Comments on RBC 14 Coventry & Warwickshire Functional Economic Market Area Updated Memorandum of Understanding on Employment Land

It is not clear who has approved this update. The signatories section is redacted but at most cannot have more than two signatures from the seven local authorities involved.

The different approach between tables 1 and 4 should be noted. Table 1 provides **absolute** figures of claimed need whilst Table 4 provides a **range** of figures of claimed need.

The authors of this document do not appear to have studied the map defining 'Area 7' provided on page 15 of the WMSESS. As well as the local authorities listed in paragraph 2.5 'Area 7' also includes small parts of Solihull, North Warwickshire and West Northants.

The authors of this document acknowledge that the claimed needs already incorporate a significant margin (ie five years of claimed need).

The figures provided in table 5 do not follow from the figures in the preceding tables. The strategic land requirement is given in table 4 as a range and therefore cannot contribute to an absolute value in table 5. Furthermore even if we were to make the heroic assumption that all of area 7's "need" should be met in the borough of Rugby then local need to 2041 from table 1 (58 hectares) plus strategic "need" from table 4 (59 to 134 hectares) leaves us with a range of 117 to 192 hectares which even at its upper end falls well short of the absolute value of 284.5 hectares of "need" claimed for Rugby.

The original WMSESS study considered the entire West Midlands and made some suggested allocations over the identified "opportunity areas". Later Iceni identified a significant error in the work which they had contributed to. However they failed to go back and correct this error and reallocate the West Midland's need over the "opportunity areas". Nor did they say as claimed in the MoU that an additional 50 hectares "should" be found from area 7. What they did say was that it would be "appropriate" for 50 or more hectares to be found from area 7 (page 4 of the Addendum report). Nowhere do they say that it would inappropriate for the "discovered" need to be met in any of the other opportunity areas.

The MoU constantly refers to the need to provide for big box units on smaller sites. However the MoU does not follow through and address the point that I made on page 19 of my.Regulation 19 consultation response. If, as RBC claim, 10% of strategic sites will end up with "non-strategic" use then this proportion of the strategic sites capacity should be deducted from the separate figure for "local" need before adding together "local" and "strategic" needs to give a total land requirement. In RBC's case this means that they have over-estimated the need for land by 79,153m^2.

Not withstanding any of this table 5 of the MoU has a local authority claim that supply will exceed "need" [need here includes a buffer of five years supply] by in excess of 67 hectares. Thus even on the local authority figures some of the allocations in RBC's local plan eg for the site immediately to the South of Cawston Spinney could be removed whilst the area's "needs" could still be met in full.

The document makes no reference to Prologis's DIRFT4 proposal to build 5.5 million square feet (c 0.5M m^2) of warehouses just to the East of area 7 between Rugby and Crick. This aligns with the proposals set out on page 277 of the Regulation 19 version of the first local plan of West Northants to allocate an additional 106 hectares in this location. Nor does the document refer to the c 0.4M m^2 of warehouses (112 hectares) which has already been committed at the DIRFT

site (West Northants Economic Growth Background paper, page 15). Furthermore the document does not refer to the 138 hectares of warehousing proposed for allocation at Magna Park (about 6 miles North of Rugby town centre) on pages 77 to 79 of Harborough District Council's regulation 19 local plan proposal nor yet does the report refer to the 22 hectares of land already committed for warehouses in Lutterworth (Harborough HEDNA, page 184).

Prologis are claiming that their 108 hectares of land in DIRFT 4 would provide some 5,000 "direct operational jobs". If we pro-rata this figure to the 378 hectares which are either proposed under regulation 19 plans or already committed we reach a figure for "direct operational jobs" of 17,500. Even if all the workforce of Crick (just over one thousand) and Lutterworth (just over six thousand) were redirected by an omnipotent Ministry of Labour to work in the these new warehouses there would still be a shortage of over 10,000 employees.

Accordingly, at the consultation event they were hosting in Rugby on 13 November 2026, I asked a representative of Prologis where their workforce was going to come from. The Prologis representative was unable to answer where the workforce was going to come from.

Given the proposed location of these warehouses just across the boundary from Borough of Rugby it is inevitable that some of the workforce will be provided from the Coventry & Warwickshire employment area. Yet this has been ignored by the authors of the MoU.

Conclusion

The updated memorandum of understanding perpetuates many of the errors of RBC's proposed local plan including:

- Not distinguishing between ranges and absolute values;
- Double counting local provision on strategic sites; and
- Not recognising the draining effect on the local labour pool of the developments at DIRFT and Magna Park.

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25 November 2026