Symmetry Park Rugby Phase 2

Response to RBC 14: C&W FEMA Updated MOU on Employment Land

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Response to RBC 14

1. Introduction

1.1. The Coventry and Warwickshire Functional Economic Market Area Updated Memorandum of Understanding on Employment Land (RBC 14; the 'Updated MOU') was published on the Rugby Local Plan Examination webpage on 14th November 2026.

1.2. The Updated MOU has been prepared by the Coventry & Warwickshire authorities[1] to inform the Examination in Public, setting out how employment land needs, supply and unmet need are intended to be addressed across the FEMA. The document intends to demonstrate that the relevant local authorities have cooperated and that identified employment needs, including Coventry's unmet need, can be accommodated within the FEMA. This is to demonstrate that Rugby's strategy for employment land has been positively prepared, justified and effective.

1.3. Savills have reviewed the Updated MOU and consider that it does not demonstrate that identified employment needs, including Coventry's unmet need, can be accommodated within the FEMA. The shortcomings that support this view are set out below. The key findings are:

- The local need forecasts set out in Tables 1 to 3 are likely to underestimate true I&L need because they project forward historic completions from a supply-constrained market[2]. Savills' market-facing approach, based on net absorption and availability and allowing for suppressed demand, produces a materially higher estimate of need. For Rugby, our Regulation 18 representation (ID: 563) identified a combined local and strategic requirement of 305 ha[3], well above the equivalent figures in the Updated MOU.
- In spite of the Updated MOU's contention that there is sufficient supply flexibility, neither the local need figure nor the strategic site needs incorporate a sufficient supply buffer in the context of not covering suppressed demand.
- The demand and supply context across Coventry and Warwickshire presented in RBC 14, Table 5 is not robust. Most supply is not established through adopted plans. Individual local authority positions have shifted considerably (for example, Coventry moving from a 9ha shortfall to over 57ha); and no site schedule is provided. Therefore, the headline supply figure cannot be relied upon.
- The identified errors are material, in spite of the contention that they are not. The roughly 50 ha Coventry Gateway overestimate of supply represents more than half of Coventry's need. It has not been demonstrated that the resulting additional unmet need can be met on suitable, available and deliverable sites elsewhere in the FEMA.

[1] Though not all appear to have signed it in the version circulated.
[2] See the November 2024 Alignment Paper, paras 3.8 – 3.13, pages 11-12.
[3] See 'Symmetry Park Rugby Phase 2 Market Assessment and Review of Draft Local Plan', Savills, March 2026, chapter 6, inc Table 6.6, p41.

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- It has not been demonstrated that Coventry's unmet need can be accommodated. The onus is on the authorities to demonstrate where and how the need can realistically be met, and this has not been done.

2. Shared Employment Evidence Base

2.1. The Updated MOU sets out the need forecasts and estimates of local residual need in Tables 1 to 3. The primary critique of the demand side is that the local need forecasts are likely to underestimate the true level of I&L need because they rely on projecting historic completions forward for a market that has itself been supply-constrained, so they do not take account of suppressed demand.

2.2. As set out in our Symmetry Park Regulation 18 representation, Savills March 2026 report (Representation ID 563), completions are fundamentally a measure of supply delivered rather than underlying occupier demand. Where availability has remained below the 8% equilibrium market (associated with a balanced market), insufficient land and premises will have constrained the amount of demand that could actually be accommodated. Projecting those constrained delivery rates forward risks perpetuating the supply constraints. Savills alternative market-facing approach uses net absorption and availability and explicitly allows for suppressed demand, producing a materially higher estimate of I&L need. For Rugby, that approach produced a combined local and strategic requirement of 305 ha over the 17-year plan period (of which 230 ha relates to strategic premises of 100,000 sqft and above), compared with the 284.5 ha in the combined local and strategic figures within the Updated MOU[4]. (The RBC 14 paper also includes office demand in their figure which is not included in the Savills figure, though this is a small fraction of the total demand).

2.3. Table 4 of the Updated MOU, p2, sets out the strategic site needs. For Rugby, its need is apparently met in Area 7 – M6/A45/A46/M45 Coventry and Rugby and through Padge Hall Farm. However, this depends on all of the identified strategic supply being available, suitable and deliverable for occupiers of strategic premises. There is though uncertainty over whether that will be the case (see para 2.5 below).

2.4. The RBC 14 section 2 concludes at para 2.6 by saying that 'supply flexibility is built into the needs calculations with a 5-year margin built into the calculations' for local need and the assessment of the strategic site needs. However, the local need figure does not allow for suppressed demand and the strategic sites' need may not adequately allow for suppressed demand. In addition genuine supply flexibility requires additional headroom above the assessed requirement, so that the market can continue to function if individual sites fail to deliver and occupiers retain a reasonable choice of sites.

2.5. With regard to the strategic sites, the Council treats selection of the upper end of the strategic demand range as if it provides an allowance for flexibility, when it remains a measure of anticipated demand, and does not adequately allow for suppressed demand. It should not also be regarded as contingency against sites failing to come forward. This is particularly important because there is uncertainty over

[4] See RBC 14, Table 5, p4.

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whether all identified strategic supply will be available, suitable and deliverable for strategic B8 occupiers.

2.6. It is also notable that some of the forecast scenarios for strategic land which support Table 4 of the Updated MOU use a 5% availability rate as reflective of a market in equilibrium. Whilst the scenario using a 5% availability rate is ultimately not preferred, we point out that a market availability rate of 8%, rather than 5%, is the appropriate benchmark for a balanced industrial and logistics market, and it should be applied consistently across all sites and size bands, local and strategic alike. Savills' analysis of the national market shows that real rental growth (rental growth net of inflation) turns strongly positive once availability falls below 8%. Between 2009 and 2014, when national availability was above 8%, real rental growth was negative or only slightly positive and demand could be accommodated. From 2014, with availability below 8%, real rents grew every year while net absorption has been lower than in 2009–2014, despite the sector's strength. This pointed to demand being suppressed by tight availability rather than by weak occupier interest. The Coventry and Warwickshire market followed the same path, with availability below 8% since 2015 and rents outpacing inflation from around 2014 (Symmetry Park Regulation 18 representation, Savills March 2026, Figures 5.1 and 6.1). We are not aware of any evidence showing that 5% is a more appropriate level for the I&L sector. Our contention is that using 5% would treat a supply-constrained market as if it were in balance, understate the extent of suppressed demand and need, and fail to leave any available land or premises at the end of the plan period for the market to function normally.

2.7. The Updated MOU also continues to treat the forecasting of local and strategic need on different bases. Local need includes a five-year margin of gross completions (HEDNA-WMSESS Alignment Paper, SD5 paragraph 3.11), whereas for strategic need the Council relies on using the upper end of the WMSESS range as 'effectively incorporating a buffer' (SD5 para 3.3). However, the Council accepts there is 'nothing magic' about the 25-ha threshold between the two site categories (Development Needs Topic Paper, SD11 para 3.48). If the Council accepts that the distinction between the two categories is tentative, the same approach to buffers should apply. In the case of strategic sites, the upper end of a range remains a realistic estimate of need, so a buffer should be applied on top of it. A 20% buffer for strategic land is not excessive if the aim is to ensure that availability is around 8% at the end of the plan period.

3. Progress on Meeting Needs

3.1. Table 5 of the Updated MOU provides a FEMA-wide snapshot of the employment land position across the Coventry and Warwickshire local authorities. Its purpose is to show where individual authorities have surpluses or shortfalls and, when those positions are aggregated, support the proposition that there is sufficient employment land across the FEMA as a whole. Table 5 is presented as though it were settled. However, the figures are derived: from different types of local authority evidence base approaches; cover different plan periods; and have different levels of certainty and deliverability with regard to their sites. Our contention is that Table 5 is not robust. This is because:

- Most of the supply is not established through adopted plans. Therefore, the supply picture could change significantly.
- There is considerable flux in the supply picture. For example, during examination, Coventry's position changed from a 9ha shortfall to over 57ha.
- The table lacks transparency about the sites comprising supply. A site schedule, particularly relating to the non-Rugby BC sites, is needed so that it can be sense-checked. We formally request that a full list of both Rugby and non-Rugby sites be provided. It is important that we are able to assess the deliverability of sites and the other considerations that may have been used. For example, we are aware that for Nuneaton & Bedworth, the surplus relies on an assumption about a number of windfall sites coming forward.
- In reference to Rugby's draft employment land allocations, around 62% of draft Policy S3 floorspace (around 640,000 sqm) is proposed on Green Belt land, including the new Walsgrave Hill allocation. Supply that depends on exceptional circumstances and on new Green Belt boundaries carries greater delivery risk, and the Stage 2 Site Assessment Report (SS8) provides no clear basis for preferring such sites. This further undermines reliance on the headline supply figure.

3.2. Taken together, these points mean that the headline supply figure of 1,311.5 ha cannot be relied upon to demonstrate a surplus. It risks being presented as an artificially favourable FEMA-wide position.

4. Correction of Errors

4.1. The section seeks to demonstrate that in spite of a few errors having been identified in the assessment of strategic employment land, principally relating to Coventry Gateway and Baginton Fields, these do not materially alter the overall employment land position. The Updated MOU's position is that the Coventry Gateway correction (being overestimated by 50 ha) creates additional unmet need, but that this can be accommodated elsewhere within the wider FEMA; that the scale of the correction is small when viewed against total FEMA-wide need; that in Rugby the corrections are absorbed through use of the upper end of the identified demand range; and that the FEMA retains sufficient overall supply such that the errors do not require additional strategic allocations.

4.2. We have several concerns with this approach, set out in this and the following paragraphs. The first is that the Updated MOU acknowledges that correcting the approximately 100 ha overstatement at Coventry Gateway[5] increases the amount of need that must be accommodated but assumes that 50 ha of this additional requirement can be met elsewhere in the FEMA. This conclusion does not follow automatically. Strategic employment land cannot simply be allocated anywhere, so the onus is on the authorities to demonstrate that sufficient suitable, available and deliverable strategic supply exists in locations capable of meeting that requirement.

4.3. The Updated MOU characterises the approximately 50 ha Coventry Gateway correction as very small

[5] See RBC 14, para 4.1, p6

when measured against total FEMA-wide need, at around 1.5%, and therefore considers it a *'very marginal reduction'.* This is misleading because the correction represents more than half of Coventry's need and is therefore significant in the context of Coventry's own requirement and supply position. Its significance should not be diminished simply by expressing it as a percentage of the much larger FEMA-wide requirement.

4.4. The Updated MOU effectively argues that for Rugby, the corrections to Coventry Gateway and Baginton Fields do not result in unmet need because Rugby is already planning towards the upper end of its identified strategic demand range. Again, our concern is that this conflates demand with supply flexibility. The 'upper end' remains an estimate of the amount of land that could reasonably be required and does not constitute a supply buffer. Absorbing corrections within that figure therefore reduces rather than preserves flexibility and leaves little or no contingency if sites do not come forward as anticipated.

4.5. The Updated MOU's position maintains the proposition that the errors are ultimately immaterial because there is sufficient, or excess, supply across the FEMA. That conclusion is only robust if the underlying supply position is itself reliable. As set out in our Section 3 above, there are material uncertainties over the composition, status and deliverability of the supply presented in Table 5 of the Updated MOU. This includes the absence of sufficient site-level information that enables the figures to be interrogated. The claimed FEMA-wide surplus cannot be relied upon to negate the consequences of the identified errors.

5. Coventry Unmet Needs

5.1. Section 6 of the Updated MOU seeks to explain how Coventry's unmet need can be accommodated elsewhere in the FEMA. It contends that: much of the shortfall is related to the five-year demand margin rather than the underlying 'core' requirement; that the unmet need can be accommodated on either strategic or smaller employment sites; and that, in any event, the FEMA-wide supply position indicates sufficient overall supply.

5.2. We consider these conclusions to be insufficiently justified. The onus should therefore be on the local authorities to demonstrate where and how Coventry's unmet need can realistically be accommodated, rather than simply concluding that it can be absorbed somewhere else in the FEMA.

5.3. As set out above, there are significant uncertainties regarding the composition, status, suitability and deliverability of that supply that is set out in Table 5 of the Updated MOU. The headline surplus does not, in itself, demonstrate that Coventry's unmet need will actually be met.

5.4. It is unclear which sites are earmarked to meet Coventry's unmet need. The Development Needs Topic Paper (SD11, para 3.36) limits Rugby's contribution to 2.5 ha without saying how or where it will be met, and the Updated MOU does not identify sites elsewhere in the FEMA. Given the correction to the capacity of the Coventry Gateway site, the authorities should identify the specific sites intended to meet this need and how delivery will be monitored, so that it is not double counted against general supply.

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5.5. The timing of the draft plan compounds these concerns about supply deliverability. The Council targets adoption of the emerging local plan in July 2027, so the 2042 end date gives a plan period of under 15 years from adoption, contrary to NPPF para 22. Further slippage is likely, particularly if Main Modifications are needed. Strategic employment sites have long lead-in times, so the Inspectors in the Coventry Local Plan examination have asked that plan to look ahead 15 years from adoption for housing and employment. Reliance on a later review within a new unitary authority gives no certainty of timing, and a new-style plan by 2033 cannot be assumed. Coventry's unmet need, and the supply buffer, should be addressed now rather than deferred.

6. Conclusion

6.1. Taken together, the Updated MOU does not demonstrate that employment needs, including Coventry's unmet need, can currently be accommodated within the FEMA. Strategic employment land cannot simply be allocated anywhere, and the onus is on the authorities to show that sufficient suitable, available and deliverable strategic supply exists in locations capable of meeting the requirement. They have not adequately done so.

6.2. The local need forecasts rely on constrained historic completions and do not allow for suppressed demand.

6.3. The Table 5 supply position is not robust because most supply is not established through adopted plans, authority positions have shifted materially, and no site schedule has been provided. The Coventry Gateway correction of around 50 ha is significant in the context of Coventry's own need. We therefore formally request that the authorities provide a full site schedule of Rugby and other local authority sites underpinning Table 5, and set out where and how Coventry's unmet need will be met.

6.4. Savills' Symmetry Park Rugby Phase 2 Market Assessment Report (13 March 2026), submitted with the Framptons Regulation 18 representation (ID 563), estimates that Rugby has a deficit of strategic I&L land. A key point is that our assessment estimates a higher level of demand than Rugby's because it takes account of suppressed demand. In addition the council has over-estimated some of its claimed supply including, for example, an area for a park at Padge Hall Farm.

6.5. There is an available solution. South West Rugby employment phase 2 (Site Ref. 17) is proposed to be carried forward from the adopted Local Plan as 'safeguarded land.' The allocation of this site is entirely justified in spatial terms as set out by the Inspector in their Report on the Examination of the adopted Rugby Borough Local Plan 2011-2031, in which South West Rugby is identified as the most appropriate location for major urban expansion (at paragraphs 103 and 105). The employment floorspace quantum for the site has reduced significantly since the Preferred Options Consultation in 2025 (a reduction of c. 70,000 sqm). We therefore respectfully invite the Inspectors to require that the Plan restore South West Rugby to its previously identified employment floorspace so that Rugby plans for the shortfall rather than relying on unevidenced/uncertain capacity elsewhere in the FEMA.

Rugby Local Plan Examination

RBC 14 – Coventry and Warwickshire FEMA Updated Memorandum of Understanding on Employment Land

Joint Technical Statement by GLP Europe, Nurton Developments and Mr FB Dewes & I Dewes (Representor 534), Stoford Properties (Representor 488) and Tritax Big Box Developments (Representor 563)

1. Introduction

1.1. RBC 14 was uploaded onto the Examination webpage on Saturday 14 November 2026, just three days prior to the scheduled start of the hearing sessions (Tuesday 17 November). It is a significant submission covering all aspects of the need and supply of employment land and the resulting spatial strategy taken by the draft Plan.

1.2. Three principal representors, who are promoting different strategic employment sites (Sites 325, 130 and 17) through the Plan and are due to participate in the relevant hearing sessions at the examination, have worked together to review RBC 14. Collectively, these two representors hold real concerns about how the relevant evidence has been presented to justify the position taken and its implications on the future development of employment opportunities in Rugby Borough and in and around Coventry.

1.3. The principal concerns are summarised below in the next section. These are followed by some concluding thoughts on the implications in terms of delivery.

2. Principal Concerns

2.1. Section 2 of RBC 14 summarises the shared employment evidence base. This provides no new evidence or analysis. However, it does illustrate some of the points made by representors in submissions made in respect of the Reg 19 draft Plan and subsequently in Matter statements. These include:-

- Parts of the principal evidence base are dated – e.g. the HEDNA was published in 2022 and WMSESS was published in 2024 but was based on data from 2022.
- The principal documents employ different base dates. None of them relate to the plan period chosen by the draft Plan (2025 – 2042).
- Much of the evidence is multi-layered and complex. This becomes particularly apparent through the Alignment Paper, which struggles to explain the divergence in conclusions between the HEDNA and WMSESS – e.g. the reduction in local need to serve Rugby from 150.5 ha to 58 ha over the period 2021-2041.[1]

2.2. Section 3 summarises progress on meeting needs. The representors find this section particularly confusing, especially Table 5, and do not hold confidence in its reliance for the following reasons:-

- The plan periods are not consistent. Only North Warwickshire shares the same plan period to Rugby.

[1] See RBC 14 Table 1, p1; Nov 24 Alignment Paper Table 3.9, p15

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- None of the authorities, with the exception of Nuneaton & Bedworth BC, have adopted their draft Plans. North Warwickshire and South Warwickshire have yet to reach examination. As such, the figures provided for need and supply cannot be relied on.
- This has been demonstrated by the recent examination of the draft Coventry Plan. The City Council started the examination hearing sessions with a need for local employment land of 105 ha (for the period 2021 – 2041) and a supply of 96 ha, leading to a shortfall of just 9 ha. Now, as confirmed by RBC 14 Table 5, p4, the plan period has shifted to 2024 – 2042, the need has reduced to a minimum of 96 ha and the supply cut drastically to 38.8 ha, leaving a shortfall of 57.2 ha.
- Similarly, the allocation of Baginton Fields (with this a component of committed supply in Opportunity Area (OA) 7 in WMSESS and the Alignment Paper) was reduced from 25 ha[2] to 9.8 ha[3].
- It is not confirmed whether the areas for supply are provided on a gross site or gross developable basis. The November 2025 Alignment Paper (para 4.4) has confirmed that the gross developable areas should be used. It is for this reason that the Coventry Gateway site area was reduced – see below for more details on this.
- It is not clear what sites are included to make up the supply figures. An appendix containing a schedule setting this out is required. This list of sites should then be sense-checked and market-tested to ensure a robust figure for supply. This will avoid obvious errors made by WMSESS (e.g. Coventry Gateway and Baginton Fields).
- For example, we suspect that the strategic supply figure for North Warwickshire may contain an allocation of 108 ha at No Mans Heath. However, this allocation is only a contingency.
- Similarly, the South Warwickshire Local Plan identified strategic supply includes a 160-ha site (with a gross developable area of 75 ha) south of Warwick (Red House Farm) that requires a new motorway junction (which is not covered by RIS3 or 4). The delivery of this site was questioned by the inspector in a recent appeal case at Jn 12 M40, Gaydon (Appeal Ref No.6002929).
- Nuneaton & Bedworth (N&B) may hold a notional surplus of 20.3 ha. However, this is principally made up of windfall sites – an approach dismissed by the Inspector to the draft Coventry Plan. In addition, the N&B Plan explicitly made no new allocations (beyond those within the previously adopted Local Plan 2019) in response to the evidence and because WMSESS was published during the N&B Local Plan examination. During the Examination, the Inspector (Para 58, IR, N&B) noted that the Council advocated that the Plan made a 19.4ha contribution towards the strategic needs across the West Midlands via the Faultlands Farm allocation. This was despite this site already benefiting from a planning permission, dated 2020, and prior to the WMSESS being published. WMSESS lists it as a committed site within Appendix A.3.
- For these reasons, no reliance can be had to the figure given in RBC 14, para 3.2, p5, for total supply – 1,311.5 ha. Analysis of the committed supply listed in WMSESS and recent experience at the Coventry Local Plan examination have borne this out.
- This then voids sensible comparison with the figures provided in Table 6 on need as set out in the Addendum to the Alignment Paper.
- It is also to be emphasised that the representors do not consider the need figures projected in RBC 14, Table 6, p5 are a reliable comparator for supply. Instead, for a variety of reasons set out in representations and matter statements, these are considered to significantly under-shoot the requirement for employment land, particularly for strategic land. This is considered further below.

[2] November 2024 Alignment Paper, Appendix A1, p22.
[3] RBC 14, para 4.2, p6

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- RBC 14 paragraph 3.3 makes a number of adjustments. These seem principally to add completions across the authorities from 2021 to 2025 (2024 in the case of Coventry). It is not clear why completions are being added to supply when the plan period for Rugby starts in 2025. At the Coventry examination, completions from 2021 to 2024 were taken out of the supply for this very reason.
- RBC 14, paragraph 3.5 refers to any adjustment to the area to Baginton Fields (now reduced from 25 ha to 9.8ha following the Coventry Local Plan examination hearing sessions) having no impact on the gross requirement for strategic land for Coventry and Warwickshire[4]. However, as discussed below in more detail, it will have a direct impact on the residual or net requirement for AO7. It reduces supply by 15.2 ha and, therefore, axiomatically should increase the residual requirement for AO7 by the same amount.
- The same should apply to other sites which form part of the committed supply in AO7 (as listed by Appendix 3 of WMSESS and Appendix 1 of the Alignment Paper) or consented subsequently where the quoted figure for supply is clearly wrong. This includes Rugby Radio Station (reduced from 16 ha to 3.75 ha following the allocation of much of the site for housing (Site Ref No.338 – land south of Crick Road, Houlton) and Padge Hall Farm (where the gross site area of 63.8 ha (including a park) has been quoted instead of the gross developable area of 32.0 ha).
- Padge Hall Farm is not located within or close to AO7. It was consented initially on the basis of meeting a need arising from Hinckley and Bosworth, and not meeting a West Midlands or Coventry/Warwickshire need.
- Necessary correction of these three sites reduces committed supply of strategic employment land in AO7 (as listed in WMSESS and the Alignment Paper) by a further 59.5 ha.

2.3. Section 4 seeks to correct errors. This refers specifically to the over-estimation of the area of Coventry Gateway by 100 ha (as the gross site area rather than the gross developable area was referenced by WMSESS and the subsequent Alignment Paper) and the reduction in area to Baginton Fields. It is explained that the Addendum to the Alignment Paper identified the error made with Coventry Gateway and increased the residual requirement for AO7 by 50 ha. However, it then states that the remaining 50 ha and any adjustment to take account in the reduction in area to Baginton Fields "*could be potentially met elsewhere within the West Midlands and would only be required to meet the highest end of the range shown*". The representors fundamentally disagree with this approach for the following reasons:-

- It goes against one of the principal purposes of WMSESS – i.e. to inform local plan-making through advising on the overall number and type of strategic sites in relation to identified opportunity areas (para 2.3).
- It totally ignores the approach and methodology of WMSESS towards opportunity areas. In each opportunity area, the amount and phasing of new strategic sites is determined by committed supply, past take-up areas and the market attributes of that particular opportunity area. This is set out clearly in the WMSESS Tables 12.1 and 12.2 (pages 177 and 180-181). Specifically, the committed supply for AO7 is listed as 174 ha for B2 and 322.2 ha for B8 (Table 12.1, p177). The supply figures correspond directly to the committed sites in Appendix 3, with these including Baginton Fields (25 ha, p233), Rugby Radio Station (16 ha, p235), and Coventry Gateway (177.7 ha, p239).

[4] Para 3.5 appears to mix up supply and demand, referring to the 25ha of the site being both a requirement and a supply. Future sites for development are supply, not demand/requirement. Also the area is reduced to 9.8 ha so it is not clear why 25 ha is being counted.

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- If the correct areas had been used when WMSESS was produced, then the conclusions drawn on the residual need for AO7 would have been materially different.
- Whilst the highest end of the range may have been employed, all representors have submitted evidence seeking to demonstrate that the residual requirement for Area 7 has been wholly under-estimated, particularly for B8 (freight and logistics).
- For example, analysis of the sites making up the 322.2 ha supply of B8 has shown that only 53.45 ha remains undeveloped and available. In addition, Padge Hall Farm, which was added to supply by the Alignment Paper, is already part developed (with a large pre-let to Tesco) and will be completed by April 2027. This leave just plots 2B and 3B – 7 ha – further eroding supply.
- WMSESS and the Alignment Paper acknowledges that OA7 – described as taking in Coventry, all of Rugby Borough, and those parts of Nuneaton & Bedworth and Warwick which border Coventry - is the best market area in the West Midlands and a "*high demand location*" (Appendix 2).
- The strength of the market is illustrated by RBC's own evidence on recent, current and projected development take-up on strategic sites within the Borough:-
  - Recent- 319,710 sqm on 90.97 ha from 2022 to 2025 (Table under para 3.23 of the DNTP (SD11)).
  - Current- 70,779 sqm on 24.77 ha under construction as at April 2026 (AMR (RBC 10)).
  - Projected to be completed by April 2027 – 93,461 sqm (excludes land listed as under construction above) (Employment Land Trajectory) (RBC 11).
  - Projected to be completed from 2027 to 2032 – 329,067 sqm (takes in the 1st phase of Frasers' development of Crowner Farm Fields, and the new allocations of Coton Park East, SW Rugby and Ansty Park North) (RBC11).
  - This equates to **813,017 sqm** of development and breaks back to **81,302 sqm** pa for this 10-year period (2022 to 2032).
  - This will be a suppressed figure. As acknowledged by paragraph 6.4 of the draft MoU, the trends for industrial land completions are significantly influenced by the availability of land. This will be particularly so where the development of land is constrained by Geen Belt.
  - This analysis takes no account of development elsewhere in OA7 but outside the Borough's boundaries (e.g. Coventry Gateway) or in established logistics locations just outside the boundaries of the Borough (i.e. Magna Park and DIRFT).
- The Plan's requirement for strategic employment land is **791,525 sqm** for the plan period (2025 to 2042) (paragraph 3.24 of SD11). This equates to **46,560 sqm pa**. It is clear that restricting supply to only just meet this requirement will drastically reduce the pace of development and act against recent, prevailing and projected market signals.

2.4. Section 6 covers Coventry's unmet needs. It seems to suggest that no action needs to be taken by Coventry and surrounding authorities to deliver the identified 57.23 ha of unmet need. Instead, because there is a perceived surplus of land within the FEMA, and it only represents less than 4% of Coventry and Warwickshire's gross need for both local and strategic land to 2045, it can be easily absorbed without making any specific allocations in the development plans of surrounding authorities. The representors do not support such an approach for the following reasons:-

- As referred to above, there is little confidence that reliance can be placed on the evidence presented on supply. Instead, as demonstrated at the Coventry Local Plan examination, the resulting scrutiny at examination is likely to reduce estimates of land supply.
- Paragraph 6.4 asserts that WMSESS identifies Coventry and Warwickshire as a single "broad market area". It doesn't. Instead, it identifies three different market areas – AO5, AO7 and AO8.

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- Whilst the shortfall of 57.23 ha may represent less than 4% of the gross need for Coventry and Warwickshire, it represents 60% of Coventry's need for local employment land (i.e. 57.23/96).
- It falls to Rugby Borough to meet this for the following reasons:
  - The South Warwickshire Reg19 Plan is yet to be submitted for examination. No reliance can be placed on the draft policies and allocations within that Plan.
  - The N&B Local Plan is recently adopted (December 2025) and, therefore, is not making provision for this shortfall, and Coventry's Plan is nearing conclusion with an agreed and stated unmet local need.
  - Our collective response to the proposed modifications consultation for the Coventry Local Plan sought changes to paragraph 3.14 that would ensure that any shortfall would be met within the FEMA and particularly by those within AO7.
- The Borough of Rugby has a particularly close geographical and economic relationship to Coventry and a history of contributing towards meeting unmet needs. Past developments (e.g. Prologis Park at Ryton and Prospero at Ansty) contributed directly to meeting the need for employment land in the adopted Coventry Development Plan.
- The spatial strategy for the draft Rugby Local Plan, concerning the location of employment land, leans heavily on the Council's claim of Exceptional Circumstances. The Council justifies its choice of strategic sites being towards the edge of Coventry (Paragraph 8 of WS2/1) because "*it is closest to the biggest labour pool and creates the greatest potential for manufacturing and agglomeration and clustering*." However, when it comes to receiving the increased level of residual strategic needs, RBC is seemingly departing from its own spatial strategy. This is even when the evidence base (The Sustainability Appraisal- RBC1) has explored different scenarios that would support alternative sites being allocated to address this need, rather than it being dismissed to the wider West Midlands.
- Previously, Rugby in its Reg 18 draft proposed to accommodate all of Coventry's then unmet need (180,000 sqm on 45 ha). No reason has been provided why this position has changed so dramatically (to 9,000 sqm on 2.5 ha).
- Given its spatial strategy, and its previous position, it makes no sense why Rugby Borough Council does not hold a stronger position in terms of accommodating all of this identified unmet need, when it has tested other sites within the SA, which could now address this.
- It also runs counter to the guidance in the 2026 NPPF on maintaining effective co-operation. References include: PM8, 2c, p12; PM10 and PM11, p13; and PM14, 2a, p15.
- The representors have no confidence that the unmet need of 57.23 ha will be delivered outside of the Rugby Local Plan, and this will be to the detriment of the local economy of Coventry.

2.5. Section 7 list signatories to the MoU. Currently, only Coventry City Council and Rugby Borough Council have signed it. The positions of North Warwickshire, Nuneaton & Bedworth, Stratford-upon Avon and Warwick are unknown.

3. Implications

3.1. The principal implications of the MOU are twofold:-

- A gross under-provision of strategic employment land serving AO7.
- The unmet need for Coventry will not be delivered.

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3.2. We also believe that demand has been under-estimated. In particular insufficient consideration has been given to suppressed demand.

3.3. To prevent this, the representors recommend that:-

- The strategic requirement for AO7 is increased by a minimum of 383,250 sqm (on 109.5 ha) to correct anomalies and errors made in WMSESS and the Alignment Paper as to committed supply. It also does not adequately address an estimate of suppressed demand.
- The strategic requirement for AO7 is further reviewed in light of evidence on market signals.
- The draft Plan increases its contribution to meet unmet needs for Coventry from 9,000 sqm (on 2.5 ha) to at least 180,000 sqm (on 45 ha).

Statement signed by the following representors:

GLP Europe, Nurton Developments Ltd, and FB & I Dewes (Representor 534)

Stoford Properties (Representor 488)

Tritax Big Box Developments (Representor 563)

PJL, JR and RB

26.11.2026

Sensitive