



**TOPIC PAPER:
DEVELOPMENT NEEDS
DECEMBER 2025**

1. INTRODUCTION

- 1.1. This topic paper provides a summary of the council's position on future development needs which underpins policies S2 (strategy for homes) and S3 (strategy for employment land).
- 1.2. The evidence base for future development needs comprises:
 - The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA)
 - The West Midlands Strategic Employment Sites Study 2024 (WMSESS)
 - The Coventry & Warwickshire HEDNA - WMSESS Alignment Paper 2024 (Alignment Paper)
 - Addendum to the Coventry & Warwickshire Alignment Paper (November 2025)
 - Rugby Office Needs Assessment Update (2025)
 - Homes – Jobs Alignment Paper on behalf of Coventry and Warwickshire Authorities (2025)
 - Updated Housing Needs Evidence for Rugby Borough 2025

WHAT IS THE PLAN PERIOD?

- 1.3. National Planning Policy Framework (NPPF, December 2024) paragraph 22 advises that strategic policies should look ahead over a minimum period of 15 years from adoption.
- 1.4. The Local Development Scheme (October 2024) envisages submission of the new local plan for examination in June 2026. It is assumed that adoption of the plan will be in spring 2027. The plan end date is set at 2042 to allow a 15 year plan period from adoption.
- 1.5. The North Norfolk Local Plan Examinations inspector's letter dated 24 May 2024 stated "Turning to the base date of the plan, this should correspond to the date from which the housing needs of the district are quantified. As set out in paragraph 12 below, this should be April 2024."
- 1.6. Applying this, the base date is set at 2025 as this is the year of the local housing need calculation which underpins Policy S2. This means that the plan period would run 1 April 2025 until 31 March 2042.

2. HOUSING NEED

WHAT IS THE HOUSING NEED?

- 2.1. The NPPF (December 2024) states at paragraph 62 that “To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance”. Minimum local housing need for Rugby calculated in accordance with the standard method is 636 new homes per year. A detailed calculation of local housing need using the standard method is set out in paragraphs 4.15 to 4.22 of the Updated Housing Need Evidence for Rugby Borough (2025) report.
- 2.2. The total need over the 2025-2042 plan period is calculated by multiplying this need by the 17 year plan period. The total housing need is therefore 10,812 homes.

WHAT IS THE RESIDUAL HOUSING NEED AFTER EXISTING SUPPLY?

- 2.3. In determining the residual amount of housing that needs to be planned for over the plan period, existing supply needs to be considered. This is shown in the table below:
- 2.4. The data behind these supply calculations is appended to this note.

Source	Number of homes 2025-2042
2025-2042 housing need	10,812
Houlton remainder deliverable by 2042 (assumes average of 180 per year)	3,060
South West Rugby deliverable by 2042	3,505
Eden Park, Rugby	602
Ashlawn Gardens, Rugby	112
Other allocations under Local Plan 2011-2031	205
Land at Projects Drive, Rugby	108
Dipbar Fields, Dunchurch	86
Former Newton Vehicle Rentals site, Rugby	122
Other sites with planning permission	193
Small site windfalls (fewer than 5 homes at 50 homes per year)	850
Total supply	8,843
Residual need	1,969

- 2.5. Houlton has in the period from 2017-18 to 2024-25 recorded completions at an average annual rate of 227 dwellings per annum. However, Lichfields’ *Start to Finish* research indicates an upper quartile average build-out rate of 188 dwellings per year on sites of more than 2,000 dwellings. Accordingly, an average rate of 180 is applied to the site over the plan period, as this allows for fluctuation over the economic cycle.

- 2.6. Higher peak and average build-out rates than this are assumed for South West Rugby. The absence of a master-developer at South West Rugby and greater fragmentation of land ownership is likely to give rise to more competition and more sales outlets on site, driving more rapid delivery.
- 2.7. The small site windfall allowance report (2025) demonstrates that a windfall allowance for sites of fewer than five dwellings of 50 homes per year is justified. The small site windfall allowance doesn't double count for years one to three of the plan period because sites of fewer than 5 units are not specifically listed in the council's five year housing land supply statements.

SHOULD A WHOLE PLAN BUFFER BE APPLIED?

- 2.8. NPPF paragraph 36c) sets as part of the test of soundness a requirement that plans are effective i.e. deliverable within the plan period. To ensure the housing requirement is deliverable over the plan period it is usual practice to identify more housing land supply than the minimum that would be necessary to meet the requirement. This is often referred to as a 'whole plan buffer' or 'headroom'.
- 2.9. The whole plan buffer is not the same as the 5% buffer required by NPPF paragraph 78a) in calculating five year housing land supply. The 5% buffer referred to in paragraph 78a) is stated to be "moved forward from later in the plan period" rather than being additional supply.
- 2.10. There is no guidance in the Planning Practice Guidance on the level of whole plan buffer that should be planned for.
- 2.11. The Rugby Borough Local Plan 2011-2031 identified supply of 14,567 homes against a minimum requirement for 12,400 additional homes. Therefore, the whole plan buffer was 17.5%.
- 2.12. The Inspector's report on the North Hertfordshire Local Plan (2022) considered the proposed buffer, which equated to approximately 13%, and concluded at paragraph 110:

"On the whole, it seems to me that the 'buffer' brought about by the difference between housing requirement and supply here is reasonable to avoid jeopardising the priority outcome of meeting need. Taking account of all the points put to me, in the context of the housing situation in North Hertfordshire, I consider the extent to which the housing land supply exceeds requirements to be justified. Indeed, if one is to have the requisite degree of confidence in the Plan's effectiveness, it is a necessity. In addition, without this 'buffer', it is highly probable that the need for affordable housing – which I discuss below – would not be met. As a consequence, I consider that this issue has no material effect on the existence or otherwise of the exceptional circumstances needed to justify altering the Green Belt boundaries to facilitate new housing"

- 2.13. The inclusion of whole plan buffers was similarly endorsed in the inspectors' reports on the local plans in Chelmsford (2020), South Kesteven (2020), Mansfield (2020) and Chesterfield (2020).
- 2.14. There are no hard and fast rules about the level of whole plan buffer required. Logically the buffer would be higher where the sites in the plan are subject to more delivery risk. This would be the case, for example, for very large sites with long lead times and complex infrastructure requirements or where there are viability concerns.
- 2.15. Locally, Appendix 3 of the submission version of the Coventry Local Plan 2021-2041 contains an 8% whole plan buffer. The Nuneaton and Bedworth Borough Plan Review (2021-2039) which is at

main modifications stage contains a 12% whole plan supply buffer. The Harborough District Local Plan 2020-2041 regulation 19 consultation (March to May 2025) proposed a 13% whole plan supply buffer.

- 2.16. The housing supply identified in a submission plan is subject to detailed scrutiny in the plan examination and so it is important to ensure adequate supply and adequate confidence in delivery so that the plan will be effective and able to be found sound.
- 2.17. As a whole plan buffer is applied, it is not necessary to also apply a “non-implementation rate”. The council’s latest five year housing land supply position statement 2025-2030 states the following on non-implementation:

“The National Planning Policy Framework requires an additional 5% supply buffer to be applied [to the five year housing land supply] and there is no reference in either the NPPF or the Planning Practice Guidance to a requirement to apply generic assumed ‘lapse rates’ in calculating five year housing land supply. In an appeal decision dated 27 September 2024 (PINS ref APP/P4605/W/24/3342499) Inspector H Nicholls commented at para 82 “My view is that it would not be reasonable to take a step beyond the Framework and PPG requirements and apply a lapse rate to the deliverable supply”. Therefore, no lapse rate is applied.”

HOW MANY HOMES ARE ALLOCATED THROUGH THE REG 19 PLAN?

- 2.18. The Regulation 19 plan allocates sites to deliver 2,886 homes after existing commitments. This exceeds the residual requirement and provides an 8.5% whole plan supply buffer. The following factors mean that this level of whole plan buffer is adequate to ensure that the plan’s strategy for housing will be effective:
- 2.19. No new large, complex strategic sites with uncertain delivery timescales are planned, reducing trajectory risk.
- 2.20. The existing strategic sites at Houlton, Eden Park and South West Rugby are either part-complete or at an advanced stage of planning with planning applications submitted or permissions in place. This reduces delivery risk in relation to these sites.
- 2.21. Urban capacity supply is identified but this is based on individual, specific site allocations rather than a windfall assumption. Although viability can be tight in the urban area, a significant proportion of the urban supply is on sites in public ownership meaning greater flexibility can be taken on residual land value to ensure delivery.
- 2.22. The plan’s site allocations significantly diversify the locations and sizes of housing sites in comparison to the existing 2011-2031 local plan. This deepens the market both for builders and prospective homebuyers, both factors that support greater supply resilience.
- 2.23. As stated above, the only part of the supply that isn’t referable to specific sites is the small site windfall allowance for sites of fewer than 5 dwellings. Analysis of long-run delivery rates on small sites demonstrates that this allowance is justified.

SHOULD MORE HOMES THAN ARE REQUIRED BY THE STANDARD METHOD BE ALLOCATED?

- 2.24. The NPPF at paragraph 62 states “To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.”.
- 2.25. Paragraph 69 then states: “Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”.
- 2.26. The wording of the NPPF states that the requirement *may* be higher than the need in some circumstances. This is the future conditional, not the future indicative of “must” or “shall”.
- 2.27. The use of the term “for example” indicates that the list of circumstances suggested is not closed.
- 2.28. The Planning Practice Guidance Paragraph: 002 Reference ID: 2a-002-20241212 states:
- “The standard method set out below identifies a minimum annual housing need figure, and ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. It does not produce a housing requirement figure.”
- 2.29. The following paragraph 040 states:
- “The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Once local housing need has been assessed, as set out in this guidance, authorities should then make an assessment of the amount of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters. The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.”
- 2.30. Therefore, the council is required to consider the merits of planning for higher growth.
- 2.31. One circumstance that might merit planning for higher growth highlighted in the NPPF is where there are “growth ambitions” or, in the terms of the PPG “to reflect economic growth aspirations”.
- 2.32. Another circumstance highlighted in the PPG is to support the delivery of affordable homes. PPG Paragraph 024 Reference ID: 2a-024-20190220 states “An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”.

- 2.33. Some representations received at Regulation 18 stage argued that a higher housing requirement should be set because past rates of delivery are higher than local housing need.
- 2.34. A final consideration is whether a housing requirement should be set to accommodate ‘unmet housing need’ from another local authority district.
- 2.35. The merits of these arguments for planning for higher housing growth are considered in the following sections.

SHOULD MORE HOMES BE ALLOCATED “TO REFLECT ECONOMIC GROWTH ASPIRATIONS”

- 2.36. The publication Local Plan plans for significant new employment land. As is detailed below, the assessment of employment need is in part regionally derived. It reflects a West Midlands wide need for strategic employment land.
- 2.37. In considering whether additional homes are needed to support this employment growth it is necessary to consider functional geographies. This is particularly relevant in Rugby Borough because 68% of new employment floorspace allocated through the publication Local Plan is on the Coventry urban edge, rather than on the edge of the town of Rugby.
- 2.38. The Homes – Jobs Alignment Paper (Iceni, 2025) produced on behalf of Coventry and Warwickshire local authorities demonstrates that the relevant functional geographies for considering the balance of new housing and new employment land is Coventry and Warwickshire as the housing market area (HMA) and functional economic market area (FEMA).
- 2.39. The Homes – Jobs Alignment Paper demonstrates that there would be sufficient housing and workforce growth in the HMA to comfortably support the jobs growth engendered by planned employment land delivery across the FEMA.
- 2.40. Therefore, there is not an argument to increase the housing requirement in Rugby Borough above local housing need to support jobs growth/economic aspirations.

SHOULD MORE HOMES BE ALLOCATED BECAUSE PAST DELIVERY RATES WERE HIGH?

- 2.41. Average new dwelling completions in the period since 2011 are shown in the table below. The annual requirement numbers are taken from the Local Plan 2011-2021:

Year	Annual Requirement	Actual net dwellings
2011/2012	540	338
2012/2013	540	456
2013/2014	540	448
2014/2015	540	425
2015/2016	540	534
2016/2017	540	376
2017/2018	540	596

2018/2019	663	939
2019/2020	663	859
2020/2021	663	832
2021/2022	663	939
2022/2023	663	1,349
2023/2024	663	873
2024/2025	663	675
Total	8,421	9,639
Over-delivery		1,218

- 2.42. Average annual delivery over this 14 year period was 688.5 dwellings. This exceeds current measured local housing need of 636 dwellings per annum by 8%. The 636 figure was exceeded in 7 of the past 14 years. The average is pushed up by strong completions in the year 2018 to 2024.
- 2.43. To contextualise these numbers, using ONS Live Table 125 (Dwelling stock estimates by local authority district) it is possible to calculate that the cumulative annual growth rate (CAGR) in the number of dwellings in Rugby Borough between 2014 and 2024 was 1.65%. This compares to a CAGR for England over the same period of 0.91% and for the West Midlands region of 0.84%. Over the twenty year period 2004-2024 the respective growth rates were 0.84% for England, 0.73% for the West Midlands and 1.48% for Rugby Borough.
- 2.44. Because of local government reorganisations in the past 10 years, it is not possible to calculate CAGR for a 10 and 20 year period for every local authority. Nonetheless, of the 285 lower tier local authorities for which it is possible to obtain the data, Rugby Borough had the 17th highest ten year CAGR. Rugby Borough's CAGR for the 20 year period 2004-2024 is 11th highest among the 276 lower tier local authorities for which this data is available. This places Rugby Borough in the top 10% of local authorities for 10 year housing delivery and the top 5% for 20 year housing delivery.
- 2.45. Thus, delivery rates in the past 20 years reflect a period when Rugby Borough was among the fastest growing local authorities in England. This in turn is a consequence of past policy decisions, specifically the identification of Rugby in the 2008 Regional Spatial Strategy for the West Midlands as a "sub-regional focus" for new development and the carrying forward of this in the Rugby Borough Core Strategy 2011.
- 2.46. Had government intended that housing requirements should be based on past trends then it would have continued with a standard method for calculating local housing need which was based on trends-based household projections (as was the position pre 2024). Instead, the 2024 NPPF introduced a new standard method which isn't trends based but is instead stock based. The new standard method applies a 0.8% annual increase in dwelling stock and then adjusts this upward depending upon the extent to which the ratio of median house prices to median earnings exceeds 4:1.
- 2.47. In short, it should not be assumed that areas experiencing fast growth will continue to maintain that rate of development in perpetuity. Equally it should not be assumed that lower growth areas will continue that trajectory. This is clearly not the intention of national policy and the new standard method.
- 2.48. Therefore, historically very high rates of housebuilding in Rugby Borough do not present a convincing argument for setting a housing requirement above local housing need.

SHOULD MORE HOMES BE ALLOCATED TO INCREASE AFFORDABLE HOUSING DELIVERY?

- 2.49. The Updated Housing Needs Evidence for Rugby Borough (2025) identifies a net need for affordable housing of 338 homes per year for those unable to buy or rent. If those already in accommodation are excluded, this reduces to 202 homes per year. This is equivalent to 32% of the standard method figure.
- 2.50. It is important to note that the need for affordable housing need is not additional to overall assessed housing need. The largest component of the assessed affordable housing need (73% of gross need) is the proportion of all new households forming under standard method local housing need, who would, based on average income levels, be unable to afford to rent or buy in the market without benefits and without spending more than 30% of their income on housing costs.
- 2.51. This means that if the housing requirement is increased, the affordable housing need will increase lockstep with this. More houses would mean more household formation – largely driven by increased migration to the area – and an equivalent proportion of those newly forming households would need affordable housing.
- 2.52. It could be argued that more housing would suppress rent or market price increases. However, this objective is already being pursued through the affordability uplift in the standard method. Also, this would not address the PPG guidance which is about the delivery of affordable homes rather than improving the affordability of market homes.
- 2.53. There are also reasons to suspect that simply increasing the housing requirement, while increasing assessed affordable housing need, would only leading to modest additional affordable housing delivery:
- 2.53.1. Any increase in affordable housing would be predicated upon delivering more s106 affordable housing. However, there is a widely reported nationwide inability to deliver s106 housing due to lack of bids from RSLs who have rolled back their programme of acquisitions.
- 2.53.2. The whole plan viability assessment demonstrates that a further strategic scale site – the most likely route to delivering a significantly boosted housing requirement – is unlikely to viably be able to deliver much if any s106 affordable housing.
- 2.54. Overall, therefore, there is not a clear justification for increasing already high levels of housing delivery as a way to address the need for affordable housing.

SHOULD MORE HOMES BE ALLOCATED TO ACCOMMODATE UNMET NEED?

- 2.55. The Memorandum of Understanding signed by Rugby Borough in July 2025 between Coventry and Warwickshire authorities identifies no unmet housing needs within the Coventry and Warwickshire housing market area (HMA).
- 2.56. No requests for assistance in meeting housing needs have been received from non-HMA authorities such as Leicester or Birmingham. Given the distance and lack of functional relationship between those urban areas and Rugby Borough, meeting unmet need from there, to

the extent that any exists, would not be a reasonable option.

- 2.57. Some responses to the Regulation 18 consultation argued that the housing requirement for Rugby Borough should be raised to provide contingency against the potential that Coventry or Nuneaton and Bedworth Borough would identify future unmet needs beyond their current proposed plan period. However, that is too speculative to provide a sound basis for setting a housing requirement.
- 2.58. Overall, unmet needs from other authorities do not provide a reason for setting a higher housing requirement.

3. EMPLOYMENT LAND NEED

WHAT IS THE EMPLOYMENT LAND NEED

- 3.1. The West Midlands Strategic Employment Sites Study (WMSESS), Alignment Paper (including the 2025 addendum) and the 2025 Rugby Office Needs Assessment Update evidence the future need for employment land in three different categories which are outlined in the following sections. The Coventry and Warwickshire Housing and Economic Development Needs Assessment (2022) (HEDNA) while not forming the evidential basis for new employment land needs is relevant in understanding the overall approach.

NEED FOR OFFICES

- 3.2. This comprises land in the following use classes:
- 3.3. E(g)(i) offices to carry out any operational and administrative functions
- 3.4. E(g)(ii) research and development of products or processes.
- 3.5. This need is calculated based on labour demand. In other words, the number of people working in office-based jobs in Rugby Borough in future is calculated and this is then translated into a floor area and land requirement. In calculating the need for land, it is assumed that offices are developed at a plot ratio of 0.5. This means that the floorspace of the buildings is equivalent to 50% of the total site area.

NEED FOR INDUSTRIAL LAND ON SMALLER SITES

- 3.6. This need comprises land within use classes E(g)(iii) (industrial processes which can be carried out in a residential area without detriment to amenity), B2 (general industrial) and B8 (storage and distribution) which is delivered on sites of less than 25 hectares in area.
- 3.7. This need is calculated based on past completion trends for Rugby Borough. This need was originally calculated in the HEDNA and was updated through the Alignment Paper to take account of additional more recent completions trend data.
- 3.8. This need includes large units of 100,000sqft/9,000sqm or more in floor area that are built on smaller sites. The need for large units on smaller sites is calculated based on past trends.
- 3.9. The Alignment Paper calls industrial need on smaller sites “non-strategic” site need.

3.10. The HEDNA assumes that industrial land on smaller sites is developed at a plot ratio of 0.4. This means that the floorspace of the buildings is equivalent to 40% of the total site area.

NEED FOR INDUSTRIAL LAND ON LARGER SITES

3.11. This comprises floorspace for B2, B8 and classes E(g)(iii) uses that is constructed on sites of 25ha or more in site area.

3.12. Not all buildings constructed on sites of this size will exceed 100,000sqft/9,000sqm in floorspace, and the WMSESS methodology makes an allowance for 25% of floor space on large sites (referred to in the WMSESS as “strategic sites”) to be used for smaller units. This is then picked up in the Alignment Paper as part of the “local need”.

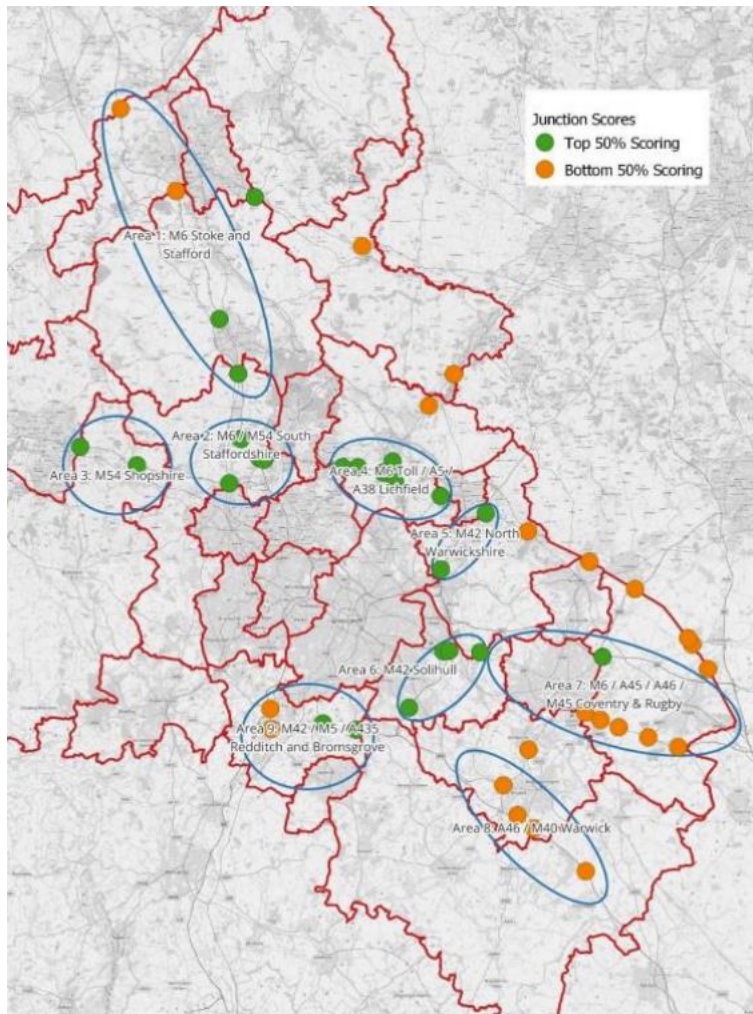
3.13. The need for large industrial sites is calculated based on the methodology set out in the WMSESS. The methodology combines replacement demand, which is an assessment of the need to replace existing floorspace due to units reaching the end of their operational lifespan, with (for storage and distribution uses) an assessment of the floorspace needed to handle projected future freight volumes. Importantly, the methodology for calculating the need for large employment sites is a West Midlands-wide methodology. This is appropriate because businesses operating from such sites are likely to be regional/national businesses and the market for buildings on large employment sites is regional rather than localised.

3.14. The WMSESS assumes that large “strategic” industrial sites are developed at a plot ratio of 0.35. This means that the floorspace of the buildings is equivalent to 35% of the total site area.

3.15. The WMSESS does not identify need for larger industrial sites based on individual local authority areas. Instead, the projected future West Midlands need is apportioned to “opportunity areas” which correspond to groups of junctions on the main motorway and A-road network. This is because large-scale industrial uses would need to be located close to these junctions.

3.16. The opportunity area that encompasses part of Rugby Borough is “Area 7: M6/ A45/ A46 / M45 Coventry and Rugby”. The location of this area is shown in the map below.

3.17. The WMSESS calculates the need for additional large employment sites, beyond land that was already in the pipeline in 2022 (because it had planning permission or was allocated for development in a local plan). These existing pipeline sites are referred to as “commitments”. The Alignment paper updates this to take account of new commitments since 2022.



SUMMARY OF ASSESSED EMPLOYMENT LAND NEED

3.18. The assessed need for each of the different categories of employment floorspace is set out below.

Category	Land need hectares	Floorspace need in square metres	Source of need
Offices	5.42ha (based on assumed 0.5 plot ratio)	27,100	Rugby Office Needs Assessment Update 2025 (2024-2042)
Industrial land on smaller sites	60.8	243,200	Alignment Paper table 3.9 need pro-rated to 2042. Pro rated by dividing the 2041-2045 need by 4 and adding this to the 2021-2041 need
Industrial land on larger sites within area 7 (upper threshold)	116.5 (134 to 2045)	430,500 (469,000 to 2045)	Alignment Paper residual need calculation. Updated with an additional 50ha by the 2025 addendum. 2022-2045

			figure pro-rated to 2042.
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WHAT IS THE RESIDUAL NEED FOR LAND FOR OFFICES AFTER SUPPLY?

3.19. The need for 27,100sqm of office space 2024-2042 is identified above. From this can be subtracted completions in 2024/25 of 7338.7sqm, leaving a residual requirement for 19,761.3sqm 2025-2042. Existing commitments that would go towards meeting that need are set out below:

Site	Imputed site area Hectares at 0.5 plot ratio	Floor space Square metres	Notes
Requirement 2024-2045	5.42	27,100	
Completions since 2021			
Wago Ltd, Houlton R22/0380		7,338.7	2024/25
Residual Requirement at 1 April 2025	3.95	19,761.3	
Commitments			
CIC Building, Ansty Park R19/0092		11,566	Discount – this permission lapses in April 2026 and it now appears unlikely this will be implemented
Crowner Fields Farm, Ansty (Frasers Campus) R23/1027		17,911	assume plot ratio of 0.5 per HEDNA para 9.23
UNIT 2, SAPPHIRE WAY, Coombe Fields, COVENTRY, CV7 9DR R23/1189		2,037	
Wago Ltd, Houlton phase 2 R22/0380		4,166.9	
Total commitments excluding CIC Building		24,114.9	

3.20. As can be seen, commitments for office space exceed assessed need. There is, therefore, not a quantitative need to allocate further land for offices.

WHAT IS THE NEED FOR INDUSTRIAL LAND ON LARGE SITES?

3.21. As set out above, the WMSESS/Alignment Paper calculates the need for employment sites in opportunity Area 7 of 84ha 2022-2045. The 2025 Errata note recommends adding additional supply for a further 50ha, giving a total of 134ha. This can be prorated to 116.5ha to 2042. Existing supply within Rugby Borough as at 2022 in the alignment paper appendix A1 totals 137ha. To this is added Padge Hall Farm for 64ha, bringing total identified commitments to 201ha.

3.22. If Rugby Borough accommodates all the residual requirement to 2042 of 116.5ha for opportunity area 7 and this is added to committed supply in Rugby Borough as at 2022, that brings the gross 2022-2045 requirement to 317.5ha.

3.23. To bring this up to a 2025 base date, completions on the Alignment Paper strategic site

commitments in the period 2022-2025 need to be subtracted. Those completions are detailed in the table below:

Site	Completed 2022-2025 hectares	Completed 2022-2025 sqm
Tritax Symmetry, South West Rugby	39.36	173,341
Prospero Ansty	37.96	102,026
Prologis Park, Ryton	13.65	44,343
Total	90.97	319,710
Total adjusted at a standardised 0.35 plot ratio	91.35	319,710

3.24. Therefore, the gross 2025-2042 requirement is 226.15ha (116.5ha + 201ha – 91.35ha). At a standard plot ratio of 0.35 that would equate to a gross requirement for 791,525m² in additional floorspace on strategic sites 2025-2042.

3.25. To calculate the residual requirement for strategic sites, we must then subtract commitments. Existing commitments are out in the table below:

Site	Committed/residual (hectares)	Committed/residual (sqm)
Prospero Ansty units 4, 8 and 9 R23/0727	6.27	21,948
Padge Hall Farm R21/0985	63.84	136,350
Coton Park East land north and east of Castle Mound Way R22/0551	8.7	26,421
Houlton remaining employment land excluding reallocated land south of Crick Road	3.75	15,000
Permission R22/0861 Land off Vigen Way, Coombe Fields, Ansty Park (site not listed in alignment paper)	1.04	4,715
Crowner Fields Farm and Home Farm, Hinckley Road, Ansty R23/1027	78.57	275,000
Land at Padge Hall Farm R24/0257	0.16	1,380
Total	162.33	480,814
Total adjusted at a standardised 0.35 plot ratio	137.38	480,814

3.26. When 480,814m² is subtracted from a gross requirement of 791,525m² this leaves a residual requirement for 310,711m² (88.77ha at a 0.35 plot ratio). This net requirement is higher than the requirement identified in the alignment paper would suggest because most of the 16ha at Houlton which was shown as a commitment in the alignment paper is now not coming forward and because the 2022 commitments have been remeasured and plot ratios have been standardised at 0.35 which is the ratio used in the WMSESS and Alignment Paper.

AT IS THE NEED FOR INDUSTRIAL LAND ON SMALLER SITES AFTER SUPPLY?

- 3.27. As noted above, the need for industrial land on smaller sites 2021-2042 is 60.8 hectares or 243,200 square metres.
- 3.28. From this can be subtracted completions in the period 2021-2025 on smaller sites totalling 10,600 square metres or 2.65 hectares (at a 0.4 plot ratio).
- 3.29. This gives a gross 2025-2042 requirement of 232,600sqm or 58.15ha.
- 3.30. There are 13,429.4 square metres (3.36 hectares) of commitments on smaller sites, leaving a residual need of 54.79 hectares (219,170.6 square metres). Employment completions and commitments are set out in full in Appendices 2 and 3 to this topic paper.

WHAT IS THE COMBINED INDUSTRIAL NEED

- 3.31. The combined 2025-2042 gross industrial need (on large and smaller sites) is 791,525sqm + 232,600sqm = 1,024,125sqm. In hectares that is 284ha (226.15 + 58.15).
- 3.32. After existing committed supply the requirement is for 529,882 (310,711m² + 219,170.6) or 143.56ha (88.77ha + 54.79ha).

HOW MUCH NEW EMPLOYMENT LAND IS ALLOCATED IN THE REGULATION 19 LOCAL PLAN?

- 3.33. The Regulation 19 plan allocates new sites capable of delivering 815,000sqm of floorspace. This includes the allocation at Crouner Fields Farm, Ansty for 275,000sqm which already has planning permission. When this is deducted, new allocations comprise 540,000sqm. These allocations are shown in the table below:

Site allocation	Floorspace sqm
South West Rugby employment land phase 2	60,000
Coton Park East	115,000
Ansty Park North	75,000
Land at Walsgrave Hill	290,000
Total	540,000

UNMET INEED FROM COVENTRY

- 3.34. It is understood that of its 2021-2041 requirement for industrial land on smaller sites Coventry City Council is unable to meet 9 hectares or 36,000 square metres.
- 3.35. This unmet need could in principle be met in any of the Functional Economic Market Area (FEMA) authorities of North Warwickshire Borough, Nuneaton and Bedworth Borough, Rugby Borough, Stratford-on-Avon District or Warwick District.
- 3.36. The planned amount of floorspace of 540,000 2025-2042 would exceed the combination of the net Rugby Borough local need and opportunity area 7 strategic need to 2042 (529,882sqm) by just over 10,000sqm. This indicates that the publication Local Plan could in principle contribute 10,000sqm/2.5ha to meeting Coventry City Council's unmet local industrial land need in addition to meeting the opportunity area 7 strategic need to 2042.
- 3.37. The overall calculation is shown in Appendix 4.

WHAT TYPES OF INDUSTRIAL LAND DO WE NEED ON SMALL AND LARGE SITES

- 3.38. The WMSESS recommended that provision in opportunity area 7 should include 2-3 larger B8/mixed sites of circa 50ha and 1-2 smaller B2/B1 sites of circa 25ha.
- 3.39. The Reg 19 local plan and prior consents would deliver three sites of 50+ hectares in Crowner Fields Farm, Padge Hall Farm and Walsgrave Hill.
- 3.40. The HEDNA 2022 similarly recommended at paragraph 11.11 "...whilst B8 demand is very strong, (...) there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector."
- 3.41. The Reg 19 local plan would also deliver a ring-fenced E(g)(ii)/(iii)/B2 site at Ansty Park north. This site would deliver circa 75,000sqm of floorspace and at an equalised plot ratio of 0.4 that would equate to a developable site size of 18.75ha. This therefore fulfils the 1-2 smaller sites of circa 25ha. The Coton Park East site allocation is also 28.75ha at an equalised 0.4 plot ratio, so this would be an additional ~25ha site. The South West Rugby phase 2 land which at an equalised plot ratio is 15ha would be a sub 25ha site.
- 3.42. The WMSESS explains that "strategic sites" should meet the following criteria:
- Good connections with the strategic highway network (for road)
 - Sufficiently large and flexible - ideally sites would be a minimum of 25ha and readily over 50ha
 - Is or can be served from an electricity supply grid with sufficient capacity.
 - Is accessible to labour and includes a clear sustainable transport solution for the local road network.
 - Is located away from incompatible land-uses
 - The ability to deliver high-bay warehousing
- 3.43. All the sites proposed for allocation in the Regulation 19 plan meet these criteria. A particular

emphasis has been placed on identifying sites that are close to the Rugby or Coventry urban areas with sustainable transport solutions.

- 3.44. The WMSESS also identifies that it is important to include “separate allocations for mid-sized and smaller industrial areas, more suited to diverse uses. These uses may also be less suited to the criteria needed for strategic sites, preferring proximity to population density and urban areas over the strategic network.” (para 1.44).
- 3.45. To address this, the strategy in the Regulation 19 plan includes the proposed northern expansion to Ansty Park which is ring-fenced to manufacturing and research and development uses. It also includes requirements for the provision of smaller units within the Coton Park East and Walsgrave Hill allocations.
- 3.46. In setting the local plan policy, a combined need for industrial land is identified. It was appropriate in the evidence base to augment local trends-based employment land need projections (which are traditionally used to define future needs) with evidence of the wider West Midlands need for larger sites. That allows a better understanding of needs that are regional in origin and are not captured in local, trends-based forecasting.
- 3.47. However, there is no clear basis to identify separate ‘local’ and ‘strategic’ need requirements in local plan policy. This is not justified, given the overlap between these categories. For example, greater than 50% of the ‘local needs’ figure in the Alignment Paper comprises large (>9,000sqm) units built on sub-25ha sites and similarly the WMSESS assumes that smaller units will be built on larger sites.
- 3.48. The WMSESS needed to identify a minimum ‘strategic’ site size to define its scope. However, there is in practice nothing magic about the 25ha threshold that was set, and therefore there is no clear basis for enshrining this in policy and creating two different local plan requirement figures for employment land based exclusively on the total area of the site floorspace is built on. This would also create significant implementation and monitoring challenges given the inability of the council through development management to control the precise sizes of units and sites.

CROWNER FIELDS FARM

- 3.49. Some representations received at Regulation 18 stage argued that the proposed allocation at Crowner Fields Farm should not be counted as contributing to the assessed need for strategic industrial land. This argument was made on the basis that the site has planning permission granted to Frasers Group for a headquarters development and therefore the site isn’t available for “general industrial” use and instead represents a large single inward investment.
- 3.50. This argument has no merit. The West Midlands Strategic Employment Site Study in assessing the need for large sites took account of both sub-regional and inward investment requirements. The West Midlands is not a closed economy and operates within a wider national economy, particularly for strategic scale regionally/nationally significant development. Therefore, it is necessary for the WMSESS to consider inwards investment as a source of demand for floorspace.
- 3.51. As an inwards investor relocating from the East Midlands, Frasers Group is no different from the occupiers of much of the completed industrial land in Rugby Borough and elsewhere in the Golden Triangle in recent years. The end occupier has often been an inward investor from elsewhere in the

UK or overseas rather than a local company relocating/upsizing. In many cases the occupiers have been national distribution centres or datacentres.

3.52. It should also be noted that Crouner Fields Farm, if developed in accordance with the current planning permission, is not restricted to be a single occupier site. Warehousing space can, under the terms of that planning permission, be occupied by the suppliers and “brand partners” of the lead occupier, Frasers Group.

3.53. Finally, it would make both plan making and subsequent monitoring unworkable if decisions as to whether employment land could be counted towards meeting the assessed need could only be made after the identity of the end occupier of development was known and were required to be based on an assessment of whether that occupier was deemed to be sufficiently ‘general industrial’. This would be further challenging given occupiers often change through the lifecycle of a building.

EMPLOYMENT LAND IN THE NEW LOCAL PLAN IN CONTEXT

3.54. The Reg 19 local plan would deliver 540,000sqm of new sites non-office employment land allocations 2025-2042 (excluding Crouner Fields Farm which already has planning permission). The equalised land areas (at 0.35/0.4 plot ratios are shown in the table below). This would contribute to meeting an overall level of new floorspace provision 2025-2042 of 1,034,000sqm or 287ha.

Site name	Sqm	actual site area	equalised site area	Notes
Coton Park East	115,000	35.9	32.86	0.4 plot ratio
South West Rugby employment phase 2	60,000	36.94	15	0.4 plot ratio
Ansty Park North	75,000	21.26	18.75	0.4 plot ratio
Walsgrave Hill	290,000	201.83	82.86	0.35 plot ratio
		Total	149.47	

3.55. This would be at a rate of 16.9 hectares per year. This compares to the Local Plan 2011-2031 which planned for 208 hectares of employment land at a rate of 10.4ha per year. This is therefore a step change in delivery of employment land compared to the current local plan, a 63% increase.

3.56. It is also useful to note that the level of employment land being planned is amongst the highest being planned anywhere in the country.

SHOULD EMPLOYMENT LAND HEADROOM/BUFFER BE IDENTIFIED?

3.57. The plan identifies sufficient supply to meet assessed need. Should it identify more for ‘headroom’ as is proposed for housing? There are a few reasons why this is not done:

3.57.1. The strategic site need for opportunity area 7 was identified in the Alignment Paper Addendum as a range of 59-134ha to 2045 (pro-rated to 2042). Therefore the requirement is already set at

the upper end of the recommended range, effectively incorporating a buffer.

- 3.57.2. Similarly, as is identified in the Alignment paper the local industrial needs calculation includes an additional margin equivalent to 5 years average gross completions.
- 3.57.3. The supply going forward comprises specific sites which either have planning permission or are new allocations. The largest floorspace contributors are Land at Walsgrave Hill, Crowner Fields Farm, Padge Hall Farm, Coton Park East. Together these sites make up circa 80% of the supply to 2042. Two of those sites (Padge Hall Farm and Crowner Fields Farm) have planning permission. The other two are controlled by employment developers (SEGRO and Panattoni) with strong track records of delivery. Looking at the supply overall and given the strength of the industrial market in the borough and the high level of demand, there is low risk that the identified supply will not be built out by 2042.
- 3.57.4. In relation to strategic site need, the Alignment Paper Addendum identified a supply position of 14.5 years for opportunity area 7. Looking at the combined position, commitments in the new plan total 494,243.4sqm of floorspace whereas new allocation floorspace comprises 540,000. This means that 48% of the supply already has planning permission. In other words supply for the first 8 years to 2033 of the plan period already has planning permission. The new allocations effectively comprise 2034-2042 supply, although sites will come forward more quickly than that. Again, this serves to illustrate the low supply risk and weak argument for a further supply buffer.
- 3.57.5. Before 2033 a new plan for a unitary authority incorporating the area of Rugby Borough will have been adopted and that will provide an opportunity to consider whether further supply is required. This, again, weakens the argument for identifying additional supply 'buffer' to meet very long-term needs now.

APPENDIX 1: HOUSING COMMITMENTS

Site	Status	Number of units	Completed to date	total from 2025-2042
Ashlawn Gardens				
Land North of Ashlawn Road, (David Wilson)	Detailed - R20/0124 - 206 Units	206	124	82
Land North of Ashlawn Road (Barratt)	Detailed R21/0689 (Outline R13/2102) - 216 Units	216	186	30
South West Rugby				
Coventry Road (Miller Homes)	Outline- R18/0936 - 210 Units. reserved matters R24/0971	210	0	210
Cawston Farm 1 (Tritax Symmetry)	Current Application- Outline- R18/0995- 275 Units	275	0	275
Cawston Farm 2 (Tritax Symmetry)	Outline application R22/0853 - 350 units	350	0	350
Land south west of Cawston Lane (Catesby Estates)	Current Application- Outline Application R25/0487 (Awaiting determination) - 470 Units	470	0	470
Land to the North East of Cawston Lane & Land to the East of Alwyn Road (Taylor Wimpey)	Current Application- Outline Application R25/0407 (Awaiting determination) - Up to 800 Units	800	0	800
Land East and West of Cawston Lane, North of Coventry Road and Land East of Alwyn Road (Homes England)	Current Application- Outline Application R25/0491 (Awaiting determination) - Up to 1600 Units	1600	0	1205
Taylor Wimpey remaining parcel	Application not yet received	195	0	195
Eden Park			0	
Eden Park Phase R3 (Bloor Homes)	Detailed - R19/0976- 146 Units. Under construction	146	94	52
Eden Park Phases R5, R6, and R7 (Bloor Homes)	Detailed - R23/0453- 550 units	550	0	550
Houlton				

Site	Status	Number of units	Completed to date	total from 2025-2042
Key Phase Two - Parcel A (Francis Jackson Homes)	Detailed - R21/1099 - 31 units	31	22	9
Key Phase Three - Parcels A and B (Redrow)	Detailed - R18/1177, R19/1375, R20/0709, R21/0739 - 248 Units	248	213	35
Key Phase Three - Parcels C and F (William Davis)	Detailed - R20/0681 - 146 Units	146	64	82
Key Phase Three - Parcel D (Mulberry Homes)	Detailed - R21/0873 - 147 units	147	65	82
Key Phase Four - Parcel E (Miller Homes)	Current Application- Reserved Matters R25/0549 (Awaiting determination) - 216 Units	216	0	216
Rest of Houlton (including Wharf Farm for past completions)	Outline R11/0699 and R17/0022	6200	1545	2636
Main rural settlement allocations				
Wolvey Campus, Wolvey (Countryside Properties)	Detailed R22/0113 - 90 Units	90	89	1
Land at Coventry Road, Wolvey (O'Flanagan Homes)	Detailed R22/0670 - 11 units	11	0	11
Land North of Coventry Road, Long Lawford (Bloor Homes)	Detailed- R17/1089- 149 Units	149	51	98
Land off Squires Road, Stretton on Dunsmore	Outline- R17/1767- 55 Units	55	0	55
Plott Lane, Stretton on Dunsmore	Revised application not yet received	25	0	25
Linden Tree Bungalow, Wolston	Application not yet received	15	0	15
Other permissions (excluding Rugby Central Shopping Centre which is an allocation)				
Former Newton Vehicle Rentals Site, 117 Newbold Road	Detailed- R19/1496 - 122 Units. Previous Detailed- R17/2113 & R19/0902 and R23/0357	122	0	122
Dipbar Fields, Dunchurch (Charles Church)	Detailed - R19/1047 (Outline- R13/0690)- 86 Units	86	0	86
Land North of Projects Drive, Rugby	Detailed - R24/0103	108	0	108
Yum Yum World Ltd, 4 High Street, Rugby, CV21 3BG	Detailed- R17/0967- 21 Units	21	5	16
Land South East of Brownsover Lane, Brownsover Lane (Jelson Homes)	Detailed - R14/1941, R22/0449- 14 Units	14	5	9

Site	Status	Number of units	Completed to date	total from 2025-2042
Development Land at Pailton Radio Station, Montilo Lane, Pailton, CV23 0HD	Detailed - R21/0937 - 10 Units	10	0	10
Elms Farm, Oxford Road, Marton, CV23 9RQ	Detailed - R21/0469 - 11 units	11	0	11
16-20 Lawford Road, Rugby, CV21 2DY	Detailed - R15/150, R21/0930 - 10 units	10	0	10
First Floor 7-8 Church Street, Rugby, CV21 3PH	Detailed - R22/0479 - 10 Units	10	0	10
32 High Street, Rugby, CV21 3BW	Detailed - R21/0894 - 32 units	27	0	27
Wolston Allotments, Stretton Road, Wolston (Spitfire Homes)	Detailed - R22/0201 and R19/1411 - 48 units	48	44	4
Land West Side of Heritage Close, Rugby	Detailed - R22/0383 - 10 units	10	0	10
Former Inwoods House, Ashlawn Road, Dunchurch	Detailed - R23/0491 - 25 units	25	0	25
76 Buchanan Road, Bilton	Detailed- R18/0830, 21/0963 - 8 Units	8	0	8
7 & 8 , St Matthews Street, Rugby, CV21 3BY	Detailed - R20/1092 - 7 Units	7	3	4
15 Bilton Lane, Rugby	Detailed - R19/1309 (R21/0353, R21/0451, R22/0125) - 5 Units	5	3	2
Land at Manor Farm, Hinckley Road, Burton Hastings. CV11 6RG	Detailed R22/0260 - 6 units	6	0	6
The Malthouse, Main Street, Thurlaston	Detailed R21/0477 - 6 units	6	0	6
11-12 Sheep Street, Rugby, CV21 3BU	Detailed R22/0979 - 5 units	5	0	5
Cawston House, Thurlaston Drive, Rugby, CV22 7SE	Detailed R23/0235 - 5 units	5	0	5
2-3 High Street, Rugby, CV21 3BG	Detailed R23/0722 - 6 units	6	0	6
Rugby Business Centre, 21-23 Clifton Road, Rugby, CV21 3PY	Detailed R23/0812 - 6 units	6	0	6
140 Railway Terrace, Rugby, CV21 3HN	Detailed R24/0533 - 5 units	5	0	5
Rugby Business Centre, 21-23 Clifton Road, Rugby, CV21 3PY	Detailed R24/0829 - 8 units	8	0	8

APPENDIX 2: EMPLOYMENT COMPLETIONS

Category	Planning reference	Site	Use class	Floorspace	Hectares	Date Completed
Strategic	R17/2019	Unit DC8 - Prologis Ryton (Furnoloc)	B8	13,685	13.65	2022/23
Strategic	R17/2019	Unit DC9 - Prologis Ryton	B8	30,658		2022/23
Strategic	R20/1026	Symmetry Park - Unit 1 Iron Mountain	B8	12,488	7.88	2022/23
Strategic	R20/1026	Symmetry Park - Unit 2 Iron Mountain	B8	17,304		2022/23
Strategic	R22/0803	Symmetry Park - Unit 3 Iron Mountain	B8	36,663.2	16.63	2023/24
Strategic	R22/0803	Symmetry Park - Unit 4 Iron Mountain	B8	23,344.8		2023/24
Office	R19/1512	Cadent, Plot 1A, Prospero Ansty	B1(a) and B1(b)/E(g)(ii)	8779.5 B1(a), 975.5 B1(b)	2.1	2021/22
Strategic	R21/1165	Plot 1b, Prospero Ansty	B2	22,493	6.35	2022/23
Strategic	R22/0485	Plot 3, Prospero Ansty	B2 or B8	15,921.0	6.85	2023/24
Strategic	R21/0525	Plot 5, Prospero Ansty	B8	27,874.0	8.05	2023/24
Strategic	R22/0491	Plot 6, Prospero Ansty	B2 or B8	24,932.0	16.71	2023/24
Strategic	R22/0491	Plot 7, Prospero Ansty	B2 or B8	10,806.0		
Strategic	R23/0398	Symmetry Park - Unit 5	B8	36,296.6	11.17	2024/25
Strategic	R23/0398	Symmetry Park - Unit 6	B8	31,407.2		
Strategic	R23/0397	Symmetry Park - Unit 7	B8	15,837.5	3.68	2024/25
Non-strategic	R19/0072	Unit 1, Parkfield Business Park, Rugby	B8	4,083	0.44	2020/21
Non-strategic	R16/0064	Dollman Farm, Houlton	B1(a)	567	0.24	2020/21
Non-strategic	R20/0929	Britvic Limited	B2	2,900	0.68	2021/22
Office	R21/0926	Land on West Side of Watling St, Clifton on Dunsmore (Alcohols Ltd)	B1(a)	732	2.03 (Alcohols Ltd)	2022/23
Non-strategic	R21/0926	Land on West Side of Watling St, Clifton on Dunsmore (Alcohols Ltd)	B2	1,501	2.03 (Alcohols Ltd)	2022/23
Non-strategic	R21/0926	Land on West Side of Watling St, Clifton on Dunsmore (Alcohols Ltd)	B8	895	2.03 (Alcohols Ltd)	2022/23
Non-strategic	R21/0664	Unit 4, Parkfield Business Park, Rugby	B8	1408	0.32	2023/24

Non-strategic	R22/0966	Unit 17, Europapark, Watling Street	B8	2070	0.25	2023/24
Non-strategic	R22/0462	6 Paynes Lane, Rugby	E, B2 or B8	1130	0.19	2023/24
Office	R22/0380	Wago, Houlton	B1, B8	7,338.7	2.09	2024/25
Non-strategic	R23/0454	Parkfield Business Park, Rugby Western Relief Road, Rugby, Warwickshire, CV21 1QJ	B2 or B8	567	0.17	2024/25
Non-strategic	R24/0889	Unit 32 Webb Ellis Industrial Estate	B2,B8 and E	129	0.01	2024/25

APPENDIX 3: EMPLOYMENT COMMITMENTS

Category	Planning reference	Site	Use class	Floorspace	Hectares	Status
Strategic	R23/0727	Plot 8, Prospero Ansty	B8	3,234.0	1.06	Detailed permission
Strategic		Plot 4, Prospero Ansty	B8	13,985.0	3.6	Allocation – floorspace figure from developer website
Strategic		Plot 9, Prospero Ansty	B2/B8	4,729.0	1.8	Allocation – floorspace figure from developer website
Discount	R19/0092	CIC Building, Zone 5 Ansty Park, Pilot Way, Ansty, CV7 9JU	B1/B2	11,566	4.49	Detailed permission but understood not to be coming forward
Strategic	R22/0551	Coton Park East, Land north east of Castle Mound Way, Rugby	B8	26,421.0	8.61	Detailed permission
Strategic	R17/002 2	Houlton employment land reminder	B1/B2/B8	Estimated 15,000	3.75	Outline planning permission excludes David Lloyd, Wago and land south of Crick Road
Strategic	R21/0985	Unit 1, Padge Hall Farm	B8	55,740.0	63.84	Detailed permission
Strategic	R21/098 5	Padge Hall Farm remainder of site	B8 or B2	80,610.0		Outline permission
Strategic not counted in WMSESS	R22/0861	Land off Viggen Way, Coombe Fields	B2	4715	1.04	Detailed permission
Office	R23/1189	Extension to FANUC, UNIT 2, SAPPHIRE WAY, Coombe Fields, COVENTRY, CV7 9DR	E(g)(ii)	2037	2.84	Detailed permission
Local	R21/0631	Land off Parkfield Road, Rugby	B2 or B8	4550	1.59	Detailed permission
Local	R23/0409	Site A, Europapark, Watling Street	B8	3323	1.16	Detailed permission
Local	R23/0410	Site B, Europapark, Watling Street	B2	2342	0.78	Detailed permission
Local	R23/0558	Unit 10, Prospect Park, Rugby	E(g)(iii)	30	0.003	Detailed permission
discount	R20/0422	Land South of A5 (Watling Street) adjacent to M69 Junction 1	B2/B8 and B1	7530	5.25	Hybrid application

Local	R22/0602	REAR OF, LODGE FARM, OXFORD ROAD, RYTON-ON-DUNSMORE, COVENTRY, CV8 3EJ	B2	1992	1.17	Detailed permission
Local	R24/0676	UNIT 3, IMPERIAL ROAD, RYTON-ON-DUNSMORE, Coventry, CV8 3LF	B2	530.4	4.88	Detailed permission
Local	R24/0769	BRITVIC SOFT DRINKS LTD, AVENTINE WAY, RUGBY, CV21 1HA	B2	662	0.26	Detailed permission
Office	R22/0380	WAGO, Houlton	B1	4,166.9	1.19	Phase 2 to be completed
Strategic	R23/1027	Crowner Fields Farm and Home Farm, Hinckley Road, Ansty	B8	275000	78.57	Detailed permission – site area calculated at 0.35 plot ratio
Office	R23/1027	Crowner Fields Farm and Home Farm, Hinckley Road, Ansty	E(g)(i)	17911	3.58	Detailed permission – site area calculated at 0.5 plot ratio
Strategic	R24/0257	Padge Hall Farm, Watling Street, Burbage	B8	1,380	0.16	Detailed permission

APPENDIX 4: EMPLOYMENT NEED AND SUPPLY CALCULATION

		Hectares	Floorspace
	Strategic need		
A	Alignment paper 2022 to 2044 (pro rata)	116.5	407750
B	Appendix A1 Rugby Borough supply as at 2022	201	703500
C	completions 2022-2025 (see appendix 2) hectares @0.35 plot ratio	91.35	319,710
D	gross requirement (A+B-C)	226.15	791,525
	Less commitments		
	Prospero Ansty units 4, 8 and 9		21,948
	Padge Hall Farm R21/0985		136,350
	Coton Park East land north and east of Castle Mound Way R22/0551		26,421
	Houlton remaining employment land excluding reallocated land south of Crick Road R17/0022		15,000
	Permission R22/0861 Land off Vigen Way, Coombe Fields, Ansty Park		4,715
	Crowner Fields Farm and Home Farm, Hinckley Road, Ansty R23/1027		275,000
	Padge Hall Farm, 24/0257		1,380
E	Total commitment hectares @ 0.35 plot ratio	137.38	480,814
F	Net strategic need (D-E) hectares @ 0.35 plot ratio	58.63	310,711
	Local need		
G	Need per alignment paper to 2042 prorated	60.8	243,200
H	less completions 2021-2025 (see appendix 2) hectares @ 0.4 plot ratio	2.65	10,600
I	Gross need 2025-2042 (G-H)	58.15	232,600
J	Less commitments (see appendix 3)	3.36	13,429.4
K	net local need (I-J)	54.79	219,170.6
	Coventry unmet need		
L	Coventry unmet need contribution	2.50	10,000
M	Combined gross need (D+I+L)	287	1,034,125
N	Combined net need (F+K+L)		539,882
	New allocations (site areas at equalised plot ratios of 0.35 for sites of >25ha and 0.4 for less than 35ha)		
	Coton Park East	32.86	115,000
	South West Rugby Employment Land Phase 2	15	60,000
	Ansty Park North	18.75	75,000
	Land at Walsgrave Hill	82.86	290,000
N	total new allocations	149.47	540,000
O	total new allocations + commitments (E+J+N)	290	1,034,243