tritaxsymmetry.com/
Address	Symmetry Park, Rugby CV23 9JR
Developer	Tritax
Summary	<p>Extending to a total of 111 acres, Symmetry Park, Rugby has an outline planning permission to deliver up to 2 million sq ft of logistics floor space. Situated on the important M45/A45 strategic highway link, the site is located at the heart of the logistics 'Golden Triangle' network and is an established key distribution and manufacturing location. This phase of the park consists of a 7-unit industrial scheme.</p> <p>Development fully committed with announcement of speculative units and Tritax seeking to promote phase 2 expansion to the park.</p>
Size	From 130,000 - 400,000 sq ft across 7 industrial units
Planning	Promotion of further phase of development, no documentation seen
Site infrastructure	Complete for estate
Occupiers/ commitments	Tritax Symmetry has exchanged an agreement for lease with Iron Mountain on circa 1 million sq ft across four units (1 - 4) on a state-of-the-art logistics space forming their first UK Campus, subject to a collar and cap of £8.00 - £9.50 psf. Units 1 and 2 have reached practical completion with units 3 and 4 currently under construction.
Rents	Guiding £10.00 per sq ft
Current availability	<p>Detailed planning granted for:</p> <p>Unit 5 - 390,694 sq ft / Speculative Build / Q3 2024 (awaiting formal announcement)</p> <p>Unit 6 - 338,064 sq ft / Speculative Build / Q3 2024 (awaiting formal announcement)</p> <p>Unit 7 - 170,473 sq ft / Speculative Build / Q3 2024 (awaiting formal announcement)</p>

Radio Mast Site Rugby

Scheme	Radio Mast Site
Website	https://rugbyradiostation.co.uk/thefuture/the-urban-extension/
Address	Rugby Radio Station, A5 Watling Street, Clifton upon Dunsmore
Developer	BT / Aviva
Summary	Site sits north of Prologis establish DIRFT phases 1-3. As per planning documents up to 1,140,975 sq ft of commercial and employment space (B1, B2 and B8). There is an absolute prohibition on developing any new industrial accommodation over 5,000 sq m.
Size	Up to 1,140,975 sq ft includes retention of existing buildings, not all new build.
Planning	Part of larger scale mixed use urban expansion to include 6,200 new homes
Site infrastructure	Initial site infrastructure works commencing
Occupiers/ commitments	TBC - no detail provided
Rents	TBC - no detail provided
Current availability	TBC - no detail provided

Prospero Ansty

Scheme	Prospero Ansty Park
Website	https://www.apolloanstypark.co.uk/
Address	Prospero Ansty Park, Coventry CV7 9JU
Developer	Mans LLP and Opus Land
Summary	Ansty Business Park extends to 196 acres and offers up to circa 1.7 million sq ft of logistics accommodation
Size	From 70,000 - 500,000 sq ft
Planning	Originally B1 only development which has since been promoted to include logistics/B8
Site infrastructure	In place for the park
Occupiers/ commitments	Apollo I - 70,389 sq ft / Let to Polestar / Q4 2023 / £10.95 per sq ft Apollo II - 174,594 sq ft / Let to Staircraft / Q2 2023 £9.25 per sq ft Unit 2 - 490,000 sq ft / Let to Meggit PLC / Q1 2020
Rents	Guiding £10.50 per sq ft

Current availability

Apollo III - 171,378 sq ft / Speculative Build / PC Q1 2024
Apollo V - 300,039 sq ft / Speculative Build / PC Q1 2024
Apollo VI - 268,371 sq ft / Speculative Build / PC Q1 2024
Apollo VII - 116,322 sq ft / Speculative Build / PC Q1 2024
One D&B plot available for a circa 150,000 sq ft unit

CONCLUSION

We trust that the above provides a suitable summary of our views, using both our Research capabilities and expert market agency position in relation to the logistics sector in and around Rugby, together with overall national trends.

We believe this report strongly supports the proposal to provide additional commercial development land in Rugby to accommodate the evolving demands of the logistics sector and the recognised focus of the logistics industry on the Rugby area. There remains a significant shortfall in the availability of credible development land in the Rugby Local Authority area over the next 20 years and therefore the area will not be able to provide for projected occupier demand. On current take up projections there is only 1.6 years of supply based on average take up over the last five years and therefore after 2026 it is difficult to identify any credible development opportunity for both strategic and non-strategic occupation requirements.

APPENDIX 1 – RUGBY UPDATED MARKET ASSESSMENT REPORT

APPENDIX 2 - ENQUIRIES

Approximate total circa 9,000,000 sq ft of active Midland's enquiries. It should be noted that whilst there is a healthy level of manufacturing lead requirements the majority of demand is focussed on B8 logistics use. This is consistent with our view of the prevailing market conditions and business drivers. Any consent should allow for both uses particularly where requirements tend to be for larger bespoke premises.

Date	Occupier	Size	Area	Comments
Nov 23	Cushman & Wakefield (for client)	180-400,000	Midlands	Existing or under construction only. Obo 3PL
Nov 23	Louch Shacklock (for client)	300-400,000	Lutterworth & 15 miles	Preference for chilled space, but will retro-fit. Occupation Q2 24.
Nov 23	LSH (for a major retailer)	1,000,000	M6/M1	Ongoing search for bespoke new distribution facility in central Midlands location.
Nov 23	LSH (for EVRI)	100-200,000	Rugby/Coventry	Need for larger bespoke parcel facility given significant business growth.
Nov 23	Bellway Homes	200-350,000	Midlands	National housebuilder seeking modular housing facility. Early stages of search.
Nov 23	Savills (for client)	250,000-500,000	Midlands	Obo Tesco, relocation out of Hinckley DC. Ideally seeking cross-dock, look either existing or D&B.
Nov 23	Orn International	80-120,000	Midlands	Based in Buckingham and Banbury. Consolidating.
Nov 23	DSV	100-150,000	Midlands	Air and sea division. Linked with MK.
Nov 23	XPO Transport	100-300,000	Midlands	Contract led requirement.

Nov 23	GL Hearn (for client)	250-350,000	Midlands	2025 lease event.
Nov 23	PSK Knighton (for client)	75-100,000	Crick & surrounds	Occupation within the next 9 months.
Nov 23	Carter Jonas (for ID Logistics)	160-240,000	Northants – Coventry	Occupation Q2 2024, prefer flexible lease lengths.
Nov 23	CBRE (for Hill Helicopters)	250-350,000	Midlands	B2 occupier, 2025 lease event.
Oct 23	Knight Frank (for Collingwood Lighting)	100-150,000	Northampton and surrounds	Lease event next year. Nov 23 – Cost sensitive but keen to move.
Oct 23	Colliers (for client)	250-400,000	M1 / M40	Occupation Q4 2024 / Q1 2025. Nov 23 – Shortlisted 3.
Oct 23	CBRE (for client)	200-400,000	Northampton and surrounds	Client based in Northampton. Feasibility study. Nov 23 – No further forward.
Oct 23	Savills (for client)	150-350,000	Midlands	Existing / BTS. Preference for rail connection / close to RFT.
Sept 23	Savills (for client)	80-130,000	Midlands	Preference for existing. Occupation Q1 2024. Nov 23 – Need racked space.
Sept 23	Checkley & Co (for CEF)	300-500,000	Midlands	Plans & Spec provided. Nov 23 – Shortlisted 2 sites.
Sept 23	Avison Young (for client)	90-130,000	Daventry	Corporate client, B2 B8, timing Q1/2 2024. Nov 23 – Pushed into new year.
Sept 23	Louch Shacklock (for XPO)	150-200,000	Crick and surrounds	20k pallet positions. Timings Q2 2024. Nov 23 – Viewed racked space.
Sept 23	ILG	100-200,000	Northampton and surrounds	Viewed available options, early stages of requirement. Nov 23 – Crawley v. midlands under review

Sept 23	3PLRE (for client)	300-500,000	Leicestershire	Contract led requirement. Nov 23 – Contract chase
Sept 23	Synergy Retail Support	100-250,000	Golden Triangle	Northampton based 3pl, looking at additional space. Nov 23 – Viewed existing options.
Sept 23	CDW	200-250,000	Rugby & surrounds	Feasibility study. Possible expansion. Nov 23 – Rugby preferred.
Sept 23	JLL (for client)	250-280,000	Midlands	Occupation by Q1 2024 Nov 23 – under offer further north.
Sept 23	JLL (for client)	50-150,000	Midlands	Needs a minimum of 15 docks. Nov 23 – Search on hold.
Sept 23	LSH (for client)	200-500,000	Midlands and South	Leasehold but will consider FH. Timing Q1 2024.
Sept 23	Bleckmann	200,000	Golden Triangle	Viewing existing options

APPENDIX 3 – RUGBY BOROUGH COUNCILS ANNUAL MONITORING REPORT WITH COMMENTS

RUGBY

UPDATED MARKET ASSESSMENT REPORT

SEPTEMBER 2023

STOFORD

Lambert
Smith
Hampton

WORKING IN PARTNERSHIP

CONTENTS

EXECUTIVE SUMMARY	3
LSH H1 2023 NATIONAL OCCUPIER MARKET OVERVIEW	4
REGIONAL MARKET SUMMARY	11
REGIONAL MARKET - RENTS	14
LAND VALUES	17
INVESTMENT COMMENTARY	18
CONCLUSION	21

EXECUTIVE SUMMARY

This report is a supplement to the Site & Market Assessment Report produced in December 2022 and provides a market update covering H1 2023. As discussed, we will ensure to provide further updated market commentary as required.

LSH H1 2023 NATIONAL OCCUPIER MARKET OVERVIEW

UNCERTAINTY WEIGHS ON ACTIVITY

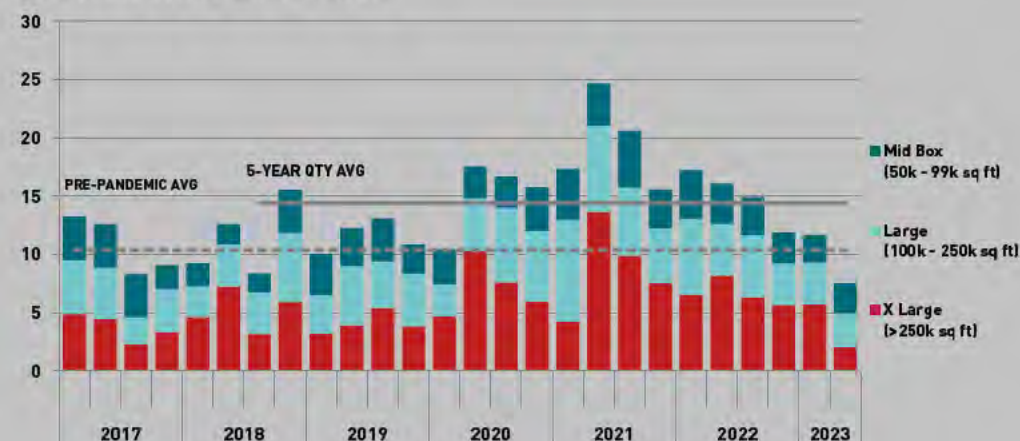
Amid a challenging economic backdrop, UK industrial & logistics occupier demand slowed during the first half of 2023. However, a clear focus of demand on high quality space continues to drive rental growth.

ACTIVITY SETTLES BACK

The pandemic-driven clamour for space appears to have run its course. For units over 50,000 sq ft, total UK take-up hit 19.2m sq ft in the first half of 2023, down 28% on H2 2022 and 33% below the five-year half-yearly average. Activity is back into line with pre-pandemic levels, with H1 take-up only 7% below the half-yearly average seen prior to 2020.

That said, persistently high inflation and a steady stream of interest rate hikes over the first half of 2023 were reflected in a deterioration of activity during the period. Q2's take-up of 7.5m sq ft was 36% down on Q1's level. However, analysing by the number of deals, Q2's drop-off was not as sharp, with only 17% fewer deals compared with Q1.

UK TAKE-UP BY SIZE BAND (M SQ FT)



LSH H1 2023 NATIONAL OCCUPIER MARKET OVERVIEW

ABSENCE OF MEGA DEALS

While all size-segments recorded take-up below trend, subdued activity at the larger end of the market weighed most heavily take-up. There was a lack of 'mega deals' in H1 with a complete absence of transactions above 750,000 sq ft, compared with six during the previous six months of H2 2022.

Having been key to the boom in 2021, the retrenchment of retail-led activity has been the main drag on recent take-up. The retail and wholesale sector still just accounted for highest share of H1 take-up, at 29%, albeit volume was 45% below trend. More specifically, Amazon's changing role in market has been especially key – having acquired over 25m sq ft between 2020 and 2022, the online behemoth was behind less than 1m sq ft in H1 2023 and was instead actively disposing of 2m sq ft space.

That said, major commitments by retailers were seen in H1, including Sainsbury's' 661,348 sq ft letting of Rugby 661, formerly occupied by Gap, Tesco's 621,000 sq ft pre-let at Panattoni Park Aylesford and TK Maxx's 454,130 sq ft letting at Crewe 460.

3PLS KEEP FOOT ON THE PEDAL

Meanwhile, healthy demand from third-party logistics operators continued relatively unabated, with take-up from the sector in H1 only 5% below the five-year average and accounting for 29% of total take-up. A 3PL operator was also behind the largest deal of H1, namely Maersk's 685,000 sq ft commitment at Segro's East Midlands Gateway.

With retail's easing in demand since the pandemic-boom, the sectors now contribute much more evenly to demand. Following behind third-party logistics operators and retail and wholesale, manufacturing accounted for 25% of H1 take-up, a notable proportion for the sector. Significant deals included Hankook Tyre's 357,221 sq ft pre-let at DC9 Prologis Apex Park, Daventry and Space4's 493,000 sq ft new factory in Loughborough.

LSH H1 2023 NATIONAL OCCUPIER MARKET OVERVIEW

QUALITY COUNTS

The strong focus of demand for quality space continued apace into 2023. Occupiers' increasingly discerning attitudes around quality, ESG credentials and energy efficiency was reflected in grade A space accounting for 73% of take-up in H1, above the five-year average of 66%. Meanwhile, only 5.1m sq ft of secondhand space transacted in H1, the lowest half-year total on record.

WEST MIDLANDS DEFIES TREND

H1 activity was subdued across most of the UK regions. However, the West Midlands defied the trend with take-up of 3.8m sq ft 5% above its five-year average. The South East was also relatively resilient with take-up of 2.4m sq ft in line with trend. In contrast, the North East was H1's weakest performing region against trend, with take-up 84% down on its average and home to only three transactions above 50,000 sq ft.

IMPROVING CHOICE FOR OCCUPIERS

UK-wide supply has continued its upward trajectory since hitting an all-time low at the end of 2021. UK supply of units above 50,000 sq ft increased by 14% in the first half of the year to stand at 72.5m sq ft, reflecting both high levels of speculative development and secondhand space coming back to the market. However, supply remains tight in its historic context, equivalent to only 1.3 years of average take-up.

While all size segments recorded an increase in supply in H1, the XL segment (units above 250,000 sq ft) was the biggest contributor to the uplift. Total UK-wide XL unit supply picked up by a notable 31% in H1 to stand at 25.9m sq ft, boosted by several spec developments commencing construction and occupiers disposing of excess space in this size bracket.

Meanwhile, the large segment showed the most limited movement in supply, increasing by 4% during H1 to stand at 27.5m sq ft. While mid box supply increased by 9% during H1, it is the only segment where current supply stands below its five-year average level.

UK AVAILABILITY BY SIZE-BAND (M SQ FT)



LSH H1 2023 NATIONAL OCCUPIER MARKET OVERVIEW

Supply varies significantly across the UK regions. Having been undersupplied prior to the pandemic, Greater London is now the most well-supplied UK region based on average take-up levels, equivalent to 1.9 years of average take-up. Meanwhile, the North East and East of England are the tightest regions, each with supply equivalent to less than one years' worth of average take-up.

YEARS OF SUPPLY

YEARS OF SUPPLY BY REGION

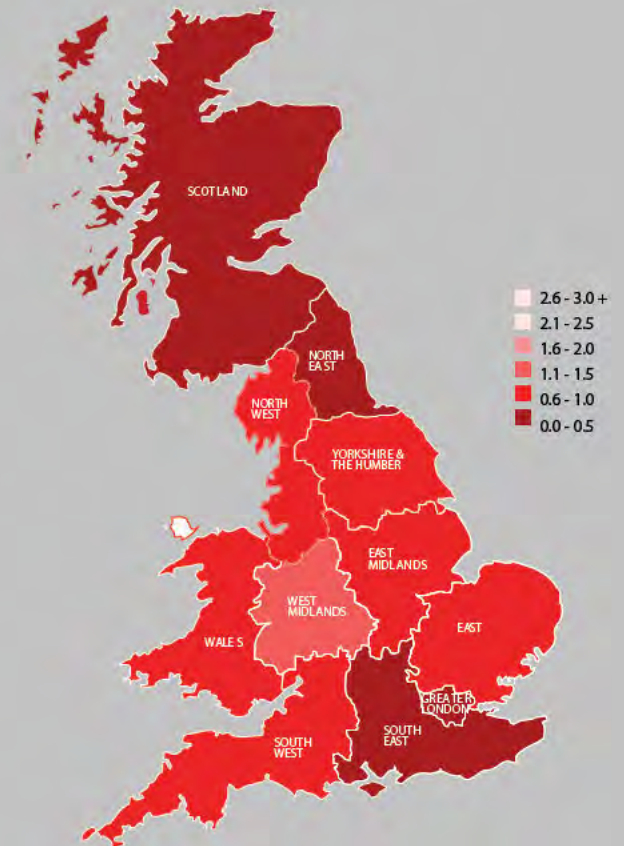
MID BOX
50K-99K SQ FT



LARGE
100K-250K SQ FT



X LARGE
>250K SQ FT



- 2.6 - 3.0+
- 2.1 - 2.5
- 1.6 - 2.0
- 1.1 - 1.5
- 0.6 - 1.0
- 0.0 - 0.5

LSH H1 2023 NATIONAL OCCUPIER MARKET OVERVIEW

SPEC DEVELOPMENT EASES

Challenges surrounding cost of finance and construction along with the market dynamics are weighing heavily on development appetite. Speculative development under construction at the end of H1 totalled 21.4m sq ft, falling 9% from the all-time high at the end of 2022. The East of England saw the sharpest reduction, falling almost 60% to stand at just over 700,000 sq ft.



That said, over 4m sq ft of spec development commenced H1 2023, with several regions witnessing an increase in construction activity. Greater London saw spec development increase by 50% since end the of 2022, with 1.7m sq ft now under construction across 15 units.

Our analysis of anticipated spec development starts points to a continued easing in development, with 16m sq ft of spec deemed likely come forward over the next 12 months. However, given the continued rises in interest rates and dampened economic outlook, it is likely that many developers may delay putting spades in the ground without securing a pre-let, reducing the anticipated volume.

Positively, the slowing pipeline should assuage any fears of potential oversupply in the market, with supply expected to peak towards the end of 2023 then gradually contract during 2024 amid improving confidence in the occupier market.

LSH H1 2023 NATIONAL OCCUPIER MARKET OVERVIEW

LAND VALUES STABILISE

The pace of rental growth has been easing since the heights of 2021 but, unlike other property sectors, it remains firmly in positive territory. Across the UK's 60 key markets, average prime rents for 50,000 sq ft units increased by 8% over the 12 months to June 2023, down from 15% in 2021. Growth also eased through the period, increasing 3% in H1 2023, down from 4% in H2 2022. However, rental growth has varied considerably, with the key markets of the North West recording average growth of 13% over the last 12 months.

Given occupiers preference for quality space with strong ESG credentials, and a slowing in the development pipeline, growth rates are forecast to continue easing as opposed to falling in absolute terms, but nonetheless compare favourably with other property sectors in the current climate.

PRIME RENTAL GROWTH EASES

The pace of rental growth has been easing since the heights of 2021 but, unlike other property sectors, it remains firmly in positive territory. Across the UK's 60 key markets, average prime rents for 50,000 sq ft units increased by 8% over the 12 months to June 2023, down from 15% in 2021. Growth also eased through the period, increasing 3% in H1 2023, down from 4% in H2 2022. However, rental growth has varied considerably, with the key markets of the North West recording average growth of 13% over the last 12 months.

Given occupiers preference for quality space with strong ESG credentials, and a slowing in the development pipeline, growth rates are forecast to continue easing as opposed to falling in absolute terms, but nonetheless compare favourably with other property sectors in the current climate.

REGIONAL MARKET SUMMARY

Demand within the Borough remains very strong highlighting the strong logistics credentials of this location with significant take up in comparison to other areas of the UK. Notable deals include DC628's letting to Zara & Campus 450's letting to Lloyd Fraser Group totalling over 1.1 million sq ft of logistics take up at DIRFT. In addition, J Sainsbury took Rugby 661 at Central Park Rugby and Iron Mountain took circa 1 million sq ft across 4 units at Symmetry Park Rugby.

The principle in-Borough availability / competition pipeline is outlined in the 'In-Borough Employment Allocations' section in the Site & Market Assessment Report produced in December 2022 (page 11). For the purpose of this report we have provided an updated summary of pipeline, competition and availability within the wider submarket:

REGIONAL MARKET SUMMARY

COMPETITION/PIPELINE

Prologis RFI DIRFT III:

Located almost opposite the subject site – 4 plots remain ranging from 20 to 80 acres. The largest plot is long and narrow which may restrict deliverable layouts. The most immediate competition with enabling works largely complete, development plateaus formed and a DCO in place (8-week planning) – delivery is less than 12 months subject to detailed consent and specification. Not located in borough therefore won't compete for Rugby BC's employment allocations. The scheme currently has one new build spec unit available DC327 quoting £9.75 psf. The most recent deal is DC628 let to Zara at £9.75 psf (10 years / 5-year break).

Symmetry Park, Rugby:

Extending to a total of 111 acres, Symmetry Park, Rugby has an outline planning permission to deliver up to 2 million sq ft of logistics floor space. Initial site infrastructure works for the first phase started in 2021. Tritax Symmetry has since exchanged an agreement for lease with Iron Mountain on circa 1 million sq ft across four units on a state-of-the-art logistics space forming their first UK Campus, subject to a collar and cap of £8 - £9.50 psf. Units 1 and 2 are reaching practical completion with units 3 and 4 currently under construction. The remaining balance of the site has the capability to offer bespoke design & build facilities to suit individual occupier requirements between 100,000 – 1 million sq ft to meet an occupation date during 2024. Detailed planning has been granted for three buildings: Unit 5 (390,694 sq ft), Unit 6 (338,064 sq ft) and Unit 7 (170,473 sq ft) ready Q2 2024 guiding £9.50 per sq ft, with interest from Iron Mountain to take on a further unit at the site.

Prologis Apex Park, Daventry:

Approx. 10 miles away from the subject site located off the A45 with inferior links to the M1 / M6. Prologis have recently signed an agreement Q1 2023 with Hankook Tyre UK, to take the final plot at Apex Park to provide a new build-to-suit unit extending to 357,221 sq ft on a 10 year lease at £8.50 psf. Existing occupiers making up the remainder of the site include Hellmann, Worldwide Logistics, Cummins, Toolstation, Weatherspoon and Ingram Micro. We have been advised no further land is coming forwards for development.

Magna Park North, Lutterworth:

GLP have speculatively built 3 units which have now recently completed and let in H1 2022; MPN2 (503,210 sq ft) & MPN3 (297,194 sq ft) let to Iron Mountain for 15 years at £7.95 per sq ft and MPN1 (200,102 sq ft) let to Bleckmann for 10 years at £7.25 per sq ft. Magna Park North Lutterworth offers a significant new extension to the existing developments and brings forward over 225 acres of land for development. In addition, a further build-to-suit development of 310,000 sq ft (MPN4) has been let to LX Pantos. The next phase (Phase II) of development offers build-to suit opportunities totalling 2 million sq ft across three units, with the first plot capable of delivering up to 1.6 million sq ft in a single building. All plots are development ready with earthworks and infrastructure complete.

REGIONAL MARKET SUMMARY

COMPETITION/PIPELINE

Magna Park South, Lutterworth:

Magna Park South has seen considerable expansion with over 2.2 million sq ft delivered in the last 3 years. The next phase of development will see three new speculative units of 119,000 sq ft (MPS11), 136,000 sq ft (MPS10) and 388,000 sq ft (MPS9) which are currently under construction expected to complete by Q1 2024 guiding at £10.50 per sq ft. The first phase of development at Magna Park South Lutterworth saw the development of circa 1.2 million sq ft of speculative development across four units. All units were leased ahead of completion to Amazon, JD.com, Whistl and Movianto at deals between £6.50 - £7.00 psf in 2021. The next phase of development (Phase II) saw the construction of four additional units of 187,000 sq ft, 211,000 sq ft, 256,000 sq ft and 355,000 sq ft two of which have already been let to Centrica, a third to Unipart and the final unit of 187,000 sq ft (MPS5) is available now for immediate occupation quoting at £9.75 per sq ft.

Logicor Park, Daventry:

Logicor acquired the former XPO site in 2021 and are redeveloping the site to create 800,000 sq ft of modern logistics space across 38.5 acres. Detailed planning consent has been secured for three new warehouses of 135,000 sq ft, 280,000 sq ft and 385,000 sq ft. Demolition is currently underway of the existing building with the aim for completion of the new units Q1 2025.

East of Lutterworth:

The site was allocated as Green Belt release in Harborough District Council's Local Plan adopted April 2019 under Planning Policy E1 Strategic Development Area Lutterworth, comprising a mixed residential / commercial allocation featuring 56 acres of employment uses.

Owned by Leicestershire CC who were tendering for joint venture development partners and was due to be openly marketed but has been placed on hold. We understand the allocation limits delivery of units to sub-100,000 sq ft across the masterplan. The site is clearly still some way off and highways improvements likely necessary given the wrong side of Junction 20 / M1. Gerald Eve have been advising LCC on a proposed sale which we expect is likely to be relaunched subject to prevailing market conditions. Leicestershire CC continue to review the position but require funds to support the residential element.

Equites Park, Rugby:

Newlands have control over an extension to Central Park, Rugby (just off J1 / M6) and has outline planning permission to deliver a single 250,000 sq ft unit. The unit had been under offer to CDW at circa £9.25 psf, 15 year term and 15 months rent free. The site is now subject to very strong investment interest.

REGIONAL MARKET - RENTS

Generally speaking the Midlands market has seen rents jump significantly over a very short period of time however with the more difficult economic backdrop the industrial market has slowed in terms of enquiries and the speed of decision making. However, quoting/guide rents have still seen growth across the board, upwards pressure is being driven by a lack of supply and competing interest for the majority of stock up and built/under construction.

Prime Big-Box rents increased in excess of 10% over the 12 months to Q3 2023 to stand at c. £9.75 psf based on the letting of DC628 unit at Prologis RFI DIRFT III which largely demonstrates the recent strength of demand for prime new-build at the expense of secondary space as occupiers, particularly third party logistics firms, continue to streamline their supply chains in order to fulfill e-commerce contracts in line with an increasing emphasis on sustainability criteria.

Rents generally within the surrounding sub-market had remained subdued for a number of years due to a conservative attitude towards speculative development from the principal controllers of land – GLP (Magna Park) and Prologis (DIRFT) – with a predominance for headline grabbing deals to be pre-let. A shift to a speculative model in response to increased demand for space driven by a Covid related structural changes in consumer habits has had a profound impact on prime rents. Current quoting rents have been crystallised by 2023 lettings at Magna Park and DIRFT, the rental trajectory witnessed over the prevailing few years is expected to slow but still increase with the latest wave of speculative space at Magna Park Lutterworth and Prologis RFI DIRFT III which are expected to establish a new rental tone in the region of £10.00 + psf into early 2024. A rent in excess of £10.00 per sq ft is being proposed for a speculatively built 100,000 sq ft unit at Central Park, Rugby.

REGIONAL MARKET - RENTS

H1 2023 - Rugby/Daventry/Lutterworth: Take up has been good through the first half of 2023 with strong rents being achieved. At Magna Park, Lutterworth TVS Supply Chain took two units in Q1 (211,518 sq ft & 256,384 sq ft on a 15 year term at 8.95 psf. Further, key deals include DC628 DIRFT let to Spanish multinational clothing company Inditex (Zara) at £9.75 psf, Rugby 661 the former GAP unit (661,348 sq ft) at £9.00 per sq ft taken by J Sainsbury, Unit 3 Mustang Park (173,509 sq ft) to Ceva at £8.25 per sq ft and DC9 Apex Park to Hankook Tyre at £8.50 per sq ft.

Strong existing unit rents are supported by the letting of XDOCK 163 in Q3 2023 at Magna Park to Lloyd Fraser Group at £8.25 psf (10 year term / 12 month incentive over two years). In addition, at DIRFT Eddie Stobart's former HQ Campus 450 is currently undergoing refurbishment and has just let to Lloyd Fraser Group at £8.25 per sq ft on a 10 year term. The largest void is DC327 (327,689 sq ft) at Prologis DIRFT is currently available guiding £9.75 per sq ft and has strong interest. The major source of new pipeline remains DIRFT and Symmetry Park Rugby.

H1 2023 - Northampton: Occupier interest remains very strong for this prime logistics location, although deal conversions have been slower. Northampton 250 (250,000 sq ft) is available guiding at £8.50 per sq ft (Sub-let from 4PX, passing rent £7.95 per sq ft). Stock remains tight. BETA, Panattoni Park (205,026 sq ft) is currently under offer guiding at £8.50 per sq ft (Sub-let from Hotel Chocolat). In addition, Brackmills 163 (163,907 sq ft) is currently under offer by way of assignment, with a Rent Review recently settled at £7.91 per sq ft. BG180 Brackmills Gateway (180,000 sq ft) the last remaining unit on the development is currently available guiding £9.75 per sq ft.

Incentives and voids have been coming in through 2021/2022 with most well-designed schemes in a decent location pre-letting or letting close to PC. However, the market has slowed through 2023 with key decision making taking longer and lower occupational activity given the economic backdrop. There is evidence to suggest this downward pressure on voids and incentives has softened. In the interest of appraising I have therefore included a realistic void below (based on current market conditions assuming up-and-built speculative stock available as at the date of this report):

Assuming up and built new stock as at today we would recommend the following:

	ERV	Incentives (Months)	Void (Months)
<250,000 SQ FT	£9.75 (Quote £9.75)	12 (assuming 10 year straight term)	9
>250,000 SQ FT	£9.50 (Quote £9.50)	12 (assuming 10 year straight term)	9

These are realistic as at today but the market is moving constantly at present and we expect still to see steady growth over the next 12-18 months as the market settles and would suggest these assumptions are revisited regularly to ensure up to date.

REGIONAL MARKET - RENTS

Quarter	Occupier	Term (Years)	Region	Scheme name / unit	Market	Size (sq ft)	Tenure	Grade	Achieved Rent / Price (£PSF)
2022 Q3	Lloyd Fraser Group	10	East Midlands	Campus 450, DIRFT	Daventry	451,919	LH	Existing	£8.25
2023 Q3	Zara	10	East Midlands	DC628, ProLogis DIRFT	Daventry	628,943	LH	New build Spec	£9.75
2023 Q3	Lloyd Fraser Group	10	East Midlands	XDOCK 163 Magna Park Lutterworth	Lutterworth	163,423	LH	Existing	£8.25
2023 Q2	J Sainsbury	10	East Midlands	Rugby 661, Castle Mound Way	Rugby	661,348	LH	Existing	£9.00
2023 Q2	Caterpillar	10	East Midlands	Unit 1 Griffen Park Leicester, Desford	Leicester	128,048	LH	New build Spec	£8.40
2023 Q2	Origin	10	East Midlands	L52 St Modwen Park Lincoln	Lincoln	52,036	LH	New build Spec	£7.50
2023 Q1	Maersk	15	East Midlands	SEGRO Logistics Park East Midlands Gateway	Castle Donnington	685,000	LH	Build to suit	£7.90
2023 Q1	Ceva	10	East Midlands	Unit 3 Mustang Park	Daventry	173,509	LH	Existing - Occupied	£8.25
2023 Q1	Hankook Tyre	10	East Midlands	DC9 Prologis Apex Park	Daventry	357,221	LH	Build to suit	£8.50
2023 Q1	TVS Supply Chain	15	East Midlands	MPS6, Magna Park	Lutterworth	211,518	LH	New build Spec	£8.95
2023 Q1	TVS Supply Chain	15	East Midlands	MPS7, Magna Park	Lutterworth	256,384	LH	New build Spec	£8.95
2023 Q1	Prologis & Biz Henderson	Conf	East Midlands	DC334 Zone B Prologis Park Wellingborough West	Wellingborough	334,913	LH	New build Spec	£7.25
2023 Q1	DSV	15	East Midlands	Unit 5 Mercia Park	Appleby Magna	315,000	LH	New build Spec	£8.25
2023 Q1	Wolseley	Conf	East Midlands	Phase 1A, Unit 3 Horizon 29	Bolsover	201,190	LH	New build Spec	Conf
2023 Q1	Bihr / Race FX9	15	East Midlands	Unit 2 (CW134)	South Normanton	134,192	LH	New build Spec	£7.75

LAND VALUES

Land values have experienced significant turmoil from the June 2022 peak. Build cost inflation, the rising cost of debt, and softening yields have combined to challenge the viability of a number of sites and resulted in many cases in deals collapsing. There remains very little market evidence to support reduced land values. One recent notable transaction has been the sale of development land at Newport Pagnall Milton Keynes Junction 14 M1 where US developer Panattoni have purchased prime development land from Newlands for Speculative development, the exact land price remains confidential but is structured to include the turnkey construction of freehold units.

Given the significant shift within an extremely short timeframe, historic land value evidence is redundant. With new re-calibrated evidence yet to be crystalised in any meaningful scale development viability and consequently land values are now better analysed on a site-by-site basis based on specific financial inputs.

Barberry Developments remain under offer on the 4.80 acre Three Points site in Rugby (owner occupied by Mahle) on behalf of Barberry at a gross figure of £10.5m equating to £2.19m per acre – however this deal has since fallen victim to the variety of market influences outlined above. The land price has since reduced considerably reflecting the impact of weaker yields.

More recently Mulberry drew down a plot at Rockingham Speedway in Corby owned by BCA to deliver a c. 500,000 sq ft build-to-suit freehold turnkey at £850,000 per acre which we understand netted back to in the region of £650,000 per acre. Corby remains an inferior but recognised market and we would expect an appraisal to support a land value for the subject in the region of £650,000 per acre (net) in the current climate.

INVESTMENT COMMENTARY

Industrial bucked the trend amid a third subdued quarter for the wider investment market, with Q2 volume of £1.9bn rebounding by 38% from Q1. While this was still 24% adrift of the average, this partly reflects the significant price correction seen at the back end of 2022. Industrial also accounted for a notable 25% of overall volume in Q2, reflecting greater caution around market fundamentals in other sectors.

Comprising a modest 60 deals, Q2 was actually no busier than Q1 activity-wise, with the return of portfolio deals being key to the rebound. 11 portfolios changed hands in Q2, with a total value exceeding £1bn. However, as with Q1, Q2 saw an absence of £100m plus single asset deals so prevalent during the recent boom.

The global appeal of UK industrials was clearly evident in Q2, with overseas inflows accounting for a record 64% share of volume. As has been seen before, Blackstone dominated and was by itself behind 37%

of Q2 volume, with major deals comprising Trafford Park / Heywood Distribution Park and the Spears Portfolio worth a combined £632m. That said, strong overseas demand for UK industrial was also evidenced by new entrants to the market, examples including Crossbay, Urbz Capital and Covent Garden IP.

There is also a notable surplus of capital ready to be invested in the industrial & logistics market, albeit with a continued emphasis on prime locations and high-quality assets. Due to limited availability of widely marketed properties, we have seen a continuation of activity through off-market transactions throughout the summer period. As we now progress into Q4, we anticipate a surge in activity as multiple investors seek to deploy their capital before the year end.

We detail below comparable investment transactions of note that are of relevance to the subject site:-

INVESTMENT COMMENTARY

Address	City	Region	"Size (Sq Ft)"	Tenure	Year Built	"Income Length (to break)"	Tenant(s)	"Rent (PA)"	"Rent (PSF)"	RR Basis	Achieved Price	NIY	"Cap Val £ psf"	ERV (PA)	ERV (PSF)	RY	Purchaser	"Date Sold"
Caswell Road	Northampton	East Midlands	253,000	Freehold	2017	15.0	Black & Decker	£2,150,500	£8.50	"OMRV or RPI (2%-4%)"	£39,900,000	5.00%	£158	£2,277,000	£9.00	5.29%	n/a	Available
Connect 6	Leyland	North West	544,000	Freehold	2023	20.0	Victorian Plumbing	£4,080,000	£7.50	OMRV or CPIH+1% (1%-3%)	£74,000,000	5.42%	£136	£4,080,000	£7.50	5.42%	JD.com	Exchanged
Warth Park	Raunds	East Midlands	659,000	Freehold	2016	23.0	Howdens Joinery	£3,624,500	£5.50	OMRV	£84,300,000	4.03%	£128	£4,942,500	£7.50	5.49%	AVIVA	Aug-23
Stirling 150	Solihull	West Midlands	141,997	Freehold	2008	5.8	DHL Supply Chain	£908,652	£6.40	OMRV	£20,500,000	4.15%	£144	£1,206,975	£8.50	5.51%	CBRE IM	May-23
Unit 3 Hams Hall	Birmingham	West Midlands	177,801	Freehold	2001	3.4	DHL Supply Chain	£1,180,375	£6.64	n/a	£25,000,000	4.42%	£141	£1,511,309	£8.50	5.66%	Urbz Capital	Jun-23
Chalker Way	Abingdon	South East	128,046	Long Leasehold	2015	25.0	Prodrive Motorsport Ltd	£907,000	£7.08	RPI (1%-4%) or OMRV	£15,200,000	5.60%	£119	£1,024,368	£8.00	6.31%	Leftfield Capital	Feb-23
Arrow 248	Corby	East Midlands	269,055	Freehold	2021	8.5	Smyths Toys UK	£1,481,877	£5.95	OMRV	£30,000,000	4.63%	£120	£1,867,913	£7.50	5.83%	Leftfield Capital	Jan-23
3520 Magna Park	Lutterworth	East Midlands	186,232	Freehold	2006	8.4	Kenwood	£186,232	£5.85	OMRV	£20,900,000	4.89%	£112	£1,489,856	£8.00	6.67%	Erta	Dec-22
Super W	Warrington	North West	246,136	Freehold	2022	24.9	Farmfoods	£1,700,000	£6.91	Higher of OMRV or 105% of passing rent	£32,100,000	4.96%	£130	£1,969,088	£8.00	5.74%	Leftfield Capital	Dec-22

INVESTMENT COMMENTARY

In reference to the above we are aware of the potential disposal of Black & Decker, Northampton where they will be quoting 5.00% with a view to achieving closer to 4.75%. Achieved pricing for this asset will provide a good indicator of a transaction reflective of where prime yields currently stand. The asset will offer circa £0.50p of reversion from the outset with the proposed passing rent on the leaseback being set off £8.50 per sq ft with a headline ERV today perhaps closer to £9.00 per sq ft.

As you can see from the above, we have not seen many prime assets trade over recent months. We are of the view prime yields outside of the south east for 15 year rack rented income to strong covenants is likely to trade at approximately 5.25% NIY, dependent upon the rent review provision. During Q2 the average transaction yield for distribution warehouses reflected 4.92%, demonstrating compression of 52 basis points when compared to Q1.

We are also aware of several speculative forward commitment development fundings progressing along the M1 with pricing on logistics units (100,000 sq ft+) achieving between £140-£160 per sq ft.

The subject scheme illustrates two buildings with institutionally acceptable base specifications. The location is also considered prime. We would therefore anticipate exceptionally strong demand and competitive bidder tension if presented to the investment market. For appraisal purposes we would be positioning exit yields here on the basis of 5.25% NIY.

As ever, this email provides an opinion of pricing for marketing purposes and has been prepared in anticipation of a potential agency instruction. The figures reported are excluded from the RICS Red Book and do not constitute a formal opinion of value.

CONCLUSION

As highlighted in our Site & Market Assessment Report produced in December 2022 and reaffirmed in this supplement market report there remains a strong level of take up and demand for new high-quality large-scale units in prime logistics locations and above average take up for such sites within the Borough. It remains our strong opinion that the current market forces support the proposal for this site to be developed for new Grade A logistics accommodation with the associated commercial and employment benefits.



**REGIONAL EXPERTISE
& NATIONAL COVERAGE**



**DRIVEN &
ENERGETIC**



**DIGITAL
MARKETING**



**SPREAD OF INSTRUCTIONS
ACROSS PROPERTY CYCLE**



**PROVEN
TRACK RECORD**



**FORWARD THINKING
DEDICATED I&L TEAM**



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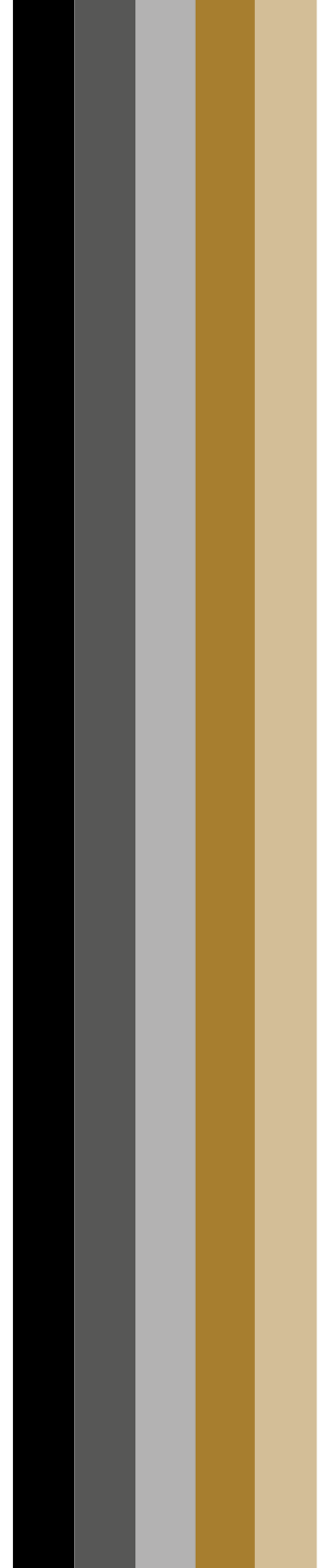
Due to space constraints within the report, it has not been possible to include both imperial and metric measurements.

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Rugby Borough Council

Building and Land Supply Assessment

February 2024

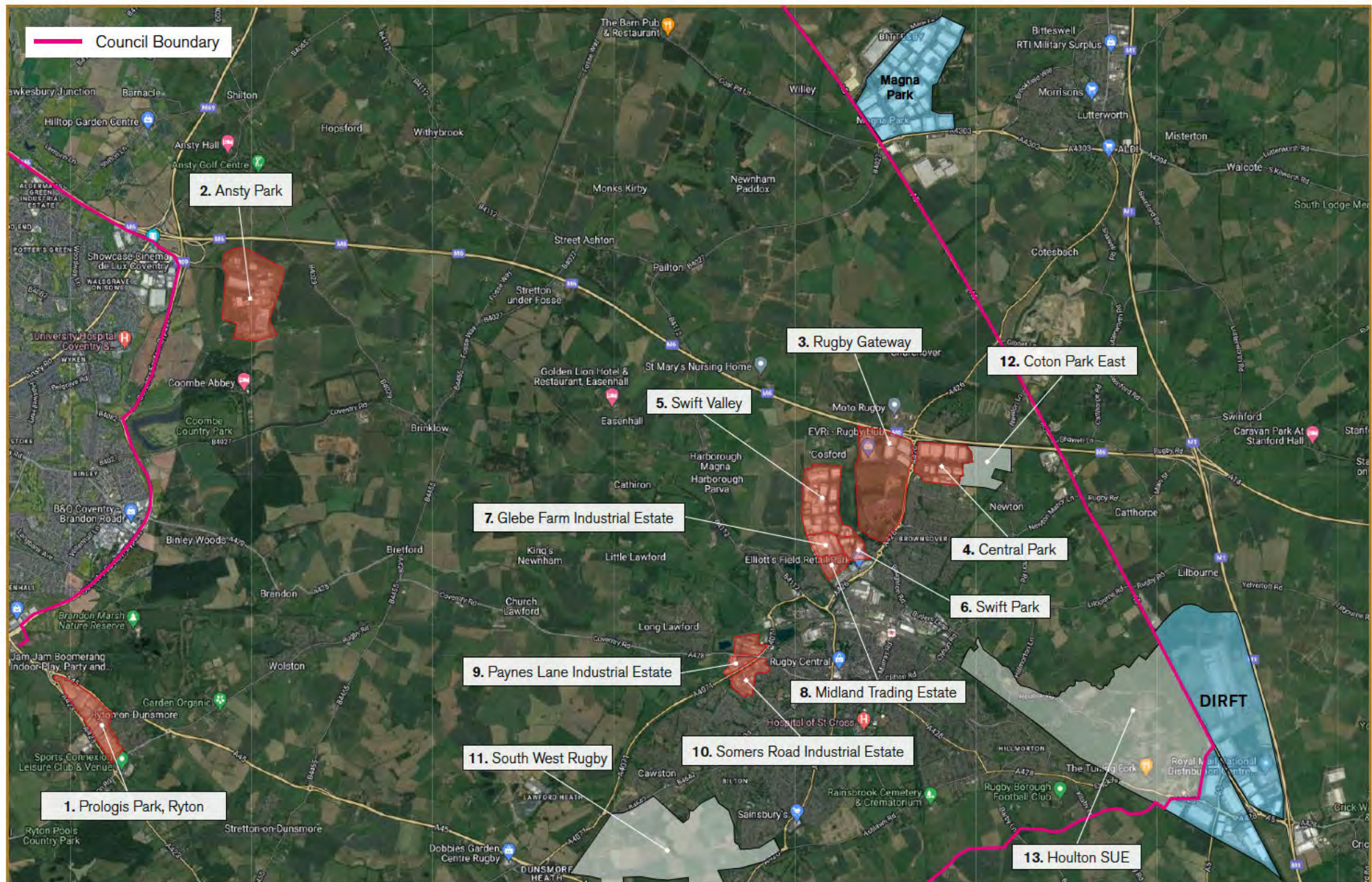


Contents

Name	Page Number
Site Location Overview	3
Rugby Industrial Estates	
Prologis Park, Ryton	4
Ansty Park and Rolls Royce	5
Rugby Gateway	6
Central Park	7
Swift Valley	8
Swift Park	9
Glebe Farm	10
Midland Trading Estate	11
Paynes Industrial Estate	12
Somers Road Industrial Estate	13
Major Employment Allocations	
South West Rugby	14
Coton Park East	15
Houlton SUE (Rugby Radio Station)	16
Additional Supply	17

This document assesses the existing, committed and allocated employment land and buildings within the Rugby Borough. We have used Rugby Borough Council's (RBC) Annual Monitoring Reports and any other data we can source to collate (where available) planning details, dates of consent, unit sizes to provide an accurate account of take-up and availability within Rugby.

Site Locations



1 - Prologis Park, Ryton

Prologis Park Ryton currently have one vacant unit (DC4) - 166,820 sqft industrial/logistics space available (believed to be under offer)

Occupier	Floorspace (sqft)	Application Number Associated	Decision Date	Lease Start Date (if known)	Use Class
DHL	221,000	R12/0600 Outline R13/1088 RM	5/9/12 23/12/13	June 2016	B1(c) B2 B8
Jaguar Land Rover (DC7)	327,730	R07/2010/OPS Outline R14/0217	18/4/08 17/2/15	July 2016	B2
Jaguar Heritage Trust (DC1)	141,225	R07/2010/OPS Outline R14/0491 RM	18/4/08 30/4/14	June 2016	B2
London Electrical Vehicle Company (LEVC) (DC5)	172,771	R07/2010/OPS Outline R13/1359 RM	18/4/08 28/8/13	2021	B2/B8
DHL (DC2)	302,000	R13/0440 RM	20/5/13	2022	B2/B8
JLR (SVO) (DC3)	226,000	R13/0440 RM	20/5/13	October 2014	B2/B8
Furnolic (DC8)	147,300	R16/2561 Outline	5/10/17	2021 (10 years)	B2/B8
CEVA Logistics (DC9)	330,770	R17/2019 RM	14/3/18	Q1 2022	B2/B8
DC4	166,820	R13/0440 RM	20/5/13	-	B2/B8

Average unit size: 226,180 sqft



2 - Ansty Park and Rolls Royce

Occupier	Floorspace (sqft)	Application Number Associated	Decision Date	Lease Start Date (if known)	Use Class
IPG Photonics	133,993	R18/0981	28/8/18		B1
Sainsburys	165,496				E
Fanuc UK	115,076	R15/0394 RM	2/11/15		B2
HTRC (High Temperature Research Centre)	133,993	R13/1645	15/11/13		E
Manufacturing Technology Centre	c.470,000 (total)	R13/1591 R12/0190	23/10/13 21/3/14		E
AVL Technical Centre	52,732				E
LEVC Head Office	360,883	R14/2343 R15/1008	24/2/15 24/6/16		B2
Cadent Gas	39,148	R19/1512	3/7/20		E
Rolls Royce	157,578 122,612				
Meggitt	453,214	R17/1829	20/4/18	Q1 2020	B2
Barberry 50 - consented	50,750	R22/0861	3/3/23	-	B2
Apollo Ansty Park					
Polestar Apollo 1	70,389	R21/0784 (Outline)	29/10/21	Q4 2023	B2/B8
Staircraft Apollo 2	174,594	R21/1165	5/4/22	Q2 2023	
Plot 5 (U/C) Apollo 5	300,039	R21/0525	31/8/21	-	B8
Plot 3 (U/C) Apollo 4	172,407	R22/0485	21/9/22	--	B2/B8
Plot 6 (U/C) Apollo 6	268,371	R22/0491	30/9/22	-	
Plot 7 (U/C) Apollo 7	116,322			-	

Average unit size: 186,533 sqft



3 - Rugby Gateway

Sustainable Urban Extension allocation for residential, employment, community facilities, open space and associated infrastructure and works. Remainder of the area outlined red is for residential/community use.

Occupier	Floorspace (sqft)	Application Number Associated	Decision Date	Use Class
DHL (Unit 1)	237,000	R10/1272 (Outline app)	20/8/13	B8
		R14/1703 (reserved matters)	27/10/14	
DHL (Unit 2)	180,263	R10/1272 (Outline app)	20/8/13	B8
		R15/1467 (reserved matters)	21/10/15	
Amazon (Unit 3)	295,000	R10/1272 (Outline app)	20/8/13	B8
		R15/1463 RM	29/10/15	
H&M (Unit 4)	237,150	R10/1272 (Outline app)	20/8/13	B8
		R13/2311 RM	12/2/14	
EVRI (Unit 5)	807,415	R10/1272 (Outline app)	20/8/13	B8
		R15/1453 RM	29/9/15	

Average unit size: 351,366 sqft



4 - Central Park

Prologis Central Park currently have one vacant unit (DC1) - 376,563 sqft industrial/logistics space, as well as a 70,110 sqft mezzanine

Occupier	Floorspace (sqft)	Application Number Associated	Decision Date	Use Class
Sainsburys (Rugby 661)	661,348			B8
Continental Tyres	217,974			B8
Autins Group	62,929	R11/1918	5/9/13	B1/B2/B8
Quartzelec	80,059	R11/0246 Outline R07/0382/MAJP RM		E
Eddie Stobart	159,369	R11/0246 Outline R15/1623 RM	27/6/11 10/9/15	B8
CDW	98,294	R11/0246 Outline (R07/0382/MAJP) RM		
Autins Fabrica	56,169			B2
Morgan Technical Ceramics	62,624			B2
MSS Lasers	42,656			E
Orscheln Europe	47,979			B8
Status VW	4,044			B8
DC1	376,563			

Average unit size: 155,834 sqft



5 - Swift Valley

Occupier	Floorspace (sq ft)	Use Class
DHL	334,172	B8
NHS	149,000	B8
Warrens Group	32,515	B8
Vantiva Distribution Centre	221,542	B8
BTM	117,118	E,B1(E(g))
Sainsburys	122,244	B8
J P Lennard	27,278	B8
First Class Safety	85,257	E,B1(E(g))
The Range	211,068	B8
Engine Developments	16,087	B2
Hi Speed Services	99,492	B8
AW Precision (this has been acquired by Rotherhill Developments)	52,566	B2
Potters Poultry	31,008	E B1
Romi Machines	29,065	B8
H.W Coates	54,001	B8
PWR Europe	38,600	
Arcese UK	77,914	E,B1(E(g))
Ideas for Living	308,655	B2
H&K Equipment	65,408	B2
EVRI	115,528	B8

Average unit size: 109,426 sqft



6 - Swift Park

Occupier	Floorspace (sq ft)	Use Class
Supplypoint	45,339	B8
Sofology	100,299	B8
BTM Travel	41,056	B8
Volvo	105,924	B8
Corteco	116,168	B8
GeesInknorba	24,050	B1/B2/B8
Staci	105,873	B8
H&K Manufacturing	133,635	B8
Mapal	17,566	B2

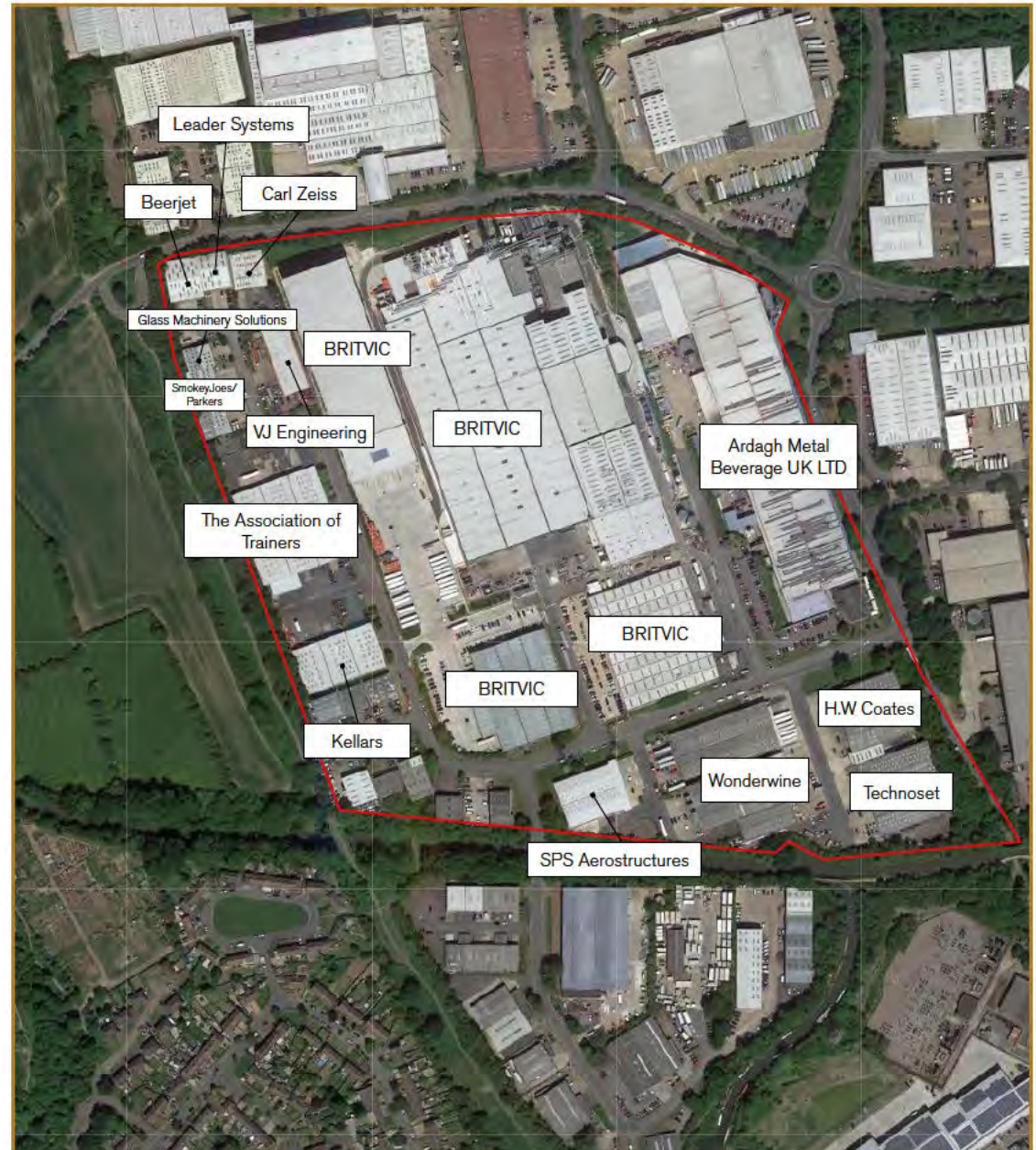
Average unit size: 76,657 sqft



7 - Glebe Valley

Occupier	Floorspace (sqft)	Use Class
Leader Systems	4,538	B8
	4,542	B8
Beerjet	12,065	E
Carl Zeiss	8,815	E
Glass Machinery Solutions	4,775	B8
Smokeyjoes	2,689	B8
Parkers	2,701	B8
VJ Engineering	14,347	B8
The Association of Trainers	55,894	B8
Britvic	630,126	B2
	104,873	B8
	75,567	B8
	58,699	B8
Kellars	28,803	E
Ardagh Metal Beverage UK	212,128	B2
Wonderwine	14,713	B8
SPS Aerostructures	25,357	B2
H.W Coates	44,935	B8
Technoset	19,435	B8

Average unit size: 69,737 sqft



8 - Midland Trading Estate



Occupier	Floorspace (sqft)	Use Class
ABS Burton	3,060	E
Alchemy Finishes	3,311	B8
Deponti	42,879	E
Hanns Automotives	12,894	B2
Portakabin Site	5,612	B2
Anyglass / Thrapston Glass	6,011	B2
Canal Boat Hire	15,174	E
Fitted Flooring Company	7,340	E
Litron Lasers	22,868	B2
Thermo Fisher Scientific	14,347	E

Average unit size: 13,350 sqft

9 - Paynes Lane Industrial Estate

Car4Occupier	Floorspace (sqft)	Application Number Associated	Decision Date	Use Class
Unit 1b Tool France	10,928	R14/0440	13/11/15	B1/B2/B8
Unit 2b Exergyn	11,400			
Unit 3 Generac Pramac	27,020			
Unit 4 Generac Pramac	15,235	R16/1376	19/12/16	
Unit 8 UK Storage Company - Rugby Storage Units	28,442			
Stepnell Head Office	82,121			
Unit 9 Available June 2024 - partial build out	88,728			B2
M&J Hire Centres	9,106			B8
Tools with a Mission	11,927			E
Final Touch Body Shop	9,349			B8
TW Tyres Rugby	11,925			B8
Mobiloader	3,567			E
Castle Forklifts	5,219			B8
RFK Contracts	5,105			E
Car4u 16	6,395			E

Average unit size: 21,764 sqft



10 - Somers Road Industrial Estate

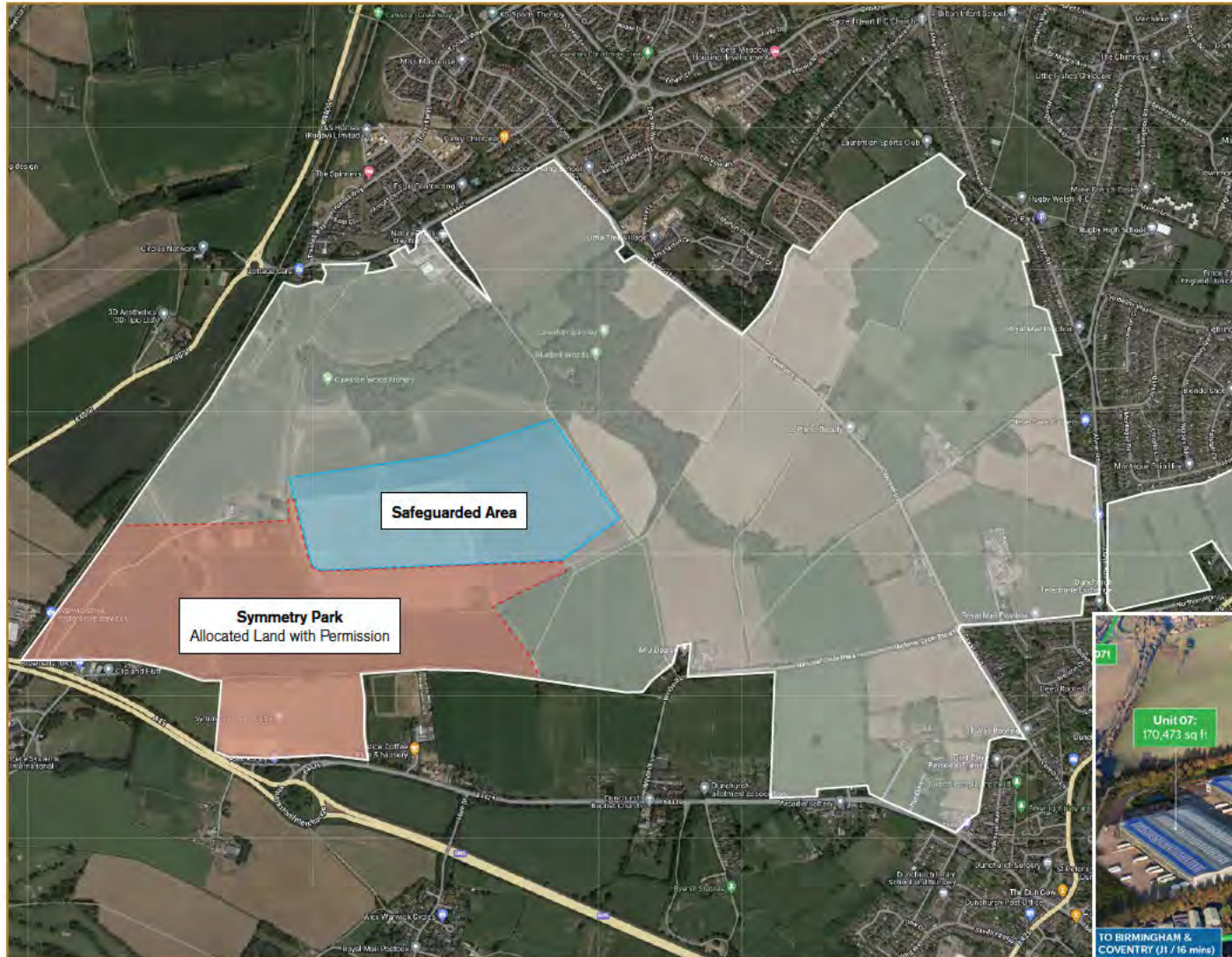
Occupier	Floorspace (sqft)	Use Class
Valetree Engineering	4,359	B2
Apex	35,680	B8
4 Shires Merchant	3,627	B8
Jewson	15,206	E
Midland Commercial	6,251	B8
A-Head 4 Healeys	6,643	B2
Sheet Metal Shaw	19,299	E
Booker	16,131	E
Rugby Tile & Bathroom	1,343	E
Hertz	1,407	B8
Eden Tyres & Servicing	4,214	B2
G Force Martial Arts	8,309	
Wolesley Plumbing	6,825	E
Custom Heat	3,394	E
Charles Watts Engineering	13,471 12,540	E
Johnstones	4,276	E
JRP	14,792	E
Apex	37,287	B8
Douglass Motors	5,149	E
Jooiced Bespoke Tech	12,947	E
Nationwide Windows & Books	36,181 11,666 14,700	E/B2
NW Glass Factory	26,435	E
Thistle Scientific	12,548	B8
Dulux	3,933	E
PT Engineers	8,232	B2
Howdens	11,211	B8
Leo Associates	11,123	B2
Carnivore	23,943	B8

Average unit size: 12,681 sqft



11 - South West Rugby

South West Rugby is an allocation within Rugby Borough Council's 2019 Local Plan. The site is allocated for 5,000 dwellings and includes 35 hectares of employment.



Symmetry Park, Rugby (Tritax)

Occupier	Size (sqft)	Application Number Associated	Decision Date	Lease Start Date (if known)	Use Class
Unit 1 Iron Mountain	137,778	R16/2569 (Outline)	29/11/17	Q1 2022	B8
Unit 2 Iron Mountain	189,821	(R20/1026) (Full)	4/5/21		B8
Unit 3 Iron Mountain	394,640	R16/2569 (Outline)	29/11/17		B8
Unit 4 Iron Mountain	251,281	R16/2569 (Outline)	29/11/17		B8
Unit 5 (U/C)	390,694	R16/2569 (Outline)	29/11/17	-	
Unit 6 (U/C)	338,064	R16/2569 (Outline)	29/11/17	-	
Unit 7 (U/C)	170,473	R16/2569 (Outline)	29/11/17	-	



12 - Coton Park East

The Local Plan policy DS7 allocates Coton Park East to provide c.800 dwellings and 7.5 hectares of employment land.



Occupier	Floorspace (sqft)	Application Number Associated	Decision Date	Use
CDW	284,493	R22/0551	17/2/23	B8

13 - Houlton Sustainable Urban Extension (Rugby Radio Station)

On the Warwickshire side of the A5, Rugby BC have allocated a Sustainable Urban Extension in the 2019 Local Plan, known as Houlton, delivering 6,200 homes, new schools, local centres, health provision and businesses.



Occupier	Floorspace (sqft)	Application Number Associated	Decision Date	Use
Wago	130,899	R22/0380 Outline	31/3/23	

R19/1105 (RM)
approved 19th Feb 2020

R17/0022 (Outline)
approved 28th June 2017

Additional Supply (not part of a larger employment estate)

Royal Mail Rugby Delivery Office, Mill Road, Rugby, CV21 1AA

Occupier	Floorspace (sqft)	Application No.	Decision Date	Use Class	Status
Royal Mail	24,950	R17/1827	28/12/17	B8	Complete



Land on West side of A5, Watling Street, Rugby, CV23 0AJ

Occupier	Floorspace (sqft)	Application No.	Decision Date	Use Class	Status
Alcohols Ltd	43,798	R20/0919	27/5/21	B1/B2/B8	U/C



Unit 1, Parkfield Business Park, Rugby Western Relief Road, CV21 1QJ

Occupier	Floorspace (sqft)	Application No.	Decision Date	Use Class	Status
Rugby Self Store	43,944	R18/0523	28/8/18	B8	Complete
		R19/0072	25/3/19		



Malpass Farm – First Phase (Eastern Process Building)

Occupier	Floorspace (sqft)	Application No.	Decision Date	Use Class	Status
Suez	43,944	RBC/13CM024	23/12/13	B2	Complete



STOFORD

Analysis of Potential Strategic Employment Locations identified within the Rugby Borough Local Plan – Issues and Options (October 2023)

February 2024

Contents

Subject	Page Number
Introduction	3
Strategic Employment Location Suitability	4
Location Assessments	
North East of M6 Junction 2	7
North West of M6 Junction +2	10
Ansty Business Park Expansion	13
West of Prologis Park	17
East of Prologis Park	20
Safeguarded Land within SW Rugby allocation	23
A45/A4071 Junction	26
A5 North of Houlton	29
North East of M6 Junction 1	32
North West of M6 Junction 1	35
Land at and adjacent to Cosford, Cosford Lane	38
South of Hinckley	42
Assessment Methodology	45

Introduction

The Rugby Borough Local Plan Issues and Options: October 2023 identifies eight broad locations that may be suitable for strategic employment uses (see accompanying map) to meet their needs. To assist the Council, Stoford has considered the suitability, achievability and availability of the potential broad locations against much of the example criteria contained within Appendix 1 of the Housing and Economic Land Availability Assessment – Methodology for Coventry and Warwickshire (February 2022). The methodology refers to future sites being assessed using a red, amber and green (RAG) approach, which we have adopted in our work. Constraints which are absolute and cannot be mitigated have been scored red, and constraints that have the potential to be mitigated have been scored amber. If there is no constraint a green score has been awarded. An overall colour score has been provided against each site to indicate if it is suitable and can readily form part of the Council’s short-term supply.

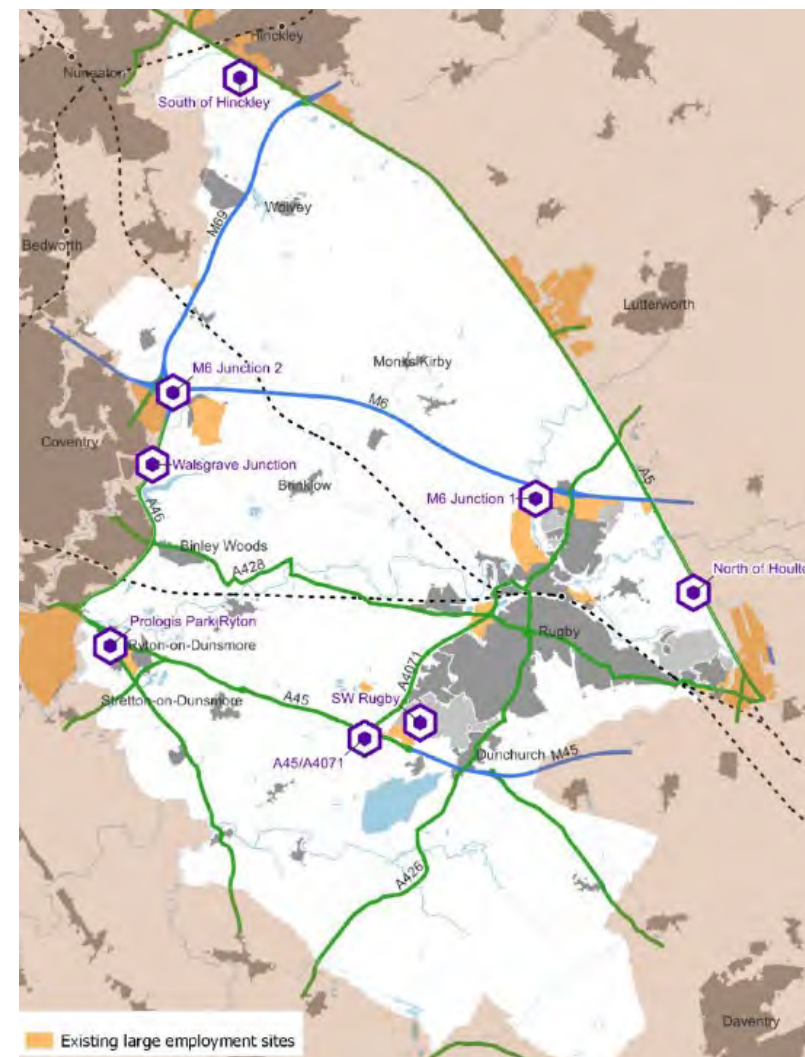
Advice from BWB consulting has informed our analysis of each site with regard to the transport related criteria.

To provide an accurate assessment of each broad location it has been necessary to define site boundaries based on the description of each location within the Plan and previously submitted Call for Sites submissions. We have suggested potential sites within the Broad Locations, within this document.

The potential strategic employment locations identified in the Issues and Options Plan comprise:

1. M6 Junction 2 (north of junction)
2. Ansty Business Park Expansion/A45 Walsgrave Junction
3. Prologis Park Ryton Expansion
4. Safeguarded Land within the South West Rugby allocation
5. A45/A4071 Junction
6. A5 North of Houlton
7. M6 Junction 1
8. South of Hinckley

For the avoidance of doubt, Stoford are promoting land at strategic employment location number 6 - ‘A5 North of Houlton’. Stoford have branded this site as “Rugby East”.





Summary of Location and Site Analysis

The Table below provides a summary of our analysis of the potential broad locations identified in Rugby's Issues and Rugby Borough Local Plan Issues and Options: October 2023. Potential locations that have an overall rating of Green are considered suitable as employment land. Those locations that have an overall rating of amber may be suitable subject to appropriate mitigation and those which have an overall red rating are considered unsuitable as the constraints are absolute and cannot be mitigated.

Site No.	Strategic Employment Locations	Suitable for Strategic Employment Development	Colour Rating
1 (a)	North East of M6 Junction 2 (Crown Fields Farm and Home Farm)	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> The site comprises the best and most versatile agricultural land which should be protected from significant, inappropriate or unsustainable development proposals. The site will serve the employment needs of Coventry rather than Rugby. Unsustainable location with nearest bus stops beyond the acceptable walking distances for commuting, poor and infrequent bus services, and the nearest railway station beyond the preferred maximum cycling distance for commuting. Highway capacity issues on the A46 Coventry Bypass and Hinckley Road 	Red
1 (b)	North West of M6 Junction 2	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> The site will serve the employment needs of Coventry rather than Rugby. Significant severance issues for vehicular access and no available or probable point of access. 	Red
2	Ansty Business Park Expansion / A45 Walsgrave Junction	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> The site will serve the employment needs of Coventry rather than Rugby. Significant highway capacity issues on A46 Coventry Bypass and Ansty Interchange. 	Red
3 (a)	West of Prologis Park	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> The site will serve the employment needs of Coventry rather than Rugby. Significant highway capacity issues on A45. 	Red
3 (b)	East of Prologis Park	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> The site will serve the employment needs of Coventry rather than Rugby. The nearest bus stop is beyond the acceptable walking distance of 400m and the bus service is infrequent. Significant highway capacity issues on A45. 	Red
4	Safeguarded Land within SW Rugby allocation	<p>Yes.</p> <ul style="list-style-type: none"> The site comprises best and most versatile agricultural land which should be protected from significant, inappropriate or unsustainable development proposals. 	Green

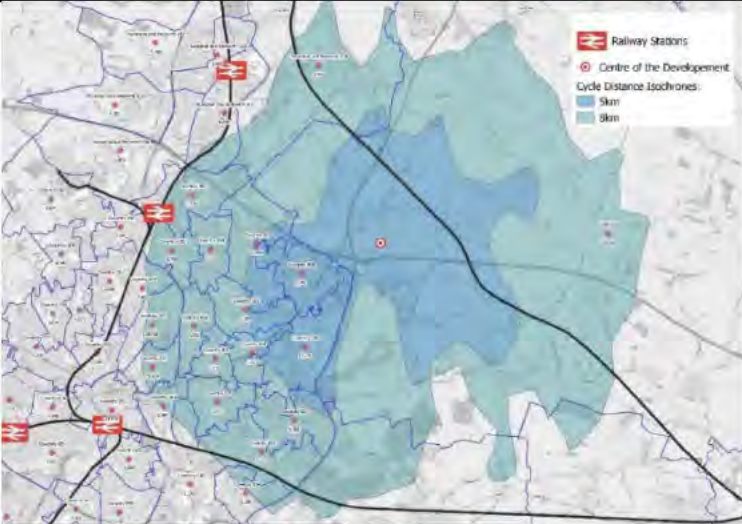
5	A45/A4071 Junction	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> – There are no bus stops within the wider area that can be realistically accessed on foot. – Sustainable access to South West Rugby SUE once complete will be difficult across trunk road. 	
6	A5 North of Houlton	<p>Yes.</p> <ul style="list-style-type: none"> – No significant constraints to prevent development coming forward. 	
7 (a)	North East of M6 Junction 1	<p>No.</p> <ul style="list-style-type: none"> – Development here will adversely impact on residential amenity for those living on the residential development at the centre of the site. – The site comprises the best and most versatile agricultural land which should be protected from significant, inappropriate or unsustainable development proposals. – No suitable pedestrian infrastructure to reach nearest bus stops on southern side of M6. 	
7 (b)	North West of M6 Junction 1	<p>No.</p> <ul style="list-style-type: none"> – The topography of much of the site is very steep. Scope for development limited to that adjacent A426. – The site comprises the best and most versatile agricultural land which should be protected from significant, inappropriate or unsustainable development proposals. – No bus service utilising nearest bus stop at Churchover and no suitable pedestrian infrastructure to reach bus stops on southern side of M6. 	
7 (c)	Land at and adjacent to Cosford, Cosford Lane	<p>Potentially, subject to appropriate highway mitigation.</p> <ul style="list-style-type: none"> – The site does not have existing direct access to the SRN, possible connections via Overview Way are possible but heavily constrained. Traffic therefore likely required to route through northern area of Rugby which may not have adequate capacity, particularly given other extensive recent development. 	
8	South of Hinckley	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> – The site will serve the employment needs of Hinckley and Bosworth rather than Rugby. – Significant highway capacity issues on A5 west of the site in addition to junctions with the A47 and M69. 	

Strategic Employment Location 1 - M6 Junction 2 (North of Junction)

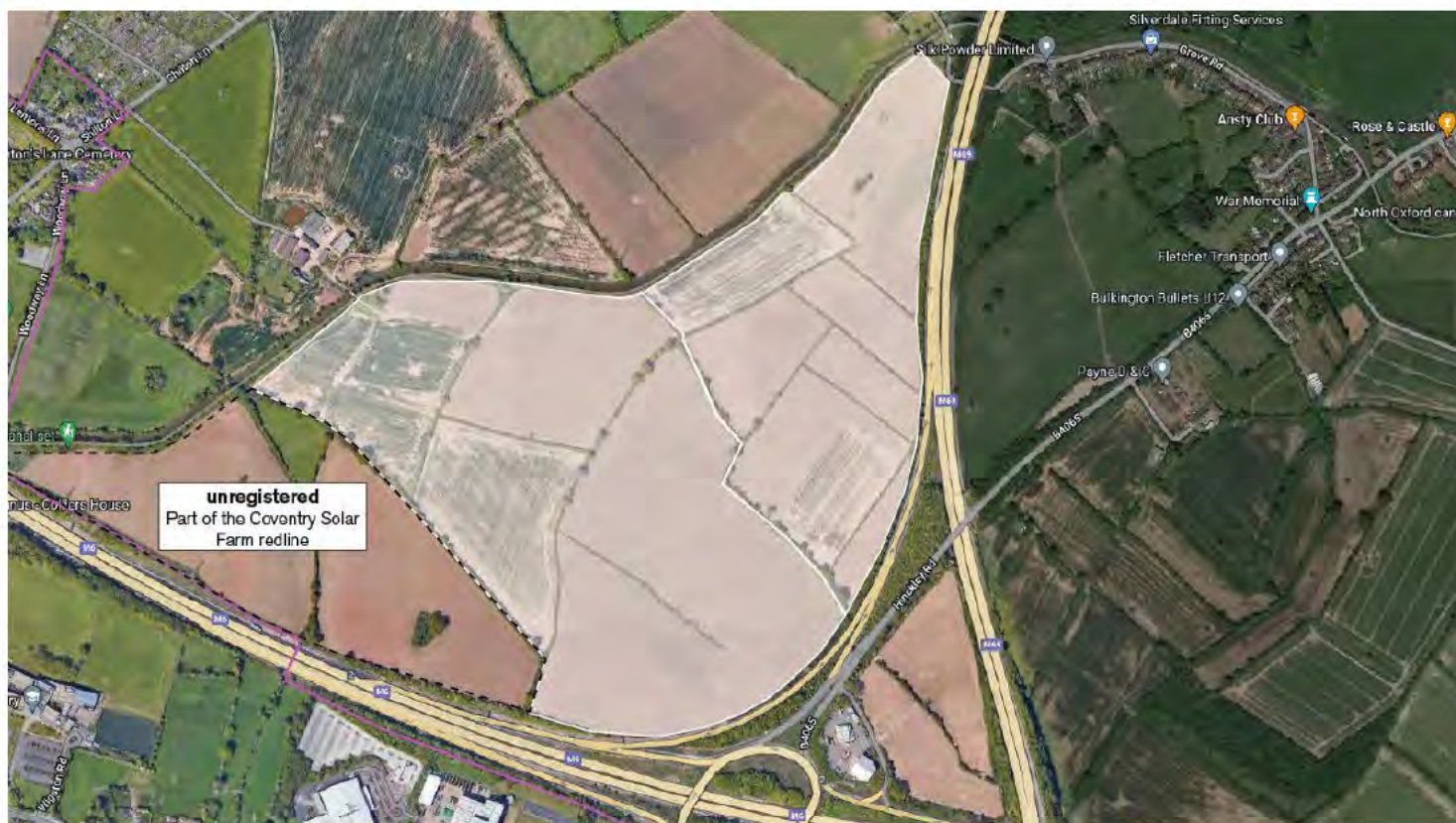
1 (a)	M6 Junction 2 (North East of Junction) – Crowner Fields Farm and Home Farm (Frasers Campus)
Ownership	10 Landowners
Site Promoter	Frasers Group
Previous Site Promotion	The site was submitted in the Rugby 2015 Call for Sites (Ref S14/045) – Agent: Tim Howard at Howkins & Harrison
Planning History	Planning Application with EIA submitted 10th Nov 2023 (R23/1027) (pending consideration) Creation of an employment-led headquarters campus development, composed of head office and distribution/warehouse facilities, concept research and development retail and leisure (including gym, swimming pool, fitness studio/sports hall, sport pitches and associated facilities), ancillary food and beverage and convenience retail, onsite accommodation including a hotel and group accommodation, learning and development academy (including auditorium and training rooms), supplier offices, helipad, landscaping and ecological enhancements, site contouring, earth bunds, drainage, surface and multi-storey car parking, cycle parking, access roads, cycleways and footways, permanent ingress/egress points, utility diversions, ancillary buildings and structures, temporary construction ingress/egress, associated infrastructure and works, and demolition of existing buildings/structures.



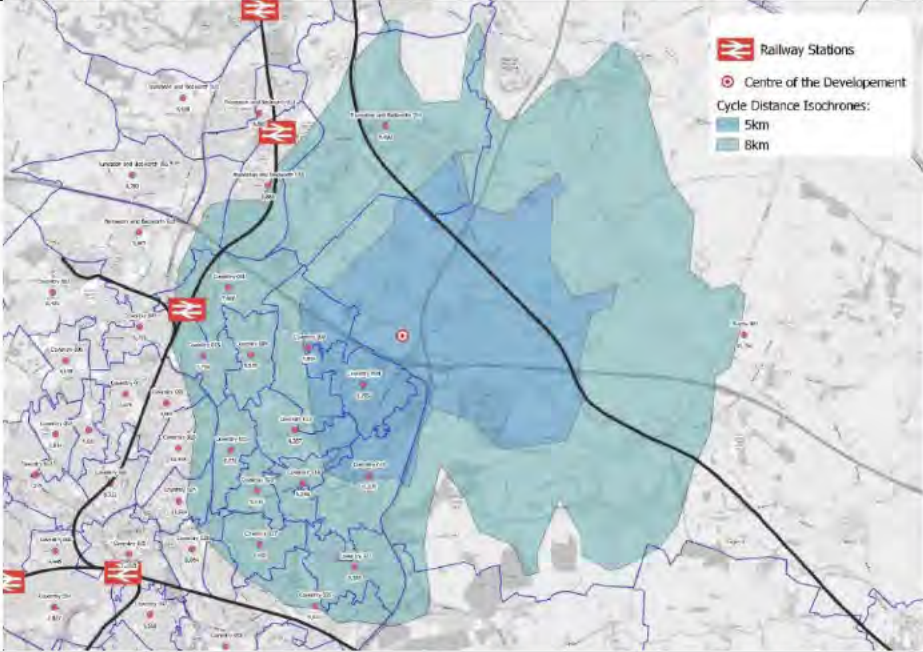
<u>Constraints</u>		Score (red/amber/green)
Green Belt (y/n)	Yes	
Public Access/Rights of Way	PROW running through centre of the site and to the East	
Levels	80m to the East, 86m to the West	
Ecology/Wildlife Designations (and other known issues)	<ul style="list-style-type: none"> • Within SSSI Impact Risk Zone of Coombe Pool SSSI • Local Wildlife Site within northern part of the site 	
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	Hedgerows and mature trees across the site.	
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	Nitrate Vulnerable Zones (NVZ) 2017	
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	No heritage assets onsite but 3 listed buildings and 3 scheduled monuments in the vicinity to the North (Church of St James – Grade II*, Ansty Hall - Grade II*, The Whitehouse Wingletang – Grade II)	
Flooding	Area of Flood Zone 2 and 3 to the southeast of the site, with Flood Zone 2 extending further into the centre of the site	
Other Physical Constraints (e.g. water bodies, ditches etc)	The Design and Access Statement submitted with the current application provides imagery of wet ditches onsite and details of three watercourses running from the northern to southern boundaries of the site	
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc.)	Overhead lines and 6 pylons across the site	
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	Strategic Green Infrastructure Network (Public Open Space) over majority of the site	
Agricultural Land Classification	Grade 2 and 3	
Does it serve the employment needs of a neighbouring authority?	Yes, Coventry	
<u>Site Accessibility</u>		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Adjacent the village of Ansty – designated rural village	
<u>Sustainable Transport Connectivity</u>		Score (red/amber/green)
Distance to closest bus stop	650m (Main Road, Ansty). Bus circa every 2 hours towards Coventry. The nearest bus stop is beyond the acceptable walking distance of 400m and the bus service is infrequent.	
Distance to closest settlement	400m (Ansty). Ansty is within desirable commuting distance of the site on foot (500m), however it has a very small population consonant with its designation in the Local Plan as a rural village. The eastern parts of	

	Coventry City are beyond the acceptable commuting distance of the site on foot (1000m) but within the preferred maximum distance of 2000m.	
Distance to closest rail station	8.5km (Coventry Arena). The nearest train station is beyond the 2km preferred maximum distance for commuting on foot and beyond the 5km acceptable cycling distance for commuting and the preferred maximum cycling distance for commuting of 8k.	
Population catchment for employees		
Access to SRN – A road access and proximity to nearest motorway junction	The B4065 routes along northern boundary and provides access to the Ansty Interchange 600m to the south, whereupon the M6, M69, A46 Coventry Bypass and A4600 Hinckley Road (into Coventry) can subsequently be accessed.	
Transport impact and HGV routing	HGVs can route directly to SRN via Ansty Interchange to the south. Transport on the local highway network will be minimal as most will route via SRN (only a few light vehicles likely to route north on B4065)	
Highway capacity	The B4065 doesn't appear to experience significant existing traffic issues in peak periods. Significant traffic appears to occur on the A46 Coventry Bypass in advance of the Ansty Interchange, in addition to some sections of Hinckley Road to the south.	
Is the site suitable for strategic employment development?	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> – The site comprises best and most versatile agricultural land which should be protected from significant, inappropriate or unsustainable development proposals. – The site will serve the employment needs of Coventry rather than Rugby. – Unsustainable location with nearest bus stops beyond the acceptable walking distances for commuting, poor and infrequent bus services, and the nearest railway station beyond the preferred maximum cycling distance for commuting. – Highway capacity issues on the A46 Coventry Bypass and Hinckley Road 	

1 (b)	North West of M6 Junction 2
Ownership	8 Landowners
Site Promoter	Unknown
Previous Site Promotion	Not been submitted to Call for Sites
Planning History	Unregistered Title - Application submitted 10th July 2023 (R23/0672) (pending consideration). Construction and operation of a solar farm, including solar arrays, control buildings and associated infrastructure, internal access roads, landscaping and associated development.



Constraints		Score (red/amber/green)
Green Belt (y/n)	Yes	
Public Access/Rights of Way	PROW cuts across the site from east to west broadly following the line of the Oxford Canal	
Levels	Relatively flat	
Ecology/Wildlife Designations (and other known issues)	Within SSSI Impact Risk Zone of Combe Pool SSSI	
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	Tree / hedgerow lined field boundaries	
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	Unknown	-
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	<ul style="list-style-type: none"> None within the site but Grade II Listed canal bridge across the Oxford Canal which forms the site's northern boundary. Grade II* Church of St James, Grade II* Ansty Hall and Grade II house (The Whitehouse Wingletang) in close proximity to the east in the village of Ansty 	
Flooding	Flood Zone 1	
Other Physical Constraints (e.g. water bodies, ditches etc)	2 no. tributaries in west part of the site	
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc.)	Pylons and overhead cables	
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	Strategic green infrastructure network across majority of the site	
Agricultural Land Classification	Grade 3 for the vast majority. Non-agricultural for a small proportion.	
Does it serve the employment needs of a neighbouring authority?	Yes, Coventry	
Site Accessibility		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Ansty – designated rural village and Coventry City, accessible only over the M6	
Sustainable Transport Connectivity		Score (red/amber/green)

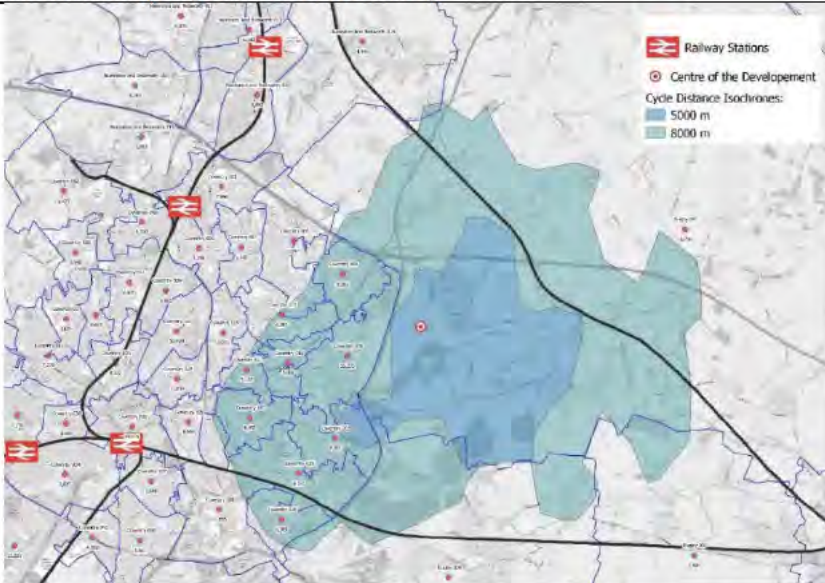
<p>Distance to closest bus stop</p>	<p>1km (Lentons Lane). Bus circa every 2 hours towards Coventry. The nearest bus stop is beyond the acceptable walking distance of 400m and the bus service is infrequent. There is an existing bus service which serves Ansty Park which may have the potential to divert into the site.</p>	
<p>Distance to closest settlement</p>	<p>1.5km to Antsy, 1.3km to North East Coventry. The north eastern parts of Coventry City largely comprise commercial premises rather than dwellings. The residential parts of Coventry are beyond the acceptable commuting distance by foot of 1000m but within the preferred maximum distance of 2000m.</p>	
<p>Distance to closest rail station</p>	<p>5.5km (Coventry Arena). The nearest train station is beyond the 2km preferred maximum distance for commuting on foot, beyond the 5km acceptable cycling distance for commuting but within the 8km preferred maximum cycling distance for commuting.</p>	
<p>Population catchment for employees</p>	 <p>The map displays the development center (red dot) and its catchment areas for employees. The 5km cycle distance isochrone (light blue) covers a large area of Coventry, while the 8km isochrone (darker blue) extends further into the surrounding region. Railway stations are marked with red 'M' icons. Major roads like the M69 and M6 are also visible.</p>	
<p>Access to SRN – A road access and proximity to nearest motorway junction</p>	<p>Site has significant severance issues for vehicular access due to the north of site being bound by canal, east by M69 and south by M6. No current access from public highway is available.</p>	
<p>Transport impact and HGV routing</p>	<p>No available (or realistically possible) vehicular access to determine where traffic would route to/from</p>	
<p>Highway capacity</p>	<p>N/A as above</p>	
<p>Is the site suitable for strategic employment development?</p>	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> - The site will serve the employment needs of Coventry rather than Rugby. - Significant severance issues for vehicular access and no available or probable point of access. 	


Strategic Employment Location 2 – Ansty Business Park Expansion / A45 Walsgrave Junction

2	Ansty Business Park Expansion / A45 Walsgrave Junction
Ownership	Site contains three different titles, under seven different ownerships
Site Promoter	Unknown
Previous Site Promotion	<ul style="list-style-type: none"> The blue land has been submitted in the Rugby 2015 call for sites (ref: S14/047B) – agent Brown & Co. The white land has been submitted in the Rugby 2015 call for sites (ref: S14/075) – agent Peter Frampton of Fisher German.
Planning History	None



Constraints		Score (red/amber/green)
Green Belt (y/n)	Yes	
Public Access/Rights of Way	PROW across the centre of the area	
Levels	Walsgrave Hill Farm sits on the brow of a hill at 92M AOD, levels for the rest of the site extend from 80m to 85m	
Ecology/Wildlife Designations (and other known issues)	<ul style="list-style-type: none"> Immediately adjacent Coombe Pool SSSI and within SSSI Impact Risk Zone The green title land is a LWS (Hill Park Wood) Land immediately adjoining the south of blue title is LWS (Coombe Abbey) 	
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	The LWS on the green land is largely covered by trees. Marginal trees and woodland on other parts of the site.	
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	Unknown	-
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	<ul style="list-style-type: none"> Walsgrave Hill Farmhouse – Grade II sits in the centre of the site (on white land title) Site immediately adjacent Combe Abbey Grade II* Registered Park and Garden, Grade I Combe Abbey alongside other groups of Grade II buildings within the park. Coombe Abbey is also a Conservation Area. 	
Flooding	<ul style="list-style-type: none"> (Blue Land) FZ2 and 3 across northwest and southeast corners. Brook running to the south of the site (White Land) FZ2 and 3 cross the Northern part of the site 	
Other Physical Constraints (e.g. water bodies, ditches etc)	None	
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc)	Pylons across the centre and to the North with overhead lines	
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	Strategic Green Infrastructure Network across northern part of the site	
Agricultural Land Classification	The majority is Grade 3b. Southern portion is Grade 2.	
Does it serve the employment needs of a neighbouring authority?	Yes, Coventry	
Site Accessibility		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Walsgrave, Coventry - accessible only across the A46 Coventry Road	

Sustainable Transport Connectivity		Score (red/amber/green)
Distance to closest bus stop	1.2km (Ansty Park). Bus circa every 30mins towards Coventry. The nearest bus stop is beyond the acceptable walking distance of 400m however the bus service is frequent. There is also an existing bus service which serves Ansty Park which may have the potential to divert into the site.	Yellow
Distance to closest settlement	North East and East Coventry 1.2km. Coventry is beyond the acceptable commuting distance by foot of 1000m but within the preferred maximum distance of 2000m.	Yellow
Distance to closest rail station	7.5km (Coventry Arena) and 7km (Coventry). The nearest train station is beyond the 2km preferred maximum distance for commuting on foot, beyond the 5km acceptable cycling distance for commuting but within the 8km preferred maximum cycling distance for commuting.	Yellow
Population catchment for employees		Green
Access to SRN – A road access and proximity to nearest motorway junction	Assumed the development will connect to Central Blvd to the north. Provides direct access to A46 Coventry Bypass and subsequently M6 and M69 via Ansty Interchange. Alternatively a connection can be made to A46 Coventry Bypass (left in/left out) which will enable connection to Antsy Interchnage by u-turning at roundabout to south.	Green
Transport impact and HGV routing	HGVs can access SRN directly, transport on the local highway network will be minimal as most will route via SRN (only a few light vehicles likely to route north via Combe Fields Road to the east – should access to this road be permitted)	Green
Highway capacity	A46 Coventry Bypass appears to experience significant issues in vicinity of the sites, particularly during the morning peak. Link to Antsy Interchange also appears congested and further significant traffic could result in blocking back to Central Boulevard.	Red

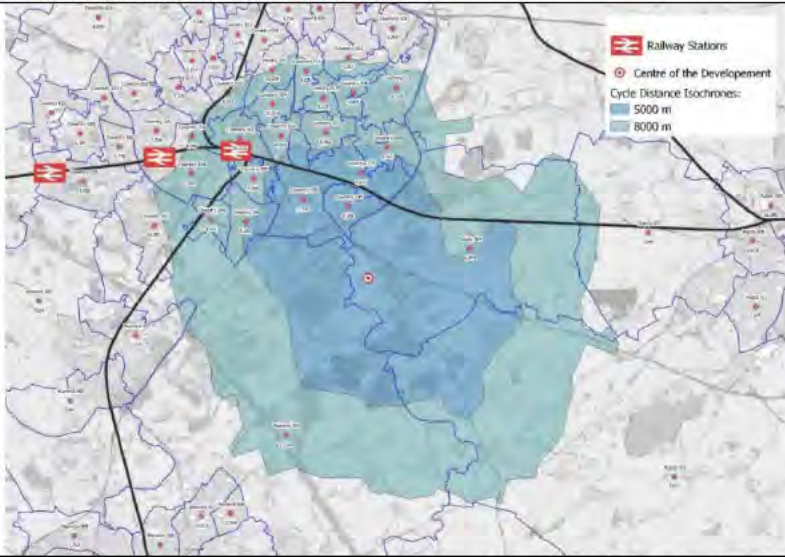
<p>Is the site suitable for strategic employment development?</p>	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none">- The site will serve the employment needs of Coventry rather than Rugby.- Significant highway capacity issues on A46 Coventry Bypass and Ansty Interchange.	
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Strategic Employment Location 3 – Prologis Park Ryton Expansion

3 (a)	West of Prologis Park
Ownership	Three different titles, 6 different ownerships total.
Site Promoter	Unknown
Previous Site Promotion	<ul style="list-style-type: none"> • White land has previously been submitted in the Rugby Call for Sites (2017) – Ref S14/043 – John Hall at Howkins and Harrison • Blue land has been previously submitted in Rugby Call for Sites (2017) – REF S14/114
Planning History	None




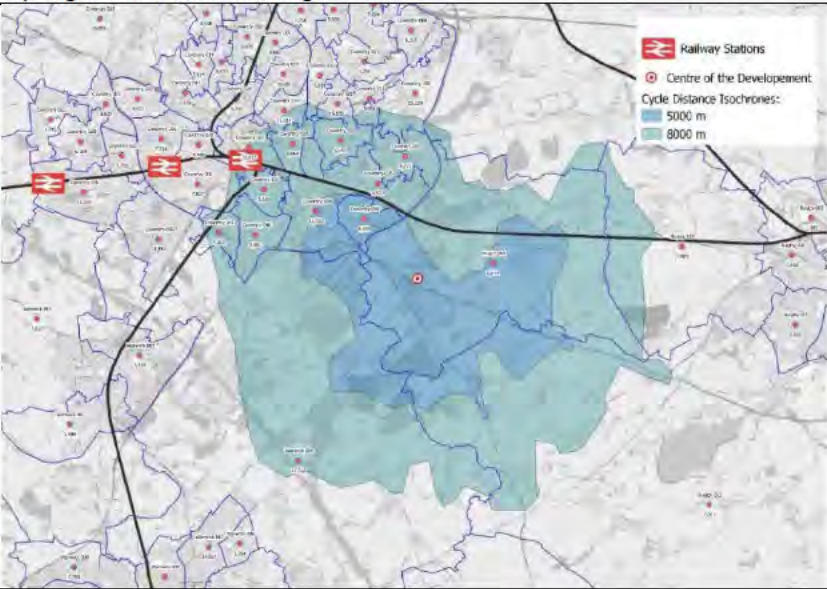
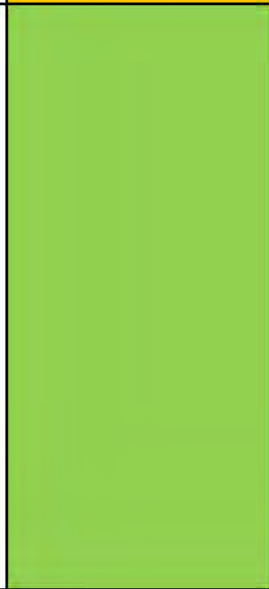




<u>Constraints</u>		Score (red/amber/green)
Green Belt (y/n)	Yes	Red
Public Access/Rights of Way	PROW runs along the Western and southern boundaries of the site	Green
Levels	Levels slope up from west to east from 65m AOD to 78m AOD	Amber
Ecology/Wildlife Designations (and other known issues)	Princethorpe Biodiversity Area	Amber
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	<ul style="list-style-type: none"> Group of mature trees in the centre of the site Boundary field hedgerows 	Amber
Land Contamination / Unexploded Ordnance (in areas where this is relevant)		-
Minerals Safeguarding	Minerals safeguarding area (sand and gravel)	Amber
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	Grade II Ryton Bridge across River Avon adjoining the site to the north	Green
Flooding	The western length of the site is located in Flood Zone 3 along the River Avon	Amber
Other Physical Constraints (e.g. water bodies, ditches etc)	None	Green
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc)	Overhead line across centre – no towers.	Amber
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	Strategic Green Infrastructure Network covering half the area	Amber
Agricultural Land Classification	Grade 3	Amber
Does it serve the employment needs of a neighbouring authority?	Yes, Coventry	Red
<u>Site Accessibility</u>		Score red/amber/green
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Ryton-on-Dunsmore - designated main rural centre - accessible only across the A423 Coventry Road. Willenhall, Coventry - accessible only across the A46 Coventry Road	Amber

<u>Sustainable Transport Connectivity</u>		Score red/amber/green
Distance to closest bus stop	Between 400m and 600m (A423). Hourly buses in peak times to Rugby/Coventry. The nearest bus stop is within the acceptable walking distance of 400m however the bus service is infrequent.	Yellow
Distance to closest settlement	Willenhall, Coventry, c.1.5km, Ryton on Dunsmore 1.2km. Willenhall and Ryton on Dunsmore are beyond the acceptable commuting distance by foot of 1000m but within the preferred maximum distance of 2000m	Yellow
Distance to closest rail station	c.6-7km 5.8km (Coventry). The nearest train station is beyond the 2km preferred maximum distance for commuting on foot, beyond the 5km acceptable cycling distance for commuting but within the 8km preferred maximum cycling distance for commuting.	Yellow
Population catchment for employees		Green
Access to SRN – A road access and proximity to nearest motorway junction	A45 can be accessed a short distance to the north and east of the sites, allowing further connections to the A46, M6 and M69; and M45 and M1 respectively	Green
Transport impact and HGV routing	HGVs can access SRN almost directly, transport on the wider local highway network will be minimal as most will route via SRN (only a few light vehicles likely to route north via other local roads)	Green
Highway capacity	Regardless of the recent Toll Bar island improvements the A45 appears to currently experience significant traffic issues to the north where it connects to the Tollbar End roundabout, particularly in the morning peak. The A45 also experiences further congestion to the north and west.	Red
Is the site suitable for strategic employment development?	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> – The site will serve the employment needs of Coventry rather than Rugby. – Significant highway capacity issues on A45. 	Red

3 (b)	East of Prologis Park
Ownership	1 Ownership
Site Promoter	Unknown
Previous Site Promotion	Site has been previously submitted in Rugby Call for Sites (2015) – REF S14/089. Agent – David Lock Associates / Geoff Wilson
Planning History	None



Constraints		Score (red/amber/green)
Green Belt (y/n)	Yes	
Public Access/Rights of Way	PROW across south east part of the site	
Levels	Slopes up from north to south from 70AOD to 80AOD	
Ecology/Wildlife Designations (and other known issues)	<ul style="list-style-type: none"> • Adjacent to Brandon Marsh SSSI and within SSSI impact zone • Western spur of the site is Ryton and Brandon Gravel Pits SSSI and River Avon and Tributaries LWS 	
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	Dense tree coverage on western spur of the site. Tree / hedgerow lined field boundaries.	
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	Immediately adjacent sewage works.	
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	Grade II* Church of St Leonard and Grade II war memorial in Ryton-on-Dunsmore south east of the site	
Flooding	Flood Zone 2 and 3 across northern parts of the site	
Other Physical Constraints (e.g. water bodies, ditches etc)	Pond in western spur of the site and River Avon tributaries across the site	
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc.)	Overhead power lines	
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	Northern third of the site forms part of Rugby's strategic green infrastructure network	
Agricultural Land Classification	Grade 3	
Does it serve the employment needs of a neighbouring authority?	Yes, Coventry	
Site Accessibility		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Ryton-on-Dunsmore – designated Main Rural Settlement	
Sustainable Transport Connectivity		Score (red/amber/green)
Distance to closest bus stop	900m (London Road) infrequent service every 1.5 – 3 hours. The nearest bus stop is beyond the acceptable walking distance of 400m and the bus service is infrequent. There may be the potential to divert the existing bus service into the site but this would not increase the service frequency.	
Distance to closest settlement	1km (Ryton on Dunsmore). Ryton on Dunsmore is within acceptable commuting distance by foot of 1000m.	

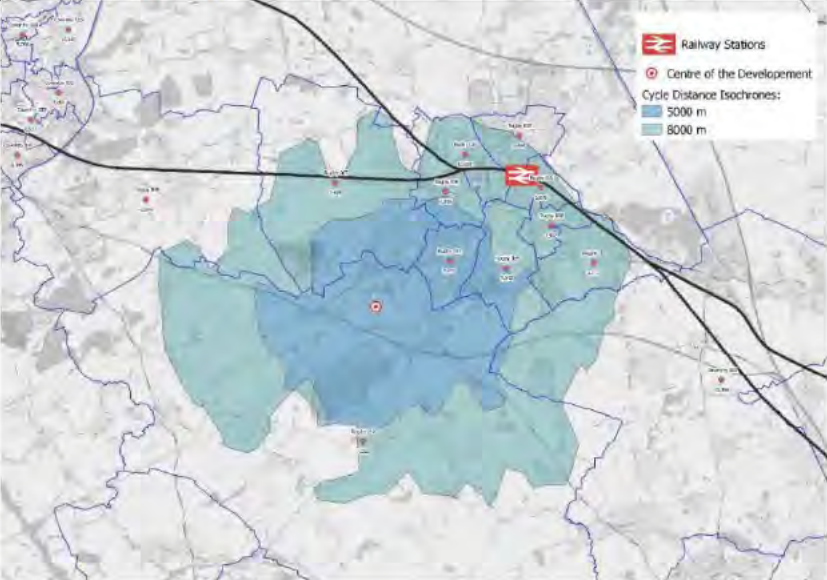
<p>Distance to closest rail station</p>	<p>7km (Coventry). The nearest train station is beyond the 2km preferred maximum distance for commuting on foot, beyond the 5km acceptable cycling distance for commuting but within the 8km preferred maximum cycling distance for commuting.</p>	
<p>Population catchment for employees</p>		
<p>Access to SRN – A road access and proximity to nearest motorway junction</p>	<p>Direct access to A45 allowing further connections to the A46, M6, M69, M45 and M1.</p>	
<p>Transport impact and HGV routing</p>	<p>HGVs can access SRN directly, transport on the wider local highway network will be minimal as most will route via SRN (only a few light vehicles likely to route north via other local roads)</p>	
<p>Highway capacity</p>	<p>A45 appears to currently experience significant traffic issues to the north where it connects to the Tollbar End roundabout, particularly in the morning peak. The A45 also experiences further congestion to the north and west.</p>	
<p>Is the site suitable for strategic employment development?</p>	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> – The site will serve the employment needs of Coventry rather than Rugby. – The nearest bus stop is beyond the acceptable walking distance of 400m and the bus service is infrequent. – Significant highway capacity issues on A45. 	

Strategic Employment Location 4 – South West Rugby, Safeguarded Area

4	South West Rugby – Safeguarded Area
Ownership	1 Title, 2 Landowners
Site Promoter	Tritax Symmetry
Previous Site Promotion	South West Rugby is an allocated Sustainable Urban Extension as allocated within the Rugby Local Plan 2019
Planning History	None on the safeguarded land



Constraints		Score (red/amber/green)
Green Belt (y/n)	No	Green
Public Access/Rights of Way	PROW along the eastern boundary	Green
Levels	Between 110 and 115m AOD	Green
Ecology/Wildlife Designations (and other known issues)	Within SSSI Impact Risk Zone of Draycote Meadows SSSI	Amber
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	Few peripheral trees/hedgerows within the site and one hedgerow through centre of the site	Amber
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	Unknown	-
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	<ul style="list-style-type: none"> No listed buildings onsite Grade II Listed Building north of the site on Coventry Road, Cawston Grade II Listed building south of the site on Coventry Road A4429. 	Amber
Flooding	Outside Flood Zone	Green
Other Physical Constraints (e.g. water bodies, ditches etc)	None	Green
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc.)	None onsite	Green
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	<ul style="list-style-type: none"> Green Infrastructure allocation/corridor Strategic blue infrastructure network 	Amber
Agricultural Land Classification	Grade 2 in west / Grade 3 in east	Red
Does it serve the employment needs of a neighbouring authority?	No	Green
Site Accessibility		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Within South West Rugby Sustainable Urban Extension	Green
Sustainable Transport Connectivity		Score (red/amber/green)

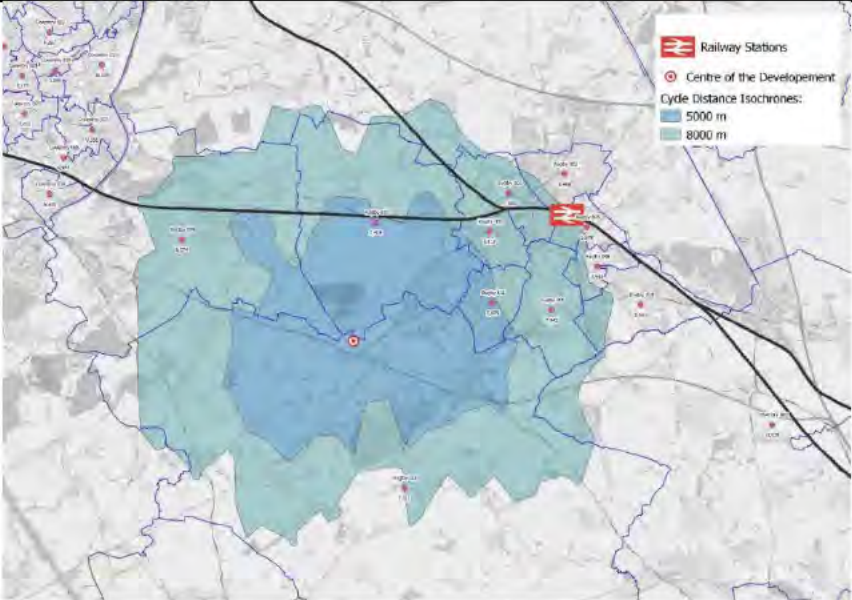
Distance to closest bus stop (m/km)	1km (B4429 Coventry Road). Infrequent service with 5 buses per day every 2-3 hours. Quantum of bus services and frequency will increase as SUE is built out.	
Distance to closest settlement (m/km)	1.5km Dunchurch, 2km South Rugby. Adjacent South West Rugby SUE when fully complete. 1.5km to Dunchurch and 2km to the southern parts of Rugby. The adjacent sustainable urban extension of South West Rugby will be within acceptable commuting distance of the site on foot (1000m) when complete. Dunchurch and the southern parts of Rugby are within the preferred maximum distance of 2000m.	
Distance to closest rail station (m/km)	6.5km (Rugby). The nearest train station is beyond the 2km preferred maximum distance for commuting on foot, beyond the 5km acceptable cycling distance for commuting but within the 8km preferred maximum cycling distance for commuting.	
Population catchment for employees		
Access to SRN – A road access and proximity to nearest motorway junction	Internal SW Link Road, once built will provide direct access to A45/M45	
Transport impact and HGV routing	HGVs can access SRN directly, transport on the wider local highway network will be minimal as most will route via SRN (only a few light vehicles likely to route north via other local roads)	
Highway capacity	Major roads in immediate vicinity appear to have no significant traffic issues other than through the centre of Dunchurch. Light vehicles likely to distribute out through wider site and diluted within wider area.	
Is the site suitable for strategic employment development?	Yes.	

Strategic Employment Location 5 – A45 / A4071 Junction

5	A45 / A4071 Junction
Ownership	1 Owner
Site Promoter	Unknown
Previous Site Promotion	The entire site has previously been submitted in the Rugby Call for Sites (2015) – Ref S14/112 – by Tony Lyons at WCC
Planning History	None



<u>Constraints</u>		Score (red/amber/green)
Green Belt (y/n)	Yes	Red
Public Access/Rights of Way	PROW across centre of the site	Amber
Levels	Relatively flat. 110m AOD across much of the site.	Green
Ecology/Wildlife Designations (and other known issues)	Within SSSI Impact Risk Zone of Draycote Meadows SSSI	Amber
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	Hedgerows and trees across site denoting field boundaries	Amber
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	-	Amber
Minerals Safeguarding	Minerals safeguarding area (sand and gravel)	Amber
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	<ul style="list-style-type: none"> Grade II Listed Building (Park Farmhouse) within site north of A45. Grade II Listed Building (Manor Farmhouse) immediately adjacent the northwestern boundary. Scheduled Ancient Monument on land immediately adjacent the site – on Lawford Heath, adjacent to the northernmost Blue Boar Farm. 	Amber
Flooding	Outside the flood zone	Green
Other Physical Constraints (e.g. water bodies, ditches etc)	Several water bodies scattered across the site	Amber
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc.)	Overhead lines across centre – no pylons	Amber
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	None	Green
Agricultural Land Classification	Grade 3	Amber
Does it serve the employment needs of a neighbouring authority?	No	Green
<u>Site Accessibility</u>		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Thurlaston – designated rural village, and South West Rugby once built out, but accessible only across the A4071.	Red

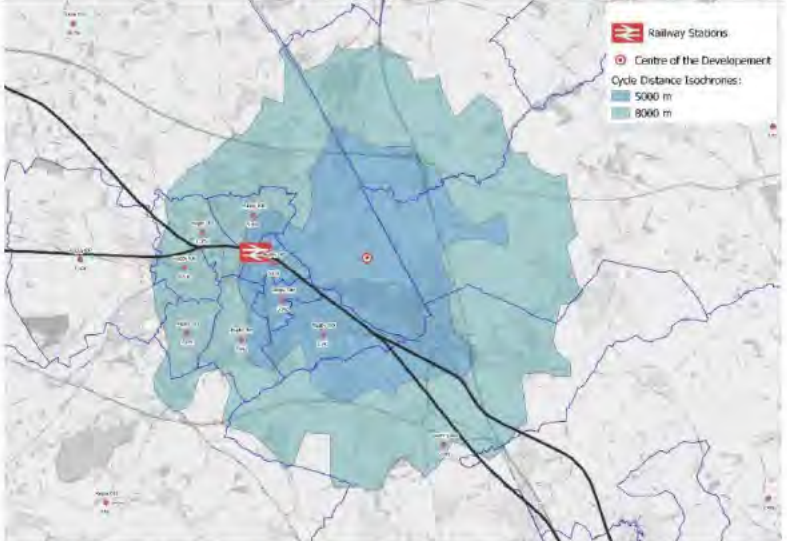
<u>Sustainable Transport Connectivity</u>		Score (red/amber/green)
Distance to closest bus stop	There are no bus stops within the wider area that can be realistically accessed on foot	Red
Distance to closest settlement	2km - South West Rugby. The south western parts of Rugby are within the preferred maximum commuting distance on foot of 2000m.	Amber
Distance to closest rail station	7.5km (Rugby). The nearest train station is beyond the 2km preferred maximum distance for commuting on foot, beyond the 5km acceptable cycling distance for commuting but within the 8km preferred maximum cycling distance for commuting.	Amber
Population catchment for employees		Green
Access to SRN – A road access and proximity to nearest motorway junction	HGVs can access SRN directly to the south	Green
Transport impact and HGV routing	HGVs can access SRN directly, transport on the wider local highway network will be minimal (with possible exception of the A4071) as most will route via SRN	Green
Highway capacity	Major roads in immediate vicinity appear to have no significant traffic issues other than through the centre of Dunchurch.	Green
Is the site suitable for strategic employment development?	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> – There are no bus stops within the wider area that can be realistically accessed on foot – Sustainable access to South West Rugby SUE once complete will be difficult across trunk road 	Red

Strategic Employment Location 6 – North of Houlton

6	A5 North of Houlton
Ownership	Land subject to Collaboration Agreement with Stoford Developments Limited
Site Promoter	Stoford Developments Limited
Previous Site Promotion	None
Planning History	None



Constraints		Score (red/amber/green)
Green Belt (y/n)	No	Green
Public Access/Rights of Way	PROW runs along a part of the Site's southern boundary and crosses it in part towards the southern end	Green
Levels	Southern two thirds of the site are relatively flat between 95m AOD and 100m AOD. The northern third of the site slopes up from 100m AOD to 110m AOD.	Amber
Ecology/Wildlife Designations (and other known issues)	Within SSSI Impact Risk Zone of Cave's Inn Pit's SSSI	Amber
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	Tree / hedgerow lined field boundaries and one copse.	Amber
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	No	Green
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	Grade II Dunsmore House located north of the site	Amber
Flooding	The majority is flood zone 1. Narrow swathe of Flood zone 2/3 along the site's southern boundary following the course of the Clifton Brook. The EA undertook hydraulic modelling in 2016 which shows that the Flood Zone effects the southern parts of the Site to a lesser extent than is currently shown on their Flood Maps. The EA have confirmed their intention to update the Flood Zones to reflect the hydraulic modelling.	Green
Other Physical Constraints (e.g. water bodies, ditches etc)	2 ponds and Clifton Brook runs along a part of the southern boundary	Amber
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc.)	None	Green
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	None	Green
Agricultural Land Classification	Predominantly non-agricultural. Remainder is grade 2 and 3.	Amber
Does it serve the employment needs of a neighbouring authority?	No	Green
Site Accessibility		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Adjacent the sustainable urban extension of Houlton	Green
Sustainable Transport Connectivity		Score (red/amber/green)
Distance to closest bus stop	1.5km (Houlton Way) – Bus service circa every 30 mins between Rugby and DIRFT with some continuing to Northampton. The nearest bus stop is beyond the acceptable walking distance of 400m but the bus service is frequent. There may be the potential to divert the bus service for DIRFT to the site.	Amber

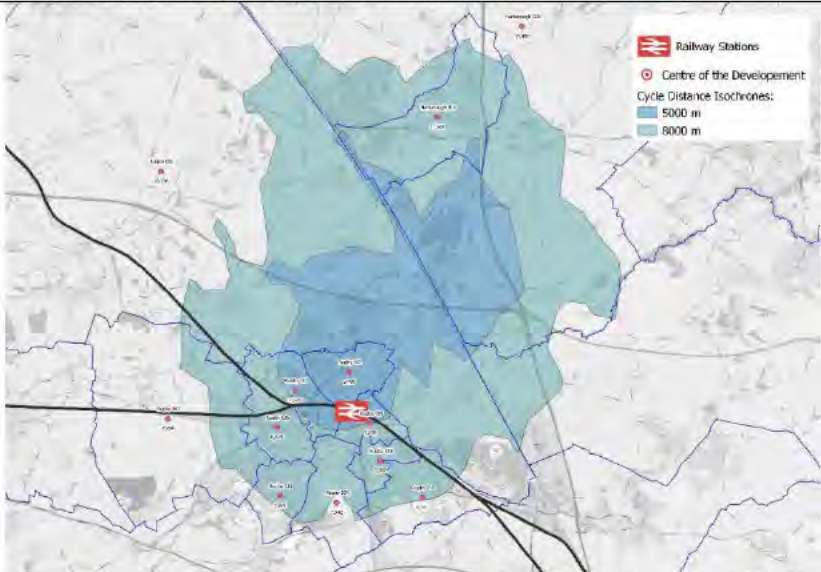
<p>Distance to closest settlement</p>	<p>1km to Houlton SUE when fully complete. 2km to Hillmorton (south east Rugby). The adjacent sustainable urban extension of Houlton will be within acceptable commuting distance of the site on foot (1000m) when complete. Hillmorton is within the preferred maximum distance of 2000m.</p>	
<p>Distance to closest rail station</p>	<p>5.5km to Rugby. 3.5km to the proposed Rugby Parkway Station. Rugby train station is beyond the 2km preferred maximum distance for commuting on foot, beyond the 5km acceptable cycling distance for commuting but within the 8km preferred maximum cycling distance for commuting. The proposed Rugby Parkway Station will be within the 5km acceptable cycling distance for commuting.</p>	
<p>Population catchment for employees</p>	 <p>The map displays the site location (red square) and the 'Centre of the Development' (red circle). It shows two concentric shaded areas representing cycle distance isochrones: a light blue area for 5000m and a darker blue area for 8000m. The map also indicates the locations of several railway stations (red squares) in the surrounding area.</p>	
<p>Access to SRN – A road access and proximity to nearest motorway junction</p>	<p>Direct access to A5 from site's eastern boundary. A5 also subsequently provides access to M6 Junction 1, and M1 Junction 18, a short distance to the north and south respectively</p>	
<p>Transport impact and HGV routing</p>	<p>HGVs can access SRN directly. Majority of light vehicles also expected to route via SRN. A smaller number of light vehicles are anticipated to route eastwards via local roads towards Rugby, however not expected to cause a significant impact</p>	
<p>Highway capacity</p>	<p>Major roads in immediate vicinity appear to have no significant traffic issues during AM peak. Some small areas of congestion appear around Rugby Town Centre and in advance of the Gibbet Roundabout (from M6) during PM peak – though not considered significant</p>	
<p>Is the site suitable for strategic employment development?</p>	<p>Yes. No significant constraints to prevent development coming forward.</p>	

Strategic Employment Location 7 – M6 Junction 1

7 (a)	North East of M6 Junction 1
Ownership	Multiple homeowners within on-site housing estate
Site Promoter	Unknown
Previous Site Promotion	The site was submitted to Rugby Call for Sites for residential development (Ref S14/074). Agent – Framptons – Richard Foxon
Planning History	R12/1353 – Outline planning application for a new estate village comprising of the provision of 60 dwellings. Approved in 2014 and now complete. 2014 onwards – Reserved Matters applications pursuant to the outline consent and householder applications relating to the houses on site.



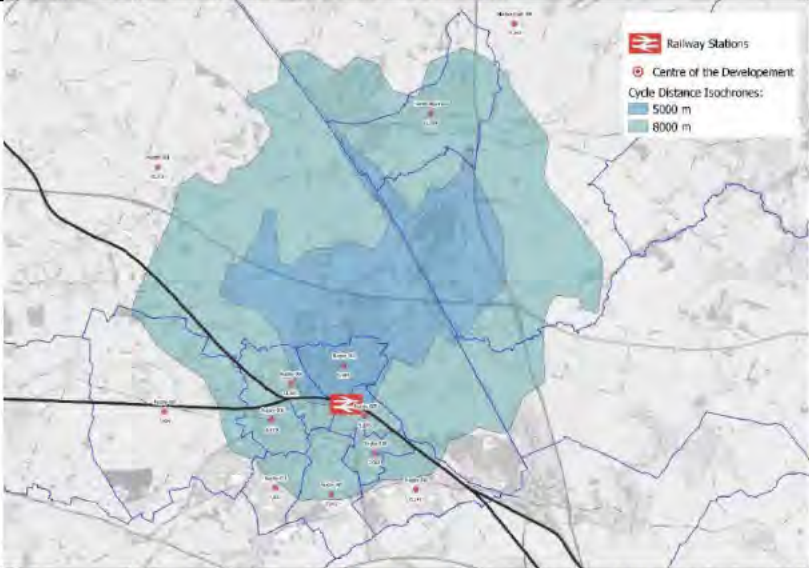
Constraints		Score (red/amber/green)
Green Belt (y/n)	No	Green
Public Access/Rights of Way	PROW from North to South East	Amber
Levels	Slopes east to west from 117m AOD to 130m AOD towards the housing estate. Largely plateaus across the housing estate at 130m AOD	Amber
Ecology/Wildlife Designations (and other known issues)	<ul style="list-style-type: none"> • Within SSSI Impact Risk Zone Cave's Inns Pits SSSI • Icehouse Spinney LWS in western part of site 	Amber
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	<ul style="list-style-type: none"> • Substantial tree coverage along A426 alongside Coton Spinney which is scattered with trees • Band of TPOs across part of the site 	Amber
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	Unknown	Green
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	<ul style="list-style-type: none"> • Grade II* Listed Building (Coton House) and Grade II Listed Building (Coton House stable block) within the site. • Scheduled Ancient Monument (Bowl barrow 470m south west of Coton House) in south west corner of the site. 	Amber
Flooding	Flood Zone 1	Green
Other Physical Constraints (e.g. water bodies, ditches etc)	Fish pond in south west part of the site	Green
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc.)	None	Green
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	None	Green
Agricultural Land Classification	Majority Grade 1. Remainder Grade 2 and 3.	Red
Does it serve the employment needs of a neighbouring authority?	No	Green
Site Accessibility		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Coton Park – part of Rugby Town. Accessible only across M6.	Red
Sustainable Transport Connectivity		Score (red/amber/green)
Distance to closest bus stop	1.6km (Central Park Drive on southern side of M6). Bus service is frequent, circa every 30 minutes although there is no suitable pedestrian infrastructure to reach this. The nearest bus stop is beyond the	Amber

	acceptable walking distance of 400m and the bus service is inaccessible. Potential to divert bus services that current serve Rugby Gateway.	
Distance to closest settlement	1.5km – North Rugby. North Rugby is within the preferred maximum distance of 2000m.	
Distance to closest rail station	5km (Rugby). Rugby train station is beyond the 2km preferred maximum distance for commuting on foot, but within the 5km acceptable cycling distance for commuting.	
Population catchment for employees		
Access to SRN – A road access and proximity to nearest motorway junction	M6 Junction 1 is a short distance to the south and can be accessed via A426. A5 can also be accessed short distance to the north	
Transport impact and HGV routing	HGVs can access SRN almost directly, transport on the wider local highway network will be minimal as most will route via SRN	
Highway capacity	Major roads in immediate vicinity appear to have no significant traffic issues other than in advance of the Gibbet Roundabout (access to A5 to the north) which appears to have significant traffic issues, particularly in the evening peak.	
Is the site suitable for strategic employment development?	<p>No.</p> <ul style="list-style-type: none"> • Development here will adversely impact on residential amenity for those living on the residential development at the centre of the site. Achieving a suitable layout for strategic employment uses alongside existing land uses will be difficult to achieve. • The site comprises best and most versatile agricultural land which should be protected from significant, inappropriate or unsustainable development proposals. • No suitable pedestrian infrastructure to reach nearest bus stops on southern side of M6. 	

7 (b)	North West of M6 Junction 1
Ownership	Wygestons and Trinity Almshouses Trustee
Site Promoter	Unknown
Previous Site Promotion	None
Planning History	Only planning applications have been made to the farm onsite



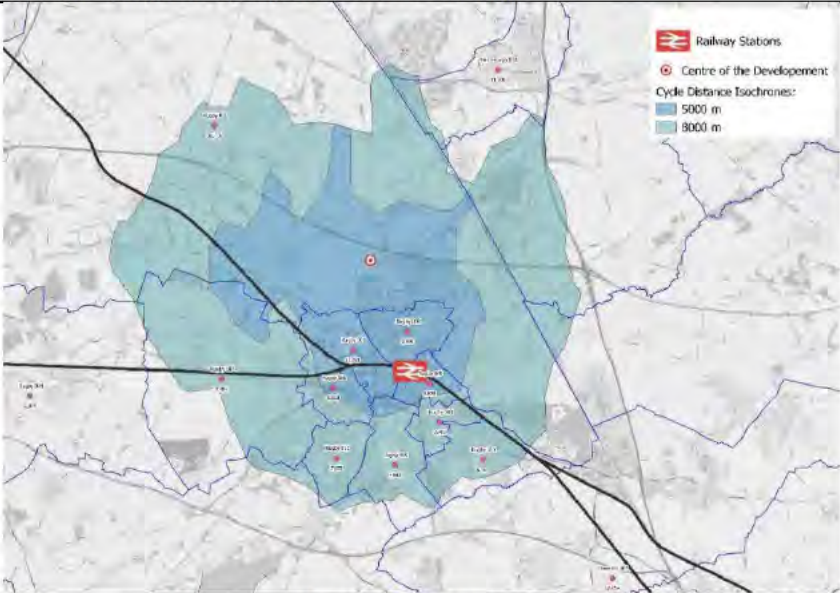
Constraints		Score (red/amber/green)
Green Belt (y/n)	No	Green
Public Access/Rights of Way	Three PROW's crossing the site	Amber
Levels	Steep site. Slopes up from 96m AOD in the west to 132m AOD in the east. Only development immediately adjacent A426 likely to be developable.	Amber
Ecology/Wildlife Designations (and other known issues)	Within SSSI Impact Risk Zone Cave's Inns Pits SSSI.	Amber
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	Tree / hedgerow lined field boundaries	Amber
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	Unknown	White
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	1.No. Grade II* and 3. No Grade II Listed Buildings adjacent the site's northern boundary Churchover Conservation Area adjoins the site to the north	Amber
Flooding	Flood Zone 1	Green
Other Physical Constraints (e.g. water bodies, ditches etc)	Canal feeder and springs cross the site	Amber
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc.)	Overhead lines across the site	Amber
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	Strategic green infrastructure network extends along western side of the site	Amber
Agricultural Land Classification	Grade 2 and 3	Red
Does it serve the employment needs of a neighbouring authority?	No	Green
Site Accessibility		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Churchover – designated rural village, and Coton Park – part of Rugby Town which is accessible only across M6.	Red
Sustainable Transport Connectivity		Score (red/amber/green)
Distance to closest bus stop	650m (School Street), although there is no active bus service. Central Park Drive on southern side of M6. Bus service is frequent, circa every 30 minutes although there is no suitable pedestrian infrastructure to	Amber

	reach this. Further bus stop on Central Park Drive is 1.6km though there is no suitable pedestrian infrastructure to reach this. Potential to divert bus services that current serve Rugby Gateway.	
Distance to closest settlement	600m – Churchover. 2km north Rugby. Churchover is within acceptable commuting distance of the site on foot (1000m), however it has a very small population consonant with its designation in the Local Plan as a rural village. North Rugby is within the preferred maximum distance of 2000m.	
Distance to closest rail station	5km (Rugby). Rugby train station is beyond the 2km preferred maximum distance for commuting on foot, but within the 5km acceptable cycling distance for commuting.	
Population catchment for employees		
Access to SRN – A road access and proximity to nearest motorway junction	M6 Junction 1 is a short distance to the south and can be accessed via A426. A5 can also be accessed short distance to the north	
Transport impact and HGV routing	HGVs can access SRN almost directly, transport on the wider local highway network will be minimal as most will route via SRN	
Highway capacity	Major roads in immediate vicinity appear to have no significant traffic issues other than in advance of the Gibbet Roundabout (access to A5 to the north) which appears to have significant traffic issues, particularly in the evening peak.	
Is the site suitable for strategic employment development?	<p>No.</p> <ul style="list-style-type: none"> – The site comprises best and most versatile agricultural land which should be protected from significant, inappropriate or unsustainable development proposals. – No bus service utilising nearest bus stop at Churchover and no suitable pedestrian infrastructure to reach bus stops on southern side of M6. 	

7 (c)	Land at and adjacent to Cosford, Cosford Lane
Ownership	Three titles – three owners
Site Promoter	Unknown
Previous Site Promotion	The site was submitted to Rugby Call for Sites (Ref S14/066). Agent – Mr Lomas Unit 9 Wheatcroft Business Park
Planning History	Only planning applications have been made to the farm onsite



Constraint	Comments	Score (red/amber/green)
Green Belt (y/n)	No	Green
Public Access/Rights of Way	Multiple PROW across the site	Amber
Levels	93m to the East and 105m to the West	Amber
Ecology/Wildlife Designations (and other known issues)	Within SSSI impact zone of Cave's Inn Pit's SSSI	Amber
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	Strategic Green Infrastructure Network (green space)	Amber
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	-	Green
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	Scheduled Ancient Monument (Shrunken Village) in centre of the site – 1002988 Grade II listed Building within the site (Grange Farm Barn) – 1233659	Amber
Flooding	Flood Zone 2 and 3 run through the eastern edge of the site	Amber
Other Physical Constraints (e.g. water bodies, ditches etc)	River Swift runs through the site and there is a pond onsite	Amber
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc.)	Overhead line from Middle to Eastern boundary	Amber
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	None	Green
Agricultural Land Classification	Grade 3	Amber
Does it serve the employment needs of a neighbouring authority?	No	Green
Site Accessibility		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Coton Park in north Rugby but over 1km away.	Amber
Sustainable Transport Connectivity		Score (red/amber/green)
Distance to closest bus stop	850m (Cosford Lane) and 1km (Valley Drive) have limited bus services which appear to be extensions of existing bus routes which coincide with AM and PM work start/finish times. Further regular services	Amber

	available 1.5km to the east (Overview Way). The regular bus service at Overview Way is beyond the acceptable walking distance of 400m but the bus service is frequent. Potential to divert bus services that current serve Rugby Gateway.	
Distance to closest settlement	The adjacent sustainable urban extension known as Eden Park be within acceptable commuting distance of the site on foot (1000m) when complete.	
Distance to closest rail station	4km (Rugby). Rugby train station is beyond the 2km preferred maximum distance for commuting on foot, but within the 5km acceptable cycling distance for commuting.	
Population catchment for employees		
Access to SRN – A road access and proximity to nearest motorway junction	M6 Junction 1 can currently be accessed via Swift Valley industrial estate and A426 (circa 4.5km). More direct route via Overview Way constrained by watercourses and third party land. Subsequent to M6 Junction 1, the Gibbet Roundabout on the A5 can be accessed a short distance to the north with provides further access to the M1 northbound and M69.	
Transport impact and HGV routing	HGVs can route to the SRN as above; however, this is not a direct route and will therefore create an impact on the main route (A426) through the northern area of Rugby which will/already has significant areas of recent/proposed development in the area. Light vehicles will create similar impacts and significant detailed modelling will be required to understand the cumulative impacts alongside the other recent/proposed residential and employment developments.	
Highway capacity	The A426 appears to have slower moving traffic at the northern end towards Junction 1, and areas of congestion further south towards the Kipling Roundabout (provides access to Swift Valley employment area) and towards Rugby Town Centre in the peak periods. Significant congestion is also apparent in advance of the Gibbet Roundabout on the A426 during the evening peak.	

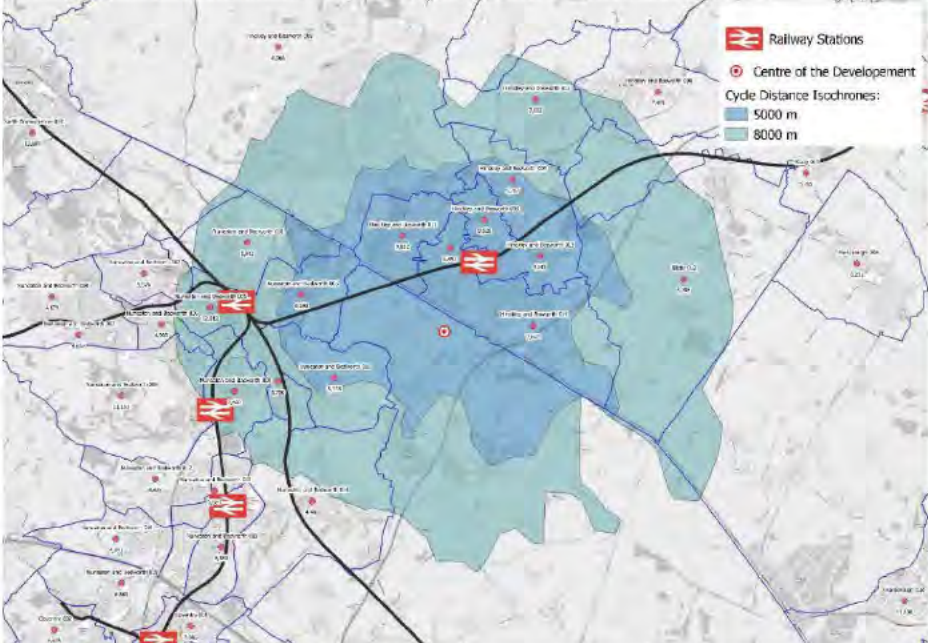
<p>Is the site suitable for strategic employment development?</p>	<p>Potentially, subject to appropriate highway mitigation.</p> <ul style="list-style-type: none">- The site does not benefit from direct access to the SRN, possible connections via Overview Way are possible but heavily constrained. Traffic therefore likely required to route through northern area of Rugby which may not have adequate capacity, particularly given other extensive recent development.	
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Strategic Employment Location 8 – South of Hinckley

8	South of Hinckley
Ownership	4 Titles – 7 different landowners
Site Promoter	Unknown
Previous Site Promotion	None
Planning History	Green Land: Planning Application (cross boundary with Rugby BC) 21/00732/FUL submitted for construction of a solar farm (up to 49.9MW), battery storage system together with associated works and infrastructure including; access, substation compound, inverters, 2m high stock-proof fencing, 2.3m high CCTV camera poles, and necessary infrastructure including internal access tracks and landscaping. Approved 22 Nov 2022.



<u>Constraints</u>		Score (red/amber/green)
Green Belt (y/n)	Yes	
Public Access/Rights of Way	PROW across the site	
Levels	Relatively flat for the majority. Site slopes up for approximately a quarter of the site - from the Scheduled Ancient Monument at 105m AOD towards the motorway junction at 120m AOD.	
Ecology/Wildlife Designations (and other known issues)	<ul style="list-style-type: none"> • Within SSSI impact zone of Burbage Wood and Aston Firs SSSI • Strategic Green Infrastructure Network down the West side 	
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	Tree / hedgerow lines field boundaries	
Land Contamination / Unexploded Ordnance (in areas where this is relevant)	Unknown	-
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	<ul style="list-style-type: none"> • Scheduled Ancient Monument at the centre of the site (Deserted village of Stretton Baskerville) • Grade II listed canal bridge south of the site • Archaeology potential given the deserted village of Stretton Baskerville 	
Flooding	Flood Zone 1	
Other Physical Constraints (e.g. water bodies, ditches etc)	River Anker and springs cross the site in multiple places	
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc.)	Overhead lines and towers across the site	
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	Strategic green infrastructure network extends along western side of the site following the course of the Asby de la Zouch canal	
Agricultural Land Classification	Grade 3	
Does it serve the employment needs of a neighbouring authority?	Yes, Hinckley and Bosworth and Nuneaton and Bedworth.	
<u>Site Accessibility</u>		Score (red/amber/green)
Nearest settlement and status in Local Plan settlement hierarchy (Policy GP2)	Burbage in Hinckley and Bosworth Local Planning Authority, accessible only across A5	
<u>Sustainable Transport Connectivity</u>		Score (red/amber/green)
Distance to closest bus stop	1.7km (Wolvey Road). Bus circa every 1-2 hours to Coventry, with more in peak periods. The nearest bus stop is beyond the acceptable walking distance of 400m and the bus service is infrequent.	

<p>Distance to closest settlement</p>	<p>1.2km – Southern Hinckley. Southern Hinckley is within the preferred walking maximum distance of 2000m for commuting to the site.</p>	
<p>Distance to closest rail station</p>	<p>3.4km (Hinckley). The nearest train station is beyond the 2km preferred maximum distance for commuting on foot, but within the 5km acceptable cycling distance for commuting.</p>	
<p>Population catchment for employees</p>		
<p>Access to SRN – A road access and proximity to nearest motorway junction</p>	<p>Development has opportunity to connect directly to A5 to the north. M69 Junction 1 can also be subsequently accessed a short distance to the east.</p>	
<p>Transport impact and HGV routing</p>	<p>HGVs can access SRN almost directly, transport on the wider local highway network will be minimal as most will route via SRN</p>	
<p>Highway capacity</p>	<p>A5 appears to have significant traffic issues to the west of the site in addition to junctions with the A47 (to Nuneaton and Hinckley) in both peak periods. M69 appears to have significant traffic northbound to M1 junction in the evening peak.</p>	
<p>Is the site suitable for strategic employment development?</p>	<p>No. The site is in the Green Belt. There are no exceptional circumstances to alter the boundaries of the Green Belt given that there are non-Green Belt alternative sites available.</p> <ul style="list-style-type: none"> – The site will serve the employment needs of Hinckley and Nuneaton rather than Rugby. – Significant highway capacity issues on A5 west of the site in addition to junctions with the A47 and M69. 	

Assessment Methodology

Agricultural Land Classification	
Grade 1, 2 and 3a	Red
Grade 3	Yellow
Grade 4 (and up)	Green

Commuting Assessment	
Walk to Bus Stop (within 400m and frequent service)	Green
Walk to Bus Stop (over 400m but frequent service or existing bus service potentially capable of diversion)	Yellow
Walk to Bus Stop exceeds 400m and no frequent service / inaccessible bus service	Red

Commute to work on foot from nearest settlement	
500m (desirable)	Green
1,000m (acceptable)	Yellow
2,000m	Red

Commute to work on bike	
5km (acceptable)	Green
8km (preferred max)	Yellow
Over 8km	Red