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Development Strategy  
Rugby Borough Council  
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30 January 2024

BY EMAIL

Dear Sir/ Madam,

**RUGBY BOROUGH LOCAL PLAN: ISSUES & OPTIONS (OCTOBER 2023) – REPRESENTATIONS ON BEHALF OF HOWKINS & HARRISON AND BERRYS (TYTHE PLATTS FARM)**

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We hereby provide comments on the Issues & Options consultation draft of the emerging Rugby Borough Local Plan on behalf of Howkins & Harrison and Berrys, who represent the landowners of the above site.

Howkins & Harrison and Berrys represent the owners of the land known as Tythe Platts Farm, located in the northeastern part of the borough, to the west of the A5, as identified in the enclosed location plan. A Call for Sites submission accompanies these representations, setting out more details on the suitability and availability of this site for logistics development.

In this context, we provide our comments on the Issues & Options draft of the Local Plan, with particular reference to the emerging employment strategy for Rugby Borough.

**a. Background**

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Tythe Platts Farm comprises an area of approximately 79 ha, located to the west of the A5, between the villages of Wibtoft to the north and Willey to the south. The site is located on the eastern edge of Rugby Borough and to the west of Magna Park Lutterworth, which is a major strategic distribution / logistics development located in Harborough District. Magna Park is currently being extended to accommodate additional demand for logistics floorspace in the area, including a northern expansion which will include the land opposite Tythe Platts Farm on the eastern side of the A5.

In this context, the land at Tythe Platts Farm represents a logical future expansion of Magna Park, building on the success of the development on the Harborough side of the borough boundary and linking into the existing infrastructure and facilities. Accordingly, this site forms part of a wider opportunity for the westward expansion of Magna Park. The extension of Magna Park to the west of the A5 will deliver significant investment and employment opportunities for Rugby Borough and build on the existing strategic logistics park.

The land at Tythe Platts Farm is currently in agricultural use, and comprises several arable fields with associated farm buildings. The site is bounded by the A5 to the east, existing roads to the north and south, and established field boundaries to the west. A collection of commercial buildings are located immediately to the south of the site.

The site is currently designated as Green Belt, but is not subject to any other designations on the adopted Local Plan Proposals Map and is not subject to any significant constraints, as detailed in the accompanying Call for Sites submission.

The borough boundary runs through the eastern part of the site, parallel to the A5. The vast majority of the site sits within Rugby Borough, however any future development could be coordinated on a cross-boundary basis to accommodate any parts of the proposals falling within Harborough District.

We consider that this site should be identified in the emerging Rugby Local Plan for the future expansion of Magna Park Lutterworth. Accordingly, the landowners are seeking an allocation for B8 development and removal of the site from the Green Belt. Based on the area of the site, it is estimated that it could deliver approximately 275,000 sqm of employment floorspace.

It is noted that the Issues and Options consultation will form part of the Rugby Local Plan Review which was agreed on 14 December 2022 to comprise a full update of the adopted Local Plan 2011-2031 policies. We understand that one of the reasons for this review is the emergence of future needs for homes and employment land, particularly for warehouse uses, through the Coventry and Warwickshire Housing and Economic Needs Assessment 2022 and agree with this decision to conduct a full review and the employment needs figures that support it.

The proposed expansion of Magna Park Lutterworth will provide a significant contribution towards the 551 – 735 ha gross requirement for strategic warehousing land across Coventry and Warwickshire.

## **b. Representations on the draft Local Plan (Issues & Options Version)**

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We set out below our comments in response to the specific relevant questions raised in the consultation document.

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

The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA 2022) identifies a significant requirement for employment land across Coventry and Warwickshire.

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

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

Paragraph 85 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Rugby Borough and the other Warwickshire Authorities are uniquely placed as the focal point for all strategic warehousing in the country. Given the proven suitability of this location for strategic warehousing and the local reliance on the sector for work, as highlighted in the consultation document, significant weight should be placed on the social and economic benefits of maximising the delivery of employment land to ensure that the population retains a steady supply of employment opportunities which will maintain and grow the prosperity of the region for years to come.

Rugby has an important role to play by providing employment opportunities for the wider region and is well placed to take a significant share of the identified regional B8 need including unmet need arising from Coventry. Having regard to the key criteria for strategic B8 development identified at paragraph 11.22 of the HEDNA, the Borough has good access to the strategic rail and road network, close proximity to an active workforce and is relatively unconstrained. Consequently, planning for a significant quantum of the identified strategic B8 need in Rugby Borough will allow the area to “*build on its strengths, counter any weaknesses and address the challenges of the future*” and be in accordance with paragraph 85 of the NPPF.

We understand that the Council are engaged in the preparation of a West Midlands Strategic Employment Sites Study and an Economic Study that are expected at some time in 2024. We support the production of this new and up-to-date evidence in accordance with paragraph 31 of the NPPF and eagerly await their publication. We would appreciate further clarification from the Council on publication dates.

Against this identified need, Rugby should be seeking to ensure sufficient new sites are identified (taking account of any pipeline supply). Additionally, the Council should ensure that enough land is brought forward for occupiers to have choice and variety in market for strategic warehousing and allocate enough to account for an element of slow/ non-delivery to ensure supply is robust and needs will as a minimum be met.

In terms of the timescales for the employment strategy, we encourage the Council to plan for the longer term (i.e. up to 2050), to ensure a robust, long-term strategy is set out. This is particularly important in the context of releasing Green Belt land in order to meet identified needs, given the requirement for Green Belt boundaries to be permanent (as set out at paragraph 145 of the NPPF).

Until the further evidence base has been prepared by the authorities, it is difficult to determine precisely how much of the identified 551 – 735 ha of strategic logistics need should/ can be planned for within Rugby Borough. However, given the significant locational advantages and reliance on the sector highlighted above, and the availability of suitable sites such as the Tythe Platts Farm site, we strongly encourage the Council to plan for a substantial quantum of the overall sub-regional need, and to ensure that needs are met in full across Coventry and Warwickshire in a coordinated manner.

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

We consider that the long-term need for large strategic warehousing in Rugby as evidenced by the HEDNA should be a particular focus in the emerging Local Plan. The proposed approach to differentiating between strategic warehousing and local industrial development would appear to be logical, thereby ensuring sufficient space is planned for to accommodate both local and strategic needs.

The HEDNA 2022 emphasises the very strong demand for B8 space and in particular notes that the Coventry and Warwickshire study area is considered a prime location for larger strategic warehousing developments. Consequently sites able to provide larger warehouses should be prioritised.

The type of sites allocated to meet this larger, strategic warehousing need should reflect the specific requirements of this sector. This includes having good access to the strategic road or rail network, with few constraints and being a sufficient size to accommodate larger units. This reflects the key locational criteria identified at paragraph 11.22 of the HEDNA. We consider that sites should be at least 20ha in order to make a meaningful contribution to the sub-area employment need. It is also helpful to consider the sequential approach suggested by paragraph 11.19 of the Warehousing and Logistics in Leicester and Leicestershire Growth Study (April 2021 (amended March 2022)), which sets out the following sequential approach:

1. Extension of existing strategic distribution sites, both rail-served and road-only connected.
2. Identifying suitable new strategic distribution sites on previously developed land which meet the site selection criteria
3. Identifying sustainable new strategic distribution sites on greenfield land which meet the site selection criteria.

The extension of existing strategic distribution sites would include the future extension of Magna Park, which is a key strategic site directly adjacent to the borough boundary.

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

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

Paragraph 11.24 of the HEDNA identifies key potential corridors within the sub-region that could accommodate strategic B8 development, and we note that some of the broad locations identified at paragraph 3.40 appear to broadly align with these key corridors. However, it is unclear to what extent the strategic locations have been informed by, or align with, the HEDNA in this regard. For example, the emerging Plan omits consideration of the broad area to the west of Magna Park Lutterworth (including the Tythe Platts Farm site) as a potential location, despite it being within the A5 corridor and adjacent to an existing major employment site which accommodates strategic warehousing uses.

We encourage the Council to ensure the criteria set out in paragraph 11.22 of the HEDNA are taken into account when selecting potential locations for strategic employment development. Proximity to existing employment areas and workforce is one of these criteria which reflects the sequential approach identified in the Leicester and Leicestershire Growth Study outlined above. In this regard, the Tythe Platts Farm site presents a key opportunity for the future expansion of Magna Park Lutterworth, which benefits from good access to local labour in Lutterworth as well as being accessible from Rugby and other major settlements in the region.

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

In relation to highway accessibility, paragraph 11.42 of the HEDNA identifies the A5 corridor as a key potential location for B8 development, given the accessibility of this area to the strategic road network. Previous proposals in the local area (such as planning application 20/02075/OUT in Harborough District) confirm that local junctions will operate within capacity up to 2032, and it is relevant to note that the relevant parties are developing an improvement scheme for the Gibbett Hill roundabout. Consequently the site is considered a suitable location for employment development.

In terms of the site's location within the Green Belt, it is noted that Paragraph 146 of the NPPF requires the Council to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development before concluding that Exceptional Circumstances exist to amend Green Belt boundaries. In this regard, as discussed above there is a significant need for additional B8 strategic employment floorspace in the sub-region, and we anticipate that it will not be possible to meet this full need on non-Green Belt sites. Consequently we consider that the need for additional employment land, the lack of supply of sites outside the Green Belt and the significant economic benefits of meeting identified need would contribute to the Exceptional Circumstances needed to release Green Belt land through the Local Plan. The Council will need to undertake a Green Belt review in due course to support this exercise. In the context of Exceptional Circumstances being demonstrated, we consider that the land at Tythe Platts Farm should be a priority location for growth, given its location adjacent to Magna Park Lutterworth, its access to the strategic road network and proximity to local labour, and its lack of any significant constraints.

Consequently, we consider that the land at Tythe Platts Farm should be identified and assessed as an option within the Council's forthcoming site selection process. We will be pleased to provide further details as necessary to assist the Council with this exercise.

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

Paragraph 146 of the NPPF requires the Council to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to amend Green Belt boundaries. Therefore the Council will need to consider the capacity of non-Green Belt sites against the identified employment need in the first instance.

However, given the scale of the need for strategic warehousing land across Coventry and Warwickshire, identified as 551 ha between 2021-2041 and 735 ha between 2021-2050, we anticipate that it will not be possible to meet this need solely in non-Green Belt locations. A significant portion of Rugby Borough is designated as Green Belt, and consequently it is likely that additional land will need to be released to meet the forthcoming requirement (yet to be identified) in the emerging Local Plan.

Consequently we consider that the need for additional employment land, the lack of supply of sites outside the Green Belt and the significant economic benefits of meeting identified need would contribute to the Exceptional Circumstances needed to release Green Belt land through the Local Plan. The Council will need to undertake a Green Belt review in due course to support this exercise.

In the context of Exceptional Circumstances being demonstrated, we consider that the land at Tythe Platts Farm should be a priority location for growth, given its location adjacent to Magna Park Lutterworth, its access to the strategic road network and proximity to local labour, and its lack of any significant constraints.

### **c. Summary**

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We trust that the above comments and enclosed details will be taken into account as the Local Plan is progressed. We consider that the land at Tythe Platts Farm is entirely suitable for a strategic distribution development and provides a unique opportunity to take advantage of existing infrastructure within the West Midlands region, as discussed above.

We would be pleased to provide any further details relating to the site and the proposed development as required, and look forward to receiving updates on the progress of the Council's development strategy for the future of the borough.

Yours sincerely,