Rugby Local Plan Examination

RBC14 – Coventry and Warwickshire FEMA Updated Memorandum of Understanding on Employment Land

Representor 488

1. Introduction

1.1. The Inspectors have invited comments on EX23. It is a significant submission covering all aspects of the need and supply of employment land and the resulting spatial strategy taken by the Rugby draft Plan. We have worked together with other principal representors who are promoting different sites within the Plan and we have submitted a Joint Technical Statement with Representors 534 and 563. Whilst not signing the same Technical Statement, we have worked with other representors too, sharing common areas of concern regarding RBC14 that will be evident in their individual submissions.

1.2. As representors we 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 (the FEMA).

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 We refer to section 2 of our Joint Technical Statement, and the references to the MOU (Section 2) providing no new evidence or analysis. In summary the data is out of date, covers different Plan Periods, methodologies and importantly in respect of Rugby, is multi-layered and complex.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.

2.2 Section 3 summarises progress on meeting needs. The representors with whom we have liaised, find this section particularly confusing, especially Table 5, and do not hold confidence in its reliance. We list a series of bullet points within our Joint Technical Statement. Critically the elements of supply are not broken down into sites, and therefore it is not possible to accurately establish the robustness of that data.

2.3 Given our knowledge and site promotion across the Coventry and Warwickshire area, some certainty can be given to the fact that the large elements of local and strategic supply listed in Table 5 for each Authority are not tested (draft allocations yet to be submitted/examined). For example:

- North Warwickshire's strategic supply of 108ha is one single site, No Mans Heath. The Site is not supported within the Council's own evidence base as s stand alone employment site (NWBC Ref. 06, Iceni 2025, page 83)
- Within the same authority, a 16.4ha site (Coleshill Manor Planning Ref 1995/0249) is relied upon as a supply commitment, despite the permission being some 30 years old (and counted as supply due to an initial start on site (demolition)).
- Nuneaton and Bedworth's strategic supply of 19.4ha is also a single site – Faultlands Farm, now built out. Importantly this was a site identified to meet Nuneaton's needs in the previously adopted Local Plan (adopted 2019) carried forward into the 2025 (with permission) and was

not a site identified to meet strategic needs of the FEMA, but to meet needs arising in Nuneaton. The 2019 Inspectors Report para 201) confirm ***'The submitted Plan seeks to meet the Borough's own employment land requirement*** *(87ha) but was only able to accommodate 16.6 ha of the Coventry shortfall, leaving it 9.4ha adrift of the agreed apportionment'.* Notably in the 2019 Plan, land on the Coventry boundary at Prologis Park (Keresley) and Wilsons Lane, for 5.3ha and 18ha respectively, were allocated.

- South Warwickshire also claims a large strategic supply, albeit the Plan is yet to be submitted and examined. A key component of the claimed 278ha of strategic supply, is Red House Farm (121ha). The site requires a new motorway junction (which is not covered by RIS3 or 4 funding). The delivery of this site was questioned by the Inspector in a recent appeal case at Jn 12 M40, Gaydon (Appeal Ref No.6002929) and is considered to be in the longer term at best. A further 51ha site relate to the draft allocation of land for the expansion of JLR only. It is not a component of open market strategic supply.

2.4 In summary, Table 5 of the MOU contains components of supply that are untested and will not stand up to scrutiny once examined.

2.5 Section 4 of the MOU 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*". We and other representors with whom we have collaborated, fundamentally disagree as outlined within our Joint Technical Statement. The 'lost 50ha' accounts for 37% of the 134ha of strategic land that WMSESS recommends is a need arising from Opportunity Area 7. Not withstanding this, there has been no agreement to this figure being found elsewhere within the West Midlands, by any of the other LPAs or the West Midlands Combined Authority as they embark on their SDS – which importantly, excludes the Warwickshire LPAs in any event.

2.6 Turning to section 6 of the MOU, previously, RBC 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). Equally, as noted above, the Reg19 Plan also sought to meet the unmet need in full.

- 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 Sustainability Appraisal, which could now address this.

- Such scenarios included the consideration of Stoford's non Green Belt promotion site, north of Houlton (Site 130) which will benefit from sustainable links to the Rugby Parkway Station, is adjacent to DIRFT, and can serve a Rugby based labour force, in addition to future rail commuters from Coventry. The site is adjacent to Rugby's largest ever sustainable urban extension, Houlton.

- It also runs counter to the guidance in the 2024 NPPF on maintaining effective co-operation. Paragraph 26 refers to joint working helping to ensure unmet needs are met.

- We and other representors have no confidence that the unmet needs will be delivered outside of the Rugby Local Plan, and this will be to the detriment of the local economy of Coventry and Warwickshire.

2.7 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 RBC14 are twofold: -

- A gross under-provision of strategic employment land serving AO7 and Rugby Borough as a whole.
- The unmet need for Coventry will not be delivered.

3.2. To prevent this, we and other representors recommend that: -

- The strategic requirement for AO7 is increased by a minimum of 350,000 sqm (on 100 ha) to correct anomalies and errors made in WMSESS and the Alignment Paper as to committed supply.
- 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 180,000 sqm (on 45 ha).

J Russell

Planning Director, Stoford

[redacted]

Enclosure: Joint Technical Statement with Representor 534 and 563

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

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