

RESPONSE TO RBC10, RBC11 & RBC14

Site: Land West of Magna Park Lutterworth (Site 325)

For: GLP Europe, Nurton Developments Limited and Mr F. B. Dewes & Mr I. Dewes (Representor 534)

Project Ref: 26009

Date: November 2026

Prepared by:

Lauren Whiteley MA (Cantab) MA MRTPI
Associate
Barker Parry Town Planning Ltd
33 Bancroft, Hitchin, Herts SG5 1LA
T: 01462 420224 / E: office@barkerparry.co.uk

RTPI Chartered Town Planners

Contents Page

Section	Title	Page
1.0	Introduction	3
2.0	Response to RBC10 and RBC11	5
3.0	Response to RBC14	9
4.0	Implications for Soundness of the RBC Plan	11
5.0	Conclusions	17

Appendices

Appendix 1 – Joint critique of RBC14 by Representors 534, 488 and 563
Appendix 2 – Employment Land Growth Scenarios Appraisal

1.0 **Introduction**

1.1 This response has been prepared on behalf of Representor 534 to respond to the following examination documents in relation to the Rugby Borough Council ('RBC') emerging Local Plan:

- RBC10 – Annual Monitoring Report 2025-2026
- RBC11 – Employment Land Trajectory
- RBC14 – Coventry & Warwickshire Functional Economic Market Area Updated Memorandum of Understanding on Employment Land

1.2 In summary, the Representor considers that the additional information, and in particular RBC14, raises fundamental soundness issues for the RBC Plan by suggesting that (a) strategic need from OA7 can be met elsewhere in the West Midlands and (b) unmet need from Coventry can be met elsewhere within the FEMA. That position undermines the Plan's reliance on proximity to Coventry as the basis for its employment land strategy.

1.3 This has fundamental implications, as it means other non-Green Belt sites have been erroneously ruled out from consideration as they are perceived to be distant from the edge of Coventry. This includes Site 325 which is a deliverable employment location, uniquely suitable to accommodate the need for more land for Freight and Logistics, and entirely outside the Green Belt.

1.4 We consider the Plan is unsound and cannot be made sound for the reasons set out in our representations to date. This position is compounded by the issues set out in this Response.

1.5 The remainder of this response is structured as follows:

- Section 2.0 – Response to RBC10 and RBC11

- Section 3.0 – Response to RBC14
- Section 4.0 – Implications for Soundness of the RBC Plan
- Section 5.0 – Conclusions

2.0 **Response to RBC10 and RBC11**

2.1 The Annual Monitoring Report (AMR) sets out the following:

- No completion of development of strategic sites in 2025/26.
- Sites at Coton Park (26,421 sqm) and Padge Hall Farm (Unit 1 – Tesco Pre-let – 44,358 sqm) under construction.
- Sites at Crowner Fields Farm (Frasers) (275,331 sqm) and Padge Hall Farm (Units 2 and 3 – 71,752 sqm) approved.
- The extant outline planning permission for Rugby Radio Station is only 3.75 ha (and not 16 ha as per the WMSESS), with the comments under "Status" noting specifically that this site now excludes the area proposed to be allocated for housing.

2.2 The Employment Land Trajectory, taken with the data for completions provided for 2022/23 to 2024/25 in the Topic Paper (SD11), **projects a much quicker rate of development of strategic land than the actual overall requirement.** This supports the Representor's position that the overall employment-land requirement is wholly inadequate based on market demand (as measured by actual and planned take-up) and counters Iceni's argument that there will be a slowdown from 2022 (paragraphs A1.20 – A1.24 of the Addendum to the Alignment Paper (SD6)). This analysis is set out below:

Take-up (actual and projected)	Years	Floorspace (sqm)	Comments
Actual	2022/23 – 2024/25	319,710	Source: SD11. Comprises 173,341 sqm at Symmetry Park, SW Rugby, 102,026 sqm at Prospero, Ansty and

			44,343 sqm at Prologis Park, Ryton.
Actual	2025/26	Nil	Source: RBC10
Projected	2026/27	164,240	Source: RBC10 and 11 Includes all three units at Padge Hall Farm (116,110 sqm – includes pre-let to Tesco of 44,358 sqm (now complete) and Units 2 and 3 currently u/c), the unit at Coton Park East (26,421 sqm – now complete and let to TikTok), and two units at Prospero, Ansty (21,709 sqm).
Projected	2027/28 – 2031/32	329,067	Trajectory includes Phase 1 of Frasers' development (79,097 sqm), Coton Park East allocation (115,000 sqm), SW Rugby allocation (60,000 sqm) and Ansty Park North allocation (75,000 sqm).
Totals		**813,017**	

Table 1 Employment Land Trajectory Analysis

2.3 A quantum of 813,017 sqm over this 10-year period (2022/23 – 2031/32) equates to **81,302 sqm** per annum. The 5-year average for 2022/23 to 2026/27 is **96,790 sqm** per annum (483,950 sqm over 5 years).

2.4 Both of these figures are below the rate of 103,500sqm pa the Representor has put forward in its Statements. However, they are still significantly greater

than the annual requirement put forward by the Regulation 19 version of the RBC Plan of **46,560 sqm** per annum (791,525 sqm over 17 years).

2.5 The principal difference is that the Representor's analysis projected completions up to March 2029 and assumed all of Frasers would be developed out by then. The RBC trajectory assumes that Phase 2 of 170,350 sqm will be developed between 2032/33 – 2036/37 and Phase 3 of 24,971 sqm will be developed after 2037. The notes state that this is based on an approved phasing plan, with a start date of March 2027. However, this seems unduly cautious.

2.6 A requirement based on the RBC trajectory from 2022/23 to 2031/32 (81,302 sqm) would generate an overall requirement for the plan period of 2025 – 2042 of **1,382,134 sqm**. This is **590,609 sqm** greater than the requirement for strategic sites proposed by the Reg 19. The corresponding requirement, based on the higher 5-year average for 2022/23 – 2026/27, would be **1,645,430 sqm – 853,905 sqm** more than the Regulation 19 requirement of 791,525 sqm.

2.7 It is to be emphasised this completions data and projections of take-up will represent a **suppression** of true market demand. As acknowledged by paragraph 6.4 of RBC 14, the trends for industrial land completions are significantly influenced by the availability of land. This is particularly so where the development of land is constrained by the Green Belt.

2.8 In addition, it is to be noted that this analysis takes no account of development elsewhere in OA7 but outside the Borough's boundaries (for example, at Coventry Gateway, where only 2 smallish plots remain available following recent development and the agreement of pre-let deals). Similarly, no allowance is made for substantial development activity – both recent and planned – at established distribution parks that lie just outside Rugby Borough (e.g. at Magna Park and DIRFT).

2.9 In reality, the demand for large scale industrial and logistics units will be significantly greater than either of the two alternative projections referred to above and those projections are provided for illustrative purposes only. The pace of the market is outstripping supply and this is evidenced by primary signals such as rental growth. According to Savills, from 2023 to 2025, rents have increased for the industrial and logistics sector at a national level at between 4% and 6% per annum. This profile is reflected at Magna Park with rents increasing from £8.95 per sqft in December 2022 to over £10 per sqft by the end of 2025.

3.0 **Response to RBC14**

3.1 RBC14 comprises an updated Memorandum of Understanding ('MOU') on Employment Land between the authorities within the Coventry & Warwickshire Functional Economic Market Area ('FEMA').

3.2 Appendix 1 of this Response includes a critique of RBC14 which has been jointly prepared by Representors 534, 488 and 563. This raises two significant points:

1. **The MOU represents a gross under-provision of strategic employment land serving Opportunity Area 7 ('OA7')**

3.3 The emerging and now submitted Plan has always been predicated on RBC providing for all the need arising from OA7. Paragraph 5.2.27 of the SA (CD5) explicitly states that *"there is little strategic case for questioning the preferred approach of … seeking to provide for the full area 7 strategic need to 2042*".

3.4 RBC's preferred approach of meeting the need from OA7 in full was based on A) a clear lack of capacity in Coventry; B) that only a small part of Warwick District is within the OA and this is already allocated for development through the Coventry Gateway and Coventry Airfield schemes; and C) Nuneaton and Bedworth's Local Plan is at a very advanced stage (set out in both the Interim SA (RBC1), and Final SA (CD5)).

3.5 RBC14 clearly acknowledges that there was an overestimation of the site area of the Coventry Gateway site by 100ha and that the Alignment Paper Addendum adjusted the need range of OA7 upwards, but by only 50ha. The suggestion now is that the remaining 50ha from this error could be met elsewhere within the West Midlands and outside the OA7. This goes against the original purposes of WMSESS (as discussed in Appendix 1) and is contrary

to RBC's consistently preferred approach of meeting the need from OA7 in full.

3.6 Accordingly, if RBC's position now is that the OA7 need should not be met in RBC, then that fundamentally undermines the soundness of the Plan. Alternatively, if RBC continue to accept that the OA7 need should be met in RBC then the Plan is unsound as it does not provide sufficient employment land.

2. The MOU fails to present a strategy for how the identified unmet need in Coventry is to be delivered

3.7 There is an agreed shortfall of 57.23ha of employment land in Coventry as detailed in Documents IN15 and PS25 from the Coventry City Council Examination in Person ('EIP'), equating to **228,920sqm** at a 40% plot ratio.

3.8 As detailed in the Representor's Matter 2 Statement, RBC changed its strategy throughout the preparation of the Local Plan – from originally proposing to meet Coventry's unmet need in full, to a far reduced quantum.

3.9 RBC14 sets out that no action needs to be taken by the FEMA authorities to deliver the identified 57.23ha of unmet need, suggesting that this can be easily absorbed without making any specific allocation in the Development Plans of the FEMA authorities.

3.10 The points made in RBC14 have significant implications for the soundness of the Plan as discussed in the following section.

4.0 **Implications for Soundness of the RBC Plan**

4.1 The additional documents raise the following soundness issues:

1. The Plan is not positively prepared

4.2 RBC did not test a higher-growth employment land scenario, so there is no assessment as to whether a greater quantum of unmet need from Coventry and an additional 50ha from OA7 (as a minimum – we have identified a further 59.5 ha following the correction of errors made with site areas of Baginton Fields (from 25 ha to 9.8 ha), Rugby Radio Station (from 16 ha to 3.75 ha) and Padge Hall Farm (from 63.8 ha to 31.8 ha)) could be accommodated in the Borough in a way which achieves sustainable development.

4.3 A higher-growth scenario should have been considered as a reasonable alternative given that there was always evidence of an unmet need arising from Coventry, and that opportunities exist within Rugby Borough to accommodate additional employment need outside of the Green Belt. Testing such a scenario would enable a full assessment as to whether the strategic requirement from OA7 and unmet need from Coventry could be met in full, rather than the now proposed approach of this being absorbed across the FEMA outside of specific allocations.

2. The Plan is not justified

4.4 Firstly, RBC14 makes clear that there are fundamental issues with the evidence on which the Plan is based, particularly regarding the level of strategic need within OA7 as identified in the WMSESS. Appendix 1 provides further detail on this.

4.5 Secondly, and in addition to not testing a higher-growth scenario, RBC also failed to test whether the employment need could be met on land outside the Green Belt. The maps included in Appendix 2 show how all scenarios tested within the SA necessitated the removal of land from the Green Belt on the edge of Coventry.

4.6 The preference for locations near Coventry informed both the spatial strategy and site selection. The SA (CD5, Paragraph 6.3.3) explains the rationale as follows:

"There is a clear preference for directing new strategic employment land to the edge of Coventry, reflecting: A) the merits of locating employment land in proximity to Coventry itself; and B) the fact that east / southeast Coventry is already a major hub for employment and research / development across key sectors, including relating to the West Midlands Investment Zone. The implication of (B) is that new strategic land directed here will be well placed to deliver a mix of employment uses, likely to include an element of B8 but not overly dominated by B8."

4.7 In contrast sites outside the Green Belt in the north and east of the Borough, such as Site 325, were considered negatively due to their distance from Coventry.

4.8 As well as informing the spatial strategy, RBC have sought to use the proximity to Coventry as an exceptional circumstance to justify the release of Green Belt in this location. Paragraphs 2.16 – 2.107 of the Exceptional Circumstances Topic Paper are highly relevant, the key points of which are summarised below:

- 60% of the residual need is for large sites to meet strategic need derived from WMSESS or is unmet need from Coventry.

- The need for large 'strategic' sites derives from the WMSESS, specifically the WMSESS's proposed apportionment to OA7.

- The apportionment of employment land to OA7 within the WMSESS is based on a range of factors including access to the strategic highway network, the assessment of junctions, market insight on occupier demand, and analysis of access to labour.

- OA7 incorporates Coventry and Rugby and small parts of Nuneaton and Bedworth Borough and Warwick District. All junctions within the OA7 lie wholly or partly within Rugby Borough.

- Lack of available land at junctions means that (for the purposes of NPPF Para 147(c)), there are no realistic non-Green Belt options for accommodating the residual large site need for OA7 within the neighbouring authorities of Coventry, Warwick or Nuneaton and Bedworth. Indeed, CCC is also unable to accommodate part of its own non-large site 'local' need.

- Therefore, in considering reasonable alternatives to Green Belt release, it is necessary to look within Rugby Borough at parts of the Borough that lie beyond the Green Belt.

- The extent of Green Belt means that a Green Belt avoidance strategy for accommodating the OA7 large site need would mean all that need being delivered beyond the outer edge of the Green Belt to the north or south of Rugby.

- There are several reasons why avoiding the Green Belt and accommodating all the large employment site need for OA7 beyond the Green Belt is not a sustainable approach and therefore why

exceptional circumstances exist justifying Green Belt release on the Coventry urban fringe, including:

- The need for employment land at Coventry
- That large new employment sites in Rugby would draw a significant proportion of their workforce from Coventry as the largest population and labour centre in the FEMA
- The greater potential for diversification, agglomeration and clustering at the Coventry urban fringe sites

4.9 This demonstrates how the proposed strategy is predicated on the perceived benefits of locating employment sites in proximity of Coventry. RBC have never assessed through its SA or other work the implications of delivering more of the allocated employment land away from the edge of Coventry in other parts of the Borough. In the absence of such assessment, the evidence does not exist to justify the approach to focusing development on the edge of Coventry.

4.10 **The updated MOU and the suggestion that strategic need in OA7 and unmet need from Coventry can now be met anywhere within the FEMA entirely contradicts this Coventry-centric strategy. It also undermines RBC's justification for not considering an alternative strategy of locating employment sites in other parts of the Borough, including one which avoids Green Belt release.**

4.11 The perceived benefits of locating employment sites near Coventry, due to their ability to deliver growth in advanced manufacturing and R&D, is also flawed given that the principal need as identified in the WMSESS is for large-scale strategic sites to accommodate demand for B8 uses, not B1/B2 uses. This is set out in detail in the Representor's Matter 3 Statement.

4.12 This further demonstrates that the Plan is not an appropriate strategy as it has not taken into account genuinely reasonable alternatives, both in terms of testing a higher-growth scenario and a non-Green Belt, non-Coventry centric scenario.

3. The Plan is not Effective

4.13 The Plan is not based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred.

4.14 The updated MOU has only been signed by two authorities within the FEMA, suggesting its publication (just three days ahead of the scheduled Examination Sessions) was premature and not based on full discussions with all parties.

4.15 It also does not identify a genuine delivery strategy for how the identified unmet need from Coventry, and additional 50ha (but 109.5 ha by our calculations) from OA7, is going to be met, instead suggesting this will be organically absorbed within the FEMA without the need to identify additional site allocations.

4.16 This approach is clearly not effective, particularly given there are alternative approaches within Rugby Borough that could meet the identified unmet need on land outside the Green Belt, yet these have not been robustly tested or even considered. This is a fundamental failure of the Plan and means that cross-boundary strategic matters are not dealt with.

4.17 Nor does the updated MOU address in anyway the approach taken by Harborough District Council and its approach to allocating employment land at Magna Park Lutterworth and the substantial housing development nearby to support employment growth. The approach RBC takes to meeting unmet need from Coventry should plainly also be informed by how its neighbouring

authority is proposing to deliver development to ensure consistency and opportunities for sustainable growth are maximised.

4. The Plan is not consistent with national policy

4.18 NPPF Paragraph 147 is clear that **before** concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined **fully** all other reasonable options for meeting its identified need for development.

4.19 As set out in the Representor's Matter Statements, RBC plainly did not fully examine all other reasonable options for meeting employment need before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, given that sites were originally identified in an order of preference with Green Belt sites ranking higher than non-Green Belt sites. As is clear from the Exceptional Circumstances Topic Paper (GBD4), the rationale for this was the proximity of the Green Belt sites to Coventry.

4.20 If, as RBC14 now suggests, Coventry's unmet need can be met 'anywhere in the FEMA', its reliance on proximity to Coventry is wholly undermined. A non-Green Belt, non-Coventry-centric approach must therefore be tested as a reasonable alternative before exceptional circumstances for Green Belt release can be demonstrated. Without doing this, the Plan is evidently contrary to the requirements of the NPPF.

5.0 Conclusions

5.1 RBC14 raises fundamental soundness issues for the RBC Plan by suggesting that strategic need from OA7 and unmet need from Coventry can be met from elsewhere within the FEMA. That position undermines the Plan's reliance on proximity to Coventry as the basis for its employment land strategy.

5.2 This has fundamental implications, as it means other non-Green Belt sites have been erroneously ruled out from consideration as they are perceived to be distant from RBC. This includes Site 325 which is a deliverable employment location, uniquely suitable to accommodate the need for more land for Freight and Logistics, and entirely outside the Green Belt.

5.3 The Representor's Matter Statements provide further commentary on the suitability of Site 325 to meet employment need, including that:

- There is no evidence to support RBC discounting Site 325 from consideration on highway capacity grounds. Rather, the evidence suggests that an improvement at Gibbet Hill is needed in any event and therefore allocation of Site 325 has no material impact on this[1].

- Site 325 is in a sustainable location for employment development. Indeed, this is the conclusion of Harborough District Council where additional employment growth in this location is proposed as part of the emerging Local Plan.

- Site 325 is well placed to meet the identified need for B8 logistics development and would comprise the expansion of a highly successful, existing park.

[1]The need for an improvement scheme at Gibbet Hill is also explicitly set out in the Infrastructure Delivery Statement as being required by 2032 (Document I2).

5.4 The RBC Plan simply does not allocate enough employment land. At the very least, a higher growth scenario which includes accommodating an increase of at least 110ha of strategic need from OA7 and 45ha of unmet need from Coventry should have been planned for.

5.5 The 110ha just represents what further land should be allocated to correct basic errors in the site areas of four sites. At 35%, this would increase the requirement for strategic employment land by 385,000 sqm. However, this is still significantly less than the requirement projected by our analysis of RBC's own data on recent, current and projected take-up over the 10-year period from 2022 to 2032. This indicates a minimum increase of 590,000 sqm is necessary to fulfil a requirement based on market signals.

APPENDIX 1

Joint critique of RBC14 by Representors 534, 488 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

Sensitive

- 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

Sensitive

- 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.

Sensitive

- 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.

Sensitive

- 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.

Sensitive

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

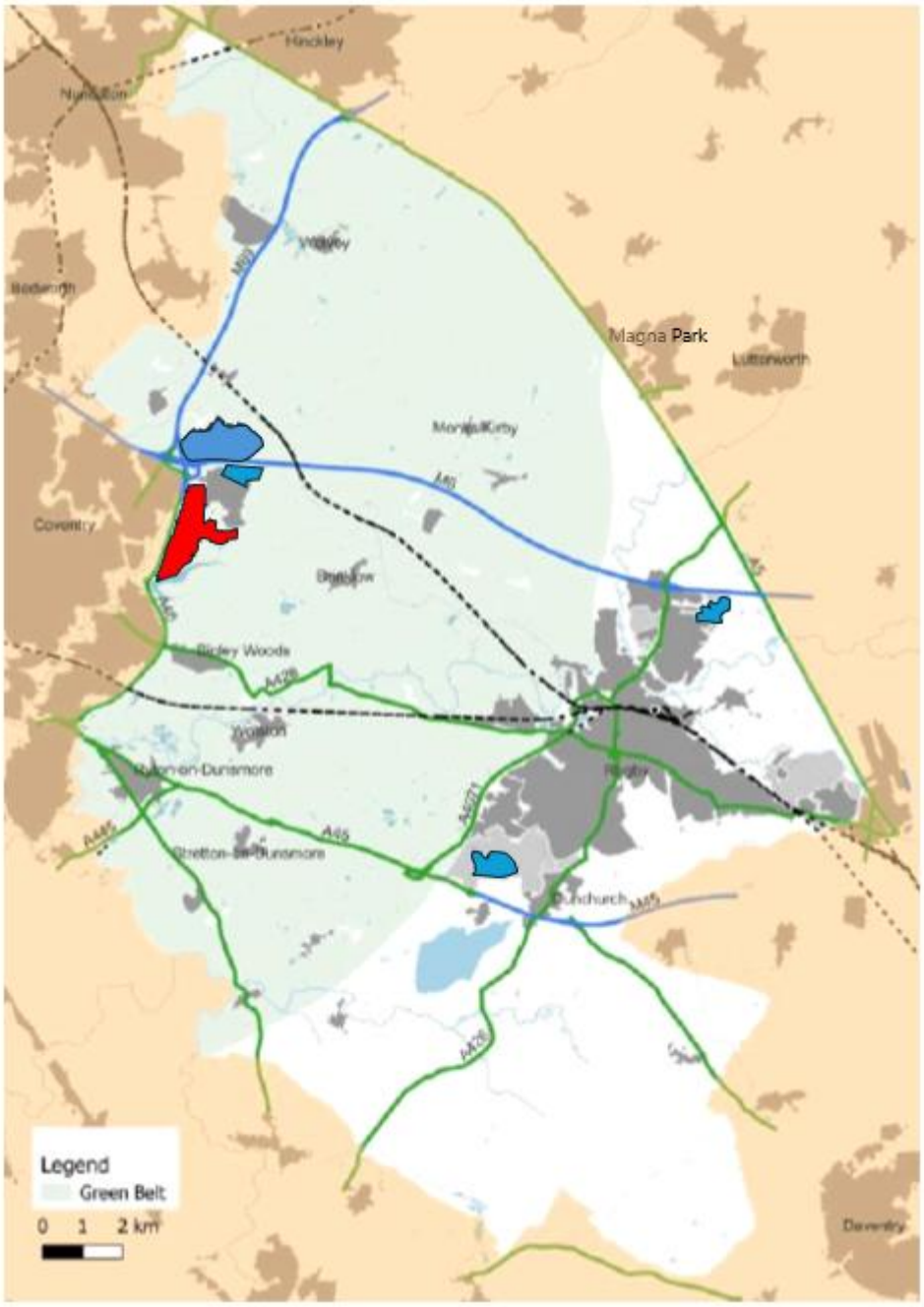
Sensitive

APPENDIX 2

Employment Land Growth Scenarios Appraisal

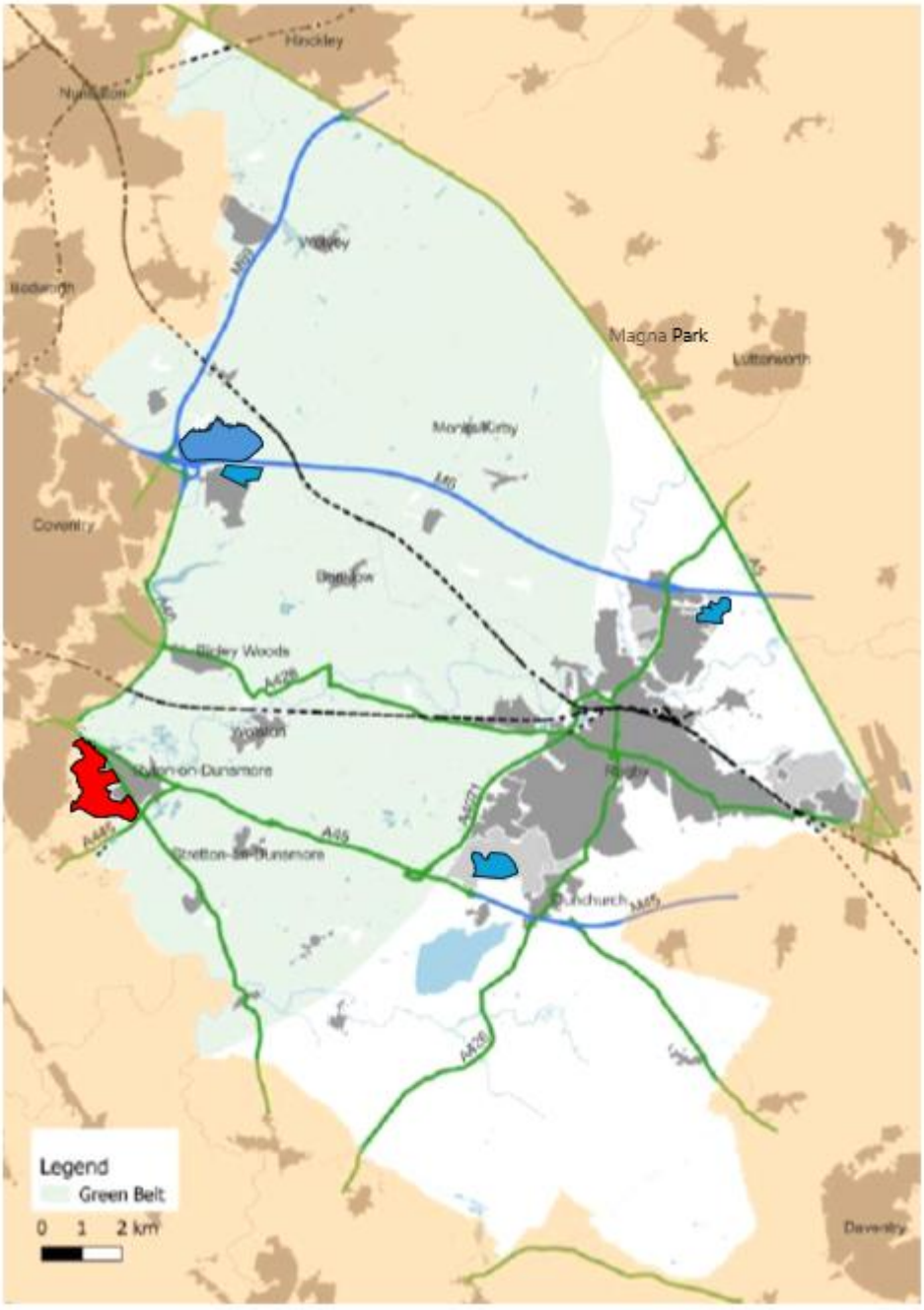
Scenario 1 – the proposed submission approach (Figure 5.3)

- Site 95 – Crowner Fields Farm, Ansty (Frasers)
- Site 64 – Coton Park East (Panattoni & AC Lloyd)
- Site 17 – SW Rugby Phase 2 (Tritax)
- Site 14 – Ansty Park North (AC Lloyd)
- Site 121 – Land at Walsgrave Hill (Segro)



Scenario 2 – Scenario 1 but with Walsgrave Hill replaced by Prologis/Mountpark

- Site 95 – Crowner Fields Farm, Ansty (Frasers)
- Site 64 – Coton Park East (Panattoni & AC Lloyd)
- Site 17 – SW Rugby Phase 2 (Tritax)
- Site 14 – Ansty Park North (AC Lloyd)
- Site 328 Ryton (Prologis/ Mountpark)



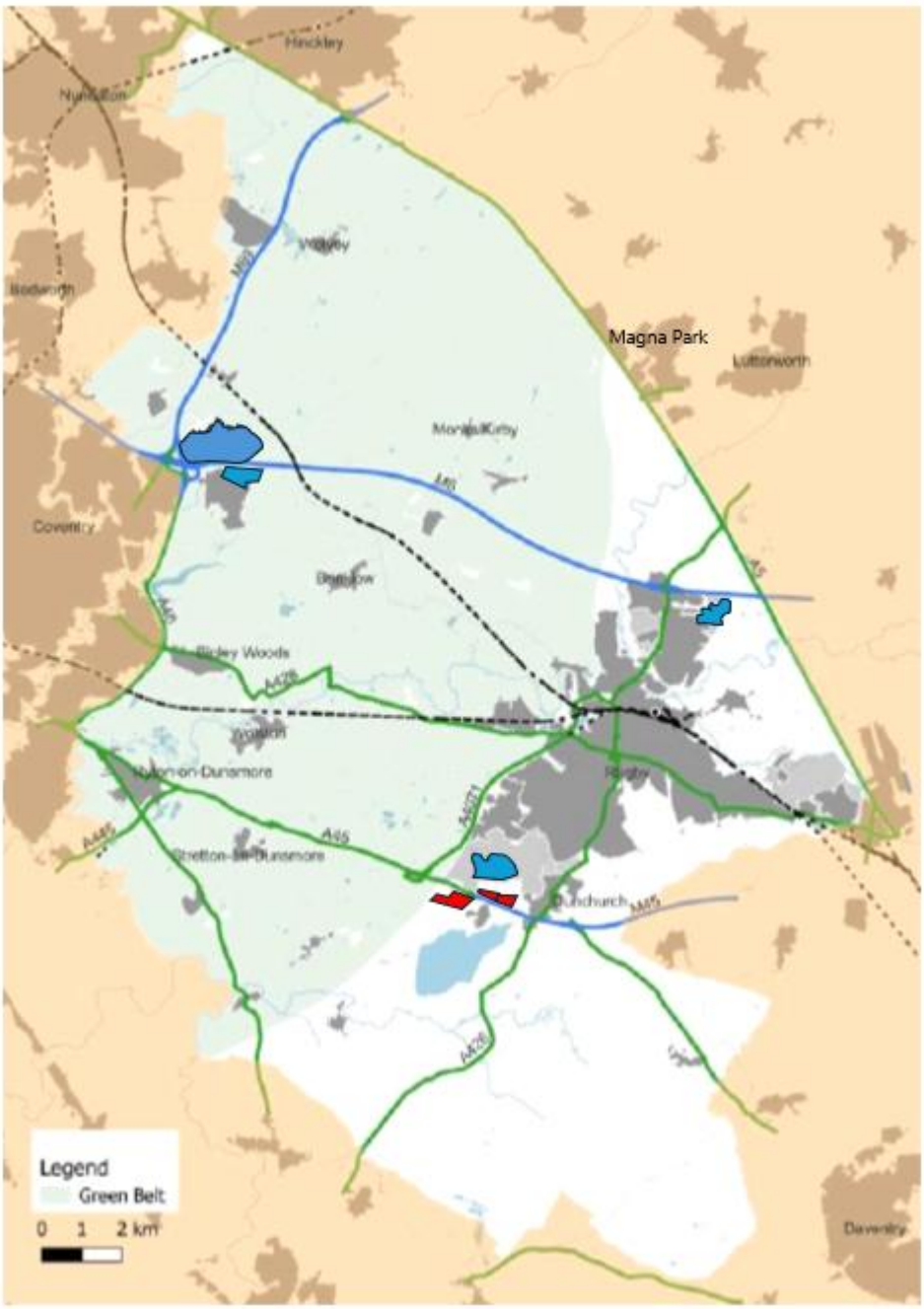
Scenario 3 – Scenario 1 but with Walsgrave Hill replaced by North of Houlton

- Site 95 – Crowner Fields Farm, Ansty (Frasers)
- Site 64 – Coton Park East (Panattoni & AC Lloyd)
- Site 17 – SW Rugby Phase 2 (Tritax)
- Site 14 – Ansty Park North (AC Lloyd)
- Site 130 – Land north of Houlton (Stoford)



Scenario 4 – Scenario 1 but with Walsgrave Hill replaced by 2 sites at Thurlaston

- Site 95 – Crowner Fields Farm, Ansty (Frasers)
- Site 64 – Coton Park East (Panattoni & AC Lloyd)
- Site 17 – SW Rugby Phase 2 (Tritax)
- Site 14 – Ansty Park North (AC Lloyd)
- Site 18 – Barnwell Farm (WCC)
- Site 133 – Land north of M45 (Richborough)



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

Sensitive

- 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

Sensitive

- 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.

Sensitive

- 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.

Sensitive

- 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.

Sensitive

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