APPENDIX 1

Regulation 18 Representations

Representations on Rugby Borough Council's Local Plan Review Preferred Options Consultation (Regulation 18) – Site 325

1. Executive Summary

1.1 These representations are submitted to Rugby Borough Council in response to the Local Plan Review Preferred Options Consultation, which was approved for consultation from 24th March to 19th May 2025. The representations specifically relate to land west of Magna Park Lutterworth, with the representations submitted jointly on behalf of GLP Europe, The Coventry Diocesan Board of Finance Limited, Nurton Developments Limited, and Mr F.B. Dewes and Mr I. Dewes.

1.2 The site promoted is comprised of four land parcels, identified in the Council's Stage 2 Site Assessment Report (March 2025) as follows:

- Site 106: Land opposite MP Lutterworth
- Site 57: North of Coal Pit Lane
- Site 36: Cross-in-Hand Farm, Willey
- Site 35: Cross in Hand Farm, Monks Kirby

1.3 The landholdings are located to the west of the A5, opposite Magna Park Lutterworth, which at present falls entirely within Harborough District Council and is Europe's largest dedicated distribution park. The land is entirely outside Green Belt and is available, suitable, achievable and deliverable for employment development within the plan period.

1.4 As currently prepared, we do not consider the proposed approach in the draft Local Plan is sound for several reasons set out in these representations. These include:

- The original omission of land west of Magna Park as a 'broad location' for growth.
- The underlying employment land figures underestimate the residual strategic employment land need.
- The approach to identifying sequentially preferable sites is unsound due to the prioritisation of sites within the Green Belt, which does not accord with national planning policy.

1.5 The site is promoted as a sustainable western expansion to Magna Park Lutterworth capable of delivering significant benefits for Rugby Borough and the wider region, which have largely been overlooked in the preparation of the draft Local Plan. The benefits include:

- A proposed expansion to a highly successful employment ecosystem at Magna Park in a very sustainable location, with the extension able to leverage the existing physical and community infrastructure already in place;
- The ability for an expansion to be able to cater for B2 and B8 use class occupiers to attract blue-chip businesses and provide a diverse range of job opportunities and associated economic benefits;

- The provision of a landscape-led scheme to provide habitat creation and biodiversity enhancements and opportunities for a new country park with links to the existing 200 acre country park at MPL;
- Opportunities for on-site training and education and synergies with training and research and innovation facilities already established at MPL;
- A large labour catchment with the existing park already served by a number of bus routes, with opportunities for network expansion; and
- Expansion of an existing employment park that acts as a satellite location to DIRFT, with further opportunities for businesses to be able to utilise the open rail terminal c. 7miles south.

1.6 The site promoters welcome the opportunity to work with Rugby Borough Council and the local community in order to realise the opportunity.

2. Introduction

2.1 These representations are submitted to Rugby Borough Council in response to the Local Plan Review Preferred Options Consultation, which was approved for consultation from 24th March to 19th May 2025.

2.2 These representations specifically relate to land west of Magna Park Lutterworth (MPL), with the representations submitted jointly on behalf of GLP Europe, The Coventry Diocesan Board of Finance Limited and Nurton Developments Limited, and Mr F.B. Dewes and Mr I. Dewes.

2.3 The site promoted is comprised of four land parcels, identified in the Council's Stage 2 Site Assessment Report (March 2025) as follows:

- Site 106: Land opposite MP Lutterworth
- Site 57: North of Coal Pit Lane
- Site 36: Cross-in-Hand Farm, Willey
- Site 35: Cross in Hand Farm, Monks Kirby

2.4 The combined landholdings are also included in the Council's Stage 2 Site Assessment Report as 'Strategic Site 325: Land adjacent Magna Park'.

2.5 The land is located to the west of the A5, opposite MPL, which at present falls entirely within Harborough District Council and is Europe's largest dedicated distribution park. Given the location of the boundary line between Rugby Borough and Harborough District Council's, which is located c. 10m west of the A5, whilst the majority of the site is within Rugby, a small proportion does fall within Harborough. This is detailed below and also on the Site Location Plan included in **Appendix 1**.

Site no.	Total site area (ha)	Area within Rugby (ha)	Area within Harborough (ha)
106	22.92	18.96	3.96
57	40.57	36.64	3.94
36	89.12	89.12	0
35	14.01	11.54	2.47
325	166.62	156.26	10.36

Table 1. Site area

2.6 MPL which was first established in 1987, is situated within the "Golden Triangle", at the intersection of the A5 and A4303, between Rugby, Coventry and Leicester. Its proximity to these three major employment centres, the M1 and the M6 allow for unparalleled access to the north, south, east and west of the country, enabling approximately 90% of the UK population to be reached within four hours by truck. This makes it one of the most sought after locations for strategic warehousing and logistics development in the country.

2.7 The site, promoted as a sustainable western expansion to MPL, is capable of delivering significant employment and economic opportunities for Rugby Borough and the wider region, and the site promoters welcome the opportunity to work with Rugby Borough Council and the local community in order to realise the opportunity.

2.8 The remainder of these representations are structured as follows:

- **Section 3** sets out the context for strategic employment development within the national, regional and local levels. It also comments on the Council's Development Needs Topic Paper and the conclusions it reaches.

- **Section 4** provides commentary on Rugby Council's approach to identifying strategic employment growth locations within the draft Local Plan, with a specific focus on the Sustainability Appraisal.

- **Section 5** describes the opportunity presented by the expansion of MPL to the west of the A5 to support the economic, social and environmental objectives of the borough. It also summarises the site's suitability and deliverability to demonstrate that the site should be allocated for employment development in the emerging Local Plan.

- **Section 6** draws conclusions and recommends the next iteration of the draft Local Plan should allocate Strategic Site no. 325 for employment development as it will meet the identified needs for employment land for Rugby in the most sustainable manner and in conformity with national planning policy.

3. The Context for Strategic Employment Development

National Context

3.1 There is policy recognition of the need for logistics floorspace, with national policy in particular recognising the need for resilience of global supply chains due to the changed circumstances from Covid-19, the UK's changes in trade relationships, and the urgency of the need to promote jobs and boost economic growth.

3.2 Paragraph 85 of the NPPF (2024) states: "*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential*".

3.3 Moreover, Paragraph 87 of the NPPF states: "*Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for: b) storage and distribution operations at a variety of scales and suitably accessible locations that allow for the efficient and reliable handling of goods, especially where there is needed to support the supply chain, transport innovation and decarbonisation*".

3.4 Furthermore, the economic objectives of sustainable development (NPPF Paragraph 8) states that the planning system needs to be responsive by ensuring sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improve productivity.

3.5 In addition, PPG (Paragraph: 031 Reference ID: 2a-031-20190722 Revision date: 22 07 2019), states that: "*The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)*".

3.6 According to the British Property Federation (BPF) economic productivity of £124 billion was generated by the logistics sector in 2019 ('Delivering the Goods in 2020: The Economic Impact of the UK Logistics Sector', (2020)). There is robust growth in the industrial and logistics market as structural change is witnessed in high street retail and growth of e-commerce drives activity into the logistics sector.

3.7 In a recent Secretary of State Call In decision (APP/N4205/V/20/3253244), he agreed with the Inspector's analysis of need including (paragraph 227): "*Information from the British Property Foundation (BPF) confirms a widely held view that rapid growth being experienced in the logistics sector of the UK has been due to structural changes to high street retailing and a commensurate growth in e-commerce. This shift has been accelerated by the ongoing Covid19 pandemic restrictions on personal movement. The warehousing and logistics sector has proved resilient in the current pandemic. It is therefore to be expected that this sector will be instrumental in the post-pandemic recovery of the wider UK economy*."

3.8 More recently the British Property Federation (BPF) (Levelling Up – the Logic of Logistics' January 2022) states that in the light industrial, B2 and B8 Use Classes (i.e., the uses classes that require warehouses or factories with associated yard space), £232 billion of GVA was generated and 3.8 million jobs. The report concludes that the sector generates significant economic benefits supporting increasing numbers of high-quality jobs across the English regions.

3.9 Furthermore, the BPF's 'Levelling Up: The Logic of Logistics' Report 27 January 2022 states that the UK Planning system is restricting growth in the Industrial and Logistics Sector by not allocating enough land. It notes that the historic lack of supply has constrained ('suppressed') demand by 29% nationally (equating to 10 million sq ft per annum).

3.10 In a recent appeal decision (APP/V4250/V/20/3253242) the Secretary of State considered that the logistics development would deliver a substantial range of tangible economic benefits including well paid jobs for local people and that these socio-economic benefits would boost the local economy and there was "*an evident and compelling planning policy imperative for high-quality logistics floorspace regionally, sub-regionally and locally*".

3.11 The British Property Federation Report 'What Warehousing Where?' (2019) states that understanding is needed of the relationship between homes and warehouses to enable positive planning. The locations which are most relevant for additional warehouse floorspace will be primarily determined by two things: the specific locational requirements of the different elements of the fulfilment response (national, regional and last mile); and the location of population as both a driver of market demand and source of labour. Therefore, it is not only the scale of housing growth which will have an impact on the logistics response, but also its location.

3.12 Other changes in the logistics sector are the realisation that global supply chains lack resilience in the certainty of supply and in timescales for the delivery of goods. The UK's changed trading relationships and natural and man-made disasters, for example the Houthis attacking Red Sea ships therefore impacting on shipping routes, also have consequences for reliability of supply chains. As a result, logistics companies supplying goods to UK manufacturers require greater levels of stock holding within the UK – so termed 'stock buffering'.

3.13 The Covid-19 pandemic restrictions accelerated this long-term adjustment, which is also associated with Brexit. Rapid changes are occurring to occupier requirements, in particular a trend towards larger footprint buildings which offer economies of scale and a shift for precautionary logistics in reaction to potential disruption of supply chains, larger buildings allow manufacturers to buffer stock.

3.14 The UK Government has responded to this in its growth policies, for example in the planning reforms for lorry parking which reflect the importance of provision of logistics, and freight to deliver a supply chain network that is secure, reliable, efficient and resilient.

3.15 However, the BPF Industrial Committee Freight, Logistics and the Planning System: Call for Evidence Response dated October 2023, states that (paragraphs 2.1 to 2.2): "*We consider the plan-making system has been largely ineffective at identifying needs and providing for the logistics sector. This is particularly the case for 'larger than local' or 'strategic' needs following the abolition of regional spatial planning and its replacement with 'Localism'. This is qualified by the significant supply/demand gaps experienced in important logistics hotspots across the country, with record take-up, rising rents and record low vacancy rates serving as key market indicators. The plan-led system is therefore failing to keep pace with the fast-changing nature of market demand…*".

3.16 Furthermore, paragraph 30 of Circular 01/2022 'Strategic Road Network and the delivery of sustainable development' dated 23 December 2022 states that: "*The NPPF is clear that planning policies should recognise the specific locational requirements of different economic sectors, including for storage and distribution operations at a variety of scales and in suitably accessible locations. To operate efficiently, the freight and logistics sector requires land for distribution and consolidation centres at multiple stages within supply chains including the need for welfare facilities for the drivers of commercial vehicles. For instance, some hubs serve regions and tend to be located out-of-town near the SRN, while others are 'last-mile' facilities that will support more sustainable freight alternatives in urban areas. The Future of Freight Plan sets*

out that a joined-up approach between the planning system, local authorities and industry can safeguard and prioritise the land needed for these uses, such that all parties should work together to identify the specific requirements in their area".

Regional and Local Context

3.17 In September 2024, the 3rd iteration of the West Midlands Strategic Employment Sites Study (WMSESS) was published. This study was produced by Iceni in August 2024. It covers the whole of the West Midlands.

3.18 The WMSESS identifies three Opportunity Areas for road based strategic scale sites in the sub-region of Coventry and Warwickshire. These are:

- Area 5: M42 North Warwickshire
- Area 7: M6/A45/A46/M45 Coventry & Rugby
- Area 8: A46/M40 Warwick.

3.19 These areas are presented by Figure 14.1 of the study. The relevant part to this figure is provide below.

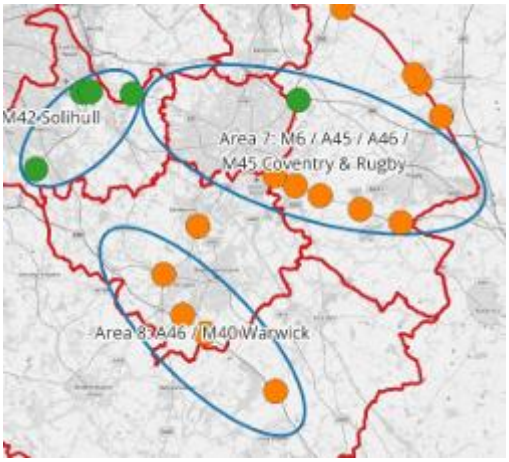


Figure 1. Opportunity Areas as identified in Figure 14.1 of the WMSESS (2024)

3.20 It is noted that the study emphasises that the boundaries of each opportunity area are not precisely defined or delineated (para 14.21).

3.21 Table 14.1 of the study provides an indicative site distribution by opportunity area. An extract of this table is provided below.

	Notional supply – years (hatching=current committed supply)					Market rank	Indicative phasing	Indicative additional strategic site requirement at B8/mixed c.50ha - E(g)/B2 c.25ha	Narrative – market rank / performance, scale (no. LPA), site supply, SRFIs, Green Belt
Opportunity Area	Type	0-5	5-10	10-15	15-20				

Area 7: M6 / A45 / A46 / M45 Coventry & Rugby	B8/ Mixed					A	C/D	1-2	Large OA. Highest existing supply. High demand location. Part GB constrained OA. Supply requirement later in study period.
	E(g)/B2						C/D	1-2	Highest existing supply although Coventry Airport is a single occupier site that may shorten supply period. Further supply at Ansty Park. Potential to attract further investment.

Figure 2. Extract from Table 14.1 of the WMSESS (2024)

3.22 For OA7 (which concerns Coventry & Rugby), one or two additional sites for B8 (50 ha +) and one or two additional sites for B2 (25ha +) are recommended for the study period (2022-2045). In both cases, the recommendation is caveated that new sites should be brought forward towards the latter part of the study period because of high existing supply. Committed supply for B8 in Area 7 is measured as lasting 20 years. The corresponding figure for B2 is 23 years.

3.23 In September 2024, the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (the Alignment Paper) was also published. It was subsequently amended and re-published in November 2024. This paper was produced also by Iceni, as was the original HEDNA (see below).

3.24 The HEDNA was published in November 2022. It also projected a wider separate need for strategic B8 for the sub-region as a whole. These projections covered the periods 2021-2041 and 2021-2050 and were presented in the Alignment Paper at Tables 2.1 and 2.2. Extracts are provided below for ease of reference.

Table 2.1 C&W Employment Land Needs 2021-41 ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	5.3	56.1	61.4	
N. and Bedworth	2.2	45.5	47.7	
Rugby	5.2	150.5	155.7	
Stratford-on-Avon	5.2	166.1	171.3	
Warwick	11.4	56.2	67.6	
Coventry	8.5	147.6	156.1	
Total	**37.7**	**621.9**	**659.6**	**551**

Source: Iceni Projects, C&W HEDNA 2022

Table 2.2 C&W Employment Land Needs 2021-50 ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	7.0	81.4	88.4	
N. and Bedworth	3.0	66.0	69.0	
Rugby	6.5	218.2	224.7	
Stratford-on-Avon	7.2	240.9	248.1	
Warwick	15.8	81.4	97.2	
Coventry	10.0	214.0	224.0	
Total	**49.4**	**901.8**	**951.3**	**735**

Source: Iceni Projects, C&W HEDNA 2022

Figure 3. Extracts from Tables 2.1 & 2.2 of the HEDNA & WMSESS Alignment Paper (2024)

3.25 The 2024 Alignment Paper reviewed these needs (i.e. industrial and non-strategic warehousing) and sought to align the findings of the HEDNA and WMSESS in respect of the need for strategic scale sites. The resulting findings are summarised by Table 3.9 of the Alignment Paper. This is extracted and provided below.

Table 3.9 Total Industrial Need

	2021-41	2021-45	2021-50
Industrial Need Non-Strategic Sites			
Rugby	58.4	68.0	79.5
North Warwickshire	60.3	70.2	82.1
Nuneaton & Bedworth	41.2	47.8	56.1
Coventry	104.9	121.8	142.8
Stratford	144.2	167.3	196.2
Warwick	83.3	96.6	113.3
Total	**492.0**	**572.0**	**670.0**
Strategic Sites Need 2021-45	**835 – 1,017**		
Total C&W Industrial Employment Land Need	**1,327-1,509**	**1,407-1,589**	**1,505-1,687**

Source: Iceni Projects analysis of Local authority Monitoring Data

NB: figures may not sum due to rounding

Figure 4. Extract from Table 3.9 of the HEDNA & WMSESS Alignment Paper (2024)

3.26 These figures are gross and do not take into account existing committed supply. This exercise is undertaken for strategic scale sites in paragraph 4.7 to 4.11 of the Alignment Paper. In essence, the Alignment Paper carries forward the assumptions made by WMSESS in respect of committed supply and adds a further site – Padge Hall Farm (adjacent to Hinckley but in Rugby Borough), which has been granted planning permission since April 2022 (the cut-off for committed supply for the WMSESS). The resulting need for strategic sites is presented in paragraph 4.11 of the Alignment Paper, as below:

4.11 The residual strategic sites need is as follows:

- Area 5: North Warwickshire – 50-100ha
- Area 7: M6 / A45 / A46 / M45 Coventry & Rugby – 9-84ha
- Area 8: A46 / M40 Warwick – 75-125
- **Total: 136 – 311ha**

Figure 5. Extract from paragraph 4.11 of the HEDNA & WMSESS Alignment Paper (2024)

3.27 Overall, it is considered by the representations that the WMSESS which underpins the Alignment Paper is a well-intentioned piece of work as it seeks to boost the allocation of strategic sites across the West Midlands. In addition, its scope is ambitious, seeking to quality and quantify the amount of land required for each sub-region. It's assessment of gross need is multi-layered and includes sensitivity testing.

3.28 However, we are of the view that the study's assessment of existing supply of sites has been wholly uncritical, taking information provided by Local Planning authorities at face value. NDL, who have prepared a Technical Paper on Employment Land Need to support these representations, contend that the information is out of date (based on data prior to 2022) and untested in terms of its capacity or capability to deliver built floor space. This has led to a gross over-estimation of supply and, as a consequence, an under-estimation of residual need. This is particularly prevalent in the assessment of Coventry and Warwickshire and especially so for OA7, which takes in Coventry, its economic hinterland, Nuneaton and Bedworth and Rugby. NDL's analysis of current deliverable committed supply is that it amounts to only 92 ha. This is a fraction of that assessed by WMSESS and the Alignment Paper (560 ha).

3.29 The resulting analysis – with a projected need of just 136-311 ha to serve the whole of Coventry and Warwickshire – makes no sense in either economic or market terms. Instead, it serves to fundamentally undermine the principal purpose of the study i.e. the allocation of sufficient number of sites to serve the sub-regional economy for the next 20 years.

3.30 NDL considers this to be a lost opportunity and is very concerned about the potential consequences on the sub-regional economy. For these reasons, NDL has sought to engage with both responsible Council officers and Iceni Projects prior to the publication of the draft Local Plan, to present its full analysis of committed supply and request that the study, and the associated Alignment Paper, is reviewed and updated as soon as practically possible.

3.31 As noted, a Technical Paper on Employment Land Need has been prepared by NDL to support these representations which sets out our criticism of the underlying evidence base in full. In summary NDL contend that the requirement for strategic scale sites in Rugby over the plan period should be 1,456,711 sqm.

3.32 We understand that for the purpose of calculating Rugby's employment land requirement, RBC has assumed it will need to accommodate <u>all</u> the need for Opportunity Area 7 as identified in the WMSESS-HEDNA Alignment Paper. This is on the basis that:

- Coventry does not have land to allocate further large employment sites.
- Only a small part of Warwick is within OA7 and this is already allocated for development.
- Nuneaton & Bedworth emerging Local Plan is at an advanced stage and it is therefore unlikely any additional allocations can be accommodated.

3.33 We consider this is the correct approach, particularly given Rugby's locational advantage of having sites located on or near the SRN and outside the Green Belt. However, as above, we consider the underlying figures for which the employment need for OA7 has been calculated is fundamentally flawed.

3.34 In addition to the above, Rugby is also looking to allocate employment land to meet Coventry's unmet need. This has been calculated as 180,000sqm on 45ha.

3.35 NDL has reviewed the draft Coventry Local Plan and its associated evidence base and made representations on related employment land issues. In summary, NDL contends that there is actually a minimum shortfall of 348,000 sqm in Coventry

for the period 2024 to 2045, which should be considered for the purpose of assessing unmet need from Coventry over the Rugby Local Plan period.

3.36 In addition, another aspect of the wider regional need not considered by Rugby, is unmet need from Harborough. Rugby Borough shares a long boundary with Harborough District, with settlements such as Lutterworth well related both geographically and economically to Rugby. Rugby Borough and Harborough District are located in the epicentre of the "Golden Triangle" and MPL is a highly successful logistics park located on this boundary.

3.37 The draft Harborough Local Plan (Regulation 19) was consulted upon from 10th March – 6th May 2025. This looks to allocate two additional sites at MPL, totalling 137.8 ha to meet the identified requirement of 340,000 sqm for large-scale warehousing within Harborough District.

3.38 NDL contends that the project need for large-scale warehousing in Harborough should be a minimum of 623,000 sqm for the reasons set out in **Appendix 2**. As such, Rugby Borough should consider opportunities to assist in meeting this unmet need from Harborough, particularly given the unique opportunity on the border to expand the existing MPL.

3.39 Taking the above into account, these representations make the case that the employment need for Rugby Borough has been underestimated, and should comprise the following:

Element	**Requirement (sqm)**
Strategic scale sites	1,456,711
Smaller sites	251,284
Unmet need from Coventry	348,000
Unmet need for strategic scale sites from Harborough	283,000
Total	**2,338,995**

Table 2. NDL assessment of employment need for Rugby Borough

3.40 Qualitatively, a large majority of the committed and proposed supply of sites (c. 60%) is located within the Green Belt and on the eastern edge of Coventry. This seems to be out of proportion relative to other well served locations in Rugby Borough. Land west of MPL is an obvious such example.

3.41 Further detail is provided within the Technical Note on Employment Land Need in **Appendix 2**.

4. Rugby's Preferred Approach & Proposed Site Selection

4.1 This section provides comments on the Rugby Local Plan Preferred Options Document and supporting evidence base.

Spatial Strategy & Site Selection Methodology

4.2 Rugby Borough Council's (RBC) approach to the spatial strategy set out in the draft Local Plan 2024-2045 comprises three stages:

Stage 1: Housing and Economic Land Availability Assessment (HELAA)

4.3 This is a desk-based assessment of 261 sites formed of sites submitted during the call for sites process, lapsed planning permissions, allocations, planning permissions and identified by Officers. The assessment concluded whether sites were to either be (1) discounted; (2) suitable, achievable and available; or (3) not currently developable – changes to policy would be required.

Stage 2: Detailed Sites Assessments

4.4 This stage comprised a more detailed technical analysis of site constraints and opportunities of the sites identified in the HELAA as (3) not currently developable – changes to policy would be required, with the aim of narrowing the list to reasonable site options for inclusion in the sustainability appraisal.

4.5 A total of 112 sites were considered, with the site assessment identifying (1) potential site options; and (2) sites not to be progressed to the next stage.

4.6 Within the Detailed Site Assessments, the four land parcels subject of this representation were assessed independently: sites nos. 35, 36, 57 and 106; and also cumulatively as part of strategic site no. 325.

4.7 It is worth noting that whilst all the individual site assessments conclude that all land is outside the Green Belt, the analysis for strategic site no. 325 notes that 2% of the land area is within the Green Belt. To clarify, this 2% relates to a small area of land within the site boundary of site no. 36 which comprises a disused railway line. Removal of this land from the site area does not impact the developable area of the site, or its deliverability, and therefore we would like to take this opportunity to amend the site area for site no. 36, and site no. 325 accordingly. As such, all of the land subject of this representation falls outside the Green Belt boundary. This is shown on the Green Belt overlay plan in **Appendix 1**.

Stage 3: Sustainability Appraisal (SA)

4.8 This final stage combined the site analysis work of stages 1 and 2 with 'top down' strategic considerations, including development needs, to generate options for growth scenarios. The growth scenarios are then appraised in terms of their sustainability and potential for significant environmental effects.

4.9 The analysis was undertaken by Aecom, with the preferred growth option scenarios then selected by the Council. This then forms the Preferred Option subject of the Local Plan consultation.

4.10 The following section of these representations provides further commentary on the Sustainability Appraisal, which we consider to be flawed for the following reasons:

- How the 'broad locations' for growth were originally identified.
- The underlying employment need figures underestimate the residual strategic employment need.
- The approach to identifying sequentially preferable sites is unsound and does not accord with the national planning policy.

4.11 Taking each of these points in turn:

'Broad locations' for growth

4.12 The potential locations for strategic employment development is discussed in paragraphs 2.3.7 – 2.3.8 of the SA. This states that the starting place for identifying broad locations for new employment land allocations is the figure taken from the Issues & Options (I&O) consultation document (2023), included at Figure 2.3 of the SA.

4.13 Paragraph 2.3.7 states that these areas/options *"unsurprisingly correlate closely with the existing strategic employment areas"*.

4.14 Whilst this is true of the areas identified, there is a clear omission of the land to the west of MPL as a potential location, despite it being within the A5 corridor and adjacent to an existing major employment site of regional significance which accommodates strategic warehousing uses. It cannot be said that this land was excluded on the basis that MPL is situated within the neighbouring borough of Harborough, as both the areas 'North of Houlton' and 'South of Hinckley' are identified in Figure 2.3 despite also being located in proximity to existing employment areas in neighbouring authorities. Indeed, MPL is the only existing large employment area which does not have a potential location for growth identified adjacent to it.

4.15 GLP and NDL raised concerns with this approach at the previous Regulation 18 stage, specifically given that it was unclear of how these broad locations for growth had been identified or the methodology used, particularly given the inconsistency of omitting the land west of MPL.

4.16 It is acknowledged that the area to the west of MPL has been included in the list of potential locations for strategic employment growth in paragraph 2.3.8 despite not featuring in Figure 2.3, however the accompanying text does make reference to this location "*[not being] flagged as a foremost option at the Issues & Options stage*". This should not be a factor weighing negatively against this potential location for strategic employment growth given there was a clear omission in Figure 2.3 as presented during the previous consultation.

4.17 We therefore question the validity of the initial process for identifying the broad locations for strategic employment growth and thus the impact this may have had on the subsequent analysis of these locations within the SA.

Employment Need Figures

4.18 Paragraphs 5.2.16 – 5.2.25 of the SA summarise how the strategic employment need has been calculated, which is largely based on the West Midlands Strategic Employment Sites Study (WMSESS) (2024) and subsequent Alignment Paper (2024). Using these figures, paragraph 5.2.39 of the SA states:

"Building upon the discussion of 'growth quanta' above, the first point to make here is that a key priority is to explore options suited to industrial uses other than large-scale logistics (use class B8), which primarily means 'general industrial' (Use Class B2)".

4.19 The SA sets out that this is based on two factors:

a. The residual need figure for B8 is not high after having taken into account a very extensive pipeline of supply of B8 sites with planning permission.

b. There are two site options at Rugby that are clearly well-suited for allocation in order to deliver the residual need figure for B8, because they are *to some extent* already committed.

4.20 Firstly, we do not agree with the residual need figure for B8 (or the employment need figures in general). This is discussed above and in detail in the Technical Statement on Employment Land Need prepared by NDL which accompanies these representations. In summary, we consider that the pipeline of B8 sites has been overestimated, which has led to the residual B8 need being reported lower than it should be. The employment need also underestimates the unmet need from Coventry and does not consider any unmet need from Leicestershire.

4.21 As this is informing the SA, this leads to the unsound conclusion that the strategy should be to explore options suited to industrial uses other than large-scale logistics as a priority.

4.22 Secondly, we do not agree with the claim that there are two site options in Rugby which are 'to some extent already committed'. This statement relates to two sites:

- Site 17: South West Rugby Phase 2
- Site 64: Coton Park East

4.23 Whilst we appreciate these sites have status as allocations in the adopted Local Plan, we do not consider it correct that these sites are to some extent already committed specifically for employment purposes. Taking each of the sites in turn:

<u>Site 17: South West Rugby Phase 2</u>

4.24 The land comprising South West Rugby Phase 2 was identified as 'safeguarded land' within the adopted Rugby Local Plan (2011-2031), to be safeguarded for future allocation in a Local Plan either for residential or employment development. Specifically, paragraph 4.61 of the adopted Local Plan states:

"The site [South West Rugby] is a long term commitment for the Council in meeting the growth needs of the Borough and will continue to be built out beyond the life of this Local Plan. Once built, it will create a new community within Rugby and it is thus important for the Borough Council and developers of the site to do this to the highest standard possible. An essential element of this is sustainability and the balance of housing to jobs, and as such there is the potential for the growth targets of housing and employment to be revisited as a result of changing demands for the Borough as it moves beyond the 2031 period. As such an area of land is safeguarded within the South West Rugby allocation, as identified in the Policies Map to assist in meeting the Borough's development needs beyond 2031".

4.25 There is further explanation regarding the safeguarding of the land in a letter from RBC to the Inspector (in the Examination Library under reference RBC/02) which sets out that safeguarding a portion of the allocation site beyond the plan period "*would allow time to ensure that development within the South West takes place in managed phases*". Additionally, the letter states: "*As detailed in the Housing Trajectory, housing within the South West Rugby allocation is already expected to built out beyond the plan period. It is therefore proposed that the wording of the safeguarded land in modification LP54.191*

is amended to reflect this so that the land is reserved for potential employment growth, if necessary, beyond the plan period".

4.26 Therefore, it is clear that the rationale behind safeguarding this parcel of land was to ensure that development would come forward in phases, and also provide flexibility in case the growth targets for housing and employment changed beyond 2031.

4.27 Within the adopted Local Plan, South West Rugby as a whole is allocated for around 5,000 dwellings and 35ha of B8 employment land.

4.28 The 35ha of employment land has already been satisfied by development granted under planning consent ref R16/2569. As the South West Rugby SPD (December 2024) explains, the total permitted site area under R16/2569 is 46.2ha, which exceeds the 35ha in the allocation, but this has been considered acceptable and accords with the site boundary identified for the employment area on plans in the previous iterations of the SPD.

4.29 A design code for the South West Rugby allocation has also been prepared and was consulted on in March 2025. Within this, two scenarios for the safeguarded land are presented: one for residential development and one for employment development. Section 6 'Built Form' includes guidance on residential density. For the safeguarded land, this sets out densities of between 30dph and 40dph. Using the site area of 40.7ha for the safeguarded land, and a density of 30dph, would equate to this land being able to accommodate c. 1,221 dwellings.

4.30 Therefore, given the safeguarded land would be able to accommodate in excess of1,000 homes, it is not clear why it has been automatically assumed that this land should be designated for employment purposes when, and as explained further below, not allocating this land for housing puts additional pressure on the Council to find alternative residential allocations, including land within the Green Belt, and there are alternative (non-Green Belt) sites capable of being able to accommodate employment land to meet the identified need (e.g. land west of MPL).

Site 64: Coton Park East

4.31 The Coton Park East land forms part of allocation DS7 in the adopted Rugby Local Plan for 800 new homes and 7.5ha of employment development. The land is subject to the following extant planning consents:

- Full planning permission ref R22/0551 for storage and distribution floorspace (Class B8) (single unit of 26,421 sqm) granted 17th February 2023. This permission satisfies the employment requirement of allocation DS7 and forms part of the committed supply for employment land.
- Outline planning permission ref R20/0336 for 225 residential dwellings granted 24th February 2021. This development has been delivered.
- Outline planning consent ref R20/0787 for up to 475 dwellings, with land for either a primary school, secondary school or additional 100 residential dwellings, granted 26th April 2023.

4.32 Planning permission R20/0787 has not yet been implemented but remains extant. A reserved matters application ref R25/0210 was submitted in February 2025 for infrastructure works (installation of new link road, footways / cycleways, 4no. bus stops and temporary drainage) pursuant to outline planning permission R20/0787 for up to 475 dwellings. Therefore, whilst the SA states that the landowner of this site has expressed a desire to deliver employment development,

it should be noted that there is an extant planning consent for residential development in this location, and the land promoter is also pursuing reserved matters associated with this consent at the current time.

4.33 As such, we do not consider the Coton Park East site can be considered 'to some extent committed' for employment development on the basis that the land promoter is continuing to pursue residential development on the site, via the recent submission of a reserved matters application.

4.34 Moreover, if this land were to be allocated for employment, rather than residential, this would lead to a shortfall of 575 dwellings against the previous DS7 allocation. This then puts pressure on elsewhere in the borough as RBC have to find alternative housing sites to satisfy this requirement. This is acknowledged in the assessment of site no. 64 in the HELAA, which states *"will need to make up for shortfall in housing numbers if site taken forward for employment instead of housing*".

4.35 The draft Local Plan sets out the need to deliver 12,978 new homes over the plan period to 2045. This includes allocating land for 3,338 new homes, of which the following comprise proposed allocation in the Green Belt:

Site Ref	Site name	Dwellings
75	Lea Crescent, Newbold on Avon	20
316	Land at Long Lawford	400
6	Fosse Way, Stretton-on-Dunsmore	3
81	Land west of Fosse Way, Stretton-on-Dunsmore	40
134	Land north of Plott Lane, Stretton-on-Dunsmore	125
39	Dyers Lane, Wolston	15
337	West Farm and Home Farm, Brinklow	75
315	Land south of Rugby Road, Brinklow	340
84	Land south of Leicester Road, Wolvey	60
96	Land at Coventry Road, Wolvey	500
309	Land north of B4109, Wolvey	150

Table 3. Proposed allocations for housing on Green Belt sites in the Rugby draft Local Plan

4.36 The emerging Local Plan therefore proposes to allocate land within the Green Belt to provide 1,728 new dwellings.

4.37 If both the SW Rugby Phase 2 site and Coton Park East were to remain allocated for residential development to provide c. 1,221 and 575 dwellings respectively, this would significantly reduce the pressure on the need to find sites for housing development within the Green Belt as the 1,728 dwellings currently planned on Green Belt sites could continue to be accommodated at SW Rugby Phase 2 and Coton Park East as originally intended.

4.38 Removing the requirement for South West Rugby Phase 2 and Coton Park East to deliver residential development and allocating them instead for employment development is therefore not in accordance with paragraph 147 of the NPPF which requires local authorities to consider all reasonable alternatives before looking to allocate Green Belt land for development.

4.39 For these reasons, we do not consider these sites can automatically be assumed to be 'already committed' for employment development, given the significant impact this has on the Council's overall housing strategy. In doing so, this leads to the Council adopting an unsound approach to identifying other employment allocations given the flawed assumption that the B8 demand can be met elsewhere.

Sequential approach to identifying preferred sites

4.40 The Council's approach to identifying preferred sites for employment growth is set out in paragraphs 5.4.84 – 5.4.95 of the SA.

4.41 In the first instance, we consider the approach within the SA as a whole is fundamentally flawed on the basis it assesses Green Belt sites ahead of locations outside the Green Belt.

4.42 Paragraph 147 of the NPPF states:

> *"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" [Emphasis added].*

4.43 We do not consider that the Council can demonstrate that it has complied with NPPF Paragraph 147 as it has not examined fully all other reasonable options for meeting its identified need for development *before* concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, given that non-Green Belt sites have not been assessed as potential options ahead of identifying Green Belt sites.

4.44 From the potential locations for growth identified in the SA, it is clear that employment needs can be met by sites wholly outside the Green Belt, including the land west of MPL, negating the need to release Green Belt land for development.

4.45 We also question how the Council can come to a decision on a preferred approach for development which includes allocating Green Belt sites, in the absence of a Green Belt Review. We understand that this is still being prepared which raises questions about the robustness of the SA, and the Green Belt Review being undertaken potentially to support the preferred approach, rather than being used to inform it.

4.46 We also understand that the Green Belt Review work being undertaken by Rugby will also include identification of Grey Belt land. Should any of the sites currently in Green Belt be considered as Grey Belt, in accordance with the NPPF, these are still to be considered less sequentially preferable than sites wholly outside the Green Belt and Grey Belt.

4.47 The SA as a whole is therefore fundamentally flawed. Our conclusions on this issue are supported by legal advice from Paul Tucker KC and Freddie Humphreys of Kings Chambers. The advice is included within **Appendix 3** and sets out that the approach in the draft Rugby Local Plan regarding the allocation of employment land is fundamentally flawed and unlawful. This is on the basis that the evidence base to support the draft Plan provides retrospective justification for the proposed allocations, as opposed to being an evidence-led process as required by both policy and law. An evidence-led process would include full assessment of 'reasonable alternatives', which, in the case of a plan proposing to allocate land in the Green Belt, should comprise assessment of meeting the identified need on land not in the Green Belt.

4.48 Notwithstanding the comments above about the SA being fundamentally unsound given the preferential assessment of Green Belt sites, the following paragraphs of these representations provide commentary on the sequential approach taken within the SA, particularly how the SA assesses alternative sites ahead of land west of MPL.

4.49 The Council first identify the residual figure is now lower than reported following a large site gaining planning permission post 1 April 2024 for 274,388 sqm, namely Crowner Fields Farm, Ansty (site no. 95). To note, this planning application (ref R23/1027) received resolution to grant at committee on 18th December 2024, but a decision notice is yet to be issued. Planning permission has therefore not yet been granted.

4.50 Secondly, it is questionable whether it is correct to assume that this development does contribute towards meeting the need for strategic employment floorspace given that the application was clearly designed to meet the requirements of a specific occupier (i.e. Frasers Group) and the draft decision notice includes conditions requiring the development to be occupied and operated by a single campus company. Rather than meeting a wider employment need, it could be argued that this this development is therefore catering for a specific occupier requirement. Notwithstanding this, this scheme does illustrate demand for new strategic employment sites in this location.

4.51 The SA identifies the 'first port of call' is to allocate the two site options at Rugby that are presented to be to some extent already committed. As set out above, we dispute the contention that the South West Rugby Phase 2 and Coton Park East sites are to some extent already committed for employment development, and do not agree allocating these sites should take priority above all other potential locations for employment growth, particularly given the consequences this has for housing delivery and the Council's overall housing strategy which requires significant Green Belt loss.

4.52 The next two sites considered sequentially preferable by the Council are both within Green Belt. These are site no. 14 (Ansty Park) and site no. 328 (west of Prologis Park Ryton). As above, we do not consider assessing these sites ahead of non-Green Belt options is sound as it does not accord with NPPF paragraph 147.

4.53 Of these two Green Belt sites considered, site no. 14 (Ansty Park North) is taken to be a constant in all growth scenarios tested on the basis that it is relatively well-contained in landscape / Green Belt terms (despite a Green Belt Review not having been published) and there is a need to support Ansty Park as a highly successful hub for a variety of high-value industrial and wider business activities (para 5.4.86 of the SA).

4.54 Taking site nos. 95, 17, 64 and 14 as constants, the SA then claims there is a residual need figure that could be met via the allocation of just one further strategic site, or the possibility of meeting it via allocation of several smaller sites (para 5.4.88). The options for this that are examined by the SA are:

- Site no. 328 (west of Prologis Park Ryton)
- Site no. 130 (Land north of Houlton); or
- Site nos. 18 (Barnwell Farm, Thurlaston) and 133 (Land North of M45).

4.55 Paragraph 5.4.90 states that an extension to Magna Park (site no. 325) is considered less sequentially preferable to the above options and is therefore ruled out as a potential allocation at this stage.

4.56 We strongly object to this approach for a number of reasons.

4.57 Firstly, and as set out above, all potential allocations on non-Green Belt land should be given first consideration in the site selection process in accordance with Paragraph 147 of the NPPF. Land west of MPL lies solely outside the Green Belt and therefore should be fully examined as a reasonable alternative by the Council, before any conclusions about releasing Green Belt are made.

4.58 In addition to the commentary made above on site nos. 95, 17, 64 and 14 and why these should not be considered sequentially preferable to other options, we also consider there are a number of issues with the other sites included as reasonable alternatives, notably:

<u>Site 328: West of Prologis Park, Ryton</u>

4.59 Site no. 328 is comprised of two sites and also assessed individually: site no. 50 Prologis Park Ryton West and site no. 61 Mountpark Ryton. The Stage 2 site assessment for site no. 328 identifies that there are high ecological constraints, specifically stating that "*given the location of Ryton Wood SSSI within 500m of the site, there are significant constraints to the development at this site and other alternative sites for development should be considered in the first instance*".

4.60 This conclusion in relation to site no. 328 is taken from the Rugby Ecological Constraints Assessment (March 2025) which was prepared to support the emerging Local Plan and comprises an assessment of ecological constraints at 53 ecologically sensitive HELAA sites, identifying potential impacts of development and outlining recommendations for mitigating impacts. The report recommended that sensitive design and site layout avoid and ensure the protection of ecological sensitive features associated with Ryton Wood SSSI, River Avon and Tributaries LWS, Featherstone Farm Fields LWS and Siskin Drive Bird Sanctuary LWS, but only where alternative site locations are not feasible (paragraph 57.3.10).

4.61 Notwithstanding this, the Council commissioned a further assessment of ecological constraints at site no. 50 (i.e. the part of site no. 328 that is the most ecologically sensitive) to complement the Ecological Constraints Assessment. It is important to note in this respect that this appears to predate the Ecological Constraints Assessment, with the main report dated March 2025 and the additional information for site no. 50 being dated 15th January 2025.

4.62 The additional information for site no. 50 reiterates (with emphasis added), that sensitive design and site layout to avoid ecologically sensitive features should only be considered where alternative site locations are not feasible (paragraph 10). The report does go on to set out potential mitigation for the site, but this can only be considered in the context of this site being the only potential location to accommodate employment development to satisfy need.

4.63 This is not the case, and it is notable that other less-ecologically sensitive sites have been discounted. This includes site no. 325 for which the Stage 2 site assessment concludes the following in relation to ecology: "*An initial ecological assessment indicated that the site was not within an Impact Risk Zone [or] a Site of Special Scientific Interest, nor a Local Wildlife Site, not was it comprised of more than 20% medium to high distinctiveness habitat*". The site was not further assessed for ecological constraints given none were identified.

Site 130: Land north of Houlton

4.64 The land north of Houlton is not located immediately adjacent to any existing employment development. It is located to the north of the Rugby Radio Station development but detached from any employment floorspace to be delivered as part of this development. The land is not well related to DIRFT, which is situated to the south east of the site with housing (i.e. the new settlement at Houlton) intervening.

4.65 As such, this location would not be able to benefit from utilising any of the existing or planned infrastructure as part of either of these developments and would effectively act as a standalone employment park. This would limit any benefits that could be released from expanding already existing employment parks through the creation of critical mass and clustering benefits.

4.66 The ability to benefit from a strategic extension to DIRFT is also limited on the basis that this site is promoted by a different developer (Stoford) compared to the developer of DIRFT (Prologis). This therefore represents a piecemeal approach to development, rather than a cohesive extension which would be able to leverage existing infrastructure such as roads and community liaison groups.

4.67 It is also noted in the Stage 2 Site Assessment that National Highways have expressed high levels of concerns regarding development in this location.

4.68 We also understand this site may also be subject to significant heritage constraints due to the proximity to, and association with, Grade II Listed Dunsmore House.

Site 18: Barnwell Farm, Thurlaston and Site 133: Land North of M45

4.69 The third option considered by the Council is seeking to meet the remaining need via two smaller site allocations (i.e. site nos. 18 and 133). There are a significant number of benefits associated with favouring larger logistics parks and the benefits associated with clustering of their uses including cost, management and environmental efficiencies from shared infrastructure and resources between businesses:

Management:

4.70 Logistics operations that form part of a cluster are much easier to co-ordinate and are therefore much more likely to be realised under a single ownership and management. Most UK based logistics developers predominately seek to maintain ownership of all their assets and associated infrastructure which enables better coordination and efficiencies between business which maximise the associated benefits.

4.71 A larger site provides an opportunity to deliver large scale facilities that are increasingly required by major warehouse and industrial units, which has seen the average sized unit increase from 217,000 sqft in 2015 to 340,000 sqft in 2020. Examples include the sharing of local bus routes and car club services.

Investment:

4.72 A piecemeal approach to logistics development results in individual developments each without the critical mass to generate the level of investment required to facilitate the infrastructure needed to support this level of development and deliver sustainable economic development.

4.73 The allocation of larger sites for Class B2 and B8 uses also has the ability to attract major occupiers in a range of sectors, including those seeking to serve regional and national markets. It is critical to provide space for a mix of sectors and employment uses that deliver a diversity of employment as a cohesive and connected business ecosystem is essential for the creation, growth and retention of innovative and economically prosperous businesses in the region.

Efficiency and Sustainability:

4.74 The co – location of different business functions (e.g. offices, research and development or training facilities) alongside warehousing and manufacturing space is a means of improving operational efficiency, reducing estate costs and fostering stronger collaboration between different business units. The close proximity of different uses will also result in a higher proportion of full HGV loads which reduces both transportation costs and C02 emissions.

4.75 Therefore, all potential options for allocating larger employment sites (i.e. land west of MPL) should be considered first ahead of looking at splitting the employment need across two smaller land parcels. This is also supported by the WMSESS within which the criteria for strategic employment sites states these should be sufficiently large and flexible, ideally a minimum of 25ha and readily over 50ha. Site nos. 18 and 133 are 26ha and 12ha respectively, thus performing poorly against this criterion in the WMSESS for strategic employment sites.

4.76 For these reasons, we do not consider that site nos. 328, 130, 18 and 133 should be considered preferential to the land west of MPL. We also dispute the rationale for dismissing site no. 325 as set out below.

Site 325: Land west of Magna Park

4.77 The SA does not provide clear justification for the omission of site no. 325 as a reasonable alternative to be examined. Rather, the assessment of site no. 325 in the Stage 2 Site Assessment Report states that the site is relatively unconstrained in highways, landscape and ecological terms – in contrast to some of the other alternative sites that have been included as reasonable alternatives, as outlined above.

4.78 In ruling out an extension to MPL as a potential site allocation, the SA makes reference to concerns raised in section 5.2. The table below responds to the concerns raised:

Commentary in paragraph 5.2.42 of the SA concerning Magna Park	**Response**
"The park is already very large, continues to expand and is set to expand further through the new Harborough Local Plan"	Harborough District Council (HDC) are preparing a new Local Plan, the regulation 19 version of which was consulted on between March – May 2025. Within this, two locations within and adjoining MPL are subject of draft employment allocations: a north-eastern extension (Land at Mere Lane SHELAA Ref 24/12227) and an infill site between Magna Park Central and Magna Park South (Land South of George House SHELAA Ref 24/10595). The emerging HDC Local Plan is accompanied by a Strategic B8 Needs Sensitivity Report (December 2024) prepared by Iceni Projects Limited. This sets out that there is a need for 137ha of strategic B8 floorspace as part of the emerging Local Plan. This need can therefore be fully accommodated by the two emerging site allocations at MPL. Any further expansion of MPL to the west of the A5 would be catering to meet additional need over and above that identified by HDC in the 2024 assessment. The authorities in Leicestershire have commissioned a new study to consider the overall need for strategic B8 development and then take forward, on this basis, consideration of how this is apportioned across Leicestershire. Whilst there is no indication of potential need, we consider this is likely to show a large requirement, particularly following the Hinckley SRFI decision. Need to be apportioned with west of Leicestershire needing to accommodate the majority given the good connectivity on the SRN compared to other areas of Leicestershire (Blaby etc.). As such, there may be a position where Leicestershire is unable to meet its identified need, and needs to look elsewhere (e.g. in Rugby/Warwickshire). There is also no evidence to suggest that the size of the park is "too large". Rather, to the contrary, there are a number of benefits associated with creating a critical mass and clustering uses, as set out above.
"Whilst further expansion through the Rugby Local Plan is an option to consider, including given land located outside of the Green Belt and other land in the Green Belt that may comprise Grey Belt"	As referenced in Section 3 of these representations, all the land to the west of MPL subject to these representations (and comprising strategic site no. 325) is wholly outside the Green Belt. As such, this location should be considered before consideration of any site allocation utilising Green Belt land in accordance with NPPF paragraph 147.
"A key concern is that this is a rural location distant from major centres of population/labour, with implications for transport and wider objectives"	These representations are accompanied by a Labour Study prepared by CBRE which is included in **Appendix 4**. This demonstrates that MPL has good labour availability and attracts workers from a number of neighbouring authorities. The greatest proportion of workers (24%) at MPL are coming from Leicester, with 13% travelling from Rugby and Harborough respectively. Workers also travel from Coventry, Birmingham, Lutterworth, Hinckley and Nuneaton. There is also

	planned housing growth within the MPL catchment, which could provide an additional c. 17,000 workers over the next 20 years. The travel patterns of existing employees aligns with the already established public transport infrastructure that is in place. A number of bus routes serve MPL, bringing workers from Lutterworth, Leicester, Rugby and Hinckley. An expansion to MPL is therefore inherently sustainable as a public transport network is already established and there may be opportunities for future enhancement to the services. It is also noted that the Strategic B8 Needs Sensitivity Report (December 2024) which Iceni prepared to support the Harborough DC Local Plan, this allocates the two locations identified for employment growth at MPL 'green' ratings, with the assessment noting that the sites are attractive locations within/adjacent to an established logistics park, with strong access to the A5 and within close proximity to the M1. The sites will also benefit from the established public transport network servicing the MPL site.
"Also there is a need to carefully consider in-combination impacts of growth on the strategic road network"	A Vision-Led Transport Note prepared by Apex Transport Planning supports these representations (**Appendix 5**). The note considers the opportunities for sustainable transport and sets out a vision-led approach for increasing sustainable transport movements and constraining vehicle movements to and from the site, whilst also reducing background movements across the existing Magna Park through a joined up sustainable travel strategy and consolidation of operational vehicle movements. The Transport Note demonstrates that the site is ideally located for accommodating employment uses and minimising vehicle movements, as well as for facilitating the delivery of key strategic infrastructure improvements which would offer further benefits on the network. The Note also includes updated traffic survey information which demonstrated that traffic flows have reduced significantly between the period 2013/14 to 2025 by up to nearly 7,000 (26%) daily trips per day within the study area, and around 600 (30-40%) trips in each of the network peak hours. There are a number of potential reasons for the reduction in flows, but this does demonstrate that there is likely to be capacity on the network for accommodating additional development west of MPL and, subject to more detailed analysis, there should be viable highway mitigation solutions to deliver the site appropriately and without a severe impact. It should also be noted that sites with 'High' transport concerns on the SRN (i.e. Prologis Park Ryton and Land north of Houlton) as identified in the Stage 2 Site Assessment document, are seen as sequentially preferable to land west of MPL. The Transport Note prepared by Apex demonstrates that site no. 325 has a preferential location for access by sustainable modes than other sites considered by RBC for employment development.
"There is also a limited numerical argument for allocation, given sequential preferable locations suited to delivering B8 at Rugby"	As set out in these representations, we consider RBC's assessment of need wholly underestimate the overall requirement for employment land in Rugby Borough. The proposed expansion to the west of MPL also provides an opportunity to deliver both B2 and B8 uses, in a range of different unit sizes, catering for market demand and providing a range of job opportunities. Moreover, the sites noted by RBC as being 'sequentially preferable' comprise land within the Green Belt. As set out above, and in the accompanying Legal Opinion (**Appendix 3**) we consider this approach to be fundamentally flawed and unlawful. Paragraph 147 of the NPPF requires an authority to demonstrate it has fully examined all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. In this instance, a "reasonable option" includes consideration of meeting employment need without using land that is

	located in the Green Belt, which hasn't been tested by RBC and rather considered sequentially less preferable.
"Site is distant from main centres of population and there would be a concern around the in-combination impacts of high B8 growth on Rugby, given that a high proportion of Magna Park workers are thought to live in Rugby. In particular, the concern around a recent increase in HMOs within Rugby, with the Council now having introduced an Article 4 Direction to address this issue."	As detailed in the CBRE work that supports these representations (**Appendix 4**), MPL attracts workers from a number of locations including Leicester, Coventry, Birmingham, Lutterworth, Rugby, Hinckley and Nuneaton. This work also highlights the different demographics that make up the workforce at MPL, the majority of which are not 'transient renters' or 'rental hubs', but rather 'aspiring homemakers' who tend to own their own home. The CBRE assessment also comments on the potential wages associated with jobs in the logistics and manufacturing sectors, which tends to be higher than those in the wholesale and retail, and the accommodation and food service sectors. Whilst the existing MPL in Harborough is subject to a planning policy restriction specifying that units must be B8 and over 9,000sqm, the same restriction does not need to be applied to an extension to MPL to the west of the A5 in Rugby, with the site instead being able to accommodate both B2 and B8 uses in a range of unit sizes (including move-on premises and mid-box units). In a recent planning appeal decision (ref APP/W2845/W/24/3354423 Land north of Bell Plantation, Watling Street, Towcester NN12 8EU), the Inspector made reference to the ONS Annual Population Survey 2018 which identifies that 12.8% of jobs in the logistics sector are for managers, directors, senior officials and professional occupants. The Inspector therefore concluded that the proposed scheme (which was 75% B8 floorspace) would therefore be likely to offer employment opportunities for a wide range of people in the local area. The relevance of the statement around HMOs is also unclear. Rugby introduced an Article 4 Direction relating to the removal of permitted development rights to change use from C3 (dwelling house) to C4 (house in multiple occupation) within central wards in Rugby on 23rd February 2025. Therefore, even if an expansion at MPL was to directly lead to more HMOs (for which there is no evidence), the Council now has a mechanism to control against this.

Table 4. Response to commentary in section 5.2 of the SA concerning land west of MPL

4.79 Thus, the land west of MPL should not have been discounted as a preferred option for allocation and rather assessed as an option for an employment allocation, given it is relatively unconstrained, is located outside the Green Belt and can provide a number of benefits associated with extending an existing Nationally recognised employment park.

4.80 Omitting land west of MPL as a potential option at this stage in the SA methodology, led to three potential options for growth being tested – all of which exclude the expansion of MPL. We object to this approach for the reasons set out above, including that this fails to comply with Paragraph 147 of the NPPF which requires all reasonable options to be assessed before releasing Green Belt. The inclusion of Green Belt sites within all of the options tested means that the approach is not in accordance with national policy. The Legal Opinion provided to accompany these representations supports this position and concludes that the approach in the draft Local Plan to the allocation of employment land is fundamentally flawed and unlawful (**Appendix 3**).

4.81 We also note that the Employment Growth Scenarios on page 44 of the SA do not show site no. 328 as being within the Green Belt, which is incorrect.

4.82 It is also unclear how all employment land scenarios tested scored the same in terms of biodiversity, given the significant ecological constraints associated with site no. 328 (Table 6.2).

4.83 Based on the assessment of growth scenarios, the SA concludes that Scenario 1 (i.e. site nos. 95, 17, 64, 14 & 328) is the preferred option, acknowledging that there will need to be exceptional circumstances to support this approach given the reliance on Green Belt release.

4.84 Whilst not forming part of the evidence base, the Officer's report on the draft Local Plan to the Council's Cabinet meeting on 4th March 2025 does provide some narrative text explaining the rationale for the employment allocations and why the Council considers there are exceptional circumstances to justify Green Belt release. These are:

- The importance of allocating land close to Coventry as the economic centre of the FEMA
- Advantages in terms of clustering, with this not being replicable in more distribution-focused locations such as the A5
- The potential of a 55ha country park at site no. 328.

4.85 Additionally, para 7.1.8 makes reference to the 'unique opportunity' at the land west of Ryton (site no. 328 – typo in the report says site no. 138), in relation to:

- *"It would deliver a 55ha country park alongside the River Avon (contiguous with the existing country park west of the Avon and would also link with Ryton Pools Country Park). No other site opportunity can deliver habitat creation on this scale, in the context of the Corporate Strategy objective for a greener Rugby.*
- *It would deliver a new on-site training centre and land that would be ring-fence for smaller units (particularly that part of the site that is owned by the County Council, and allocating for expansion here has clustering and agglomeration benefits which would support more higher-skilled jobs and expansion in high value-added industries."*

4.86 We do not consider that these constitute exceptional circumstances for release of Green Belt, and specifically allocation of site no. 328 ahead of other potential locations outside the Green Belt, on the basis that there is limited evidence to support allocating land close to Coventry instead of other locations within the borough, and given it has not been fully considered whether other locations could achieve comparative benefits.

4.87 As site no. 325 was excluded from any further consideration, the potential benefits of a development in this location have been discounted. The opportunity associated with an extension to the west of MPL is expanded on in Section 5 of these representations, but in summary:

- Provision of c. 580,000sqm of employment floorspace in a highly sustainable location via an expansion to the existing MPL and ability to leverage already established transport and community infrastructure.
- The ability to accommodate B2 and B8 occupiers in a range of unit sizes, to be able to attract a range of blue-chip businesses and provide diverse employment opportunities, plus associated GVA and Business Rates benefits.
- Clustering and agglomeration benefits associated with expanding the MPL ecosystem, plus opportunities to enhance existing education and training provision.
- A landscape-led scheme which will provide habitat creation and biodiversity benefits, plus opportunities for the establishment of a country park with links to the existing 200 acre country park at MPL.
- A highly sustainable location in terms of labour availability and existing public transport network. Ability to provide additional employment floorspace in a location which acts as a satellite to DIRFT, providing opportunities for businesses to use the open rail terminal in this location.

4.88 Therefore, we do not consider the Council is able to demonstrate exceptional circumstances exist to justify the release of Green Belt. Nor do we consider the Council's overall approach to the preferred strategy to be sound for the reasons set out within this section.

5. Magna Park Extension – The Opportunity

Magna Park Lutterworth

5.1 Established in 1987, Magna Park Lutterworth (MPL) is an example of a pioneering logistics cluster set within a parkland setting, incorporating sustainability; wellness; innovation; education and environmental initiatives. It is the UK's first and Europe's largest dedicated distribution location, with 1.2m sqm of sustainable logistics floorspace across 50+ separate units.

5.2 It is GLP's flagship distribution park, home to some of the UK and Europe's most recognisable brands which has contributed significantly to the development of the local economy and infrastructure. The existing Magna Park (Central) and its subsequent expansions (North and South) have made a significant contribution to local and regional employment levels and associated benefits for the wider economy. Taking into account Magna Park Central, plus the MPN & MPS expansions, once fully built out and occupied, MPL will accommodate between 14,500 – 16,500 jobs directly on site, contributing an estimated £700m - £800m in GVA annually to the economy. It will also be contributing £50m annually in business rates.

5.3 MPL is home to over 30 businesses, including a range of blue-chip businesses including Toyota, BT, Asda Walmart, Amazon, DHL and Britvic. One of the most recent customers at the Park is Centrica who occupy MPS6 and MPS7. Centrica, who employs 7,500 engineers and serves more than nine million homes across the UK, gained permission for the dual use of MPS6 as a storage and distribution facility and a Centre of Excellence for British Gas. The Centre of Excellence will comprise a combination of training, research and supporting office functions, and will bring together training activity with research and development of Net Zero products and services. This will help future-proof training by including solar, battery and hydrogen technologies across the full lifecycle of activities and provide opportunities for collaboration between training, scientists and entrepreneurs. The selection of MPS6 is an important development for Centrica given its aspirations to double the current number of Hive customers to 2.5 million, its commitment to Net Zero carbon, and to upskill and train 3,000 apprentices in green jobs.

5.4 Additionally, MPL continues to provide essential skills training and financial support to the local community through a number of initiatives, including:

- Establishing the Lutterworth Area Community Projects Limited as a means to administer and manage the distribution of financial contributions. As of February 2025, the fund has donated over £1.2m to over 100 local organisations and charities.

- Creation of the Centre for Logistics Education and Research (CLEAR) which is a prime example of the social value that MPL provides. The partnership between GLP, North Warwickshire and South Leicestershire College and Wincanton offers skills training and professional development at all levels across the spectrum of logistics and supply chain roles as well as applied research and associated facilities for up to 1,000 students.

- MPL is home to Creating Tomorrow College which is a Specialist Post-16 Institution for 16–25-year-old adults with SEND, with a mission to address the employment deficit for adults with learning needs. Creating Tomorrow College has a clear 5-year development strategy for growth in both cohort resources and curriculum offer, and is located in the Iron Mountain Building at MPL adjacent to the CLEAR campus.

- Planning permission has been granted for a truck parking / services facility within the MPL development. The 9-acre site will provide overnight truck parking, amenity building and HGV EV charging stations. Works to provide the services has commenced on site and an operator has been identified, anticipating delivery of the facility in 2026 which will be open to customers on the park as well as the public.

- Planning permission is also being sought for an Innovation Centre at MPL which will provide a space to host innovation events for the customers on the park and wider logistics industry. The focus of these innovation events will be on sustainability and construction within the logistics sector. Subject to planning permission, GLP will be launching the Magna Park Innovation Centre in 2025.

5.5 At MPL, sustainability is a key priority. GLP has invested in extensive green spaces, energy-efficient buildings and initiatives aimed at reducing carbon footprints.

5.6 As part of the planning consent for Magna Park North, a 200 acre Country Park was created. Bittesby Country Park is a harmonious blend of diverse wildlife habitats, agricultural, community space and educational engagement. Over half of the Magna Park North site area was dedicated to Bittesby Country Park and open green public spaces, including woodlands, meadows and wetlands integrated as part of a sustainable drainage system. This creates a habitat for diverse wildlife, providing a sanctuary for both nature enthusiasts and the wider community. Bittesby Country Park incorporates grazing areas, orchards, and forest gardens, all woven seamlessly into the historical fabric of the rich heritage and archaeology across the site alongside the deserted medieval village scheduled monument. Pathways traverse the park's interconnected green corridors, following the permissive paths that intertwine with existing public rights of way. These routes offer an array of experiences, from invigorating ridge walks to tranquil strolls along stream corridors. Explore the species rich meadows, lakeside edges, and diverse woodlands, or embark on a longer journey to immerse yourself in the park's natural richness through the foraging woodland and orchards. The existing Park is not just a picturesque escape but also an educational haven. With interpretive resources and educational facilities located at key vantage points, it aims to foster an understanding of ecological resilience, climate adaptation, and the importance of sustainable landscapes.

5.7 Buildings within MPL have also been designed to ensure that any environmental impacts are reduced with the site being set within a fully landscaped parkland with stringent measures in place to preserve natural habitat and wildlife. This includes the planting of over 1.5 million trees across the MPL campus as well as a partnership with the British Beekeepers Association which led to GLP's third and fourth UK apiary sites being installed at MPL in July 2020.

5.8 Furthermore, Unit MPS9 (33,583sqm) has recently been awarded a BREEAM Outstanding rating of 97.8% making it the highest scoring industrial BREEAM rated building in the UK as of June 2024. This demonstrates that MPL remains at the forefront of logistics sector, delivering buildings that are both functional for operators and beneficial to the environment.

5.9 MPL is strategically positioned within the Midlands "Golden Triangle" of logistics, offering excellent connectivity to major motorways such as the M1, M6 and M69. This prime location enables access to approximately 85% of the UK population within a four-hour truck drive-time. It is well located to existing settlements at Lutterworth, Rugby, Coventry and Hinckley. Distances and drive times (from the AA Route Planner website) to the nearest urban edges of these cities/towns are as follows:

City / Town	Miles	Minutes Driving
Lutterworth	2.3	7

Rugby	5.6	12
Coventry	14.9	22
Hinckley	7.4	12

Table 5. Drive times from MPL

5.10 Staff working at MPL are encouraged to travel to work sustainably with occupiers implementing Travel Plans to promote sustainable transport modes.

5.11 The majority of staff employed on site work shift patterns. GLP have formed partnerships with local Public Transport operators to provide sustainable, efficient and cost-effective travel options to MPL. This includes regular bus services from across the local area, operated by Arriva, which includes the following services:

- X45 – Lutterworth & Leicester
- X84 – Rugby, Lutterworth & Leicester
- 8 – Lutterworth & Hinckley.

5.12 There is also a pay on demand bus service to MPL from rural areas of South Leicestershire in place (Fox Connect). In addition, some agency colleagues travel to site by minibus from Leicester City Centre and some occupiers engage coach firms to transport workers during peak periods.

5.13 GLP has also partnered with Liftshare to offer a free liftshare scheme to all park employees, supporting key workers to access the park with ease, save on commuting costs and travel more sustainably. With over 500 members, it is estimated that MPL has removed 335,525 miles off the local roads, reduced 73 tonnes of CO2 emissions and saved its key workers a total of £84,000 over 5 years.

5.14 A significant benefit of MPL is the proximity to the open-rail terminal at DIRFT which is c. 7m south on the A5. A number of customers at MPL utilise the rail head, including Asda and Britvic. The proposed expansion into Rugby would also be able to make use of the rail head. This is a unique proposition and unlike other potential sites in Rugby which are not located near rail terminals.

5.15 Further detail on the existing MPL and the associated benefits listed above is included in **Appendix 6.**

Proposed Magna Park West Extension

5.16 The proposals to extend MPL to the west of the A5 will build on the established principles underpinning the existing distribution park, ensuring the site remains a benchmark for modern logistics while maintaining its strong environmental and community-focused approach. A western extension will be able to build on MPL's proven success, leveraging the existing infrastructure and strong transport links.

5.17 An expansion at MPL would allow for a high proportion of future employment need to be concentrated in a single, sustainable location that has a proven track record of successful delivery over the past 30 years. It is important to note the speed at which the Magna Park North and South extensions were built and occupied, demonstrating an immediate demand for B8 space in this location. Also, despite the age of some of the older units at MPL, occupancy levels remain

extremely high with only 4 units unoccupied (out of 50 units total) across the entire site (including north and south extensions) as of Q1 2025.

5.18 The existing MPL development in Harborough is safeguarded for strategic storage and distribution (Class B8) uses only, with units to be in excess of 9,000sqm as per Policy BE2 of the adopted HDC Local Plan. This is also true of the two proposed allocations in the emerging HDC Local Plan (ref MP1 and MP2), both of which are designated for Class B8 uses.

5.19 An expansion to MPL to the west of the A5 therefore provides an opportunity to be able to accommodate both B2 and B8 occupiers in a mix of units. Given the size of the site, there is also an opportunity to provide smaller / incubator units to support SMEs, alongside larger units catering for manufacturing and logistics demand in this location.

5.20 The accompanying plans (**Appendix 1)** show how built development on the site could be positioned, with a 35% plot density equating to the delivery of just over 580,000 sqm of employment floorspace. The proposals would be landscape-led to provide habitat enhancements to deliver significant biodiversity and amenity enhancements. This includes the potential for a country park to be delivered comprising community parkland and habitat creation along the western boundary of the site, for use both by the site employees and local community. Opportunities to link this with the existing 200 acre country park at MPN could also be explored.

5.21 Business operating from a proposed expansion to the west of MPL would also benefit from the site's unique position as a satellite location to DIRFT, with businesses able to capitalise on using the existing open rail terminal.

5.22 There are successful HGV routeing arrangements in place for MPL and this would be carried through to the new development, ensuring that restrictions on HGVs accessing nearby villages would continue.

5.23 As detailed above, MPL already benefits from a number of bus services, linking the site to Rugby, Leicester, Harborough and Hinckley, which the proposed extension would be able to utilise and also explore opportunities for network enhancement. The proposals could also benefit from other on-demand public transport services already established such as Fox Connect and Liftshare.

5.24 Through further masterplanning, opportunities for other on-site amenities can be explored, including the provision of additional lorry parking to complement the provision of a service facility at MPL which is currently being built.

5.25 Further opportunities for training and education can also be explored, including links to the already established CLEAR Centre and other initiatives as part of the existing MPL.

5.26 There are a significant number of benefits associated with the proposed western extension of MPL, including:

Ability to respond to specifically identified need – unit sizes, heights, location etc.

5.27 The Site's location in the Golden Logistics Triangle is regarded as a strategic hub for distribution and logistic operations. Research indicates that this area provides access to 95% of the British population, making it an ideal location for same-day and next-day delivery services.

Job creation

5.28 The proposed 166ha extension of MPL to the west of the A5 will create substantial job opportunities in the local area, both during the construction and operation phase.

5.29 During the construction phase, it is estimated that over 3,000 direct construction jobs could be supported per annum, across a wide range of trades and sub-sectors. It is anticipated that the Proposed Development will lead to opportunities for apprenticeships and training during the construction phase, alongside opportunities for existing local contractors. The GVA benefit of the direct construction phase could exceed £200m.

5.30 The proposals will also support a further indirect and induced additional jobs at the local and wider regional level during the construction phase, equivalent to around a further 1,800 jobs supported through the development process. Total national GVA benefits of the construction phase would be expected to exceed £500m.

5.31 Once operational, the proposals would support permanent employment opportunities in Rugby and the surrounding area.

5.32 During the operational phase, the proposals for around 580,000 sqm could generate in excess of 4,000 jobs, assuming employment densities in line with the existing MPL occupiers. This may vary seasonally. At the sub regional level the benefits associated with both supply chains as well as the wage spend of workers will support further employment creation in the sub region being around 2,600 jobs.

5.33 The direct annual GVA benefits of the scheme are estimated to be around £260m, rising to over £400m taking into account regional multiplier benefits.

5.34 These employment opportunities are likely to be in a range of sectors depending on the final occupants of the floorspace, but is likely to include roles in warehousing and distribution, manufacturing, wholesale, business administration, IT and professional services.

5.35 Research indicates notably increases in professional and associate professional / technical occupations in the logistics sector, reflecting increased levels of automation as well as the prevalence of collocating offices with warehousing. Logistics sector jobs postings in 2021 in the South East Midlands reported that 65% of requirements were for technical workers including project managers, sales managers, supply chain analysts and software developer / engineers.

CIL Income

5.36 Rugby Borough Council's CIL Charging Schedule came into effect from 1st April 2024. This includes a £5 per sqm rate for industrial, light industrial and storage and distribution uses (B2 / B8).

5.37 Based on a proposed floorspace of 580,000 sqm, the proposed extension could contribute £2,900,000 in CIL revenue for RBC.

Business Rates

5.38 The 2020 business rates income for MPL was estimated at £24m, a proportion of which is retained locally. Applying this ratio to the future development proposals indicates future additional contributions of at least £16m, however this is expected to be substantially higher based on the new and higher quality floorspace.

5.39 The business rates income from MPL in 2023/2024 meant that Harborough District Council was able to freeze council tax for all residents in 2024/2025.

5.40 As such, substantial increases in business rates will benefit Rugby Borough Council and its residents by reducing the cost of public services leading to tax savings for residents.

Transport & Sustainability

5.41 A western extension to MPL would allow the new development to take advantage of established infrastructure already in place to promote sustainable transport patterns. Staff would be able to utilise the bus services that currently serve MPL as well as the potential for additional highways contributions to support sustainable modes of travel.

5.42 In addition, these representations are accompanied by a Transport Note prepared by Apex Transport Planning (**Appendix 5**) which considers the opportunities for sustainable transport and sets out a vision-led approach for increasing sustainable transport movements and constraining vehicle movements to and from the site, whilst also reducing background movements across the existing MPL through a joined up sustainable travel strategy and consolidation of operational vehicle movements. The Note demonstrates that the site is ideally located for accommodating employment uses and minimising key vehicle movements, as well as for facilitating the delivery of key strategic infrastructure improvements which would offer further benefits on the network.

Green Infrastructure & Biodiversity

5.43 As detailed above, the proposals would be landscape-led to provide habitat enhancements to deliver significant biodiversity and amenity enhancements. This includes the potential for a country park to be delivered comprising community parkland and habitat creation along the western boundary of the site, for use both by the site employees and local community. Opportunities to link this with the existing 200 acre country park at MPN could also be explored.

Community Initiatives

5.44 As detailed above, the existing MPL supports the community and local voluntary organisations to deliver local projects within the geographical area surrounding MPL. The Lutterworth Area Community Fund has contributed over £1m to community projects in the local area. There is also an established Community Liaison Group for the purposes of providing information and updates on current development proposals and operations at MPL. Members include local parish councils and local interest groups.

5.45 A western expansion would be able to build upon these already established community initiatives and further extend the benefit to community groups within Rugby.

5.46 Therefore, as demonstrated, there are significant benefits associated with locating employment development to the west of MPL, including for this to be a highly sustainable development given the ability to leverage the existing infrastructure associated with MPL.

5.47 We also consider that an allocation to the west of MPL would also fully align with the criteria in Para 5.50 of the WMSESS for identifying, allocating and delivering strategic employment sites. An assessment of site no. 325 against these criteria is set out in the Table below:

Criteria in para 5.50 of the WMSESS	Assessment of site no. 325
Good connections with the strategic highway network – close to a junction with the motorway network (ideally within 3km and up to 5km) or long-distance dual carriageway suitable for HGVs (reflecting the	MPL is located within the 'Golden Triangle', a region that is pivotal to the UK's supply chain and distribution networks due to its central location and connectivity to the strategic road network (SRN). The Golden Triangle area is within a four-hour drive of 90%

success of parks on the A1, A14 and other linking A-roads).	of the British population, and specifically in the context of MPL, has good access to the SRN including the M1 and M6 motorways, and the A5 trunk road, all of which provides for efficient transportation and logistics operations. MPL already has an extensive network of infrastructure catering for sustainable transport modes, including a shared pedestrian/cycleway connecting MPL to Lutterworth, and regular bus services from across the area. The site already implements successful travel planning initiatives.
Sufficiently large and flexible in its configuration so that it can accommodate the range of sizes of distribution centre warehouse units now required by the market. Preferred plot ratios being a minimum of 0.3516 and building sizes of over 9,000 sq.m which means a minimum of 2.5 ha, however ideally sites would be a minimum of 25ha and readily over 50ha which takes into account the landscaping and infrastructure involved in delivering sites of this scale as well as inclusion of smaller employment units where appropriate	The site as a whole totals 166ha and therefore is sufficiently large and flexible in its configuration to accommodate a range of unit sizes plus associated amenities and green infrastructure, including a country park.
Is served from an electricity supply grid with sufficient capacity to permit the charging of large fleets of battery-electric freight vehicles simultaneously / able to support high tech facilities, or part of the electricity supply grid which can be upgraded (network reinforcement) relatively easily and at a reasonable cost.	The existing Local DNO Bulk supply point (BSP) has at present sufficient spare capacity to cater for the demands of HGV fleet charging and high tech facilities without the requirement of major reinforcement works.
Where relevant, is sufficiently large (+100 ha but often towards 300ha) and flexible in its configuration so that it can accommodate an intermodal terminal and internal reception sidings (for rail).	Whilst the site is not being promoted as rail-connected, it is sufficiently large and over 100ha (166ha total). It is also well-located to DIRFT International Rail Freight Terminal, with MPL being located 9.3 miles north of DIRFT on the A5 (15 minute drive). MPL therefore acts as a satellite location to DIRFT with businesses at the existing park utilising the open rail terminal. A further expansion of MPL to the west of the A5 would also enable future businesses occupying space to capitalise on the close proximity to DIRFT.
Is accessible to labour, including the ability to be served by sustainable and/or active transport, and	MPL attracts workers from across nearby areas, including Leicester, Coventry, Birmingham, Lutterworth, Rugby, Hinckley and Nuneaton, with worker travel patterns closely aligning with the bus services already established to serve the park. As per the

where appropriate being located close to areas of employment need.	CBRE analysis, it is anticipated that future planned housing development could provide an additional 17,000 workers in the MPL catchment over the next 20 years.
Is located away from incompatible land-uses (including residential) and has the ability to undertake 24/7 unrestricted operating hours and manage noise/lighting expectations.	The site is located adjacent to an existing employment park and offers the opportunity to strategically extend MPL into Rugby. The nearest residential properties are in the village of Willey. Appropriate landscaping and offsets can be included in any masterplan to ensure there is sufficient mitigation to protect residential amenity.
Is located such that the development does not significantly crowdout alternative land uses, such as office and lab space, and ensures a balanced supply of commercial premises and strategic employment opportunities in the local area.	The site is sufficiently large to be able to accommodate a range of employment uses and unit sizes.
The ability to deliver high-bay warehousing at least 20m height (recognising the landscape impacts and need for appropriate locations and / or mitigation).	As concluded by the Council in the Stage 2 Site Assessment, the overall landscape sensitivity of the site is medium/low. The site comprises arable and pastoral fields located within a broadly rural landscape to the west and warehouse development and transport infrastructure to the east. There are no known cultural heritage or historic features within the site and views from and into the surrounding RPGs are unlikely to be affected by the development. Views into the site are filtered from the surrounding transport infrastructure. The A5 and B4027 and surrounding warehousing development detracts from the tranquillity and visual value of the site. As such, the site has the ability to accommodate high-bay warehousing with the appropriate landscaping mitigation in place.
Has access to or potential for broadband capabilities and infrastructure	The existing local MPN Openreach infrastructure can be extended to provide the site high speed fibre.

Table 6. Assessment of site no. 325 against the criteria in paragraph 5.50 of the WMSESS (2024)

5.48 Therefore, as demonstrated, the proposed extension to the west of MPL would deliver a number of significant benefits and fully aligns with the criteria in the WMSESS in terms of where strategic employment development should be located.

5.49 The site is also considered deliverable given it is available for development, in a suitable location, and achievable within the plan period. This is evidenced by the different parties with land interests in the combined site no. 325 working together on these representations.

6. Conclusion

6.1 These representations have been prepared jointly on behalf of GLP Europe, The Coventry Diocesan Board of Finance Limited, Nurton Developments Limited, and Mr F.B. Dewes and Mr I. Dewes in response to the Rugby Borough Council Local Plan Review Preferred Options Consultation and specifically in relation to land west of Magna Park Lutterworth (Strategic Site no. 325).

6.2 As demonstrated by the representations and supporting information, we do not consider the proposed approach in the draft Local Plan is sound for a number of reasons, in particular the approach taken to identifying development sites to satisfy the (underestimated) employment need which is unsound due to the prioritisation of sites within the Green Belt, which does not accord with national planning policy.

6.3 Site no. 325 represents a significant opportunity for the expansion of the existing Magna Park Lutterworth on land that is entirely outside Green Belt and is available, suitable, achievable and deliverable for employment development within the plan period.

6.4 As set out in these representations, a western expansion to the highly successful employment ecosystem at Magna Park in a very sustainable location would deliver a number of benefits to Rugby Borough and the wider area, particularly as the proposed development would be able to leverage the existing physical and community infrastructure already established.

6.5 Therefore, we strongly recommend that the next iteration of the draft Local Plan should allocate Strategic Site no. 325 for employment development as it will meet the identified needs for employment land for Rugby in the most sustainable manner and in conformity with national planning policy.

6.6 The site promoters welcome the opportunity to work with Rugby Borough Council and the local community in order to realise the opportunity.

APPENDIX 2

Technical Statement on Employment Land Need

Rugby Borough Regulation 19 Draft Local Plan Review

Land West of Magna Park, Lutterworth

Technical Statement on Employment Land Need

Context

1. This statement responds to the updated evidence base produced by the Council to support its spatial strategy on employment land. This updated evidence base includes: -

   - Green Belt Exceptional Circumstances Topic Paper (GBECTP), December 2025
   - Sustainability Appraisal, Aecom, December 2025
   - Development Needs Topic Paper (DNTP), December 2025
   - Stage 2 Site Assessment Report, December 2025
   - Addendum to the HEDNA-WMSESS Alignment Paper, Iceni, November 2025.

2. In addition, this statement refers to the evidence base supporting the production of development plans covering neighbouring local authorities of Coventry and Harborough.

3. This statement follows on from a similar statement produced by NDL in May 2025 which formed part of the response by NDL and its landowning partners in promoting a western extension to Magna Park at the Regulation 18 stage of the Local Plan. The statement from May 2025 is enclosed for ease of reference (**Enclosure No.1**).

4. The Regulation 19 draft Local Plan has set a reduced requirement from that proposed by Rugby Borough Council at the Preferred Options (Regulation 18) stage. This is summarised as follows in Table 1.

   Table 1 - Employment Land Need Requirements

	Regulation 18 (2024–2045) (sqm)	Regulation 19 (2025–2042) (sqm)
Strategic Scale Sites	761,250	791,525
Small Sites	265,296	232,600
Unmet Need from Coventry	180,000	10,000
Total	1,206,546	1,034,125

5. According to the Development Needs Topic Paper (DNTP), there was 494,243 sqm of unbuilt commitments as at April 2025. These are primarily made up of two sites: -

   - Padge Hall Farm, Hinckley — 136,350 sqm
   - Crowner Fields Farm, Ansty — 275,000 sqm

6. Taking commitments into account, a net requirement of 529,882 sqm (1,034,125 – 494,243) is realised. This is covered by the remaining four allocations identified by Policy S7, namely:

   - South West Rugby Phase 2 — 60,000 sqm

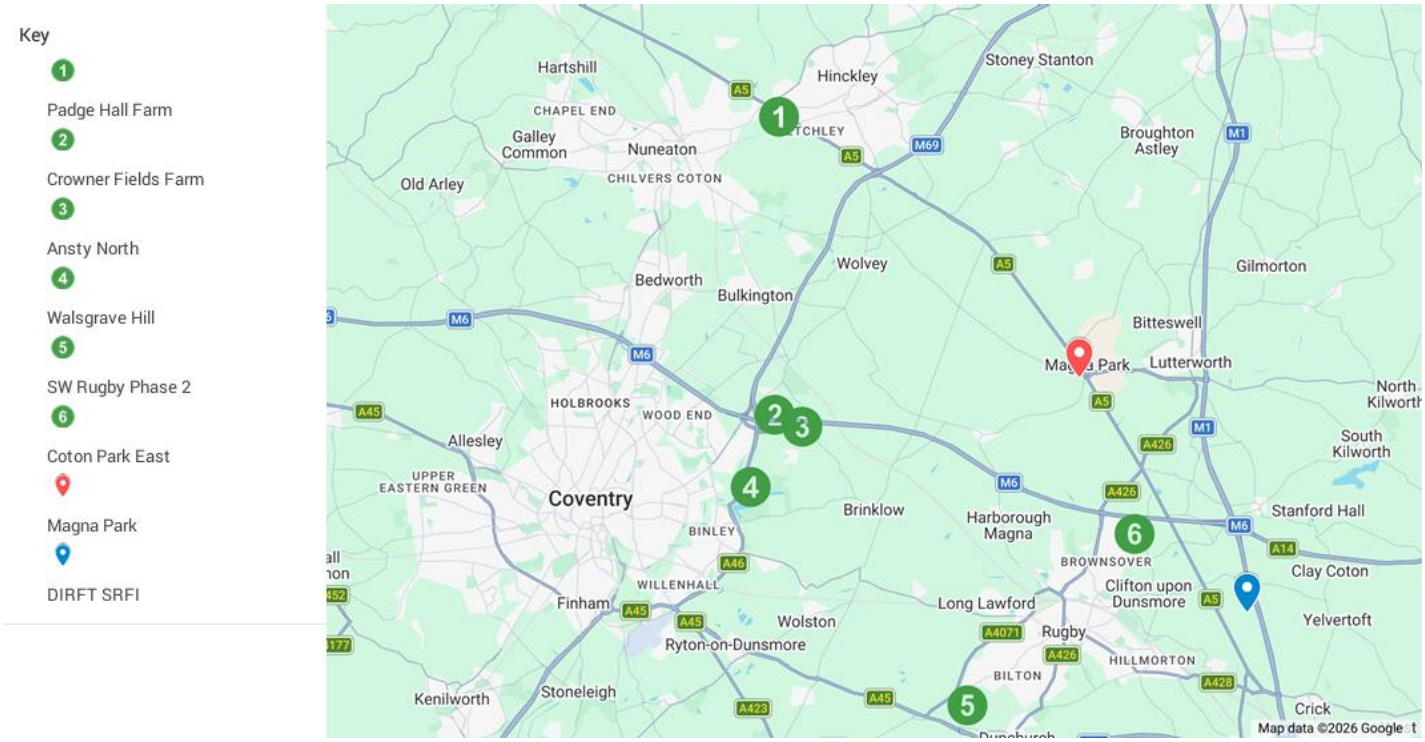
- Coton Park East — 115,000 sqm
- Ansty Park North — 75,000 sqm
- Walsgrave Hill — 290,000 sqm

7. These total 540,000 sqm. The fifth allocation — Crowner Fields Farm — is counted as a commitment by the DNTP.

8. These take the total supply to 1,034,243 sqm — just 118 sqm greater than the overall identified requirement.

9. The location of these six committed and allocated sites is presented on the map below (Figure 1). This map also identifies Magna Park, an extension to which NDL is promoting jointly with GLP (the owner and developer of Magna Park) and other parties, and the Strategic Rail Freight Interchange at DIRFT.

Figure 1 – Committed and Allocated Sites



10. Of the total supply, 666,663 sqm is located at the north-east edge of Coventry, where the M6, M69 and A46 converge. This represents 64.5% of total supply. The percentage of the five allocations located on the edge of Coventry is even greater — amounting to 640,000 sqm, or 78.5%, of the 815,000 sqm allocated by Policy S7. All three of the allocations proposed on the edge of Coventry require the release of Green Belt land.

Summary of Principal Arguments

11. NDL considers that the spatial strategy for employment land is flawed for three principal reasons: -

- The identified need — particularly for large-scale logistics — is not being effectively met.
- The need for large-scale employment land has been significantly underestimated.

- Very little, if any, allowance has been made to meet unmet need from the neighbouring local authorities of Coventry and Harborough.

These three points are developed in turn below.

Meeting Identified Need Effectively

12. In a nutshell, the evidence base to employment land need for Rugby Borough confirms that the principal element of need to meet on a qualitative basis is for **Freight and Logistics** (i.e. Use Class B8). However, in assessing how this need should be met, established locations for logistics, such as Magna Park, have either been ignored or not properly appraised. Instead, locations close to Coventry have been prioritised, although they seem to have been chosen not because they are obviously better located to serve the Freight and Logistics sector. Instead, their preference seems to rely on their perceived relative attractiveness to the Manufacturing and Research & Development (R&D) sectors.

13. This approach is not supported by relevant guidance in the NPPF and the proposed changes to the NPPF which were consulted on between December 2025 – March 2026. A strong driver of the latter is to enable and encourage decarbonisation of the economy. The Freight and Logistics sector is considered to be an important contributor to this overriding aim. Accordingly, the draft NPPF now recognises it as a separate and specific sub-sector and acknowledges its distinct locational requirements over other forms of employment land. These points are dealt with in turn below in more detail.

Logistics — the principal driver behind employment land need

14. The evidence base points to Logistics, particularly at scale, being the principal driver behind the total projected floorspace requirement. This is confirmed in the following components of the evidence base: -

- Paragraph 2.19 of the GBECTP — 77% of gross need is derived from the West Midlands Strategic Employment Sites Study 2024 (WMSESS).
- Paragraph 5.2.29 of the Sustainability Appraisal — refers to the mix of sites recommended by WMSESS, with a clear bias to B8 sites in terms of number and scale.
- Paragraph 3.38 of the DNTP — refers to WMSESS's recommendation that Opportunity Area 7 should include 2/3 larger sites (50 ha+) for B8 use, and 1/2 smaller sites (25 ha+) for B1 and B2 uses.

15. It is to be recalled that the original WMSESS, which underpins the evidence for need for strategic-scale employment sites, anticipates that **70% of supply** should be directed to meeting demand for **Logistics** (i.e. B8 use). This is based on stock, take-up and market sentiment (paragraph 1.19). The remaining 30% would be required for manufacturing. WMSESS notes also that **75% of market requirements** are for **Logistics** (paragraph 1.12, first bullet). It also refers to Area 7 being a major market for logistics (paragraph 12.38).

Assessment of Magna Park

16. Magna Park is acknowledged to be an established or major logistics location in various parts of the evidence base to the draft Local Plan. These include: -

- Paragraph 2.90 of the GBECTP.

- First bullet on page 8 of the Sustainability Appraisal.
- Paragraph 5.2.36 of the Sustainability Appraisal.

17. In addition, it is to be noted that the Regulation 19 draft Harborough Local Plan recognises the importance of Magna Park as an established logistics hub through the proposed allocation of a further 340,000 sqm on an area of 137 ha.

18. Despite this recognition, Magna Park it is asserted that it should not considered to be a suitable location for further strategic growth in this sector and was discounted early in the assessment process. The principal reasons put forward for this position are summarised by the GBECTP and Sustainability Appraisal. These reasons refer to:

    - commuting patterns;
    - traffic impact;
    - other modes of transport;
    - relative suitability to attract manufacturers;
    - proximity to universities; and
    - scope for R&D clustering.

19. Paragraph 2.90 of the Sustainability Appraisal provides a conclusion. It states:

    "*It is not realistic for Magna Park to deliver the same diversity and growth in manufacturing and research and development uses that can be delivered by the proposed allocations at Ansty Park and Walsgrave Hill."*

20. In addition, it states that:

    *"Magna Park lacks the proximity to Coventry and Warwick Universities" and "*there are not the opportunities for clustering and synergies that exist on the edge of Coventry, given the presence of existing important manufacturers and research institutions there, particularly in the automotive industry.*"*

21. It is asserted for these reasons, the GBECTP states that further expansion of Magna Park would not conform with the guidance set out in paragraph 110 of the NPPF and is not considered to be a "*sustainable location or one that could be made sustainable*".

22. This analysis is fundamentally flawed and totally rejected by NDL and the other parties promoting the extension to Magna Park. Evidence is provided and summarised in our main statement of representations to rebut this conclusion and point to the advantages of Magna Park over allocated sites in terms of serving the Freight and Logistics sector. This includes easy access to DIRFT SRFI – an important component in decarbonising the movement of goods and raw materials.

23. Nonetheless, it is equally clear that the extension to Magna Park has been ruled out prematurely as a potential allocation, as it is not considered to be a suitable or sustainable location for B2 and R&D uses. This is despite the principal driver for need being logistics (as referred to above), and the rationale given by the evidence for the allocation of two of the three Green Belt release sites being to meet this specific need. This is now considered below.

Rationale to allocation of Walsgrave Hill and Crowner Fields Farm, Anstey

24. As referred to above, paragraph 5.2.29 of the Sustainability Appraisal makes reference to the recommendations made by WMSESS on the provision of strategic sites in Opportunity Area 7. These recommend "*A) 2–3 larger B8/mixed sites of circa 50 hectares; and B) 1–2 smaller B1/B2 sites.*"

25. Given that the overarching recommendation of WMSESS is to provide land on the basis of a 70/30 split in favour of B8 over B1/B2 uses, it is clear that the *"B8/mixed sites"* will either be wholly or primarily for B8 uses (covering Freight and Logistics).

26. Paragraph 5.2.30 of the Sustainability Appraisal then states:

    "With regards to (A), the proposed supply (Figure 5.3) involves three sites of 50+ hectares in Area 7, namely: Padge Hall Farm, ***Crowner Fields Farm*** *and* ***Walsgrave Hill,*** *such that the recommendation is met."* (Our emphasis).

27. This is corroborated by paragraphs 3.38 and 3.39 of the DNTP. This confirms that these sites are allocated to meet the need for the larger B8 sites.

28. However, contradictory evidence is then provided later in the Sustainability Appraisal in Section 6.3 — Employment land growth scenarios appraisal. Here, the sixth bullet to paragraph 6.3.3 states as follows:

    "***Economy/employment*** *— 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/south-east Coventry is already a major hub for employment and research and development across key sectors, including those 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.*** *A final factor is that Prologis/Mountpark is a larger site relative to Walsgrave Hill (having factored in developable areas/proposed country parks), and there is a case for supporting higher growth (see Section 5.2)."* (Our emphasis).

29. Furthermore, it is clear that an expansion of Magna Park, or other locations outside the Green Belt, have been dismissed on the basis that they are ***"sequentially less preferable***" (paragraph 5.2.37 of the Sustainability Appraisal) than the sites proposed to be allocated on the edge of Coventry that require Green Belt release. As referred to above, the reasons given for an expansion of Magna Park being less preferable relate to it being perceived as less attractive for B1/B2 uses.

30. This reveals a confused and twisted logic, as summarised below:

    - the principal need for large-scale strategic sites (i.e. 50 ha+) is to accommodate demand for B8 uses and not B1/B2 uses;
    - two Green Belt sites on the edge of Coventry have been allocated specifically to fulfil this need;

- however, they have been preferred because they are considered to be more attractive for B1/B2 uses (with reference to proximity to universities, R&D and advanced manufacturing clustering);
- it is stated that they may include an element of B8, but should not be overly dominated by this use; and
- other sites acknowledged to be "logistics locations", such as Magna Park, have been either ignored or not addressed.

31. In addition, it is to be noted that:

    - the draft Plan only seeks to meet an unmet need from Coventry of 10,000 sqm (2.5 ha);
    - the draft Plan restricts the allocation of 75,000 sqm at Ansty Park North to B1/B2 uses in order to provide for the manufacturing and R&D sectors;
    - the evidence base notes very real constraints to development at Walsgrave Hill due to both ecology and heritage;
    - both Walsgrave Hill and Crowner Fields Farm are assessed by the Green Belt Contributions Study Stage 2 as Green Belt (rather than Grey Belt), with strong contributions in respect of Purpose a).

32. With regard to the first point, NDL considers the significant reduction in the scale of unmet need from Coventry from that proposed to be met by the Preferred Options has not been justified. This is covered in greater detail in the next section. However, as matters stand, the allocation of three large employment sites on the edge of Coventry is also not justified on the basis of it being needed to meet the specific needs of Coventry, although the reasons provided for their preference lean heavily on the sites' relationship to Coventry in terms of workforce, universities and other socio-economic factors.

33. With regard to the third point, it is to be noted that the Stage 2 Site Options Assessment highlights a particular issue with ecology at Walsgrave Hill. It states:

    "Given the location of Coombe Pool SSSI, ancient woodland at Hill Park Wood LWS, and Combe Abbey LWS immediately adjacent to the site, there are significant constraints to development at this site and other alternative sites for development should be considered in the first instance*."* (Our emphasis).

34. In contrast, land being promoted to extend Magna Park is:

    - outside the Green Belt;
    - not constrained in terms of ecology, heritage or landscape quality; and
    - is acknowledged as an established location for logistics.

35. Criticisms made by the draft Local Plan evidence base about Magna Park's transport sustainability and deliverability in terms of road capacity are not substantiated and are rebutted by the transport evidence supporting the representations being made by the parties promoting the extension to Magna Park.

National planning guidance

36. The NPPF states that planning policy should recognise and address the specific locational requirements of different sectors (paragraph 87). This includes storage and distribution operations, with reference to "*suitably accessible locations that allow for the efficient and reliable handling of goods*".

37. The proposed changes to the NPPF go further. Whilst recognising the draft nature of the consultation document it signals a direction of travel that resonates with recent market experience across the country. A new sub-section (E3) was included in the draft NPPF consulted on between December 2025 – March 2026 to cover Freight and Logistics. The explanatory note to the draft NPPF regarding this proposed change states: -

    "*A policy specific to this sector is proposed because of the particular physical and locational characteristics of logistics development, which in some cases will involve particularly large structures, and because of the particular importance of having access to the right transport links for the type of operation.*"

38. Magna Park clearly meets these requirements and has done so for some time. It presents an obvious platform for further investment in this increasingly important sector.

39. As such, it makes no sense that it is not being given much more serious consideration in meeting the sub-regional needs for large scale B8, particularly as Magna Park falls outside the Green Belt. It is an "*other reasonable option*" in meeting this need as described by paragraph 147 of the NPPF and should have been assessed properly in this context prior to consideration being given to any land within the Green Belt.

The Assessment of Need for Strategic-scale Employment Sites

40. In making representations to the Regulation 18 Preferred Options, NDL produced a critique of the assessment of employment land need (the technical note of May 2025 provided in Enclosure No.1). This critique made the following observations: -

    - The projected need for strategic-scale sites was significantly underestimated and will result in a sharp reduction in the pace of recent development.
    - The projected need for smaller sites was a significant reduction from the level projected by the 2022 HEDNA, with the reasons provided by the subsequent HEDNA/WMSESS Alignment Paper unclear and unsubstantiated.
    - Coventry's unmet need of 180,000 sqm was underestimated.
    - No account had been taken of meeting unmet need from Harborough.
    - Qualitatively, there was a disproportionate level of allocated land located on the edge of Coventry.

41. These criticisms still stand and remain substantially unaddressed by the Council. Some further analysis on these points is provided below, with reference where relevant to the addendum to the Alignment Paper produced for the Council by Iceni in November 2025 and to the evidence base to the draft Coventry and Harborough Local Plans.

Projected need for strategic-scale sites

42. The Technical Note of May 2025 made two principal criticisms of the assessment of this aspect of employment land need: -

    - Flaws in the original assessment of committed supply by WMSESS had skewed badly the conclusions on the residual requirement for Area 7 (paragraphs 19–21 of the Technical Note).
    - The recent rate of development was over twice the adopted projected rate and building policy around the projected rate would lead to significantly reduced levels of inward investment in Area 7 (paragraphs 12–18).

43. With regard to the 1st point, Iceni has acknowledged to NDL in correspondence that the information provided by LPAs on committed supply was taken at face value. It was not tested as to its accuracy or relevance. No assessment as to the sites' availability or deliverability was undertaken.

44. Subsequently, the Addendum to the Alignment Paper (Iceni, November 2025) has revised the committed supply by netting off the country park element of the Coventry Gateway scheme. As the country park element is 90 ha, this reduces the committed supply by the same amount, and results in an additional residual need of 90 ha. However, for reasons that are not clear, Iceni recommends that additional land is sought to provide only a further 50 ha in Area 7, albeit "as a minimum".

45. Unfortunately, no reassessment has been undertaken of other elements of supply in Area 7 despite their obvious inability to deliver land to meet identified need for B8 and B1/B2. These most obviously include: -

    - Gigafactory site (Coventry Airport) — 124.7 ha. This is included in the committed supply (and, therefore, factored into computing the residual need) despite the text to the original WMSESS report (paragraph 10.60) confirming it is "*reserved for battery manufacturing only*", and that such demands "*would not be reflected in any modelled need in past trends, but rather inward investment*".

    - Baginton Fields, Coventry — 25 ha. An historic allocation in the 2017 adopted Coventry Development Plan. The site comprises a primary school, playing fields, local nature reserve and woodland, is not accessible from the adopted highway, has not been marketed and will never be developed.

46. Appendix 1 of the Iceni Addendum provides a rebuttal to issues raised by Regulation 18 responses. This includes paragraph A1.19, which states:

    "The Coventry Airport site is considered as contributing towards B2 supply and would meet a component of the B2 needs assessed in the WMSESS."

47. This statement directly contradicts paragraph 10.60 of the original WMSESS report. This states: -

    "*Additionally, a significant portion of the supply is earmarked for a specific use. Land at Lighthorne Heath (100 ha) is earmarked for Jaguar Land Rover/Aston Martin Lagonda* ***and Coventry Airport (127 ha) is reserved for battery manufacturing only. These demands would not be reflected in any 'modelled' need in past trends, but are inward investment.*** *This reduces the general B2 supply to 191 ha and the residual need rises to around 300-400 ha*" (Our emphasis).

48. It is also a fallacy. The permission granted for the Airport was tightly restricted to the manufacture of batteries and for no other B Class uses (as defined by the description of the development). This very narrow and specific use was a fundamental justification for demonstrating the "very special circumstances" required as the site lies within the Green Belt.

49. Neither site can be relied upon to meet the modelled need identified by WMSESS for B2 and B8 uses and should not be counted in any assessment of committed supply in deriving a residual requirement. Their loss would increase the residual requirement by a further 150 ha and necessitate identification of more sites than the current 2/3 B8 and 1/2 B1/B2 sites planned for.

50. With regards to the 2nd point, NDL's analysis of the pace of development in the May 2025 Technical Note is addressed by paragraphs A1.20 – 24 of Iceni's Addendum. This refers to the use of a limited period not adequately capturing the full economic and property market cycle and the market slowdown experienced through 2023–2024 following heightened demand from 2019–2022. It concludes that "*evidence therefore points to a more moderate and sustainable level of take-up over the medium to long term*" (paragraph A1.22).

51. It is to be noted that the PPG (paragraph 2a-029-20190220, under "Economic Need") advises that recent employment land take-up is considered in projecting need. In addition, it emphasises the importance of market signals.

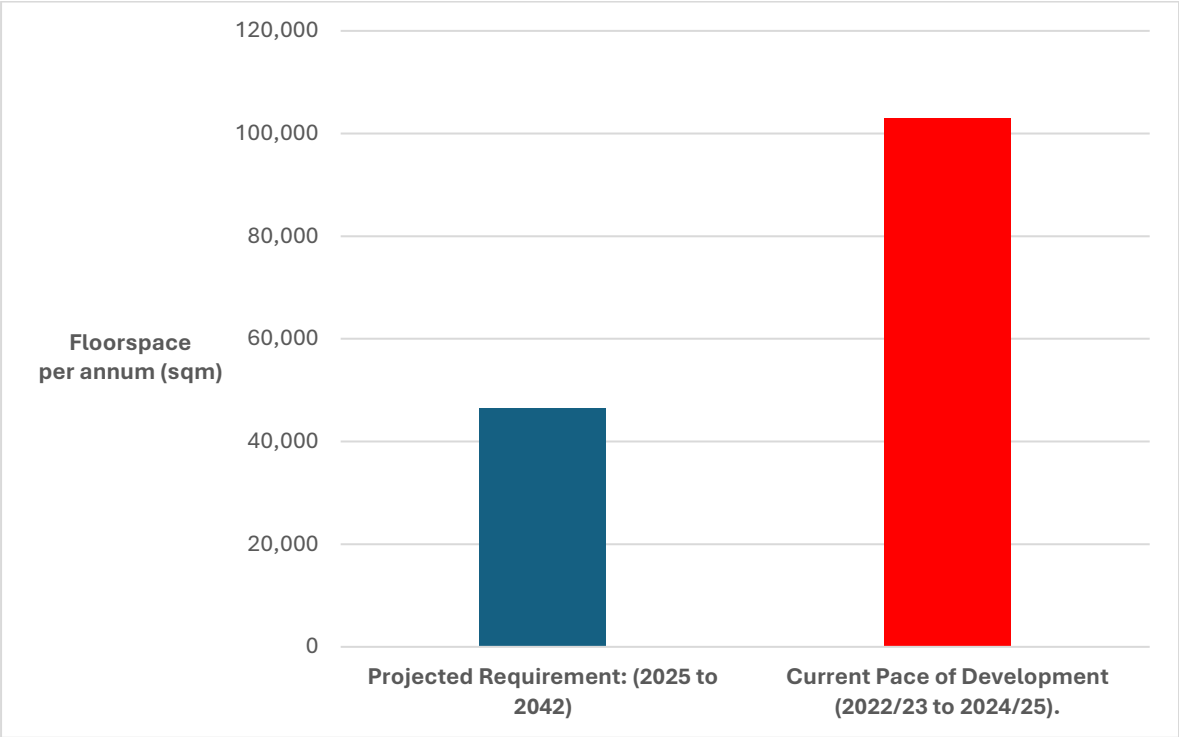
52. The DNTP provides data on completions on strategic-scale sites within the Borough covering the period 2022–2025. This is itemised in more detail in Appendix 2 of the Topic Paper and summarised overleaf in Table 2.

Table 2 – Completions on Strategic Sites in Rugby Borough (sqm) from 2022 to 2025

Year	Sites (sqm)	Total (sqm)
2022/23	Prospero, Ansty: 22,493 Prologis, Ryton: 44,343 Symmetry Park: 29,722	96,558
2023/24	Prospero, Ansty: 68,727 Symmetry Park: 60,008	128,735
2024/25	Symmetry Park: 83,541	83,541
Total		308,834

53. This provides an average of 102,945 sqm of take-up per annum over the last three years. The requirement for large sites for the plan period is 791,525 sqm. This works out at 46,560 sqm per annum. Current rates, including years of perceived market slowdown (2023/24 and 2024/25), are running at 2.2 times that. This is illustrated overleaf by Figure 2.

Figure 2 – Projected requirement for strategic sites against recent pace of development



54. Development in the pipeline (i.e. at Padge Hall Farm – where a unit for Tesco of 45,700 sqm is close to completion - and the 275,000 sqm Frasers pre-let) should maintain these healthy rates of completion over the next 2/3 years.

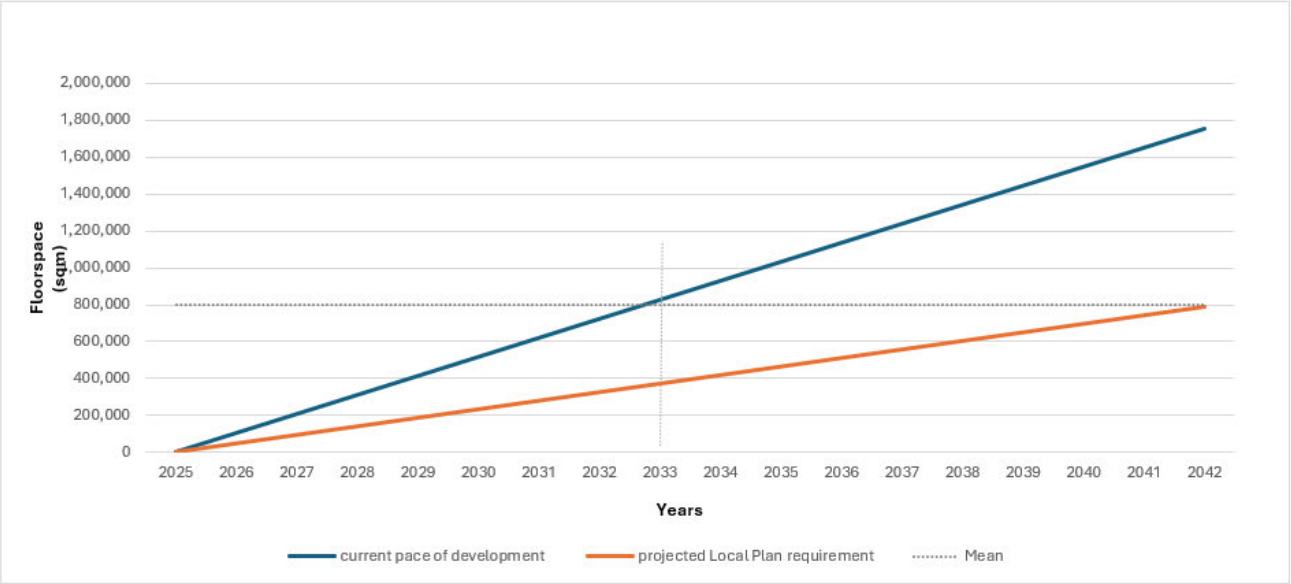
55. In addition, healthy levels of development completions have been experienced at Magna Park and DIRFT over the last few years. The former is considered in greater detail below with reference to unmet need from Harborough. In addition, wider trends on take-up over the last two years have been resilient, and better than pre-pandemic levels. According to Savills, 2025 was the strongest year for take-up of big box units over the last three years. Take-up reached 33.4 million sq ft nationally – 14% up on 2024 and 29% above pre-pandemic levels.

56. The Midlands accounted for 12.23 million sq ft of national take-up in 2025, representing 37% of all floorspace taken up. Much of this took place in the Golden Triangle. The most notable deal was the pre-let of 120,000 sqm to M&S in a single building at DIRFT.

57. In terms of market signals, rents for big box floorspace have increased steadily over the last 3 complete years (2023 to 2025 inclusive). At a national level, rents have increased for this sector at between 4% and 6% per annum. This profile is reflected at Magna Park with rents increasing from £8.95 per sq ft in December 2022 to over £10 per sq ft by the end of 2025.

58. On this basis, NDL considers the pace of development will continue at this rate if sufficient suitable land is brought forward. The difference in the two rates — current pace and projected rate — is illustrated on the graph overleaf.

Figure 3 – Projections of current pace of development of strategic sites against Local Plan requirement



59. At the current rate of development, the need for strategic scale floorspace will be circa 1.75 million sqm over the plan period. This is almost 1 million sqm more than currently projected.

Unmet need from Neighbouring Local Authorities

Coventry

60. Previously, the Development Needs Topic Paper that supported the Regulation 18 version of the daft Rugby Local Plan assumed an unmet need from Coventry for non-strategic industrial sites of 180,000 sqm and that Rugby would commit to accommodate all of this. The figure of 180,000 sqm was generated by applying a 40% plot ratio to the shortfall between need for the period from 2021 to 2041 (105 ha) and supply (60 ha) – i.e. 45 ha This was on the basis set out in the Regulation 19 version of the draft Coventry Development Plan.

61. The revised Development Needs Topic Paper (DNTP), which supports the draft Regulation 19 Rugby Local Plan, refers to the level of unmet need from Coventry reducing from 45 ha to 9 ha (able to generate 36,000 sqm rather than 180,000 sqm). The DNTP states that the planned amount of floorspace in the Regulation 19 draft Local Plan will exceed the need to meet its own non-strategic industrial land plus the entirety of the need for Area 7 (as defined by WMSESS) by just over 10,000 sqm. As such, the Regulation 19 draft Local Plan could contribute just 10,000 sqm (or 2.5 ha) to help meet Coventry's unmet need.

62. Essentially, the contribution of Rugby to meeting Coventry's unmet need has reduced considerably, both absolutely and relatively. Previously, Rugby has contributed fully to meeting unmet need from Coventry. Prologis Park at Ryton-on-Dunsmore and Prospero at Ansty are obvious examples. However, the evidence base clearly places no reliance on any unmet need from Coventry in allocating Green Belt land at Walsgrave Hill, Ansty Park North and Crowner Fields Farm.

63. It is to be noted that the reduction in unmet need for Coventry has yet to be tested at examination. The draft plan submitted by Coventry City Council for examination in September 2025 retained the position of need exceeding supply by 45 ha (i.e. a need of 105 ha against supply of 60 ha). Since then, Coventry City Council has submitted evidence that seeks to demonstrate an increase in the figure available for supply (principally through an allowance for windfall sites). The Inspectors to the examination have questioned the efficacy of this evidence and it will be reviewed at examination sessions in March and April this year.

64. NDL will be participating at these sessions and have recently submitted statements on both need (Matter 2) and supply (Matter 6). These are provided as **Enclosures Nos. 2** and **3** respectively).

65. NDL concludes that there is a minimum shortfall between local need and supply over the Rugby Local Plan plan period of **67.4 ha**. At a development ratio of 40%, this generates a requirement of **269,000 sqm**.

Harborough

66. Despite sharing a long boundary with Harborough District along the A5, the DNTP makes no reference to any potential unmet need from Harborough. In addition, the Iceni Addendum makes no response to submissions made in NDL's May 2025 Technical Note that there was a potential unmet need of 283,000 sqm from Harborough.

67. The Harborough draft Local Plan (Regulation 19) was published for consultation in March 2025. It allocates 340,000 sqm on 137.8 ha at Magna Park.

68. Since then, Iceni has produced a follow-up report on strategic distribution for all Leicestershire authorities – the Leicester and Leicestershire Strategic Distribution Floorspace Needs Update and Apportionment Report, October 2025. This identifies a gross requirement of 823,400 sqm for Harborough District in the area of Magna Park and Junction 20, M1 (described as Opportunity Area 6) for the period 2023 - 2046. Allowing for completions since 2023 and unbuilt commitments (257,000 sqm – all at Magna Park), there is a residual requirement of 566,400 sqm.

69. GLP are seeking to increase this allocation to 370,000 sqm through the examination process – Harborough DC is looking to submit its draft plan for examination in April 2026. In addition, we are aware of a recent consent for 50,000 sqm at Junction 20, M1. This would increase supply to 420,000 sqm but still leave a **shortfall of 146,400 sqm**.

70. NDL and GLP have undertaken analysis of completed development at Magna Park over the last seven years. This is presented overleaf in Table 3.

Table 3 — Development Completions at Magna Park

Year	Phases/Units	Floorspace (sqm)
2019/20	Plot G (Wayfair)	100,844
2020/21	MPS 1-4	117,226
2021/22	MPN 1	18,590
2022/23	MPS 5-8 and MPN 2-4	197,117
2023/24	MPS 9-11	59,888
2024/25	-	0
2025/26	MPN 761	70,732
Total		**564,392**

71. On average, take-up at Magna Park over the last seven years has been **80,628 sqm per annum**. There is consent for two plots — MPN5 and MPN6 — totalling 118,449 sqm. The allocation in the draft Harborough Local Plan can provide a further 370,000 sqm. There is no further land available or developable at Magna Park within Harborough.

72. As such, Magna Park has a finite capacity of 488,449 sqm on the eastern side of the A5. At the build rates of the last seven years, this equates to just **6.06 years' supply**.

Analysis

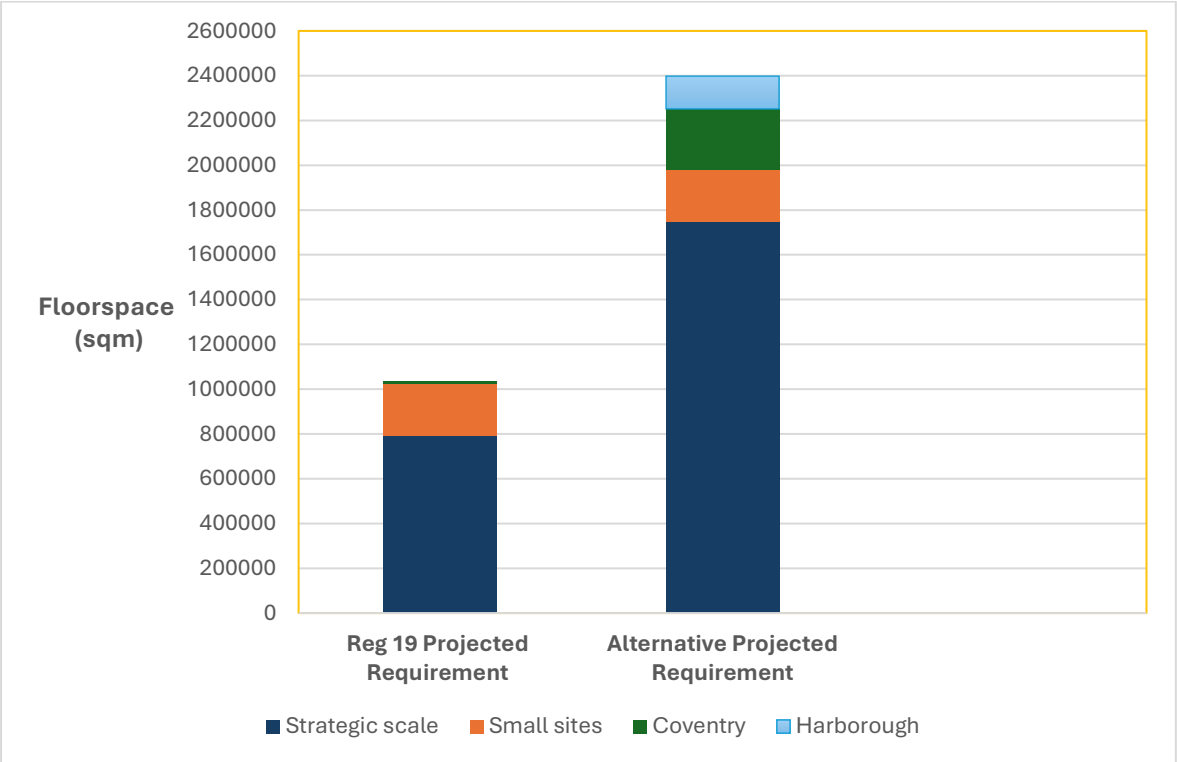
73. Table 4 below brings the various components of need together and compares these against the relevant projections set out by the Regulation 19 Local Plan and its evidence base.

Table 4 – Quantitative Comparison of NDL's Analysis against the Reg 19 Requirements (sqm)

	Reg 19 Local Plan	**NDL's Alternative Analysis**	**Difference**
Strategic Scale Sites	791,525	1,750,065	958,540
Small Sites	232,600	232,600	0
Unmet Need from Coventry	10,000	269,000	259,000
Unmet Need from Harborough	0	146,400	146,400
Total	**1,034,125**	**2,398,065**	**1,363,940**

74. This is illustrated in the bar chart presented overleaf in Figure 4.

Figure 4 – Reg 19 proposed employment land requirements against NDL's analysis



75. NDL's analysis leads to a very different conclusion on the quantity of employment floorspace required. Clearly, the Local Plan will need to identify further sites.

76. Qualitatively, the largest element is for strategic scale employment sites, of which 70% should be directed to meeting the needs of the Freight and Logistics sector. Magna Park, an acknowledged and established logistics location, which is located outside the Green Belt, is an obvious platform to accommodate and attract this sector.

Conclusion

77. NDL considers that the spatial strategy for employment land is flawed for three principal reasons:

- The identified need — particularly for large-scale logistics — is not being effectively met.
- The need for large-scale employment land has been significantly underestimated.
- Very little, if any, allowance has been made to meet unmet need from the neighbouring local authorities of Coventry and Harborough.

78. With regards to the first reason, the evidence base to employment land need for Rugby Borough confirms that the principal element of need to meet on a qualitative basis is for Freight and Logistics (i.e. Use Class B8). However, in assessing how this need should be met, established locations for logistics, such as Magna Park, have either been ignored or not properly appraised. Instead, locations close to Coventry have been prioritised, although they seem to have been chosen not because they are obviously better located to serve the Freight and Logistics sector. Instead, their preference seems to rely on their perceived relative attractiveness to the Manufacturing and Research & Development (R&D) sectors.

79. This reveals a confused and twisted logic. It is clearly a flawed basis for the employment spatial strategy proposed by the draft Local Plan.

80. In addition, this approach is not supported by relevant guidance in the NPPF and the proposed changes to the NPPF which were consulted on between December 2025 – March 2026. A strong driver of the latter is to enable and encourage decarbonisation of the economy. The Freight and Logistics sector is considered to be an important contributor to this overriding aim. Accordingly, the draft NPPF now recognises it as a separate and specific sub-sector and acknowledges its distinct locational requirements over other forms of employment land.

81. With regards to the second reason, NDL has substantiated two principal criticisms in the evidence base: -

- Flaws in the original assessment of committed supply by WMSESS have skewed badly the conclusions on the residual requirement for Area 7.
- The recent rate of development is over twice the adopted projected rate and building policy around the projected rate would lead to significantly reduced levels of inward investment in Area 7.

82. With the second point, taking into account current market activity and signals, NDL considers the current pace of development will continue at these much higher rates if sufficient suitable land is brought forward. At this rate of development, the need for strategic scale floorspace will be circa 1.75 million sqm over the plan period. This is almost 1 million sqm more than currently projected.

83. With regards to the third reason, NDL has identified potential unmet need from both Coventry and Harborough as follows: -

- Coventry – 269,000 sqm.
- Harborough – 146,600 sqm.

84. Taking this, and our analysis of the need for strategic scale sites, NDL assesses the overall requirement to be in the order of **2.4 million sqm**. This is close to 1.4 million sqm more than the requirement set by the Regulation 19 draft Local Plan. A significantly greater quantum of land must be identified and allocated, particularly to meet the demand for the **Freight and Logistics** sector - the principal driver behind the need for strategic scale sites in this part of the sub-region.

85. Magna Park is acknowledged to be an established "logistics location". Building upon this platform is the obvious choice in both economic and market terms to meet this identified need both quantitatively and qualitatively.

PJL
12 March 2026

ENCLOSURE 1

Rugby Borough Local Plan Review

Preferred Options Consultation (Regulation 18)

Technical Statement on Employment Land Need

Summary

1. Policy S3 – Strategy for Employment Land – of the draft Local Plan identifies a gross requirement of 1,026,546 sqm of industrial and distribution land (Classes B2, E(g)(ii) and (iii), and B8) to cover the plan period of 2024 to 2045. The Development Needs Topic Paper breaks this down to meet two specific needs: -

    - Strategic scale sites – 761,250 sqm
    - Smaller sites – 265,296 sqm

2. In addition, the Topic Paper refers to an unmet need from Coventry of 180,000 sqm. Added to the need for strategic scale sites and smaller sites, this would generate a total requirement of 1,206,546 sqm.

3. Existing commitments for strategic scale sites and smaller sites total 272,975 sqm and 14,012 sqm respectively. These derive a residual requirement as follows: -

    - Strategic scale sites – 488,275 sqm.
    - Smaller sites – 251,284 sqm.
    - Unmet need from Coventry – 180,000 sqm.
    - Total - 919,559 sqm.

4. Five new allocations are proposed: -

    - Crowner Fields Farm, Ansty (Frasers) – 275,000 sqm.
    - Coton Park East, Rugby – 115,000 sqm.
    - SW Rugby Phase 2 – 130,000 sqm.
    - Ansty Park North – 75,000 sqm.
    - Prologis Park West and Mountpark, Ryton-on-Dunsmore – 350,000 sqm.

5. These total 945,000 sqm and, on the face of it, would cover in quantitative terms the residual need of 919,559 sqm.

6. However, NDL's analysis indicates a completely different picture. It considers each assessment of need to be flawed. Brought together, they wholly underestimate the overall requirement for employment land for Rugby Borough. NDL's alternative analysis of need for the planning period is presented overleaf in Table 1.

Table 1 – NDL's analysis of the different elements of need

Element	Requirement (sqm)
Strategic scale sites	1,456,711
Smaller sites	251,284
Unmet need from Coventry	348,000
Unmet need for strategic scale sites from Harborough	283,000
Total	**2,338,995**

7. A full explanation of NDL's analysis is presented in turn below. However, of particular note is NDL's assessment of strategic scale sites. This is based on the latest empirical evidence on take-up of strategic scale sites in Rugby Borough over the last four complete years. This demonstrates a pace of development over two times greater than the projection set out in the Alignment Paper. Both NDL and GLP see no reason why the current pace of development will reduce in either the short or long term if sufficient suitable and deliverable development land is allocated.

8. NDL has also identified a potential unmet need from Harborough of 283,000 sqm. This is particularly relevant given that Magna Park's growth is constrained east of the A5 in Harborough District.

9. It is clear from this quantitative analysis that the draft Plan is allocating a substantially insufficient amount of new development land, particularly to meet the need for strategic scale sites. NDL's analysis points to an overall shortfall of just under 1.4 million sqm, having taken into account existing commitments and the five new allocations.

10. Qualitatively, a large majority (59%) of the committed and proposed supply is located within the Green Belt on the eastern edge of Coventry. This seems to be out of proportion relative to other well-served locations in Rugby Borough. Land west of Magna Park is an obvious such example.

Need for Strategic Scale Sites

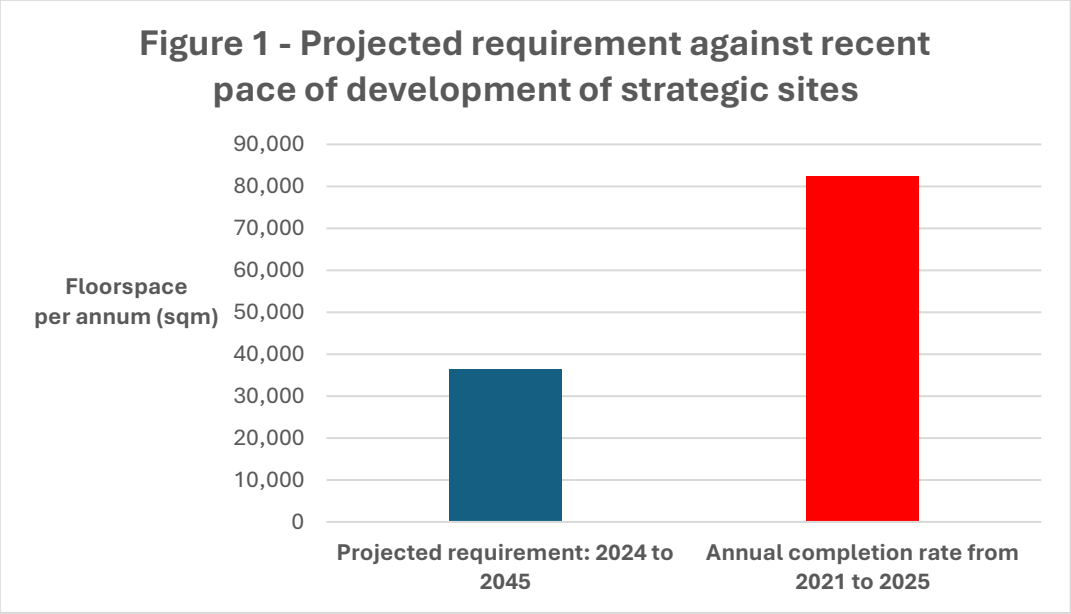
11. The Topic Paper on development needs refers to a gross requirement of 761,250 sqm for the plan period (2024 to 2045). This projection breaks back to 36,250 sqm per annum.

12. NDL has compared this annual requirement to the recent pace of development of strategic sites in Rugby Borough. Appendix 2 of the Topic Paper provides a site-by-site breakdown of completed development on strategic sites for 2021/22 to 2023/24. In addition, Appendix 3 provides a breakdown of committed sites as of April 2024. This lists Units 5–7 at Symmetry Park, Rugby, as under construction. These units were completed prior to April 2025. Table 2 provides a summary of these completions.

Table 2 – Completions of floorspace on strategic scale sites in Rugby Borough (April 2021 to April 2025)

Scheme	Floorspace (sqm)	Land Area (ha)
Prologis, Ryton-on-Dunsmore	44,343	13.65
Units 1–4, Symmetry Park, Rugby	89,800	24.51
Prospero, Ansty	111,781	40.06
Units 5–7, Symmetry Park, Rugby	83,541	19.7
Total	329,465	97.9

13. This represents an annual completion rate of 82,366 sqm per annum. This is a considerably faster pace of development than projected by the requirement (36,250 sqm per annum). Indeed, it is a multiple of 2.25 times the requirement. This is illustrated below by Figure 1.



14. This is of obvious concern to NDL. It strongly implies that an insufficient quantum of land will be provided and, at the current pace of development, will be absorbed well before the end of the plan period (2045).

15. It is to be noted that the principal original evidence base on strategic employment land is the West Midlands Strategic Employment Sites Study of August 2024 (Iceni). This study employed three principal methodologies – traffic growth and replacement demand, completions trends, and absorption trends. The first two methodologies were favoured, with the past completions' trends method generating the lower projected need. Some adjustments were then made – margin flexibility, the recycling of sites, and some large floorplate buildings being developed on non-strategic sites – which both added to and reduced the gross need figures.

16. In the case of the last four years of completions in Rugby, none have involved the recycling of old sites or large floorplate buildings on non-strategic sites. In addition, NDL considers the take-up over the last four years is representative of current and foreseeable future market conditions. Also, it takes no account of market activity on its borders. There has been significant development at Magna Park, DIRFT, and SEGRO Park, Coventry over the last four years.

17. Looking forward, agents and developers are still receiving a healthy flow of enquiries for large-floorplate buildings for both industry and warehousing. Particular trends are:

    - Retailers' requirements for larger buildings due to technological advancements, cost efficiency, and supply chain resilience.
    - Defence-related contracts due to increased Central Governmental spend on this area of the budget due to geo-political changes.
    - Global corporate occupiers seeking buildings which match their ESG ambitions.
    - On-shoring of manufacturing and assembly due to recent changes in international trade (i.e. the introduction of tariffs).

18. For these reasons, NDL is confident that the pace of development seen in Rugby Borough over the last four years will continue at the same rate, if not at a higher rate, if a sufficient quantum and choice of sites are made available. Moreover, it is Central Government guidance that recent employment land take-up is considered in projecting need (paragraph 029 to the PPG under the heading of economic need).

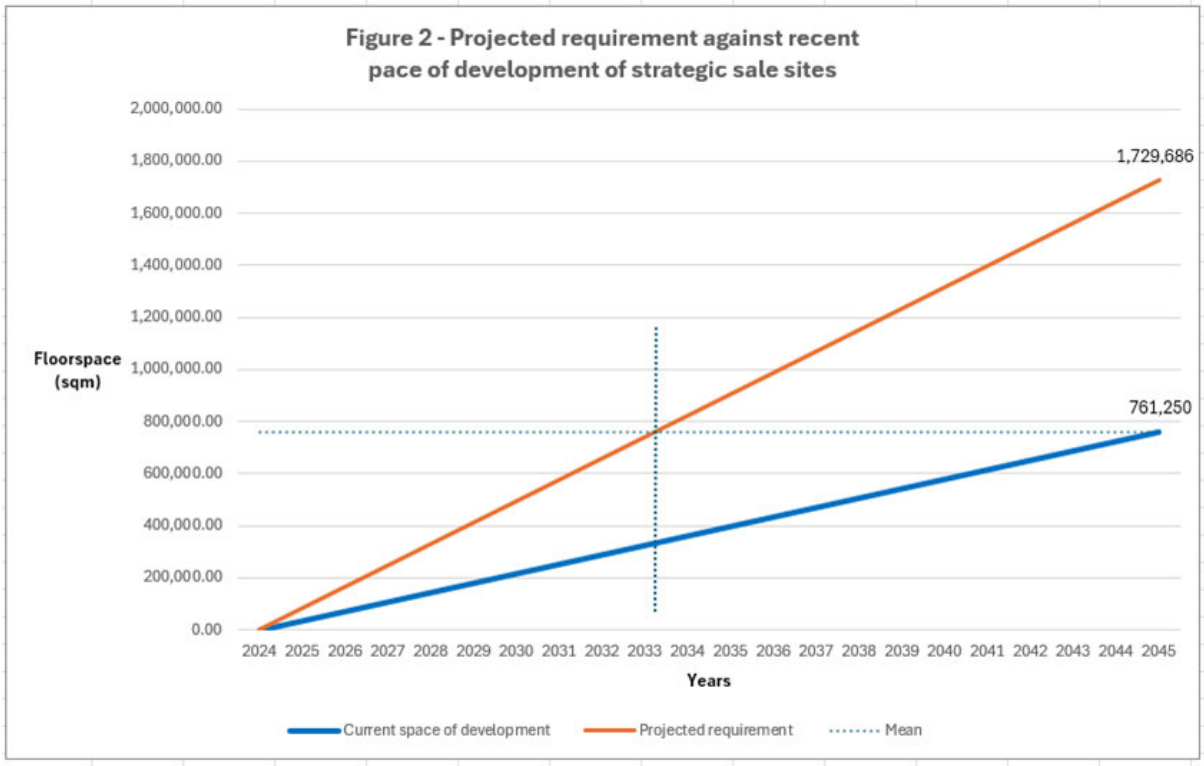
19. The principal reason why the annual requirement set by the Topic Paper is much lower is because it uses the base projection of 84ha for the residual need for Area 7 (i.e. Coventry and Rugby) set by the HEDNA and WMSESS Alignment Paper. NDL considers that this projection is deeply flawed as it is based on a wholly uncritical assessment of committed supply. This assessment is inadequate for a number of reasons: -

    - It provides gross areas, whereas need is derived on a developable area basis (i.e. hectares based on projected floorspace at a plot ratio of 35%).
    - It includes sites with fettered or restricted permissions or allocations.
    - It includes sites which do not meet the criteria for strategic employment sites, particularly with regard to size.
    - It includes sites which are not available or deliverable.
    - It is out of date and does not make allowance for completions over the last three years.

20. For example, the site area for Gateway South, Warwick (SEGRO Park, Coventry) of 177 ha includes a Country Park of 100 ha. The proposed Gigafactory site at Coventry Airport (124.7 ha) is included, although it is recognised by the Study that it is reserved for battery manufacturing only and such a use would not be reflected in any model of need based on past trends. Baginton Fields in Coventry (25 ha) - an historic allocation in the Coventry Development Plan (adopted in 2017) - is constrained by existing uses (primary school), local nature reserve, woodland, playing fields and flooding and can only be accessed through third party land. A large number of sites making up the committed supply have been developed already, including land at Symmetry Park, Prologis Park (Ryton), Faultlands (Nuneaton), Prospero and SEGRO Park, Coventry.

21. NDL has alerted already the responsible Council officers and the consultants Iceni of these concerns and presented a full analysis on how this has reduced significantly the level of remaining deliverable committed supply. This correspondence took place over the winter from November 2024 to February 2025. For Area 7, NDL's conclusion is that it reduces the supply quoted in the Alignment Paper from 560ha to 92ha. If this was factored in, the true residual need for Area 7 would rise substantially.

22. For the sake of simplicity, NDL has projected an alternative requirement based on factoring up the annual completions on strategic scale sites in Rugby Borough over the last four years. Over a 21-year plan period, from 2024 to 2045, this would generate a gross requirement of 1,729,686sqm (i.e. 82,366 X 21). This compares with a gross requirement of 761,250 sqm referenced by the Topic Paper. This is illustrated by Figure 2. This shows that the projected requirement, if acted upon, will only provide sufficient land up to 2033 at current development rates.



23. To derive a net requirement, completions for 2024/25 on extant unbuilt commitments need to be deducted. These are set out in the table below paragraph 1.35 of the Topic Paper. The plots for Units 5–7 Symmetry Park – the first entry in the table – have now been completed. These total 272,975 sqm and derive a residual requirement of 1,456,711 sqm (i.e. 1,729,686 - 272,975).

24. Policy S3 of the draft Local Plan allocates 5 sites, as follows: -

Table 3 – Draft allocations

Site	Floorspace (sqm)
Crowner Fields Farm, Ansty	275,000
Coton Park East	115,000
SW Rugby Phase 2	100,000
Ansty Park North	75,000
Prologis Park West & Mountpark, Ryton-on-Dunsmore	350,000
Total:	**945,000**

25. Crowner Fields Farm, Ansty is the subject of a resolution to grant planning permission for a new HQ campus for Frasers. Like the Gigafactory, it is arguable whether this also reflects modelled need and should be included as part of the future supply to meet such need. An alternative view is that it is illustrative of the demand for new strategic employment sites in this location.

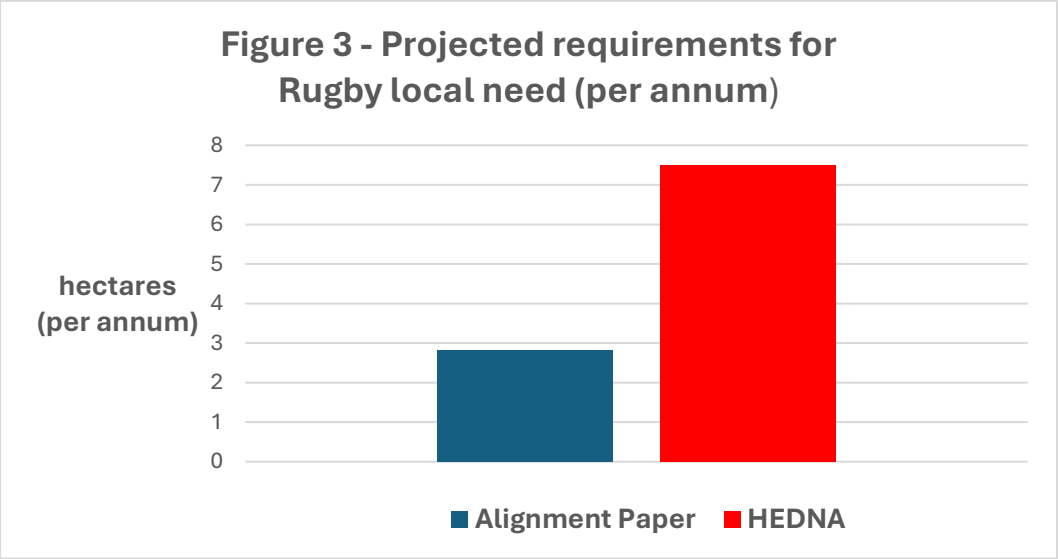
26. If it is included, then there will be a shortfall of 511,711 sqm of strategic employment site floorspace, taking NDL's projected residual requirement into account (i.e. 1,456,711 - 945,000).

27. It is to be noted that this analysis takes no account of Rugby's requirement to meet local need for industry and non-strategic warehousing, Coventry's unmet need, or any unmet need arising from Harborough. These are considered in turn below.

Rugby's Local Need – Smaller Sites

28. In the table below paragraph 1.28 of the Topic Paper, a need for industrial land on smaller sites from 2021 to 2045 of 272,000 sqm on 68 ha is identified. The source of this need is the Alignment Paper.

29. It is to be noted that this projection is a significant reduction from the 2022 HEDNA that remains part of the evidence base. The HEDNA projected a local general industrial need of 150.5 ha for 2021 to 2041 and 218.2 ha for 2021 to 2050. The current projection of 68 ha equates to 2.83 ha per annum. The HEDNA rates to 2041 and 2050 both each equate to 7.5 ha per annum. This is illustrated by Figure 3.



30. NDL understands that the Alignment Paper has removed big-box units from the completions trend for local / general need (paragraph 3.24 of the Alignment Paper). However, it is to be noted that the 2022 HEDNA already accounted completions for local need and strategic needs separately. As such, NDL is confused how the Alignment Paper presents such a different picture and has referred this directly to the Study's author, Iceni.

31. Let's assume, for the sake of argument, that the local need is 272,000 sqm. This is a gross need and reduces to a residual need of 251,284 sqm once completions from 2021 to 2024 and existing commitments are factored in (paragraphs 1.36.1 to 1.36.4 of the Topic Paper). This requirement is over and above the shortfall of 511,711 sqm derived by NDL's analysis of the strategic-scale requirement.

Coventry's Unmet Need

32. This is covered by the Topic Paper (paragraphs 1.36.7 to 1.36.10) but not referenced by Policy S3. The Topic Paper indicates an unmet need of 180,000 sqm on 45 ha. Paragraph 1.36.10 states that if Coventry's unmet need was to be included, it would increase the gross need to 1,206,546 sqm. However, for reasons that are not made clear, this does not translate to the actual draft Plan.

33. NDL has reviewed the draft Coventry Local Plan and its associated evidence base and made representations on related employment land issues. Representations made to the Regulation 19 draft Local Plan are provided in Appendix 1 to this statement.

34. The unmet need referred to by the Topic Paper of 45 ha has been derived by taking a supply of 60.2 ha (as of April 2024) and matching this against a need of 104.9 ha covering the period of 2021 to 2041. It is to be noted that this need, which was derived by the Alignment Paper, covers local need only. It excludes any wider strategic need.

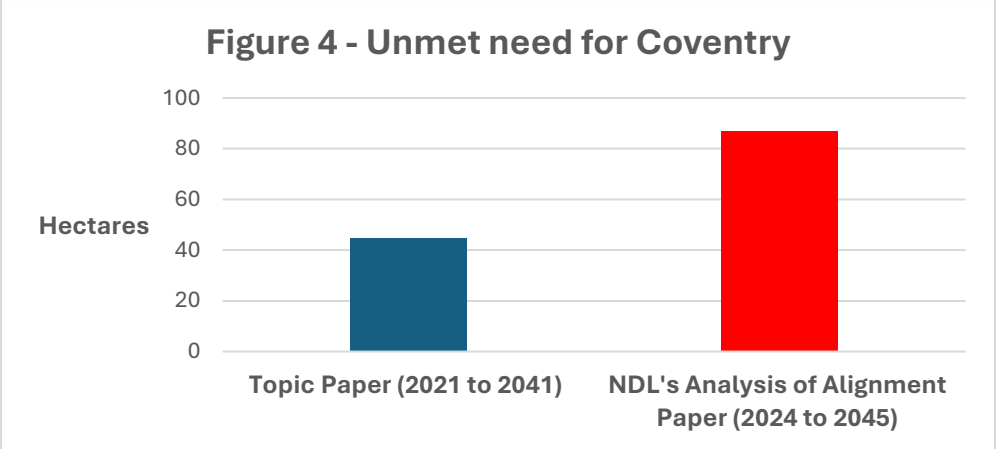
35. The Coventry Local Plan covers the period to just 2021; hence, the use of this figure for its purposes. However, the Rugby Local Plan covers the period to 2045. The Alignment Paper also derives a need to cover the period from 2021 to 2045. Coventry's local need to cover this period is 121.8 ha.

36. The supply of 60.2 ha is broken down and summarised by Table 5.1 of the draft Coventry Local Plan. It is provided below for ease of reference

Table 5.1 – Class B2 and B8 local employment land supply components for Coventry

Supply components	Site size (Ha)
Completions 2021 – 2024*	25.4
Committed supply	6.2
Remaining Allocations from adopted 2017 Local Plan carried forward (where not included above)**	28.6
Total	60.2

37. This allows an analysis of Coventry's unmet need for the same plan period as Rugby's (i.e. 2024 to 2045). Completions from 2021 to 2024 fall outside this period and are not relevant for the purposes of this exercise. This reduces supply, as of April 2024, to 34.8 ha. Assuming a gross requirement of 121.8 ha for 2021 to 2045, the residual requirement for 2024 to 2045 (or shortfall) would be 87 ha (i.e. 121.8 – 34.8). The difference between this assessment and the Topic paper is illustrated overleaf by figure 4. This equates to a requirement of 348,000 sqm (at 40% site cover, the assumption made by the Alignment Paper for non-strategic industrial sites).



38. In the representations made to Coventry, NDL argued that the Alignment Paper's projected need of 105 ha for 2021 to 2041 was an obvious underestimate. This was for three principal reasons:

- The projection was a significant (and unexplained) reduction from the 2022 HEDNA's projection for Coventry of 147.6 ha.
- Recent completion trends (2021–2024) of 8.5 ha per annum were significantly greater than the projected requirement (5.25 ha per annum).
- Market signals, as set out in other employment land evidence commissioned by the Council, pointed to strong demand and constrained supply.

39. NDL's analysis demonstrated that a continuation of recent take-up trends would lead to an alternative total projection for the plan period of 211.5 ha. This would represent a shortfall of 151.5 ha as of April 2021.

40. For these reasons, NDL contends that the identified shortfall of 348,000 sqm for the period from 2024 to 2045 represents a bare minimum for the purposes of assessing unmet need from Coventry over the Rugby Local Plan period.

Harborough's Unmet Need

41. The draft Rugby Local Plan and Topic Paper make no reference to any unmet need from Harborough. In NDL's view, this is an omission for three principal reasons: -

- Rugby Borough shares a long boundary with Harborough District, with settlements such as Lutterworth well related both geographically and economically to Rugby.
- Rugby Borough and Harborough District are located in the epicentre of the "Golden Triangle" – the sweet spot of logistics and freight for the UK.
- Magna Park is a centre of excellence for logistics and freight, and an obvious platform for economic growth and inward investment but is constrained in terms of future development within Harborough District.

42. The draft Harborough Local Plan (Regulation 19) was consulted upon from 10 March to 6 May 2025. It allocates two new allocations at Magna Park, totalling 137.8 ha with this meeting wholly the identified requirement of 340,000 sqm for large-scale warehousing for the District.

43. This requirement is evidenced by a report produced by Iceni – Strategic B8 Needs Sensitivity Report, December 2024. NDL has assessed the draft local plan and the Iceni report and concluded that the projected need is an underestimate. This is for two principal reasons: -

- Misinterpretation by the draft Local Plan of the principal related evidence base – the Iceni report – in respect of the quantum of recommended projected need.
- Analysis and assumptions contained in the Iceni report, which are flawed or not evidenced.

44. These two reasons are expanded on in representations made recently by NDL, with these forming **Appendix 2** to this statement. NDL contends that the projected need for large-scale warehousing in the District should be a minimum of 623,000 sqm. Against the identified requirement of 380,000 sqm, this represents a shortfall of 283,000 sqm.

Analysis

Quantitative

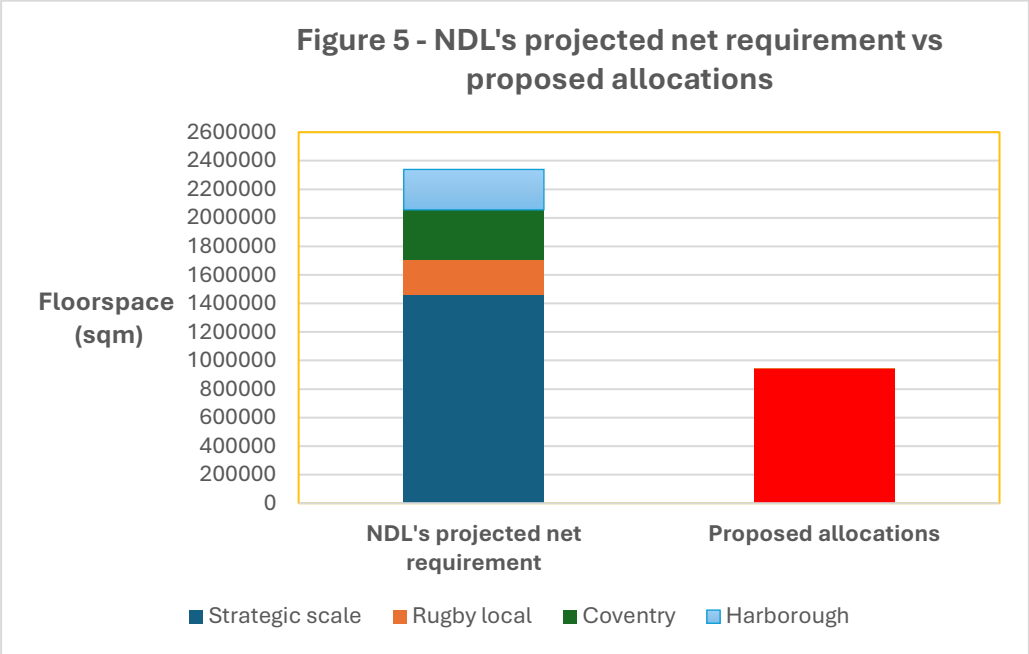
45. NDL has provided alternative assessments of need for various elements of the overall employment land requirement for Rugby Borough. These are summarised below in Table 4:

Table 4 - NDL's alternative assessments of need

Element	Floorspace (sqm)
Strategic scale need for Rugby	1,456,711
Local need for Rugby	251,284
Unmet need from Coventry	348,000
Unmet strategic scale need from Harborough	283,000
Total	**2,338,995**

46. These figures for requirements are net of unbuilt commitments, as of 1 April 2024 (the start of the plan period). It is to be noted that NDL has utilised the Council's figure for local need for Rugby, although questions the methodology of its derivation and notes its significant reduction from the 2022 HEDNA. In addition, NDL considers the figure of 348,000 sqm for unmet need for Coventry should be treated as a baseline or minimum figure. The five new allocated sites will provide 945,000 sqm of floorspace. By NDL's calculation, this will still result in a shortfall of just under 1.4 million sqm. This is illustrated below by Figure 5.

47.



Qualitative

48. NDL has also undertaken some analysis of the location of the principal commitments and allocations. This is presented below in Table 5.

Table 5 — Geographical dispersion of supply:

Type	Rugby Town	Rugby Borough	Coventry Edge
Commitments	Symmetry Park — 83,541 Coton Park East – 26,421 Small sites — 14,012	Padge Hall Farm, Hinckley — 136,350	Prospero, Ansty — 26,663
Allocations	Coton Park East — 115,000 SW Rugby Phase 2 — 130,000		Crowner Fields Farm, Ansty — 275,000 Ansty Park North — 75,000 Prologis Park West & Mountpark, Ryton-on-Dunsmore — 350,000
Totals	368,974	136,350	726,663

49. Of the total supply of 1,231,987, almost 59% (i.e. 726,663 sqm) is located within the Green Belt on the eastern edge of Coventry. This seems to be an over-provision relative to other locations within Rugby, particularly given the opportunity that exists outside the Green Belt to the west of Magna Park. This specific issue is dealt with by a separate legal note from leading counsel.

PJL

8 May 2025

Appendix 1 – Representations made by NDL to the draft Coventry Local Plan (Regulation 18)

Appendix 2 – Representations made by NDL to the draft Harborough Local Plan (Regulation 19).

ENCLOSURE 2

ID 45

Examination of Coventry Local Plan

Position Statement by Nurton Developments Ltd (NDL) (ID45)

Matter 2: Need for Industrial and Warehouse Development

Q2.6 (a) - Is the assessment that 105 hectares of additional land are required to meet Coventry's local need for industrial and warehouse development between 2021 and 2041 justified by adequate, proportionate and up-to-date evidence?

(b) - If Policy DS1 was modified to cover the period 2024 to 2042, what would the local need for industrial and warehouse development be based on that available evidence?

1. In NDL's view, as set out in its representations to Policy DS1 and paragraphs 3.10 to 3.15, the projected need of 105 ha to meet Coventry's local need is not justified by the most up-to-date evidence. Instead, this projection underestimates the local need for industrial and warehousing to a very substantial degree.

2. A copy of NDL's representations is enclosed (**Enclosure No. 1**) for ease of reference. It made the following observations and criticisms: -

    - The projection of 105 ha, which is a product of the HEDNA/WMSESS Alignment Paper (EB10), is 40% less than the projection made by the HEDNA (EB8) of 147.6 ha.
    - This reduction is not explained clearly or commented upon by the draft Plan or associated evidence base.
    - Analysis of the latest completions data (2021 - 2024), as set out in Table 5.1 of the draft Plan, indicates a much higher recent pace of development than that projected.
    - This high pace of development is corroborated by the market sentiment reported by the Employment Land Review (EB13).

3. Since the draft Plan was submitted for examination, the Council has provided more detailed evidence on development completions through the Employment Windfall Paper (PS11 a).

4. Specifically, Table 5.1 of this report provides a breakdown, by year, of industrial development from 2015/16 to 2024/25. The purpose of this table (and the wider study) is to indicate the proportion of industrial development on windfall sites. However, its principal significance in this context is that it gives 10 years of completions data, including that covering recent years.

5. This data was not provided in such detailed form in either the HEDNA (EB8) or the Alignment Paper (EB10). For ease of reference, the table is extracted and provided overleaf.

Table 5.1 Profile of Industrial Development in Coventry by Type of Site (Ha)

	All Industrial Development (ha)	Development on Allocated Sites	Development on Windfall Sites	% Windfall
2015/16	11.2	4.5	6.7	60%
2016/17	21.4	20.6	0.8	4%
2017/18	3.3	0.0	3.3	100%
2018/19	23.3	12.8	10.5	45%
2019/20	5.1	1.6	3.5	68%
2020/21	12.8	11.3	1.6	12%
2021/22	9.6	4.8	4.8	50%
2022/23	8.4	2.2	6.2	74%
2023/24	3.2	2.9	0.3	8%
2024/25	1.7	0.0	1.7	100%
Total	99.9	60.6	39.3	39%
Annual Average	10.0	6.1	3.9	39%

Source: CCC Monitoring Data/Iceni Analysis

6. Some of the 99.9 ha developed will be of a strategic scale, although its extent will be constrained by the dense urban nature of Coventry and its tightly drawn boundaries. Accordingly, few sites will have met the site size threshold of 25 ha set by WMSESS (EB11).

7. However, EB11 does contain a list of strategic scale completions over the period from 2012/13 to 2021/22 in Appendix 4. It lists five completions within Coventry over this period, totalling 172,792 sqm. Assuming a site density of 43% - based on a floorspace of 433,552 sqm developed out in the period from 2015/2016 to 2024/2025 (Table 5.2 of PS11a) on an area of 99.9 hectares (Table 5.1 of PS11a) - this floorspace would have required a developable area of 40.2 ha.

8. By deduction, the amount developed for non-strategic purposes over the last 10 years was 59.7 ha (i.e. 99.9 less 40.2). This equates to an average of 5.97 ha per annum. Projected over a 20-year plan period (i.e. 2021 - 2041) this would derive a base need of 119.4 ha (i.e. 5.97 × 20).

9. The HEDNA (EB8) adds a margin of flexibility equating to five years' take-up. Adopting the same methodology, this would add a further 29.9 ha (i.e. 5.97 × 5) to the base need.

10. Added together, this indicates a total projected need of **149.3 ha**. This is close to the projection of the HEDNA (EB8) of 147.6 ha.

11. NDL would argue this should be treated as a minimum for two particular reasons: -

    - The tight urban nature of Coventry and the constraints imposed by the Green Belt will have acted to suppress development. Natural demand levels would have been higher.
    - Market sentiment and related signals (i.e. rising rental levels) demonstrate the strength of the market for industrial and warehouse premises in Coventry, with demand outstripping supply, as evidenced by the Employment Land Review (EB13).

12. On this basis, NDL contends that Policy DS1(3) should replace "**105 ha**" with "**a minimum of 150 ha**" to cover local employment needs for the plan period 2021 - 2041.

13. For an alternative plan period of 2024- 2042, this figure should be modified to read "**a minimum of 138 ha"**. This is based on a straight-line reduction on the trend from 20 years to 18 years (i.e. 5.97 × 18) and a five-year margin (i.e. 5.97 × 5).

14. It is to be noted that changing the plan period to 2024 - 2042 will have an effect on supply. It will remove the completions from 2021 - 2024 from the land supply components summarised in Table 5.1 of the draft Plan. Excluding recent assumptions on windfall developments, this will reduce supply to 34.8 ha. This is considered in more detail in our response to Matter 6.

Q2.7 (a) - Is the assessment that (in addition to the 105 ha to meet Coventry's local need) up to 84 ha of additional land (comprising sites of over 25 ha suitable for units of over 9,000 sqm) are required in Coventry and/or Rugby between 2021 - 2045 justified by adequate, proportionate and up-to-date evidence?

(b) - If Policy DS1 were modified to cover the period 2024 - 2042, how would that sub-regional figure need to be modified based on that available evidence?

15. No, this assessment has not been justified by the evidence presented. Instead, it is NDL's contention that the projection of the WMSESS/HEDNA Alignment Paper (EB10) of up to 84 ha is hopelessly inadequate and, if allocated land is restricted to this level, will hold grave consequences for the economy of Coventry and its sub-region.

16. Full reasons to justify this position were advanced in NDL's representations in respect of paragraphs 5.14 of the draft Plan. These are provided in **Enclosure No. 2** for ease of reference. A short summary of our principal criticisms is provided below: -

- Area 7, which takes in Coventry and Rugby, is located in the heart of the Golden Triangle - the sweet spot for large-scale Freight and Logistics at a national level.
- The projected requirement will lead to a severe reduction in the current rate of development in this area.
- This will severely undermine the principal purpose of the original WMSESS (EB11) - i.e. the allocation of a sufficient number of sites to serve the sub-regional economy of the West Midlands for the next 20 years.
- It will run directly contrary to current and proposed national planning policy guidance that seeks to support the development of Freight and Logistics and related infrastructure.
- The residual need for Coventry and Warwickshire should be a minimum of 451 - 602 ha (instead of 136 - 311 ha referenced by paragraph 5.14).
- A substantial majority of this should be located in Area 7, based on recent take-up and market demand.

17. NDL considers that the WMSESS (EB11), which underpins the Alignment Paper (EB10), is a well-intentioned piece of work. It seeks to boost the allocation of strategic sites across the West Midlands. Moreover, its assessment of gross need is multi-layered.

18. However, its assessment of committed supply has been wholly uncritical, taking out of date information provided by the local planning authorities at face value. This has fundamentally undermined the study's findings. It has led to a gross overestimation of supply, which in turn has led to a total underestimation of residual need.

19. NDL has undertaken its own analysis of supply. This is presented in detail in the representations made. Essentially, NDL has discounted:

- sites developed out by April 2025 and no longer available;
- sites patently not deliverable (e.g. Baginton Fields);
- sites below the size threshold of 25 ha;
- gross site areas inflated by non-core employment uses (e.g. the country park at Coventry Gateway); and
- sites severely restricted in terms of use and not anticipated by modelled need (e.g. the Gigafactory at Coventry Airport).

20. By NDL's calculations, this has reduced the committed supply as at April 2025 as follows.

Table 1 - Comparison of Committed Supply

	WMSESS (as at 2022)	NDL (as at 2025)
Coventry and Warwickshire	655.8 ha	243 ha
Area 7	560.3 ha	92.4 ha

21. This makes a very significant difference to the residual requirement for Coventry and Warwickshire and Area 7. The difference for the former is illustrated in Table 2.

Table 2 - NDL's Alternative Assessment of Residual Requirements for Coventry and Warwickshire

Gross Requirement 2021–2045 (ha)[1]	Gross Requirement per annum (ha)	Gross Requirement 2025–2045 (ha)	Supply as at April 2025 (ha)	Residual Requirement 2025–2045 (ha)
835–1,017	34.7–42.3	694–845	243	451–602

22. By NDL's estimations, the residual requirement for Coventry and Warwickshire is over 200 ha greater than the projection made in Table 3.3, despite reducing the period to 2025 - 2045.

23. Unfortunately, the Alignment Paper (EB10) does not give a breakdown of the gross requirement for Coventry and Warwickshire for the three opportunity areas. Therefore, a similar exercise cannot be carried out for Area 7. However, the inadequacy of the projected residual requirement for Area 7 of 9 - 84 ha can be measured in a different way - through a sense check against recent development rates.

24. NDL has analysed completions of large floorplate buildings on strategic employment sites in Area 7 over the period 2022 - 2025. This is presented in Table 1 of NDL's representations to the Regulation 19 draft Plan. In summary, over the last complete three years, 530,689 sqm has been developed on 167.7 ha of land. This equates to 56 ha per annum.

[1] Source: Table 3.3 of EB10

25. It could be argued that a projection based on a three-year trend is insufficiently long to capture the full market cycle. However, the PPG emphasises the importance of using evidence of **recent employment land take-up** (para 029 under the heading of economic need). In addition, the period 2022 - 2025 has witnessed a market slowdown from that experienced in 2020 and 2021, following the steep rise in interest rates in 2022.

26. Market indicators now show an upward trend in take-up, with 2025 witnessing the highest level of take-up in the big-box market nationally for three years (Savills market research). Locally, development is under construction at both Padge Hall Farm (pre-let to Tesco of 45,700 sqm) and at Coventry Gateway and Frasers have agreed a pre-let of 275,000 sqm at Ansty. These indicate that this pace of development will be sustained over the medium term if land is made available.

27. The Alignment Paper (EB10) projects a requirement of 9 - 84 ha. Taking the higher figure (84 ha) and adding to NDL's assessment of supply as at April 2025 (92.4 ha) provides a total gross requirement of 176.4 ha for Area 7. At the current pace of development (56 ha per annum), this represents **just 3.2 years of supply**. Essentially, this would leave no land available after 2028.

28. That cannot be what the WMSESS (EB11) intended when it was commissioned and makes no sense in market or economic terms.

29. NDL has corresponded with Iceni and representatives of Rugby Borough Council, who commissioned the Alignment Paper (EB10), and shared this analysis following publication of the WMSESS (EB11) and the Alignment Paper (EB10). For the most part, NDL's analysis has been ignored, although there has been some engagement by Iceni, who have acknowledged that the committed supply figures were taken at face value and were not subject to any assessment of true capacity or deliverability.

30. However, in November 2025 Iceni produced for Rugby Borough Council an Addendum to the Alignment Paper. This Addendum is not in the Examination Library and a copy is provided as **Enclosure No.3**.

31. The Addendum accepts that the developable area of the Coventry Gateway site should not include the area developed as a country park. This reduces the developable area by 90.6 ha (from 178 ha to 87.4 ha).

32. In turn, this reduces the supply in Area 7 by 90 ha. However, for reasons not entirely clear to NDL, Iceni recommends that the residual requirement of Area 7 should be increased by only 50 ha (rather than 90 ha), albeit considered this should be treated as a minimum.

33. The resulting changes to the overall residual requirement are summarised in paragraph 2.19 of the Addendum. For ease of reference, this is extracted below.

- Area 5: North Warwickshire – 50-100ha
- Area 7: M6 / A45 / A46 / M45 Coventry & Rugby – 59-134ha
- Area 8: A46 / M40 Warwick – 75-125ha
- **Total: 184 – 359ha**

34. The reduction in the developable area for Coventry Gateway reduces overall committed supply in Area 7 from 560.3 ha to 469.7 ha (taking the Alignment Paper figures at face value). Adding the new residual requirement of 134 ha (taking the larger figure) generates a gross requirement of c.694 ha from 2022. At the current pace of development (56 ha per annum), this requirement will last only 12.4 years and cover the period to 2036 (adopting the starting date for the Study of 2022). For the reasons provided, NDL considers that the assessment of committed supply is deeply flawed. However, even if the figures are taken at face value, the gross requirement still falls well short of covering the study period (to 2045) at current development rates.

35. It is NDL's considered view that the WMSESS (EB11) and the associated Alignment Paper (EB10) need to be reviewed and updated to provide a realistic and positive basis for rolling out the next generation of strategic-scale sites for industry and logistics, particularly serving Coventry and Warwickshire and Area 7. This update does not need to be complex. Instead, it should concentrate on two specific areas: -

    - An independent appraisal of committed supply as at April 2025 (which NDL has undertaken already).
    - Extension of the completions data to cover 2022–2025.

36. NDL considers that such an exercise would present an entirely different picture of what the residual requirement would be for strategic-scale land in this sub-region. This requirement would be considerably larger and support wider planning and economic objectives at both a national and sub-regional level.

Q2.8 - Irrespective of the plan period and the specific figures, does the plan need to be modified to clearly set out the quantified local and sub-regional needs for industrial and warehouse development?

37. NDL considers such an approach would support plan-making across the sub-region. Moreover, the data on completions - the principal method employed by the various elements of the evidence base - is available. This should enable a reasonably accurate projection to be made of Coventry's local need for industry and warehousing and the contribution it can make to meeting wider strategic-scale needs.

38. With regard to the latter, completions data on strategic-scale warehousing indicates that 40 ha out of 100 ha developed over the last 10 years in Coventry was to meet this wider need. If extrapolated over the plan period (2021 - 2041), and a five-year margin added, this would realise a gross requirement of **100 ha** for this element. For the period 2024 - 2042, this would reduce to **92 ha**.

39. Currently, there is only one site in Coventry counted by the WMSESS (EB11) and the Alignment Paper (EB10) as committed supply to meet strategic scale needs - 25 ha at Baginton Fields. If this site is allowed for, it would generate a residual requirement for Coventry of 75 ha for 2021 - 2041 (and 67 ha for 2024 - 2042).

40. As referred to earlier, NDL does not consider Baginton Fields to be deliverable, and it should not count as committed supply. NDL's reasoning on this is provided in detail in its Position Statement on Matter 6.

PJL - 26 February 2026

ENCLOSURE 3

Examination of the Coventry Local Plan

Position Statement by Nurton Developments Limited (NDL) (ID45)

Matter 6: Economic Development and Employment Land Supply

Q6.8

(a) Is allocation JE2.4 Baginton Fields suitable for large-scale warehousing development comprising units of over 9,000 sqm to help meet the identified need for such developments in the Coventry/Rugby part of the West Midlands?

(b) And/or is allocation JE2.4 Bagington Fields suitable for other types of industrial and warehouse development to help meet Coventry's local needs?

(c) Is Policy JE2.4 effective in ensuring that development on the site would make an appropriate contribution to meeting the identified need for employment development in Coventry and the wider sub-region?

(d) Is there a reasonable prospect that the site will be available and could be viably developed for industrial and warehouse uses during the plan period?

1. This site is listed in Appendix A3 of the West Midlands Strategic Employment Sites Study (WMSESS) (EB11) as a commitment. The relevant extract from EB11 is provided below.

Table A3.1 Strategic Commitments in the West Midlands study area

Local Authority	Site	Allocation / Planning Permission	Description	Land (Ha)	Floorspace (sq.m))	Notes	Estimated Phasing (years)	Use
Coventry	Land at Baginton Fields and South East of Whitley Business Park	Allocation	Employment Type: B1b&c, B2 & B8	25			5-10	Mixed

2. As such, it is considered by this study to count towards meeting the overall gross requirement for strategic-scale land.

3. The HEDNA/WMSESS Alignment Paper (EB10) adopts the same position, with the site included in Appendix 1 – Strategic Site Commitments.

4. It therefore follows that: -

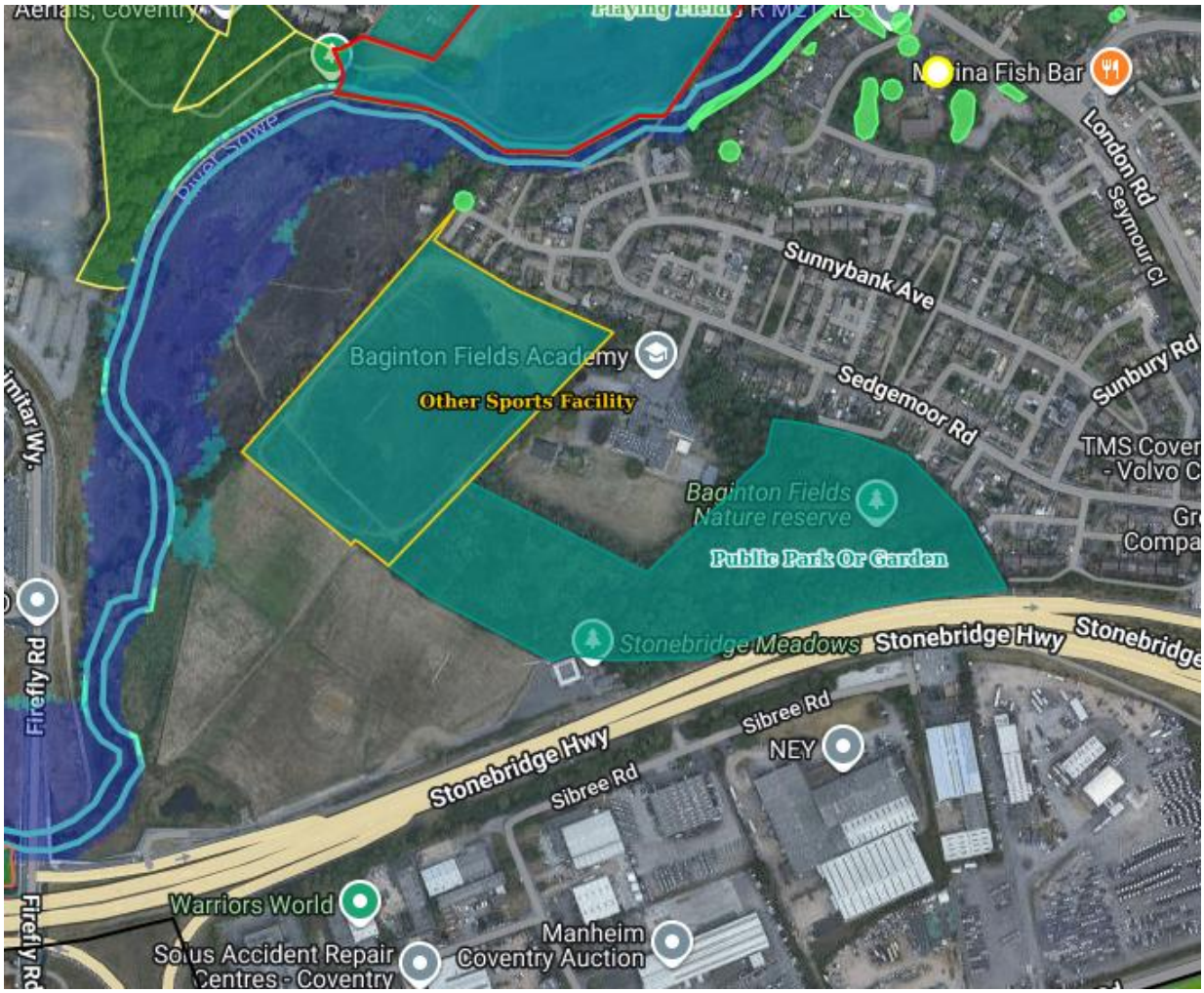
- The site cannot count towards meeting any residual requirement for Area 7 (now up to 134 ha following publication of an Addendum to the Alignment Paper), as the site has already been accounted for in reaching that figure.
- The site cannot contribute towards local needs, as EB10 and the HEDNA (EB8) segregate local and strategic-scale needs.

5. In any event, the site is clearly not suitable, available or achievable for a number of reasons. These are as follows: -

- It was allocated in the 2017 adopted Coventry Development Plan but has yet to come forward for development.
- It is heavily constrained by existing uses. These include a primary school and separate playing fields, both of which would require relocation.
- It contains a large woodland area and a designated Local Nature Reserve.
- Completion of the wider road improvements (to serve Coventry Gateway and JLR at Whitley) has constrained access options for the site. The only feasible access would be through third-party land and would require crossing the River Sowe.
- Part of the site lies within the floodplain of the River Sowe.

6. These constraints are illustrated in the extract from Landstack below.

Figure 1 – Landstack depiction of Baginton Fields



7. The site is well located strategically, with the A45 running along its southern boundary and it is in close proximity to JLR at Whitley and Coventry Gateway. Given these advantages, and the strength of the industrial and warehouse market over the last 10 years, the site might ordinarily have been expected to come forward successfully. However, there appears to be no appetite from the principal landowners, including the relevant third party, to promote the site. Despite being allocated for nine years, no planning application has been submitted, and no marketing has been undertaken.

8. In these circumstances, NDL does not consider that the site will be delivered in the foreseeable future. It should therefore be de-allocated and removed from the identified supply.

Q6.11 Is there a reasonable prospect that the total of 85 ha of land (60 + 25) will be developed for industrial and warehouse uses on the allocations and other sites referred to in Policy JE2 and Table 5.1 during the plan period?

9. Three factors should be considered in addressing this question: -

- The relevance of completions in accounting for future supply, particularly if the plan period changes to 2024–2042.
- The likelihood that not all existing commitments and allocations, summarised in Table 5.1 and listed (in the case of allocations) in Policy JE2, will necessarily come forward for the development.
- The likelihood that Bagington Fields (25 ha) will not be delivered.

10. With regard to the first factor, the 25.4 ha of completions from 2021–2024 are relevant to supply if the plan period remains 2021–2041. However, if the plan period changes to 2024–2042, those completions will no longer form part of the supply. This would reduce supply to 34.8 ha (i.e. commitments of 6.2 ha plus remaining allocations of 28.6 ha).

11. With regard to the second factor, no allowance has been made for any commitments or allocations failing to come forward during the plan period. Instead, it has been assumed that all such sites will be delivered during the plan period.

12. This would seem to be a high-risk strategy. As such, NDL considers that the identified supply of 60.2 ha (to meet local needs) represents a maximum figure when compared against projected need and in quantifying unmet need.

13. The third factor has been addressed in response to Q6.8. For the reasons set out above, NDL concludes that there is no reasonable prospect of Bagington Fields (25 ha) being developed for industrial and warehouse use during the plan period.

Q6.12 - Is the approach of not meeting Coventry's identified need for local employment land (105 ha) in full, and the unmet need for strategic employment land in Warwickshire, justified and consistent with national policy?

14. NDL considers that this approach is justified and consistent with national policy, particularly in respect of unmet need for strategic scale employment land.

15. Firstly, Coventry's capacity to deliver new employment land, particularly at scale, is constrained by: -

    - The tightly drawn boundaries of the city, with most expansion opportunities limited to land within adjoining Local Planning Authority areas (such as Nuneaton & Bedworth, Rugby and Warwick).
    - The dense and heavily urbanised nature of the city.
    - Competing land use pressures, particularly for housing.

16. For these reasons, much of the recent expansion of Coventry's industrial base has taken place on sites at the periphery of Coventry within neighbouring authority areas. Examples include:

    - Prologis Park, Ryton-on-Dunsmore (Rugby).
    - Middlemarch Industrial Estate, Bagington (Warwick).
    - Coventry Gateway, Bagington (Warwick).
    - Prospero, Ansty (Rugby).
    - Prologis Park, Keresley (Nuneaton & Bedworth, in part).

17. Secondly, the need for strategic employment sites extends beyond Coventry. EB11 identifies Opportunity Area 7, which encompasses the M6/A45/A46/M45 strategic road network covering Coventry and Rugby, and parts of Warwick and Nuneaton & Bedworth.

18. NDL's Matter 2 statement (M2/10) identifies Freight and Logistics as the principal driver of need for strategic-scale sites. EB11 (paragraph 1.19) anticipates that 70% of supply should meet logistics demand (Class B8), and paragraph 1.12 notes that 75% of market requirements are for logistics. EB11 recognises also Area 7 as a "*key market*" with "*high levels of demand and take-up*" being "*positioned firmly within the 'Golden Triangle'* "(paragraph 12.38).

19. This introduces a qualitative dimension to site selection. Sites must be suitably located and of sufficient scale to accommodate and attract this sector. EB11 recommends that logistics sites should be a minimum of 50 ha.

20. The NPPF (paragraph 87) recognises the particular needs of the Freight and Logistics sector, requiring storage and distribution uses to be located in "*suitably accessible locations that allow for efficient and reliable handling of goods"*. The draft NPPF proposes to strengthen this approach with the introduction of Policy E3 to cover the Freight and Logistics sector.

21. NDL contends that no such sites exist within Coventry itself, but opportunities are available within the wider Area 7, including a site promoted jointly by NDL and other parties in Rugby Borough. This is considered in more detail in response to the next question.

Q6.13 - Is there a reasonable prospect that Coventry's unmet local need for industrial warehouse development, and up to 84 ha of strategic sites, will be provided for in the local plans elsewhere in the FEMA?

22. NDL considers that there is a strong prospect that unmet local need and strategic-scale requirements in Area 7 can be met elsewhere in the FEMA, particularly in respect of strategic scale sites.

23. NDL is promoting an extension to Magna Park in Rugby Borough with Marq Logistics (the owner and developer of Magna Park) and two other landowners. The location of this site is marked on the map in Figure 2 below: -

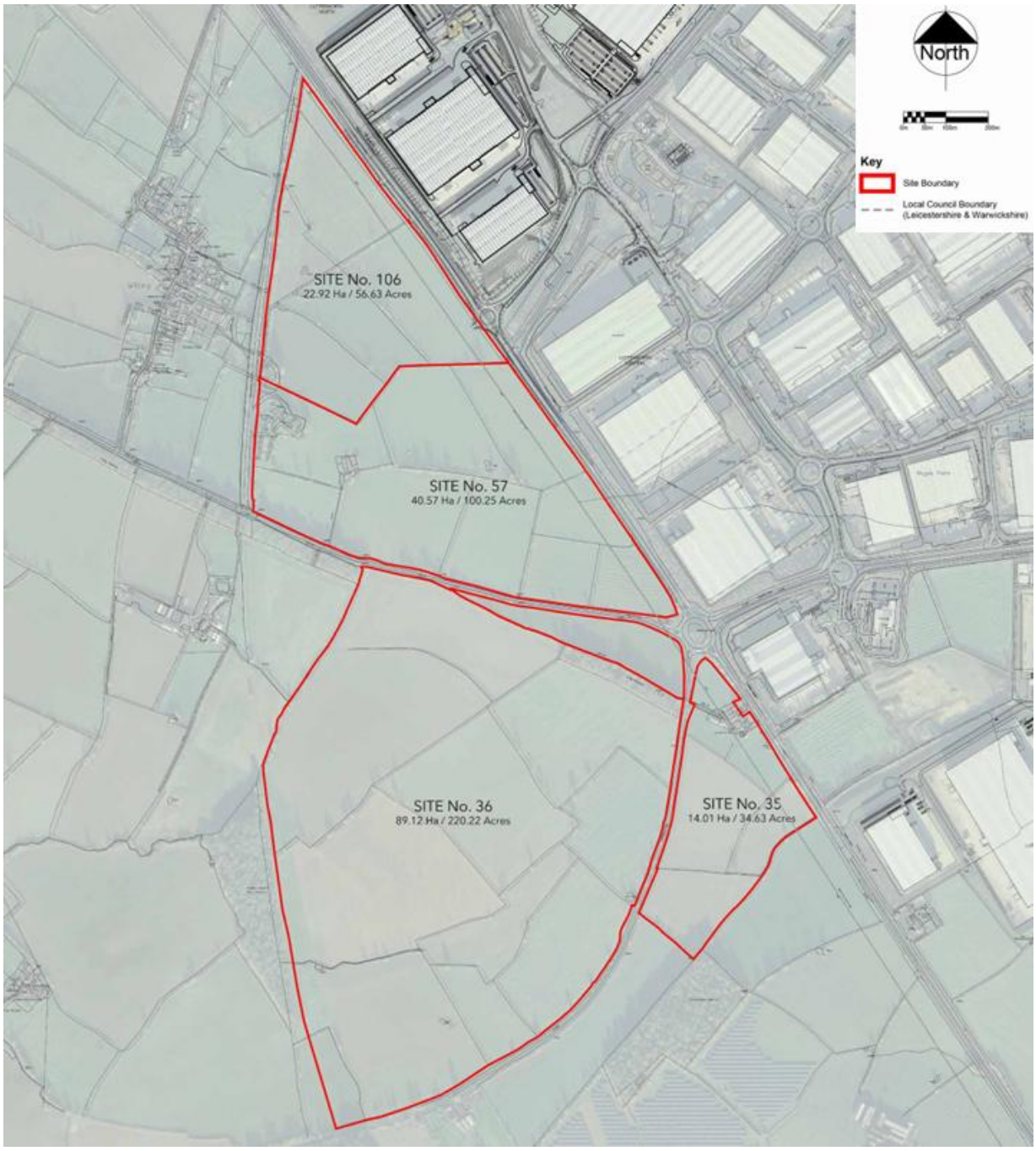
Figure 2 – Location Plan of the Proposed Western Extension to Magna Park

24. Magna Park is the largest and most established dedicated logistics park in the UK. It accommodates 30 customers in 50 buildings, providing over 13.7 million sq ft (1.27 million sqm) of floorspace, and supports over 10,000 jobs. It is also home to the Centre of Logistics, Education and Research (CLEAR), a dedicated training hub supporting the logistics and supply chain sector.

25. Magna Park is strategically located with direct access to the A5 and A4303, providing connectivity to the M1, M6, M69 and A14. DIRFT SRFI is located 7 miles to the south along the A5.

26. NDL and its partners are promoting a 166-hectare extension (gross site area) through the Rugby Local Plan Review. The site has the potential to accommodate over 500,000 sqm of industrial and logistics floorspace. The extent of this opportunity is marked in red on the Site Plan overleaf. This also illustrates well the relationship of the site with Magna Park.

Figure 3 – Site Plan of the Proposed Western Extension to Magna Park



27. A parameters plan is provided in Figure 4 overleaf. This shows how the site would form a natural extension to Magna Park and build on the investment made to date, including the existing Country Park.

Figure 4 – Parameters Plan of the Proposed Western Extension to Magna Park

28. Importantly, this strategic opportunity lies outside the Green Belt, unlike sites being promoted that are on the edge of Coventry. Evidence supporting the draft Rugby Local Plan Review identifies no significant constraints in respect of ecology, heritage or landscape.

Q6.14

(a) Is there compelling evidence to demonstrate that around 36 ha of employment land will come forward on non-allocated sites during the plan period?

(b) If so, are the Council's proposed modifications to Policy DS1 and paragraph 3.14 necessary to make the plan sound and would they be effective in that regard?

29. NDL does not take significant issue with the analysis presented in the Employment Windfall Paper (PS11a) per se. However, it raises concerns regarding the consistency of the overall approach to assessing the need for and the capacity of supply of employment land.

30. This approach, introduced at a late point of the review of the plan and production of its evidence base, allows for future windfall employment development. However, it does not appear to account for the loss of existing employment land to non-employment uses during the plan period. To be consistent, the replacement of existing employment land to be lost should also be factored in.

31. It is also advised by national planning policy guidance. The PPG on the assessment of Economic Needs assessment recommends that Local Planning Authorities should assess the recent pattern of employment land supply and **loss** in gathering evidence (paragraph 2a-026-20190220). Further, under the heading of "*How can strategic policy making authorities identify the existing stock of employment land and identify the recent pattern of supply and loss*", paragraph 2a-028-20190220 refers to relevant analysis being "*supplemented by information on permissions for other uses that have been granted, if available,* ***on sites formerly in employment use***".

32. Policy JE3 presumes against the loss of employment land. However, it allows exceptions where sites are proven not to be suitable or marketable.

33. As far as NDL is aware, the draft Local Plan evidence base does not include data on recent employment land losses, although such information should be available through plan monitoring. In addition, housing completions (from 2021), commitments and allocations resulting in the loss of employment land should be analysed. Policy H2 includes housing allocations on former employment land.

34. For consistency, this data should be gathered and analysed. Then, adopting the same approach as PS11a, a projection of employment land losses over the plan period should then be undertaken and factored into either the assessment of need or capacity of supply. For example, if projected losses amount to 1 hectare per annum (i.e. 20 ha over the period), then either need should increase by 20 ha or supply reduced accordingly.

35. At present, no such analysis has been undertaken. NDL considers this to be necessary to balance the assessment in PS11a.

36. Separately, NDL notes that the Inspectors have expressed concern, following the receipt of the Employment Land Recycling Paper (PS1), that redevelopment of 19.5 ha across 11 existing employment sites may not contribute additional land (which is the metric used by the plan to define employment development needs) towards meeting the 105 ha requirement, as these sites are already in employment use (IN2.1). Notwithstanding the analysis presented subsequently by PS11a, that concern remains. PS11a relies on recycling existing employment land rather than delivering additional land.

37. NDL's representations on Matter 2 (M2/10) provided an alternative analysis of need at both a local and strategic level. This analysis and the latest supply information is summarised below.

Table 1 – Summary of Local Need and Supply (ha)

Plan period	Need (NDL analysis)	Supply (PS11a)	Shortfall
2021–2041	149.3	96	53.3
2024–2042	138	70.6[1]	67.4

[1] Completions of 25.5 ha from 2021–2024 deducted.

Table 2 – Summary of Strategic-Scale Need and Supply (ha)

Plan period	Need (NDL analysis)	Supply	Shortfall
2021–2041	100	0[2]	100
2024–2042	92	0	92

38. With regard to local need and supply, the supply assumes a best-case scenario, relying on:

- all commitments and allocations being delivered in the plan period;
- a windfall allowance of 35.8 ha (PS11a); and
- no allowance for the replacement of employment land losses during the plan period.

39. NDL does not consider this to be a safe or robust set of assumptions. They need to be tested and sense checked. Nevertheless, even on this basis, there remains a significant shortfall of between 53.3 ha and 67.4 ha, depending on the plan period adopted.

40. This shortfall should be clearly identified to inform engagement with neighbouring authorities, particularly Rugby Borough, which is well placed to accommodate unmet need.

41. The unmet need for strategic-scale land is provided for illustration. NDL's Matter 2 statement (M2/10) projected a residual requirement for Area 7 of 451–602 ha (2025–2045), of which approximately 100 ha relates to Coventry.

PJL
4th March 2026

[2] Baginton Fields is discounted

APPENDIX 3

Legal Opinion

RE: THE RUGBY BOROUGH COUNCIL

LOCAL PLAN REVIEW

OPINION

Introduction

1. We are asked to advise the promoters ("the Promoters") of a significant planned extension to the existing strategic employment site Magna Park on the approach taken by Rugby Borough Council in the Draft Rugby Local Plan ("the DRLP") to the allocation of employment land.

2. Magna Park is the first purpose-built and dedicated distribution park in the UK. It has been developed since 1987 (principally by GLP) and is home to 30 different occupiers occupying in excess of 1.2 million sqm (13 million sqft) in 50 units. The Promoters consider there is an opportunity to extend Magna Park to the west on land adjoining the A5 and outside of the Green Belt and have provided evidence to the Council to demonstrate that the proposed development will meet the identified needs for employment land in Rugby in a sustainable manner. The extension of Magna Park is not currently proposed to be allocated in the DRLP.

3. The DRLP is currently undergoing its regulation 18 consultation. It proposes to allocate five new sites for employment land:

    a. Crowner Fields Farm, Ansty - 275,000 sqm - north-eastern fringe of Coventry (Green Belt) (currently subject to a resolution to grant for the Frasers' HQ campus development);
    b. Coton Park East - 115,000 sqm - northern part of Rugby town;
    c. South West Rugby Phase Two - 130,000 sqm - extension to Symmetry Park;
    d. Ansty Park North - 75,000 sqm - northeastern fringe of Coventry (Green Belt); and

e. Prologis Park West and Mountpark, Ryton-on-Dunsmore – 350,000 sqm - south-east fringe of Coventry - (Green Belt).

Discussion

Issue 1 – The Need for a Green Belt Assessment

4. The NPPF sets out a test of "exceptional circumstances" for revisions to Green Belt boundaries: §145 indicates that:

"*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans*";

And §146 provides examples of exceptional circumstances:

"*Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means*."

§147 is also of particular relevance to the issues here and we set it out in full for ease of reference:

"*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. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy:*

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."

5. The PPG provides further guidance on the approach to Green Belt in the plan making process:

"***Why should authorities assess their Green Belt to identify grey belt land?***
As set out in national policy, the review and alteration of Green Belt boundaries should take place, where necessary, as part of the plan making process. In doing so, we expect authorities to identify grey belt land to inform this review and the prioritisation detailed in paragraphs 147 and 148 of the NPPF…
Paragraph: 001 Reference ID: 64-001-20250225

How should authorities assess their Green Belt to identify grey belt land?
In order to identify grey belt land, authorities should produce a Green Belt assessment, either as part of the review of Green Belt boundaries during the preparation or updating of a local plan, or at another relevant point. This assessment should be informed by the guidance below…"
Paragraph: 002 Reference ID: 64-002-20250225"

6. In *Mead Realisations Limited v SSHCLG* [2025] EWCA Civ 32 the Court of Appeal confirmed that the NPPF and PPG have the same legal status and that the PPG can be used as an aid to the interpretation of the NPPF.

7. In our opinion the requirements of national policy are clear that "exceptional circumstances" can only be demonstrated where they are fully evidenced and justified, that it requires the plan making process to be informed by a Green Belt Assessment. The Green Belt Assessment is an essential pre-requisite to the identification of a plan strategy or the allocation of sites to meet identified needs. If such an assessment is carried out after the allocation stage or revisions to Green Belt boundaries have been proposed then the assessment would represent an *ex post facto* justification of the decisions that had been made, which would seriously undermine its credibility as a robust evidence base.

8. The DRLP is presently unsupported by a Green Belt Assessment. It is therefore missing essential evidence which is required to inform the development of the plan's strategy and to demonstrate the existence of exceptional circumstances. This is in clear conflict with national policy and as such the DRLP is, in our opinion, demonstrably unsound. Arguably[1] this constitutes a failure to have regard to a material consideration or alternatively an incorrect interpretation of national policy, which would be a legal error capable of undermining the adoption of the DRLP. Whilst this might be remediable by the production of a Green Belt Assessment during the examination – such a document ought to be the subject of intense scrutiny and some little circumspection if it does no more than to confirm decisions which have already been reached.

[1] The relevant threshold for permission to bring a statutory challenge

Issue 2 - §147 of the NPPF

9. The DRLP fails to comply with the §147requirement 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*". Self-evidently, the phrase "all other reasonable options" includes consideration of meeting its needs without using land that is located in the Green Belt. Criteria (a) to (c) of §147 form a non-exclusive checklist against which this test should be judged. The evidence base of the DRLP simply does not provide sufficient evidence to demonstrate that this has yet been properly considered or at least evidenced. Crucially §147 requires that this work is done prior to the making of decisions to change Green Belt boundaries.

10. The DRLP has proposed to allocate three sites in the Green Belt to meet employment land needs. This amounts to over 700,000 sqm of land in the Green Belt out of a total of 945,000 sqm of new allocated land (representing 74%). However, on the basis of the published evidence the DRLP has not appropriately considered whether the employment needs could be met outside the Green Belt and clearly did not do so prior to the decision being made to allocate land within the Green Belt for development.

11. Magna Park is an existing strategic employment site, its extension into non-Green Belt land is an obvious "reasonable option" under §147 that falls to be considered prior to the decision to allocate land within the Green Belt.

12. There is no document that on its face carries out the §147 exercise or carries out any exercise of planning judgment by reference to criteria (a) to (c) of §147. The only document that could be plausibly claimed to deal with "reasonable options" to any degree is the Interim SA March 2025. At Chapter 5 it deals with "Defining Growth Scenarios" which 5.1.1 clarifies as meaning: "*The aim here is to discuss the process that led to the definition of reasonable growth scenarios in 2025. To reiterate, growth scenarios equate to reasonable alternatives.*" The consideration of the Employment Land Spatial Strategy begins at 5.2.39 which states "*Building upon the discussion of 'growth quanta' above, the first point to make here is that a key priority is to explore*

options suited to industrial uses other than large-scale logistics (use class B8), which primarily means 'general industrial' (use class B2)." This is purporting to be a proactive exercise – "the key priority **is to** explore options". However, by this point in time the consultation version of the DRLP had already been approved by the Council's Cabinet at their meeting of 4th March 2025 and so the decision had already been taken to allocate land for employment use in the Green Belt. At 5.2.42 the Interim SA places employment sites in a sequential order of preference and this inexplicably places Green Belt sites ahead of non-Green Belt sites (including Magna Park). This again illustrates the decision to allocate Green Belt sites has been made prior to the necessary consideration of non-Green Belt sites as mandated by §147 of the NPPF.

13. In the Employment Land Scenarios section of Chapter 5 of the Interim SA, Magna Park is ruled out prior to the consideration of the reasonable alternatives:

"*5.4.90. The next port of call is then an extension to Magna Park (e.g. Site 325). However, at this stage in the process (of defining RA growth scenarios) it is considered reasonable to rule out the possibility of allocation, i.e. this allocation option is not taken forward to the RA growth scenarios for appraisal. This reflects preferable options able to deliver on the identified need(s) in combination (as discussed above) and concerns regarding further expansion of Magna Park (as discussed in Section 5.2).*"

14. This approach simply does not accord with the NPPF §147 requirement to consider reasonable options **prior** to the decision to allocate land in the Green Belt. At best the exercise in the Interim SA can be described as an *ex post facto* justification for the allocation decisions made but, on any fair reading, the policy test in §147 has not been met. In our opinion, this constitutes either a failure to have regard to a material consideration, that being the policy requirements of §147, an unlawful interpretation of §147 or an *irrational* application of §147.

Issue 3 – Reasonable Alternatives

15. As well as the policy obligation under §147 to consider reasonable options there is a legal obligation under reg 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 to consider reasonable alternatives to the DRLP.

16. Where a plan is proposing to allocate land in the Green Belt a clear reasonable alternative that should be assessed is meeting the identified need on land not in the Green Belt. The Interim SA has not carried out any assessment of the identified employment needs of the DRLP to be met on non-Green Belt land. In our opinion this is such a clear and obvious "reasonable alternative" that it is *irrational* of the sustainability appraisal to not consider it.

Conclusion

17. For the reasons set out above the approach in the DRLP to the allocation of employment land is fundamentally flawed and, in our opinion, unlawful. The clear tenor of the evidence base supporting the DRLP is as an after the fact justification for the decisions that have been made in the DRLP rather than being an evidence-led process which is what is required as a matter of both policy and law.

18. We advise accordingly. Should anything else arise please do not hesitate to contact us further.

PAUL G TUCKER KC

FREDDIE HUMPHREYS

15TH MAY 2025

Kings Chambers

Manchester – Leeds – Birmingham – London

APPENDIX 5

Transport Planning Note (DTA)

Land West of Magna Park, Lutterworth

Rugby Borough Council Proposed Submission Local Plan

Transport Planning Approach

DTA

Transport Planning Consultants

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Appendix A – Extracts Planning Practise Guidance

Appendix B – Extracts from TAG guidance

1.0 Executive Summary and Conclusions

1.1 This report has been prepared by DTA on behalf of the Parties promoting Site 325 (Nurton Developments Ltd, GLP and The Dewes Family) to review the appropriateness of the approach taken by Rugby Borough Council in respect of the Transport Evidence base which has been submitted in support of their Proposed Submission Local Plan.

1.2 Land is being promoted for an expansion to Magna Park to the west of the A5 by the client group and that amounts to a total of around c. 580,000 sqm of employment land. This is within Rugby and in addition a further 340,000 sqm is included as a draft allocation in the Harborough District Draft Local Plan.

1.3 In respect of transport matters, the evidence comprises two main documents which were prepared jointly on behalf of Rugby Borough Council and Warwickshire County Council:

- Rugby Strategic Transport Assessment – prepared by SLR and Dated 28th October 2025; and
- Rugby Strategic Transport Assessment Addendum Report – also prepared by SLR and dated 3rd December 2025.

1.4 Collectively the principal purpose of the reports is:

> The purpose of this report is to provide an overview of the work that has been undertaken to appraise the implications, on the transport network, of the options for development identified through as part of identification of RBCs New Local Plan.
>
> The expectation is that the outcomes of the modelling assessment which are presented within this Report will provide RBC and WCC with an understanding of how the operation of the transport network may be affected by the allocation of the proposed developments as well as identifying areas where interventions may be considered essential in managing the traffic impacts and enabling the developments to come forward as the Plan is delivered.
>
> Para 1.5 and 1.6 of STA

1.5 For the reasons set out in **Section 2** below, the process followed by Rugby in considering the proposed allocations within the plan is flawed. The Council have chosen the location of allocations in the draft plan and then prepared a transport report which considers the implications of that choice in transport terms. As set out in **Section 2** the appropriate approach should have been to use the transport modelling to inform and derive an

appropriate spatial strategy for development. That has not been undertaken.

1.6 The STA does (at a high level) consider three sites which the LPA have chosen not to include as draft allocations and this includes Site 325 – Land Adjacent to Magna Park. Section 11 of the STA considers the sites and states that:

> On this basis it *suggested* that the traffic impacts associated with these sites, on sensitive parts of the network, are *likely* to be *considered* significant.
>
> Ref Para 11.6

1.7 As discussed in **Section 3** below, the approach taken in the assessment of Site 325 is flawed. Unlike the assessment of the chosen draft local plan allocations, there is explicitly no modelling (to allow proper like for like comparison) of the implications of the development coming forward. This is a requirement of the NPPF and PPG as set out in **Section 2**.

1.8 To the extent that the implications are considered, these are based on over-inflated and unreasonable trip rates (and therefore traffic generation) and on headline views of the capacity of one junction in particular (Gibbet Hill). No assessment (again in stark contrast to the draft allocation assessments) of potential mitigation options, timescales and wider Local Plan options (i.e. Infrastructure Delivery Plans) has been provided.

1.9 Work is underway by the promotors of the site, using existing WCC and NH modelling tools to allow proper testing of the implications of the development option in the context of the Local Plan.

1.10 This report should be read alongside that prepared by Apex which deals with sustainable travel and accessibility issues to which the appropriate assessment processes (as discussed in **Section 2**) has also not been followed.

1.11 In short, this report concludes that the site has been disregarded as a draft allocation without any reasonable evidence base to support that decision. On that basis, the plan as currently drafted cannot be considered sound.

2.0 Transport Planning Approach and Evidence Base

2.1 NPPF sets out the requirements of the wider transport and accessibility objectives of Government Policy at Section 9. The NPPF at Para 109 confirms that:

> Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:
>
> a) making transport considerations an important part of early engagement with local communities;
> b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;
> c) understanding and addressing the potential impacts of development on transport networks;
> d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;
> e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and
> f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

2.2 And 110 that:

> The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

2.3 It is plain from the approach taken in the STA that these policy requirements have not been followed.

2.4 The interpretation and implementation of these Policy requirements are confirmed in the National Planning Policy Guidance Notes. These are set out in full in **Appendix A**. The most pertinent elements of the requirements are summarised below:

> "It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. A robust

transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector."

Para 001

The key issues, which should be considered in developing a transport evidence base, include the need to:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms
- assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- highlight and promote opportunities to reduce the need for travel where appropriate
- identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate
- consider the cumulative impacts of existing and proposed development on transport networks
- assess the quality and capacity of transport infrastructure and its ability to meet forecast demands
- identify the short, medium and long-term transport proposals across all modes

The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.

(Note Emphasis added)

2.5 Paragraph: 004 Reference ID: 54-004-20141010 goes on to confirm that assessment should be undertaken at every stage of Local Plan progression thus:

- as part of the initial evidence base in terms of issues and opportunities
- as part of the options testing
- as part of the preparation of the final submission

2.6 Following this review, Paragraphs 008 -10 set out a comprehensive and thorough assessment process to ensure appropriate evidence to support any allocation, which provides full consideration of all transport related implications including accessibility, highway safety, amenity and traffic impacts. Specifically, Paragraph 010 encourages the use of WebTAG to assess the development. For transport schemes, the approach requires as a fundamental starting point the need to identify objectives.

2.7 In the context of a local plan that objective would be to determine the appropriate scale of employment provision needed and then assess the best way and location to meet that need.

2.8 WebTAG would then require an assessment of all the possible alternatives to meet these against the key criteria of Environment, Social, Economy, and Public Accounts. The Guidance on WebTAG is clear that:

> There must be a clear rationale for any proposal and it must be based on a clear presentation of problems and challenges that establish the 'need' for a project.
> There must be consideration of genuine, discrete options, and not an assessment of a previously selected option against some clearly inferior alternatives. A range of solutions should be considered across networks and modes.
> There should be an auditable and documented process which identifies the best performing options to be taken forward for further appraisal.
> There should be an appropriate level of public and stakeholder participation and engagement at suitable points in the process. In most cases this should inform the evidence-base which establishes the 'need' for an intervention, guide the option generation, sifting and assessment steps, as well as informing further appraisal in Stage 2.
>
> Para 1.1.5
>
> (Note Emphasis added)

2.9 The process therefore requires firstly an assessment of the need for any scheme (in this case employment allocations), then to identify potential options to meet that need, and then finally to confirm whether it would meet the scheme objectives.

2.10 The purpose of the output is that the process should be transparent and allow proper consideration of alternatives to be tested against the benefits and dis-benefits of each option. The process is clearly set out on Figure 1 of **Appendix B** which is an extract from the TAG Guidance Appraisal Process Summary.

2.11 It is clear on every level that the process undertaken by Rugby Borough Council to identify and test the appropriate level and location of development for the local plan was, and is, wholly flawed.

2.12 In this case a process that was the opposite to that required by the guidance was undertaken by the Council:-

i) Rugby Borough Council identified the need for employment. As set out in the Technical Statement on Employment Land Needs provided by NDL (and forming part of the wider submission), the approach they took to considering sites was wrong because whilst they identify a need for B8 development, they chose to

allocate sites (in the Green Belt) on a locational basis on the assumption they would be more attractive to B1/ B2 uses.

ii) Those chosen sites for proposed allocations were then assessed through Strategic Transport Assessment. They then used that process (but not on a like for like basis) to seek to discount three sites (of which Land at Magna Park is one).

iii) In other words, Rugby Borough Council has chosen the location for development and then are seeking to set the evidence base around that pre-determined strategy.

2.13 This process is wrong and runs contrary to the purpose of the process which is to allow proper consideration of alternatives to be assessed, by overall economic performance, against the benefits and dis-benefits of each potential employment option.

2.14 This flaw cannot be rectified by subsequent transport appraisal work and can only be rectified by a fundamental review of the strategic and spatial employment allocation options within the District.

2.15 In terms of the detail of individual sites the need for appropriate assessment is particularly important when the plan is seeking to rely on major stand-alone developments. At present no sound evidence base which directly supports the necessary transport infrastructure can be provided either for the plan as a whole or for individual sites. At present therefore there is no sound evidence base which directly supports the deliverability of the Plan in transport terms.

3.0 Assessment of Site 325 – Land at Magna Park

3.1 Based on the above, to allow for proper consideration of the sites proposed for allocation, the Council should have used the STA process to model different strategic / spatial distributions of employment allocations. That would have allowed the merits of different strategies (and indeed the infrastructure requirements of them) to be properly and fairly considered.

3.2 This has not been undertaken. Whilst the chosen draft allocations were subject to detailed assessment through two strategic transport models, that approach was not adopted in consideration of the Land at Magna Park.

3.3 That position is explicitly confirmed in Para 1.3 of Appendix C of the STA (Commentary on "Non-Modelled" omission sites):

> On the basis that these sites have not been considered within the core modelling assessment, but that each site needs to be considered as part of the STA, this note has been compiled to present a high-level analysis of the suitability (or lack of) for delivering these three sites as part of the Local Plan

3.4 The change in flows they consider are shown on Figures 11 and 12 of Appendix C and the sole basis for discounting the site is set out in Para 4.7 and 4.8 of Appendix C. These relate to traffic impacts at the A5/ Cross in Hand junction and at Gibbet Hill Junction.

> Based on the trip generation and assignment for the Land Adjacent Magna Park site, significant development trip volumes are expected at the A5/ Cross in Hand roundabout. There is a predicted to be a particularly large increase in flows on the Coventry Road approach.
> Ref Para 4.7
> A significant amount of the trips to/from this site are predicted to route through the A426/A5 Gibbet Hill Roundabout. Given the capacity constraints that already exist at this junction, it is likely that the volume of additional traffic that this site would create at this roundabout would exacerbate the significant congestion issues identified at this location.
> Further analysis of this point is provided within Appendix D of the STA Addendum report, specifically related to the assessment of change in flows at the SRN junctions.
> Ref Para 4.8.

3.5 The Council's 'assessment' is based on unreasonable trip rates, the definition of which is not provided (Para 4.4 of Appendix C just refers to the use of WCC "Standard Trip Rates"). The SLR approach adopts unrealistically high trip rates. As set out in Apex

report, which supported representations made to the Reg 18 draft Local Plan, detailed trip rate assessments have been carried out for the proposed site, based on observed patterns of movement from the existing (and adjacent) Magna Park. Table 1 below compares the trip movements included in the STA with those more appropriate rates based on observations of the adjacent site.

Table 1 – Comparison of STA Rates vs Rates Observed at Magna Park

Time Period	STA Adopted Rates	Observed MP derived flows	Difference
0800-0900	2,707	762	-1,945 (3.55 times higher)
1600-1700	2,735	648	-2,087 (4.22 times higher)
0700-1900	26,781	8,065	-18,716 (3.32 times higher)

3.6 The clear over-estimate of traffic generation from the site adopted by the Council removes any credibility from the assessment. A revised assessment using properly derived trip rates is therefore essential.

3.7 In terms of impact at The Cross in Hand junction, clearly a development of the scale envisaged can be expected to bring with it improvements to the adjacent road network. These need not be assessed as part of Local Plan IDP or other considerations as they would more appropriately be defined and determined through the planning application process and delivered via a Section 278 agreement. In this case, works have been identified at the adjacent junctions and can be delivered by the development on land within the promotors' control, or Highway land. This is not a constraint to allocation.

3.8 In terms of impact at Gibbet Hill, the impacts as shown on Figures 11 and 12 are clearly overstated. To demonstrate this, the corrected trip rates have been applied to the appropriate traffic assignment. AM and PM peak hour distribution has been taken from the Magna Park Extension Transport Assessment which used the Leicester and Leicestershire Integrated Transport Model (LLITM). Leicestershire's Pan Regional Transport Model (PRTM) is an expansion of the authority's LLITM.

3.9 This is considered an appropriate approach given the close proximity of Magna Park to the proposed development. In due course this may be refined through more recent assessments being undertaken by Apex.

3.10 **Table 2** shows the net change in trips at Gibbet Hill. The absolute change in flows, particularly in the context of a junction that currently caters for in the order of 3,000 vehicles per hour, is not material. Whilst the flows are material enough to warrant proper assessment (which will follow), they are clearly not at a level that, in isolation, would require strategic intervention.

Table 2 – Increase in Flows at Gibbet Hill

	AM Peak		PM peak	
A5 South	6.3%	48	7.3%	47
A426 (S))	4.1%	31	3.2%	21
Total		79		68

3.11 Overall, the current position in respect of Gibbet Hill is set out in the STA Addendum (Appendix D) which confirms at Table 4 that localised improvements are to be provided at the junction.

3.12 These improvements are already committed as a result of various recent applications. Following the grant of planning permission for expansion of Magna Park and the sustainable urban extension – South of Lutterworth – improvements were proposed at the Gibbet Hill roundabout by both developments. However, Warwickshire County Council and National Highways subsequently agreed financial contributions from developers towards a more comprehensive scheme. This scheme also included funding from developments north of Rugby. Payments totalling £5.3 million have been secured in this way across a number of consents.

3.13 These improvements have not been undertaken to date but are committed (and deliverable). In addition, National Highways are currently reviewing options for a larger scale, strategic intervention at the junction. It is expected that this will be subject to public consultation later in 2026 and that it may be included in the forthcoming Road Investment Strategy (RIS) 3 program.

3.14 However, neither the committed schemes, nor the strategic intervention have been modelled in any of the Local Plan tests because whilst it is included in the schemes confirmed at Para 12.6, the junction was subsequently effectively removed

(unconstrained) in the model. This is because the development of the model showed queuing from the Gibbet Hill roundabout back to M6 Junction 1 and caused instability in the model. As such, the modelling was amended to assume the roundabout to be unconstrained so that the modelling of the wider network could be considered. On this basis, the impacts of any of the schemes at the Gibbet Hill roundabout are not considered within the junction modelling (Para 3.16 of the STA).

3.15 On that basis, there is no modelled outcome which supports or confirms the STA Appendix C conclusion that allocation of the site would be unacceptable on the grounds of impact at the junction.

3.16 In assessing the overall implications of Gibbet Hill the STA Addendum notes that:

> "3.37 The operation of the A426/A5 Gibbet Hill junction is an existing problem location, which is expected to experience significant increases in traffic flows based upon the modelling presented which will exacerbate the issues at the junction. However, the strategic function that the junction serves means that there is a significant level of future traffic demand predicted to occur prior to the Regulation 19 demands being included within the assessment.
>
> 3.38 Clearly a solution is required at this junction, however, it is unlikely that this would be development led, given the nature of the impacts, and the distance from most developments being promoted through the plan. There may be some opportunity to secure contributions towards the delivery of a scheme in this location, on a cumulative basis, but it would require further analysis to confirm that the contributions would comply with CIL Regulation 122.
>
> 3.39 Furthermore, the Regulation 19 Submission Sites already represents a strategy which limits the extent to which development is allocated close to the junction which is also a means of limiting future impacts as a result of the Local Plan.
>
> 3.40 Whilst a scheme is required in this location, it is not considered appropriate to rely on a development led delivery strategy as there is insufficient evidence relating to the specific impacts of any one site within the Regulation 19 Submission or the cumulative effect of the strategy since the local plan makes only a small additional contribution to the traffic flow increases predicted to occur at this location."

3.17 Following the same logic, it is clear that based on proper assessment of the impacts of the proposed allocation, flows from the site would not be material and whilst they might require consideration of localised (cost effective) mitigation as required by NPPF Para 115, those impacts are unlikely to be significant, or indeed severe.

3.18 Given the key flaw in the approach adopted by the Council, the promotors intend to undertake their own assessment of impacts to support this conclusion. That will involve a run of the WCC strategic model to review traffic assignment and then assessment of the junction itself using the NH's microsimulation model of the junction, which has been prepared to support their own strategic intervention assessments.

3.19 In the absence of this proper assessment of the scheme, the conclusion reached by the STA to support the exclusion of the site from the Local Plan is clearly and demonstrably unsound.

4.0 Other Comments on the Modelling Approach

4.1 Whilst the above assessment has focused on the suitability of the approach adopted by the Council, there are a number of unresolved and detailed modelling queries which should be addressed as part of an appropriately updated evidence base. These include:

i) There are two models which form the basis of this assessment - the Rugby Wide Area (RWA) model and Rugby Rural Area Model (RRAM). Both models have been developed using Paramics Discovery and are large scale microsimulation models. There is no model validation report provided (although it is referenced in footnotes), so there is no way of verifying the appropriateness of this model.

ii) It is stated that the RWA model has been "rebased to 2024". It is unclear if this is based on new traffic data. It is stated that the model has been audited by WCC, but there is no evidence of any external review and in particular no commentary from National Highways on its suitability.

iii) It is noted that the RRAM Base model was developed using majority 2018 baseline data, supplemented by several 2017 counts and a 2016 count of the Stretton Baskerville Roundabout. These are all pre-covid and as has been demonstrated in the Apex report (referred to in para 3.5) there have been significant reductions between pre and post pandemic traffic flows. The RRAM model is likely therefore to significantly overestimate the level of traffic on the network in the baseline scenario.

iv) Significant concerns were also raised by National Highways with the RRAM model as part of a planning application for the European HQ for Fraser Group. It is specifically stated that "These issues have not been fully resolved, this should be recognised as a risk." As such, there are doubts as to the validity of this model for drawing conclusions in relation to the Local Plan.

v) On the basis of overestimates of background traffic and significant overestimates in trip generation from the industrial sites, the model is likely to be unnecessarily

conservative and significantly overestimate flows on the network. It is not compliant with the NPPF requirements for a Vision Led Approach.

vi) There is no explanation as to how 'double counting' of vehicle movements has been considered in the model. For example, the trip generation from residential allocations (both committed and those of the draft allocations) will travel to the employment sites and vice versa. Again, the models are likely to be significantly overestimating the level of vehicles on the network.

vii) Finally, there is nothing stated about general growth rates applied to the models. As demonstrated in the Apex report, previously forecast future growth has not materialised and there has been a reduction in background flows between pre- and post- pandemic years.

ST/25337
13th March 2026

APPENDIX A

Transport evidence bases in plan making and decision taking

Why establish a transport evidence base for Local Plans?
It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. A robust transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector.

The transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, where reasonable to do so; and highlight the infrastructure requirements for inclusion in infrastructure spending plans linked to the Community Infrastructure Levy, section 106 provisions and other funding sources.

Local planning authorities should also refer to the Department for Transport's Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development

Paragraph: 001 Reference ID: 54-001-20141010

Revision date: 10 10 2014

What is the purpose of a transport evidence base to support the Local Plan?

A robust evidence base will enable an assessment of the transport impacts of both existing development as well as that proposed, and can inform sustainable approaches to transport at a plan-making level. This will include consideration of viability and deliverability.

A robust assessment will establish evidence that may be useful in:

- improving the sustainability of transport provision
- enhancing accessibility
- creating choice amongst different modes of transport

- improving health and well-being
- supporting economic vitality
- improving public understanding of the transport implications of development
- enabling other highway and transport authorities/service providers to support and deliver the transport infrastructure that conforms to the Local Plan
- supporting local shops and the high street

Paragraph: 002 Reference ID: 54-002-20141010

Revision date: 10 10 2014

What key issues should be considered in developing the transport evidence base to support the Local Plan?

The key issues, which should be considered in developing a transport evidence base, include the need to:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms
- assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- highlight and promote opportunities to reduce the need for travel where appropriate
- identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate
- consider the cumulative impacts of existing and proposed development on transport networks
- assess the quality and capacity of transport infrastructure and its ability to meet forecast demands
- identify the short, medium and long-term transport proposals across all modes

The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and

deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.

Paragraph: 003 Reference ID: 54-003-20141010

Revision date: 10 10 2014

When should the transport assessment of the Local Plan be undertaken?

An assessment of the transport implications should be undertaken at a number of stages in the preparation of a Local Plan:

- as part of the initial evidence base in terms of issues and opportunities
- as part of the options testing
- as part of the preparation of the final submission

The last of these stages should highlight the scale of and priorities for investment requirements and support infrastructure spending plans. Like a sustainability appraisal, it will be an iterative process and become more refined and detailed as the process draws to a conclusion.

Paragraph: 004 Reference ID: 54-004-20141010

Revision date: 10 10 2014

What baseline information should inform a transport assessment of a Local Plan?

The following list indicates the key aspects that should be addressed in the transport assessment. This list is not exhaustive, and there may be additional issues that are important to consider locally.

- all current transport issues as they affect all modes and freight covering, for example, accessibility, congestion, mobility, safety, pollution, affordability, carbon reduction across the whole Plan area and, within relevant areas of the Plan, including existing settlements and proposed land allocations

- the potential options to address the issues identified and any gaps in the networks in the short, medium and longer term covering, for example, accessibility, congestion, mobility, safety, pollution, carbon reduction
- the locations of proposed land allocations and areas/corridors of development and potential options for the provision of sustainable transport and transport networks to serve them
- solutions to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- the scope and options for maximising travel planning and behavioural change.
- accessibility of transport nodes such as rail/bus stations to facilitate integrated solutions

The transport assessment should be produced at a Local Plan level in partnership with all relevant transport and planning authorities, transport providers and key stakeholders, for example, the Local Economic Partnership. It may be appropriate for the transport assessment to cover an area wider than the Local Plan at least initially given the size of some travel to work areas (this would be similar to the Strategic Housing Market Assessment). This process should help to identify any potential measures that may be required to mitigate negative impacts.

Paragraph: 005 Reference ID: 54-005-20141010

Revision date: 10 10 2014

What detailed information is required for the transport assessment of the Local Plan?

Much information required for the transport assessment will already be available, not least from the development needs and land availability assessments. Local planning authorities will need to consider the demographics of the area and also the desired or perceived changes likely to take place in the life of the Plan as they might affect the transport network.

Other considerations that could be included are:

- baseline existing conditions, which need to be established accurately to understand fully the context of the Local Plan policies and proposals
- the existing integrated transport networks and any gaps in these as well as service and quality
- opportunities to change to other forms of transport
- the current use and demand by all different types of transport including cumulative trips into and out of the area
- the availability of information from travel plans, previous assessments, transport operators etc
- capacity data on rail and tram networks and constraints across the area
- walking and cycling facilities and movements including future predicted trips
- description and functional classification of the road network
- current traffic flows including peak periods on roads, links and key junctions
- parking facilities, including any park and ride and existing under-provision of off-street parking spaces
- journey purpose of trips
- identification and assessment of key links and junctions on the highway network to establish existing conditions
- committed network improvements
- personal injury accident records, including cyclist safety
- any programmed public transport improvements including type, timing and promoter information
- pollution, including baseline carbon emissions broken down by type of travel
- existing transport-related environmental impacts
- established best practice in transport provision and the share of each type
- at a broad level, journey purpose and origin and destination currently and how it is likely to change or desired to change – for all types of transport

The above is not exhaustive, and other issues may need to be included as appropriate to give a complete baseline for the Plan area

and how it will change. Early engagement between interested parties is important in agreeing the level and scope of assessment required.

Paragraph: 006 Reference ID: 54-006-20141010

Revision date: 10 10 2014

How can a transport assessment of the Local Plan be undertaken?

A transport assessment is likely to be scenario based and in terms of projections look at a range of potential outcomes given a number of assumptions, for example, a movement in the proportion of people using different forms of transport consistent with best practice.

Transport data should be included that reflects the typical (neutral) flow conditions on the network (for example, non-school holiday periods, typical weather conditions etc) in the area of the Plan, and should be valid for the intended purposes. It should also take account of holiday periods in tourist areas, where peaks could occur in periods that might normally be considered non-neutral. The recommended periods for data collection are spring and autumn, which include the neutral months of April, May, June, September and October. Further advice is available from the Highways Agency, as described for traffic in the Design Manual for Roads and Bridges (Volume 13, Part 4).

In terms of road traffic, but not other types of traffic, where there is a need to project existing or historical traffic data for future year assessments, the preferred option is the use of appropriate local traffic forecasts (such as the Trip End Model Presentation Program used for transport planning purposes), provided they offer a robust assessment. In some cases, National Road Traffic Forecast growth rates would be appropriate. However, it is important to ensure that this does not just perpetuate existing travel patterns but, where reasonable to do so, facilitates the use of sustainable modes of transport.

The use of any area-wide traffic models or background growth rates should be agreed with the relevant transport or highway authority at the evidence gathering stage of the Local Plan. Care needs to be taken when considering using any model that it takes account of the

need to address historic travel patterns not necessarily reinforce them.

To assess the availability of the capacity of the road network, the transport assessment should take into account:

- recent counts for peak period turning movements at critical strategic junctions, for example, in certain instances where there is known to be a significant level of heavy goods vehicles traffic, a classified count (identifying all vehicles separately) should be provided
- 12 hour/24 hour automatic traffic counts

Additional counts that may be required on the strategic parts of the road network could include:

- manual turning counts (which should be conducted at 15 minute intervals) to identify all strategically relevant highway network peak periods
- queue length surveys at key strategic signal junctions to establish demand and actual traffic flows
- journey time surveys
- freight counts
- abnormal load counts
- pedestrian and cyclists counts

Capacity assessments for roads, rail and bus should also be obtained.

Paragraph: 007 Reference ID: 54-007-20141010

Revision date: 10 10 2014

How should the impact of land allocations be considered in assessing the transport implications of Local Plans?

The first step in quantifying the impact of proposed land allocations in the Local Plan on the transport system is to provide an estimate of the person trips (for all types of transport) that are likely to be generated by it.

In all cases, an analysis of development-related trips using an appropriate database or an alternative methodology should be agreed with the relevant highway authorities, as this will form the major element of the assessment.

An assessment of the impacts of the proposed additional land allocations can be initiated once initial potential allocations have been determined. There needs to be a description of the type of development at each of the locations proposed in as much detail as possible at the time. Where this is not possible, a “likely” scenario will need to be employed to set out the potential transport impact. Information that could be required includes:

- location plans of each site
- description of all the proposed land uses
- scale of development – such as the number of residential units or gross floor area of development – subdivided by land use where appropriate/possible
- site area in hectares
- likely proposed access to existing transport infrastructure for all types of travel
- where known, the likely proposed parking strategy
- development phasing, where applicable
- potential for securing travel planning benefits and enhanced sustainable transport provision

The above requirements are not exhaustive and will require adaptation to reflect the knowledge about the potential site allocations and developments as well as the type and scale of the proposed developments.

Paragraph: 008 Reference ID: 54-008-20141010

Revision date: 10 10 2014

How should safety considerations be addressed and accident analysis used effectively in the transport assessment of the Local Plan?

All types of transport should be covered by safety considerations and accident analysis, taking into account the objective of facilitating, where reasonable to do so, the use of sustainable modes of transport. The level of detail required will be dependent on the stage of the Local Plan.

The transport assessment should identify any significant highway safety issues and provide an analysis of the recent accident history of the affected/impacted areas. The extent of the safety issue considerations and accident analysis will depend on the scale and type of developments in the context of the character of the affected Strategic Road Network. The need to minimise conflicts between vehicles and other road user groups should be adequately addressed.

Critical locations on the road network with poor accident records should be identified. This is to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads.

Where the Strategic Road Network is involved, we recommend that appropriate national statistics are also used as a comparison.

Paragraph: 009 Reference ID: 54-009-20141010

Revision date: 10 10 2014

How is the WebTAG approach useful in the transport assessment of the Local Plan?

An assessment should adopt the principles of WebTAG by assessing the potential impacts of development within the framework of WebTAG objectives. For most Local Plan assessments the full methodology recommended will not be appropriate. The Highways Agency's Project Appraisal Report System may provide some useful guidance on methods more appropriate in these cases. Assessments involving major new transport infrastructure should, however, employ the methods set out in WebTAG.

Although this approach is typically applied when planning for local transport infrastructure, adopting this approach for Local Plan

transport assessments will ensure that any proposed land allocation impact is considered in the context of two alternative scenarios – ‘with development’ and ‘without development’ – and will enable a comparative analysis of the transport effects of the proposed allocation.

Paragraph: 010 Reference ID: 54-010-20141010

Revision date: 10 10 2014

APPENDIX B

Department for Transport

TRANSPORT ANALYSIS GUIDANCE

The Transport Appraisal Process

January 2014

Department for Transport

Transport Analysis Guidance (TAG)

https://www.gov.uk/transport-analysis-guidance-webtag

This TAG Unit is guidance for the **TECHNICAL PROJECT MANAGER**

Technical queries and comments on this TAG Unit should be referred to:

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2 Option Development (Stage 1)

2.1 Introduction

2.1.1 This Section describes Stage 1 of the transport appraisal process - Option Development (Figure 1). **It is applicable to all types of intervention, including individual schemes, packages of measures, strategies and plans.**

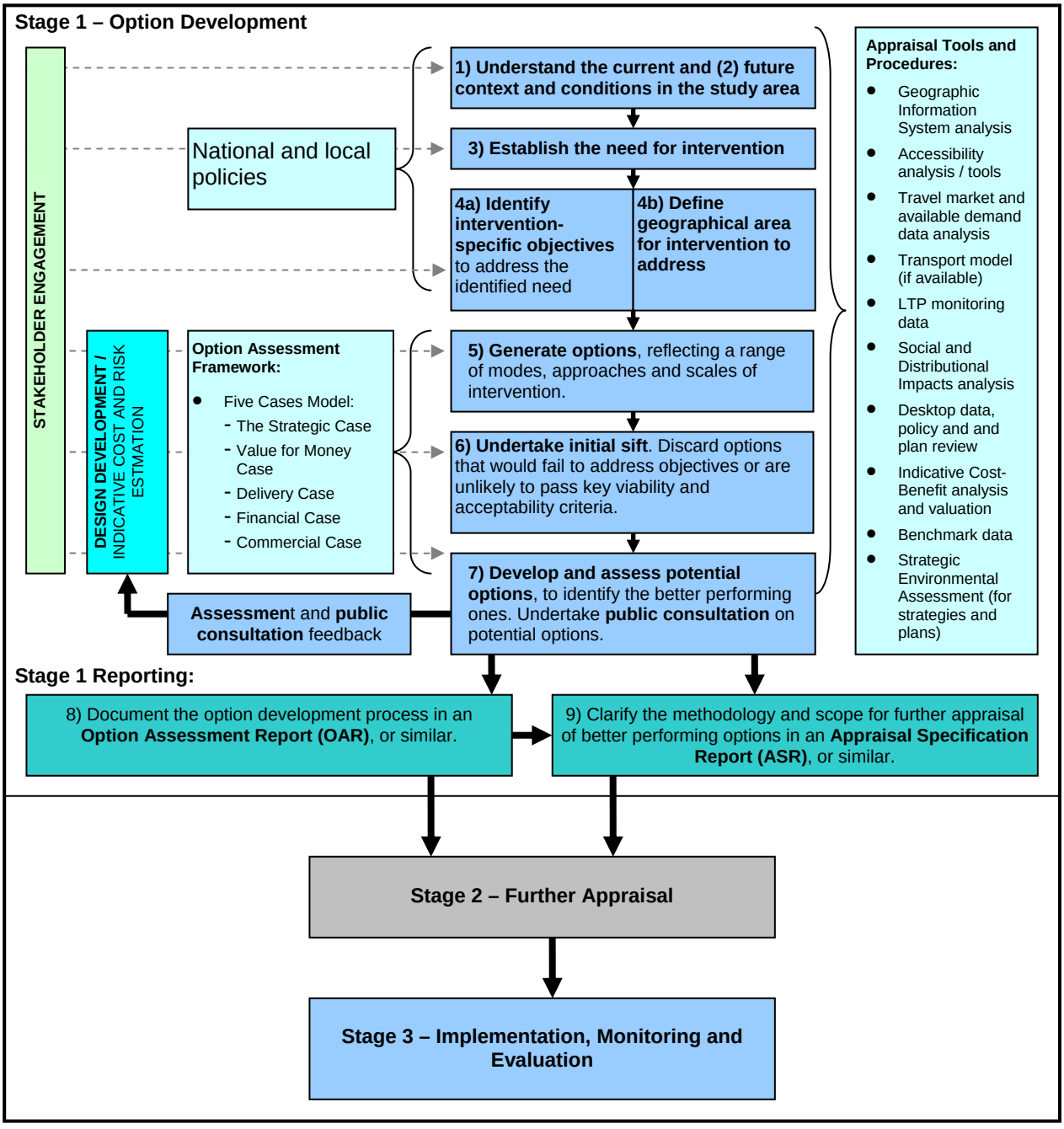

Figure 1 Steps in the Stage 1 process

2.1.2 Stage 1 involves identifying the need for intervention and developing options to address a clear set of locally developed objectives. It involves generating a broad range of options, which reflect a range of modes, approaches and scales of intervention. These are then sifted and assessed against criteria from the **Transport Business Case** (DfT, 2011) 'Five Case Model' to identify the better performing options for further appraisal in Stage 2. The focus of assessment is on developing a transparent and appropriate view of the relative merits and disadvantages of different options.

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Notes:

Please note Title Plans have been scaled using Ordnance Survey Sheets which may have altered over time. Complete accuracy cannot be guaranteed without further on site survey.

Any dimensions given are to be confirmed with site measure.

Schedule Notes:

All sq. ft areas are based on the conversion factor of 10.763910417 to ensure accuracy.

However, discrepancies may occur due to rounding up / down which can sometimes result in the totals not always adding up.

NB

- **SUBJECT TO SURVEYS, CONSTRAINTS & PLANNING.**
- **LAYOUT TO BE TRACKED.**
- **RED LINE INDICATIVE ONLY.**

North

0 500m 1000m 2000m

Key

Site Boundary

Local Council Boundary (Leicestershire & Warwickshire)

P2	Boundaries updated to client comments	01.05.25	MK/PS
P1	First issue	28.04.25	MK/PS
No.	Revision Instruction	Date	Author

PRELIMINARY

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chetwoods

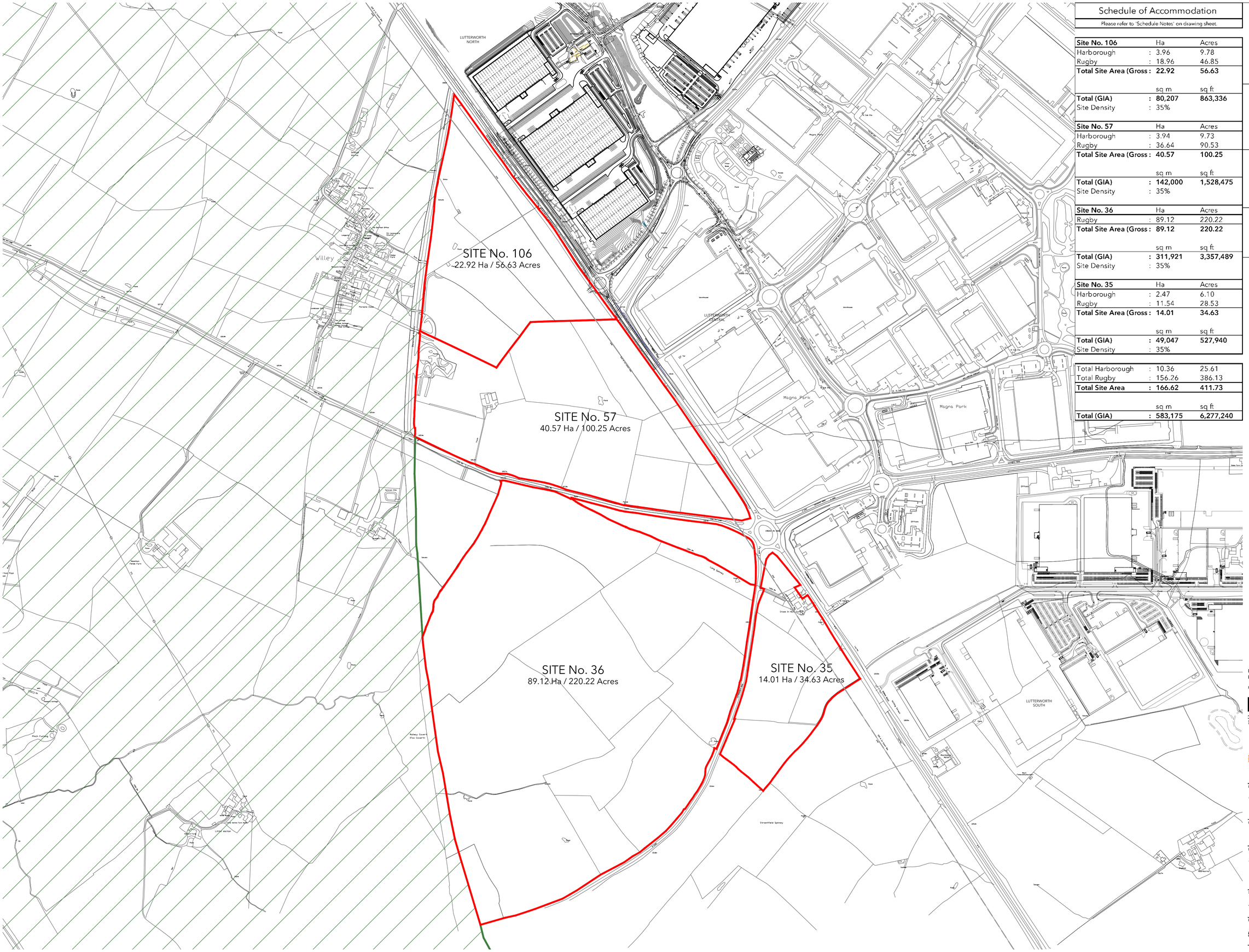
Project
GLP Magna Park West

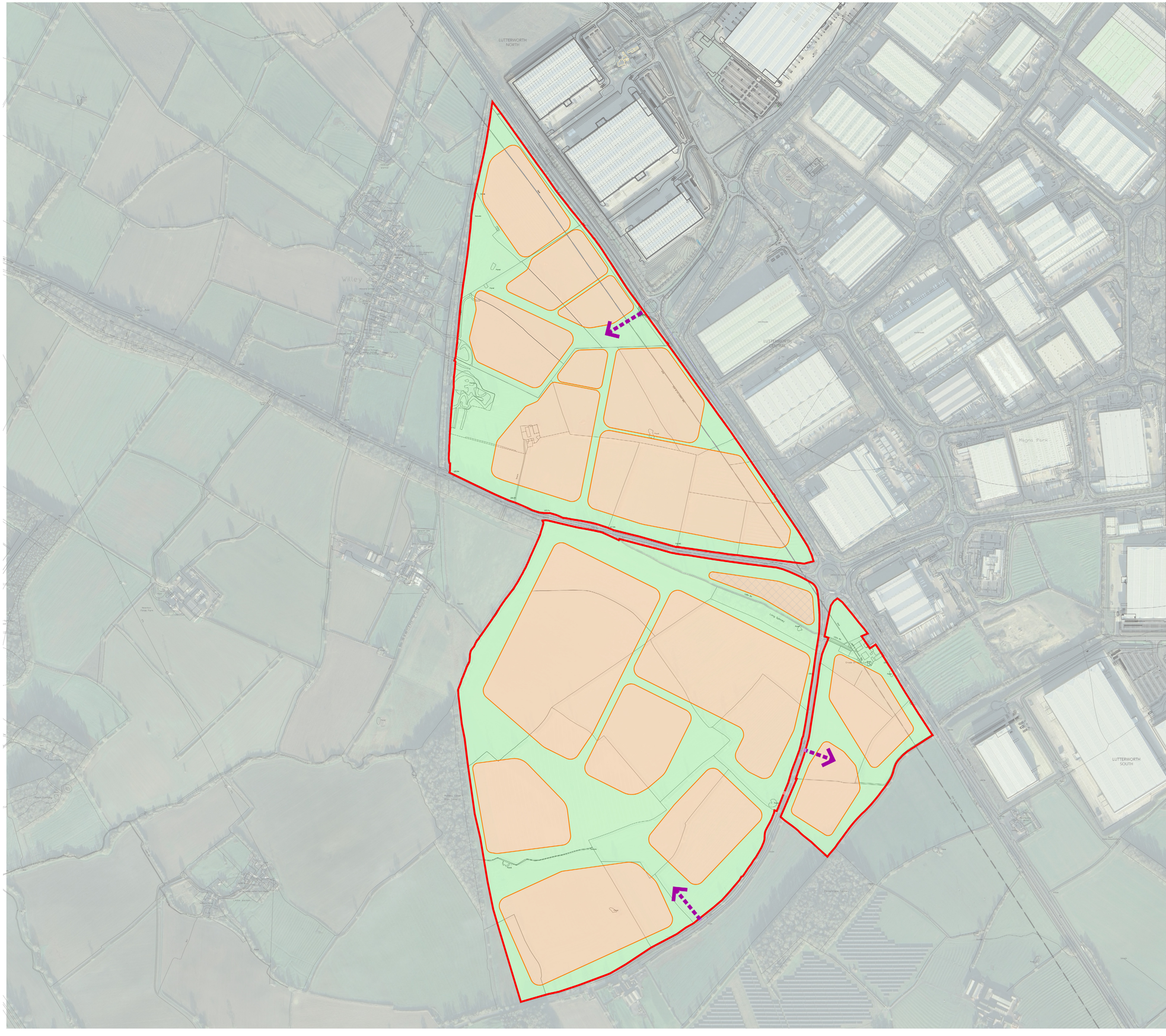
Client
GLP

Drawing Title
Site Location Plan

Scale	Size	Drawn	Checked	Date
1:5000	A1	MK	PS	28.04.2025

Project	Originator	Zone	Level	Type	Role	Number	Rev
5830	CA	00	00	DR	A	00050	P2


SITE No. 106
22.92 Ha / 56.63 Acres
SITE No. 57
40.57 Ha / 100.25 Acres
SITE No. 36
89.12 Ha / 220.22 Acres
SITE No. 35
14.01 Ha / 34.63 Acres
LUTTERWORTH NORTH
LUTTERWORTH SOUTH
Willey
Magna Park
Magna Park
Stanbridge Farm
Peach Farming
Newton Field Farm
Lutterworth Golf Course
Lutterworth Rugby Club
Lutterworth Cricket Club
Lutterworth Hockey Club
Lutterworth Tennis Club
Lutterworth Bowling Club
Lutterworth Swimming Pool
Lutterworth Sports Centre
Lutterworth Leisure Centre
Lutterworth Rugby Club
Lutterworth Cricket Club
Lutterworth Hockey Club
Lutterworth Tennis Club
Lutterworth Bowling Club
Lutterworth Swimming Pool
Lutterworth Sports Centre
Lutterworth Leisure Centre
Lutterworth Golf Course



Schedule of Accommodation

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Site No. 106		Ha	Acres
Harborough	:	3.96	9.78
Rugby	:	18.96	46.85
Total Site Area (Gross)	**:**	**22.92**	**56.63**
Net Developable Area	**:**	**14.15**	**34.95**
		sq m	sq ft
Total (GIA)	**:**	**80,207**	**863,336**
Site Density	:	35%	

Site No. 57		Ha	Acres
Harborough	:	3.94	9.73
Rugby	:	36.64	90.53
Total Site Area (Gross)	**:**	**40.57**	**100.25**
Net Developable Area	**:**	**26.25**	**64.87**
		sq m	sq ft
Total (GIA)	**:**	**142,000**	**1,528,475**
Site Density	:	35%	

Site No. 36		Ha	Acres
Rugby	:	89.12	220.22
Total Site Area (Gross)	**:**	**89.12**	**220.22**
Net Developable Area	**:**	**55.91**	**138.15**
		sq m	sq ft
Total (GIA)	**:**	**311,921**	**3,357,489**
Site Density	:	35%	

Site No. 35		Ha	Acres
Harborough	:	2.47	6.10
Rugby	:	11.54	28.53
Total Site Area (Gross)	**:**	**14.01**	**34.63**
Net Developable Area	**:**	**7.08**	**17.50**
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Total (GIA)	**:**	**49,047**	**527,940**
Site Density	:	35%	

Total Harborough	:	10.36	25.61
Total Rugby	:	156.26	386.13
Total Site Area	**:**	**166.62**	**411.73**
Total Net Developable Area	**:**	**103.39**	**255.47**
Net Developable Area	**:**	**62.05%**	
		sq m	sq ft
Total (GIA)	**:**	**583,175**	**6,277,240**

NOTES:
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Contractors must verify all dimensions on site before commencing any work or shop drawings. This drawing is not to be scaled. Use figured dimensions only.

Subject to statutory approvals and survey.

Building areas are liable to adjustment over the course of the design process due to the ongoing construction detailing developments.

Please note the information contained within this drawing is solely for the benefit of the employer and should not be relied upon by third parties.

The CDM hazard management procedures for the Chetwoods aspects of the design of this project are to be found on the "Chetwoods - Hazard Analysis and Design Risk Assessment" and/or drawings. The full project design teams comprehensive set of hazard management procedures are available from the Principle Designer appointed for the project.

Notes:
Please note Title Plans have been scaled using Ordnance Survey features which may have altered over time. Complete accuracy cannot be guaranteed without further on-site survey.

Any dimensions given are to be confirmed with site measure.

Schedule Notes:
All sq. ft areas are based on the conversion factor of 10.763910417 to ensure accuracy.

However, decimals are hidden values which are rounded up / down which can sometimes result in the totals not always adding up.

NB.
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- **LAYOUT TO BE TRACKED.**
- **RED LINE INDICATIVE ONLY.**

North

0m 50m 100m 200m

Key

- Site Boundary
- Local Council Boundary (Leicestershire & Warwickshire)
- Net Developable Area
- Landscape Area
- HGV Parking Area
- Road Infrastructure

Rev	Revision Description	Date	Author/ Reviewer
P6	Site 36 access updated	14.05.25	MK/PS
P5	Red line adjusted	09.05.25	MK/PS
P4	Site annotations removed	09.05.25	MK/PS
P3	Site No.57 Site boundary adjusted	08.05.25	MK/PS
P2	Boundaries updated to client comments	01.05.25	MK/PS
P1	First Issue	28.04.25	MK/PS

PRELIMINARY

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Project
GLP Magna Pak West

Client
GLP

Drawing Title
Parameters Plan

Scale	Size	Drawn	Checked	Date
1:5000	A1	MK	PS	28.04.2025

Project	Originator	Zone	Level	Type	Role	Number	Rev.
5930	CA	00	00	DR	A	00060	P6

M69 J1 (3miles)
EXISTING COUNTRY PARK
A5
COUNTRY PARK EXTENSION
COAL PIT LANE
A4303
M1 J20 (3miles)
A5
M69
M6/M1 (4miles)
DIRFT (5miles)
Rugby Town (7miles)
North
Key
Site Boundary
Local Council Boundary (Leicestershire & Warwickshire)
Net Developable Area
Landscape Area
HGV Parking Area
Country Park Extension
Road Infrastructure
Road Network (A5 / A4303 / B4027 / Coal Pit Lane)
Proposed Country park Extension
Proposed Magna Park connections
PRELIMINARY
GLP Magna Pak West
Connectivity Plan
1:10000 A1 MK PS 06.05.2025
5930 CA 00 00 DR A 00061 P4

APPENDIX 7

Site 325 Vision Document

MAGNA PARK WEST EXTENSION VISION DOCUMENT

SEPTEMBER 2025

Table of Contents

1 Introduction

2 Background

3 The Opportunity

4 Benefits

5 Summary / Conclusion

1 Introduction

This document sets out the vision for the future expansion of GLP's Magna Park on land west of the A5. This represents a strategic opportunity to build upon the success of the pioneering logistics cluster at Magna Park Lutterworth and deliver a number of significant benefits for Rugby Borough.

This vision document has been prepared by a [CONSORTIUM OF LANDOWNERS] who are jointly promoting this strategic employment opportunity for allocation in the next Rugby Local Plan.

Situated within the UK's 'Golden Triangle' for logistics and entirely outside the green belt boundary, the proposals to extend Magna Park Lutterworth in Rugby to the west of A5 will build on the established principles underpinning the existing distribution park, ensuring the site remains a benchmark for modern logistics while maintaining its strong environmental and community-focused approach. A western extension will be able to build on MPL's proven success, leveraging the existing infrastructure and strong transport links.

The proposed extension to Magna Park's highly successful and already established employment cluster would deliver a number of benefits to Rugby Borough and the wider area, assisting the Council in achieving its economic growth ambitions and meeting the established need for strategic employment land in the new Rugby Local Plan.

The key benefits include:

- A proposed expansion to a highly successful employment cluster at Magna Park in a very sustainable location, with the extension able to leverage the existing physical and community infrastructure already in place;
- The ability for an expansion to be able to cater for B2 and B8 use class occupiers to attract blue-chip businesses and provide a diverse range of job opportunities and associated economic benefits;
- The provision of a landscape-led scheme to provide habitat creation and biodiversity enhancements and opportunities for a new country park with links to the existing 200 acre country park at MPL;
- Opportunities for on-site training and education and synergies with training and research and innovation facilities already established at MPL;
- A large labour catchment with the existing park already served by a number of bus routes, including from Rugby town centre, with opportunities for network expansion; and
- Expansion of an existing employment park that acts as a satellite location to DIRFT, with further opportunities for businesses to be able to utilise the open rail freight terminal c. 7miles south on the A5.

2 Background

2.1 Land Ownership

The proposed Magna Park West extension is being jointly promoted by a [consortium] of landowners for inclusion as a site allocation for employment development in the emerging Rugby Borough Local Plan.

The consortium is comprised of four parties and the site being promoted is comprised of four land parcels as identified in the Council's Stage 2 Site Assessment Report (March 2025) as follows:

- **GLP Europe** – Land opposite MP Lutterworth (site 106)
- **The Coventry Diocesan Board of Finance Limited** – Land north of Coal Pit Lane (site 57)
- **Nurton Developments Limited** – Cross-in-Hand Farm, Willey (site 36)
- **Mr F.B. Dewes and Mr I. Dewes** – Cross in Hand Farm, Monks Kirby (site 35)

The combined landholdings are included in Rugby Borough's Stage 2 Site Assessment Report as "Strategic Site 325: Land adjacent Magna Park" and comprises 166.62 hectares in total.

SITE No. 35

2.2 Need and Demand

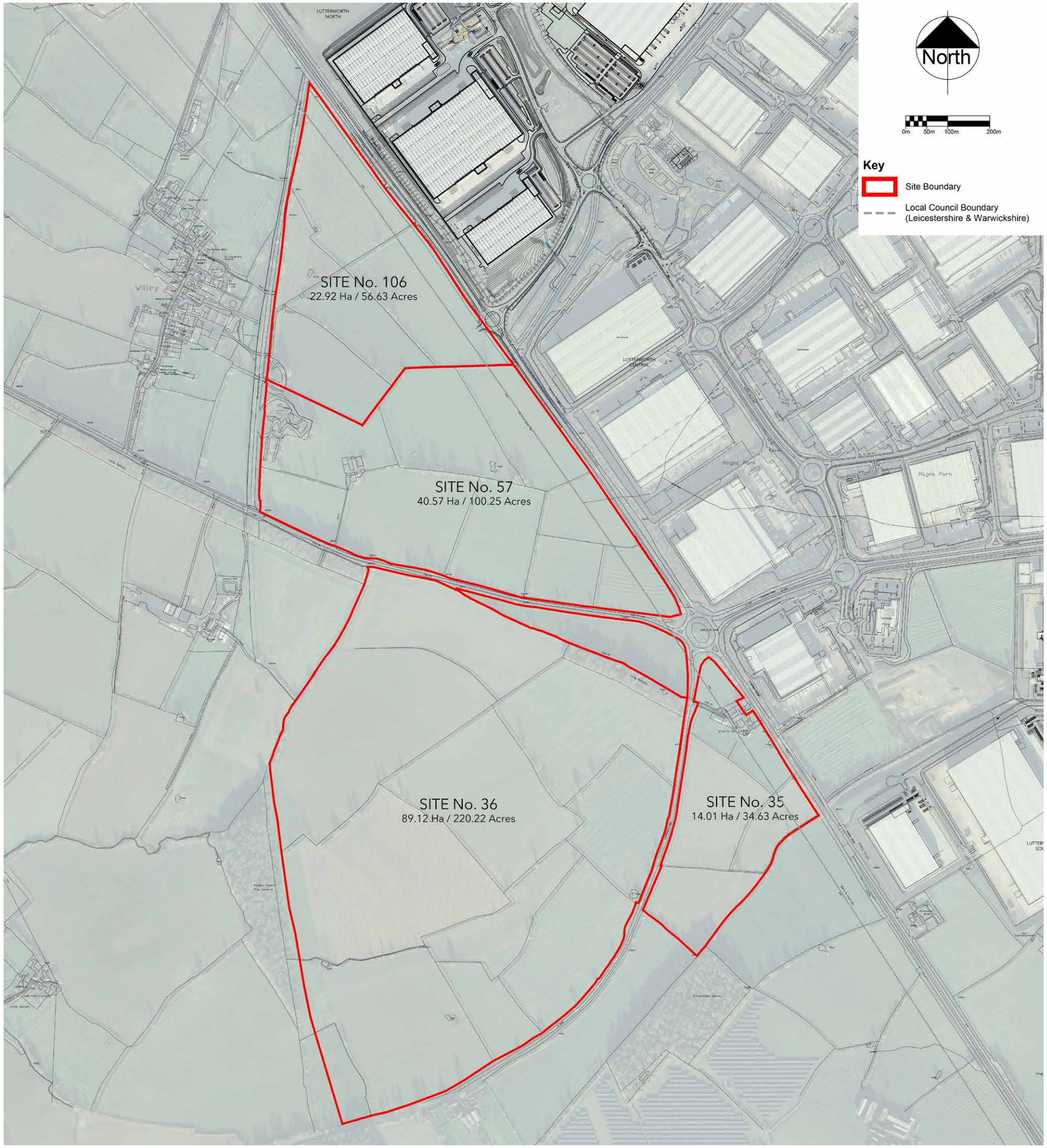
There is policy recognition of the need for logistics floor-space, with national policy in particular recognising the need for resilience of global supply chains due to the changed circumstances from Covid-19, the UK's changes in trade re-lationships and the urgency of the need to promote jobs and boost economic growth.

At the regional level, it is well recognised that there is a need for strategic employment sites and that Rugby is well-located to assist in meeting this demand. Given a large proportion of land within Rugby Borough is within the green belt, the proposed extension to the west of MPL represents a unique opportunity to assist in meeting Rugby's identified need for employment floorspace, providing 580,000 sqm in a strategic and sustainable location wholly outside the green belt boundary and well-connected to the strategic road network. The proposal would also fully align with the criteria in the WMSESS in terms of where strategic employment development should be located.

2.3 Magna Park Lutterworth

Established in 1987, Magna Park Lutterworth (MPL) is an example of a pioneering logistics cluster set within a parkland setting, incorporating sustainability; wellness; innovation; education and environmental initiatives. It is the UK's first and Europe's largest dedicated distribution location, with 1.2m sqm of sustainable logistics floorspace across 50+ separate units. It is situated in a location, bounded by the M1, M6 and M69 motorways; widely known as the "Golden Triangle" this part of the UK is the first choice for logistics businesses due to its strategic position in the centre of the country.

Magna Park Lutterworth is GLP's flagship distribution park, home to some of the UK and Europe's most recognisable brands including Toyota, BT, Asda Walmart, Amazon, DHL and Britvic and therefore has contributed significantly to the development of the local economy and infrastructure. MPL provides essential skills, training and financial support to the local community through a number of initiatives



including:

- Establishing the Lutterworth Area Community Projects Limited as a means to administer and manage the distribution of financial contributions. As of September 2025, the fund has donated over £1.3m to over 100 local organisations and charities.
- Creation of the Centre for Logistics Education and Research (CLEAR) which is a prime example of the social value that MPL provides. The partnership between GLP, North Warwickshire and South Leicestershire College and Wincanton offers skills training and professional development at all levels across the spectrum of logistics and supply chain roles as well as applied research and associated facilities for up to 1,000 students.
- MPL is home to Creating Tomorrow College which is a Specialist Post-16 Institution for 16–25-year-old adults with SEND, with a mission to address the employment deficit for adults with learning needs. Creating Tomorrow College has a clear 5-year development strategy for growth in both cohort resources and curriculum offer, and is located in the Iron Mountain Building at MPL adjacent to the CLEAR campus.
- Planning permission has been granted for a truck parking / services facility within the MPL development. The 9-acre site will provide overnight truck parking, amenity building and HGV EV charging stations. Works to provide the services has commenced on site and an operator has been identified, anticipating delivery of the facility in 2026 which will be open to customers on the park as well as the public.
- Planning permission is also being sought for an Innovation Centre at MPL which will provide a space to host innovation events for the customers on the park and wider logistics industry. The focus of these innovation events will be on sustainability and construction within the logistics sector. Subject to planning permission, GLP will be launching the Magna Park Innovation Centre in 2025.

At MPL, sustainability is a key priority. GLP has invested in extensive green spaces, energy-efficient buildings and initiatives aimed at reducing carbon footprints.

The Magna Park North development included the creation of the 200-acre Bittesby Country Park, a harmonious blend of diverse wildlife, habitats, agricultural, community space and educational engagement. This is a significant asset used by employees of Magna Park and the wider community.

Buildings within MPL have also been designed to ensure that any environmental impacts are reduced with the site being set within a fully landscaped parkland with stringent measures in place to preserve natural habitat and wildlife. This includes the planting of over 1.5 million trees across the MPL campus as well as a partnership with the British Beekeepers Association which led to GLP's third and fourth UK apiary sites being installed at MPL in July 2020. Furthermore, Unit MPS9 (33,583sqm) has recently been awarded a BREEAM Outstanding rating of 97.8% making it the highest scoring industrial BREEAM rated building in the UK as of June 2024. This demonstrates that MPL remains at the forefront of logistics sector, delivering buildings that are both functional for operators and beneficial to the environment.

Magna Park Lutterworth is strategically positioned within the Midlands "Golden Triangle" of logistics, offering excellent connectivity to major motorways such as the M1, M6 and M69. The prime location enables access to approximately 85% of the UK population within a four-hour truck drive-time. It is well located to existing settlements at Lutterworth, Rugby, Coventry and Hinckley.

Staff working at MPL are encouraged to travel to work sustainably, with occupiers implementing Travel Plans to promote sustainable transport modes. The majority of staff employed on site work shift patterns and GLP have formed partnerships with Local Public Transport operators to provide sustainable, efficient and cost-effective travel options to MPL.

A significant benefit of MPL is the proximity to the open-rail terminal at DIRFT which is c. 7m south on the A5. A number of customers at MPL utilise the rail head, including Asda and Britvic.

3 The Opportunity

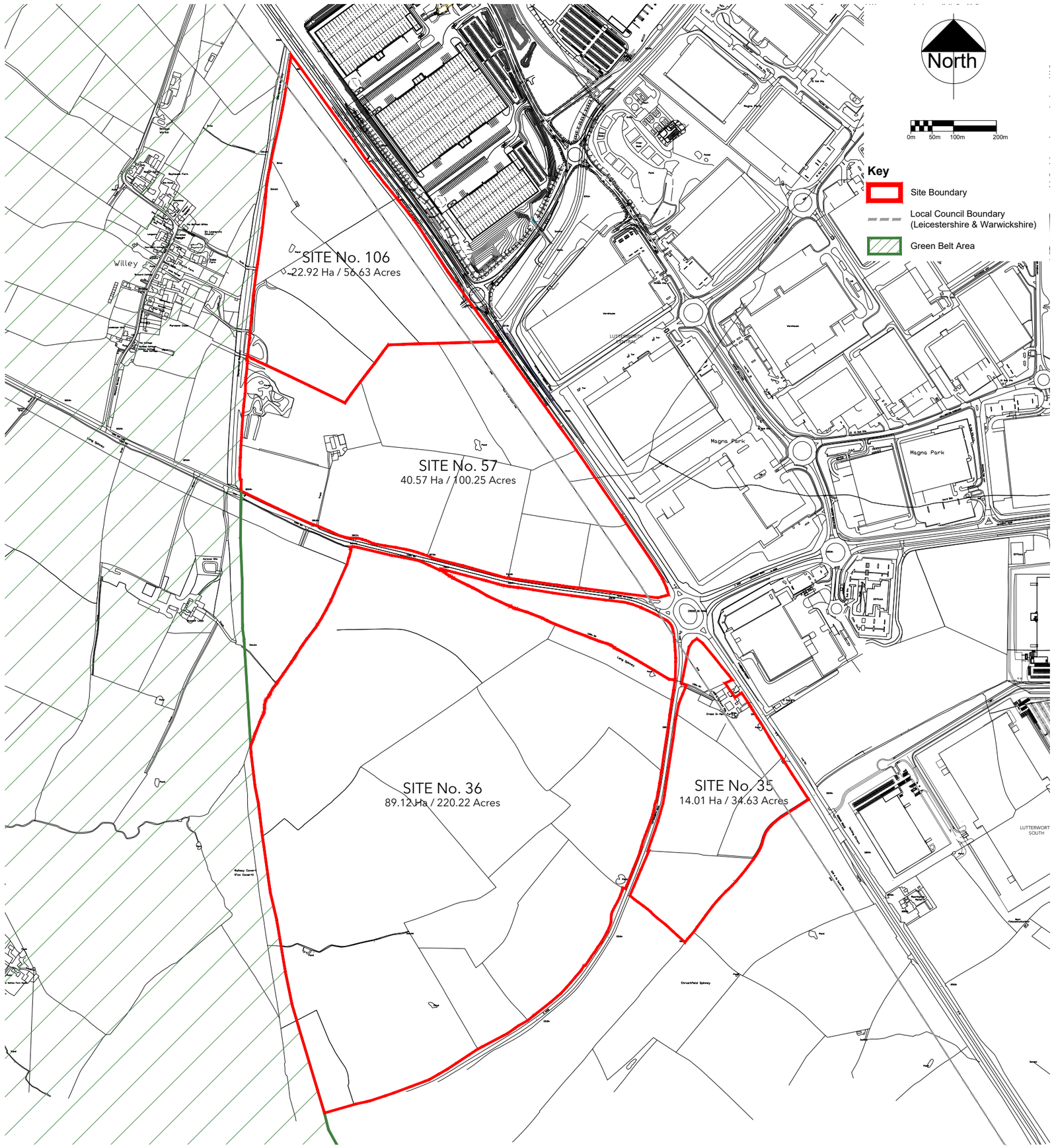
The proposals to extend MPL to the west of the A5 will build upon the established principles underpinning the existing distribution park, ensuring the site remains a benchmark for modern logistics while maintaining its strong environmental and community-focused approach.

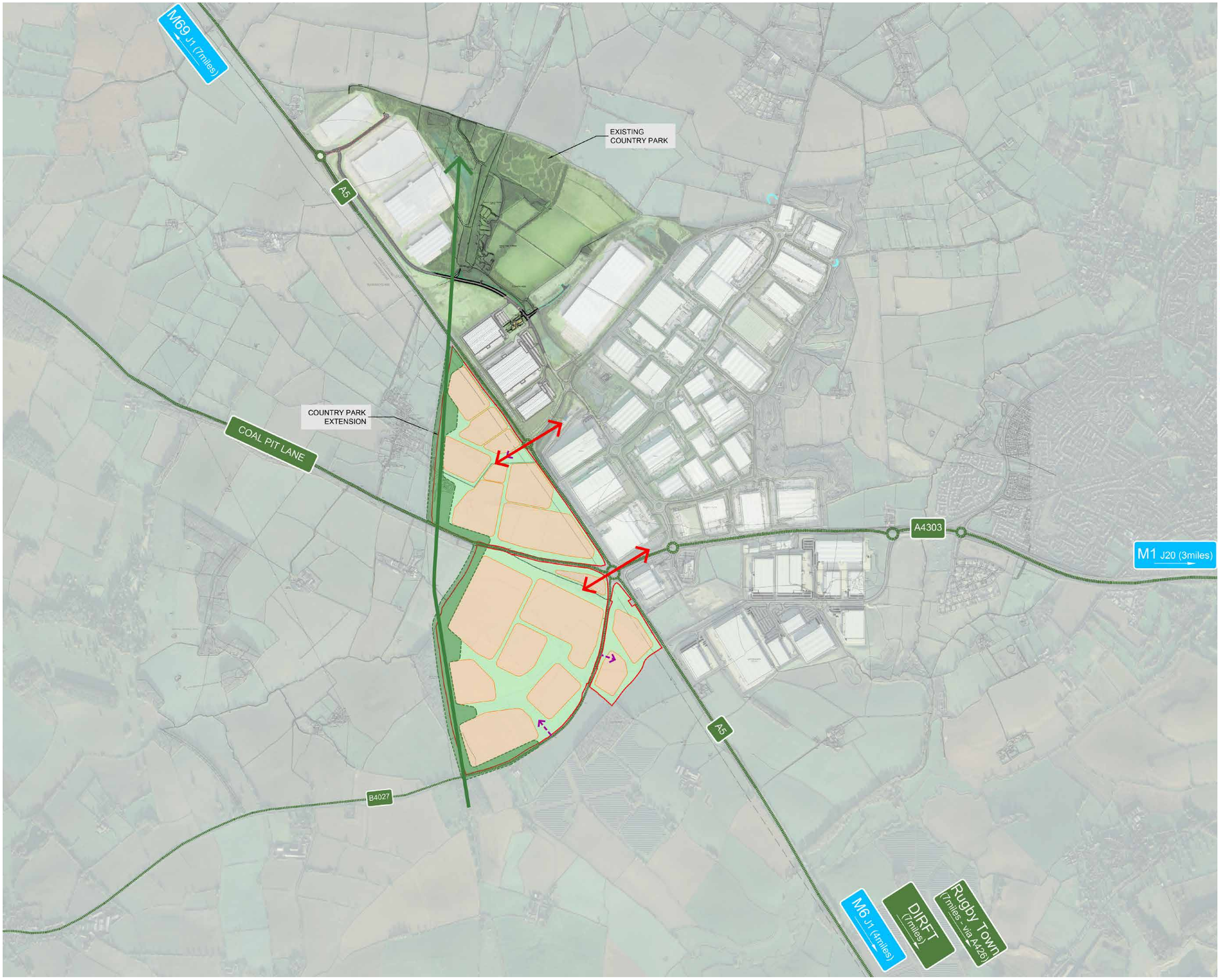
3.1 The Site

The site, which comprises four land parcels, lies to the west of the A5, opposite Magna Park Lutterworth which at present falls entirely within Harborough District Council. Given the location of the boundary line between Rugby Borough and Harborough District, which is located c. 10m west of the A5, whilst the majority of the site for the western extension is within Rugby, a small proportion directly adjacent to the A5 does fall within Harborough.

The land is situated within the Golden Triangle, at the intersection of the A5 and A4303, between Rugby, Coventry and Leicester. Its proximity to these three major centres, the M1 and the M6 allow for unparalleled access to the north, south, east and west of the country, enabling approximately 90% of the UK population to be reached within four hours by truck. This makes it one of the most sought after locations for strategic warehousing and logistics development in the country.

The land is relatively unconstrained in policy terms, is located in Flood Zone 1 and is wholly situated outside the green belt boundary. There are a number of PROWs which intersect the northern portion of the site, which can be retained/diverted as part of a future development proposal.




M69 J1 (7miles)
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Landscape Area
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Country Park Extension
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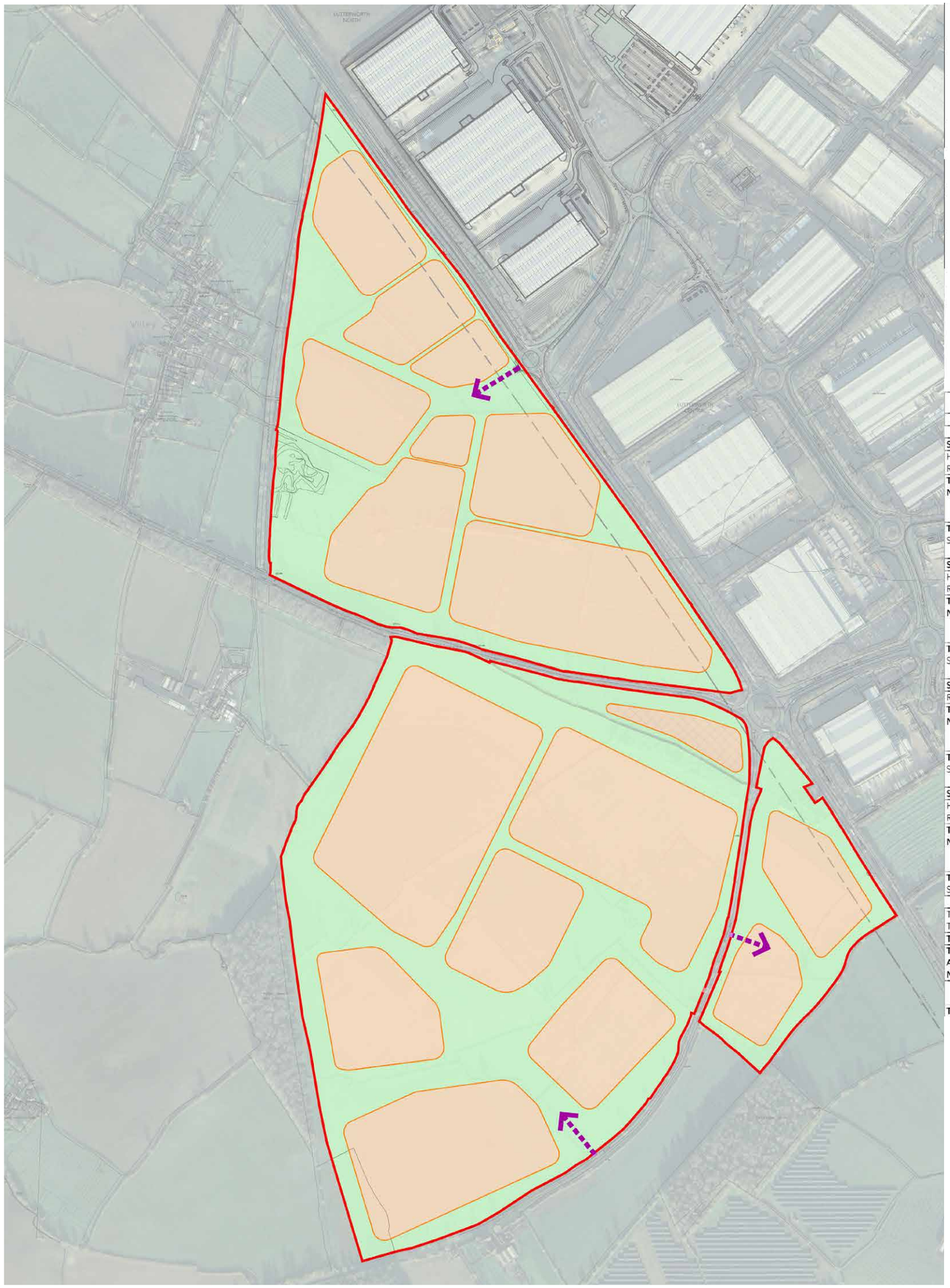
Road Network (A5 / A4303 / B4027 / Coal Pit Lane)
Proposed Country park Extension
Proposed Magna Park connections

3.2 Employment Floorspace

A western expansion at MPL would allow for a high proportion of future employment need to be concentrated in a single, sustainable location that has a proven track record of successful delivery over the past 30 years. The proposed extension of the park into Rugby Borough also provides an opportunity to be able to accommodate both B2 and B8 occupiers in a mix of units. The existing MPL development is safeguarded for strategic storage and distribution (Class B8) uses only, with units to be in excess of 9,000sqm as per Policy BE2 of the adopted Harborough Local Plan. This is also true of the two proposed allocations in the emerging Harborough Local Plan (ref MP1 and MP2), both of which are designated for Class B8 uses. Also, given the size of the site, there is also an opportunity to provide smaller / incubator units to support SMEs, alongside larger units catering for manufacturing and logistics demand in this location.

An indicative development plan has been prepared to show how built development on the site could be positioned, with a 35% plot density equating to the delivery of just over 580,000 sqm of B2 / B8 employment floorspace in a range of unit sizes, including the potential for SME and incubator units.



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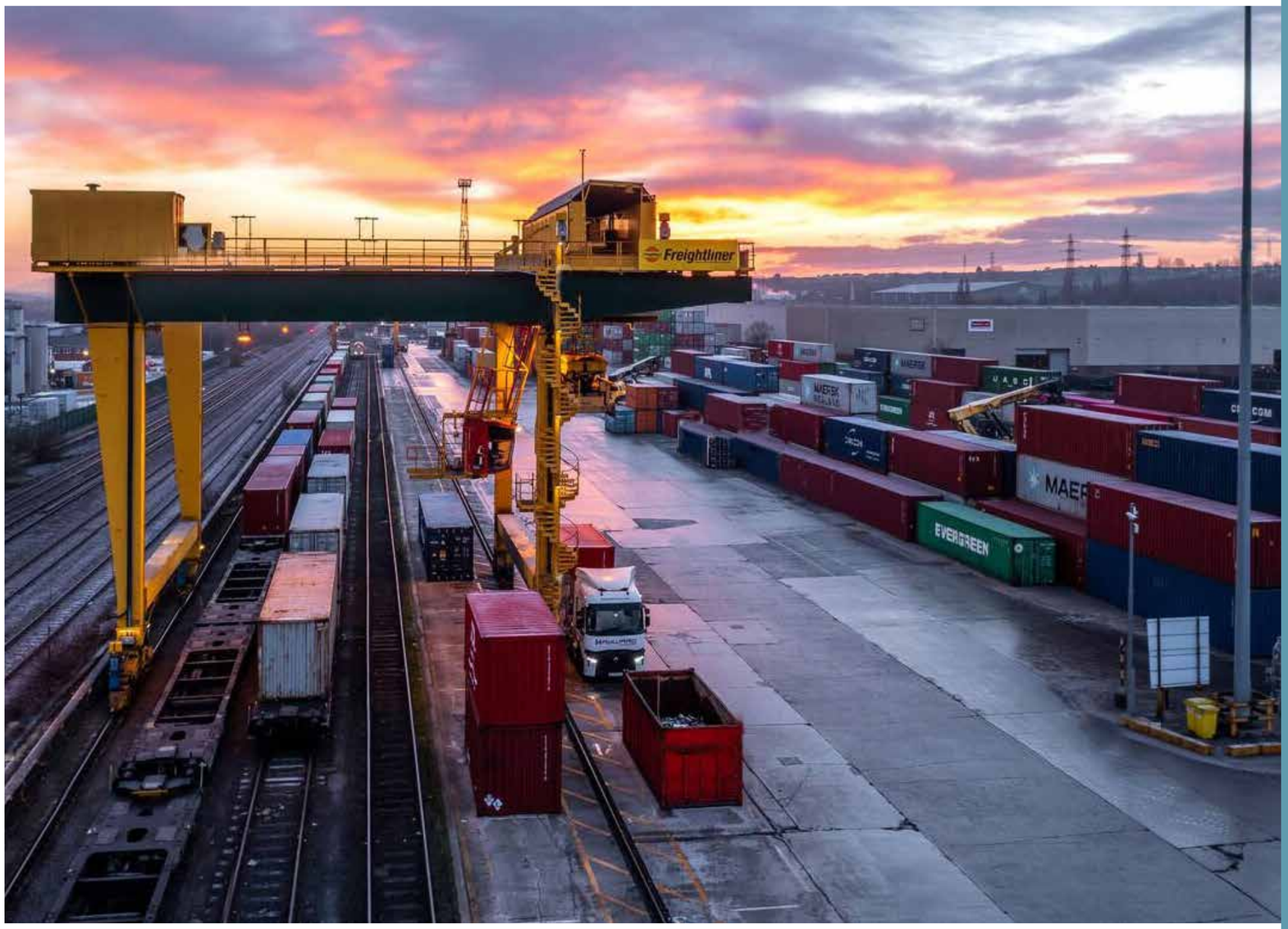
Total Net Developable Area	:	**103.16**	**254.91**
Net Developable Area	:	**61.91%**	
		sq m	sq ft
Total (GIA)	:	**583,175**	**6,277,240**

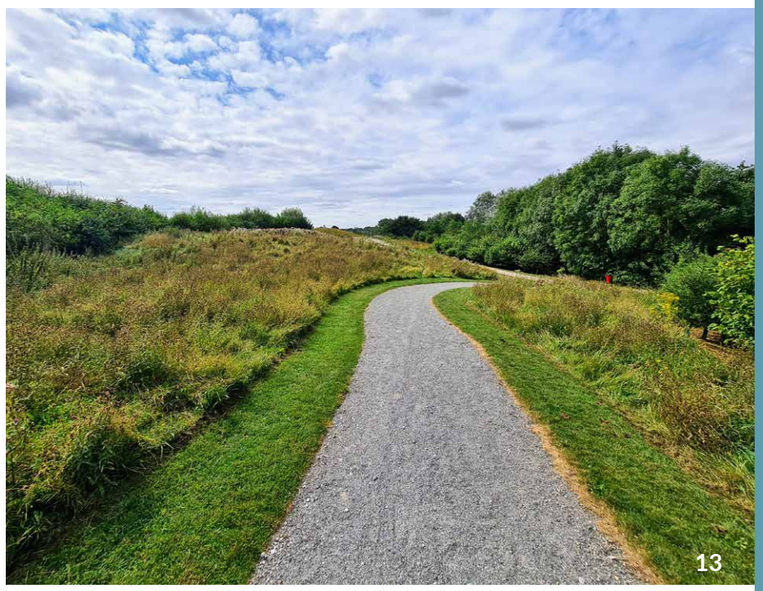
3.3 Access / Transport

Vehicle access to the site would be from the Mere Lane Roundabout and the A5/4303 Cross-in-Hand Roundabout Lutterworth Road. An initial transport assessment has been undertaken which has confirmed that there is likely to be capacity on the network for accommodating additional development west of the A5 as an extension to MPL and, subject to more detailed analysis, there should be viable highway mitigation solutions to deliver the site appropriately and without a severe impact.

In addition, the site can provide improvements to the pedestrian and cycle network to enable continuous connections to the various parcels from the existing infrastructure. The existing Magna Park is also well served by existing public transport services and an extension to the west of the A5 would be able to benefit from the established bus services already in place.

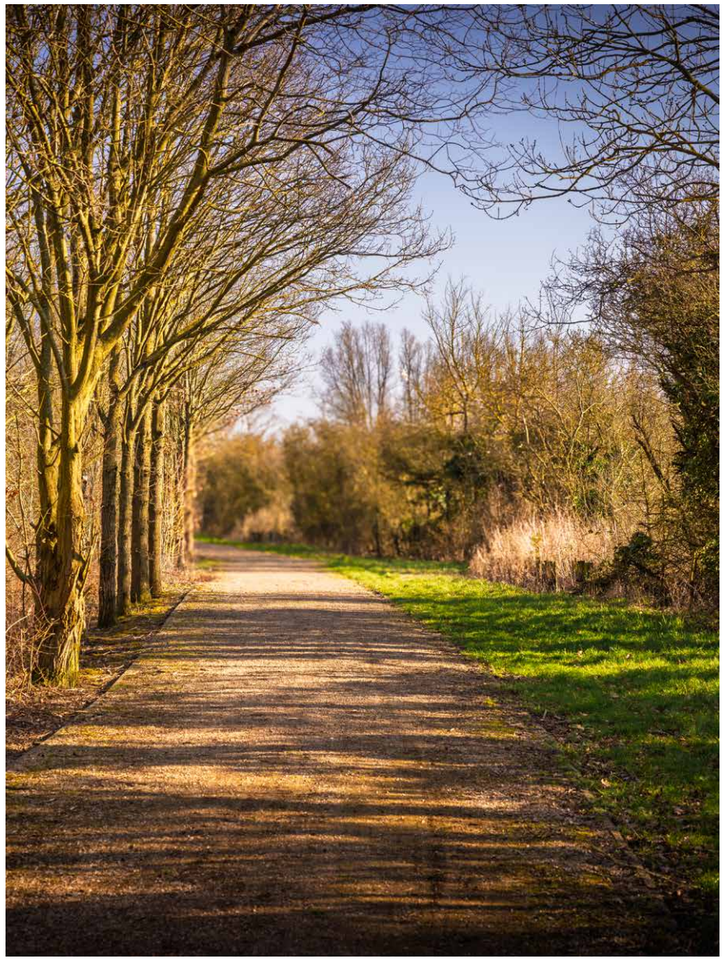
A significant benefit of MPL is the proximity to the open-rail terminal at DIRFT which is c. 7m south on the A5. A number of customers at MPL utilise the rail head, including Asda and Britvic. The proposed expansion into Rugby would also be able to make use of the rail head. This is a unique proposition and unlike other potential sites in Rugby which are not located near rail terminals.

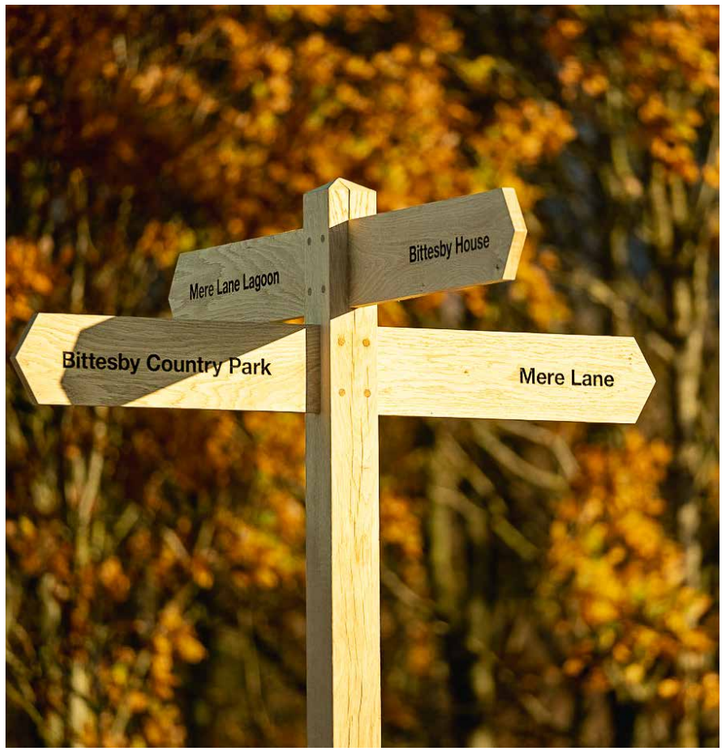


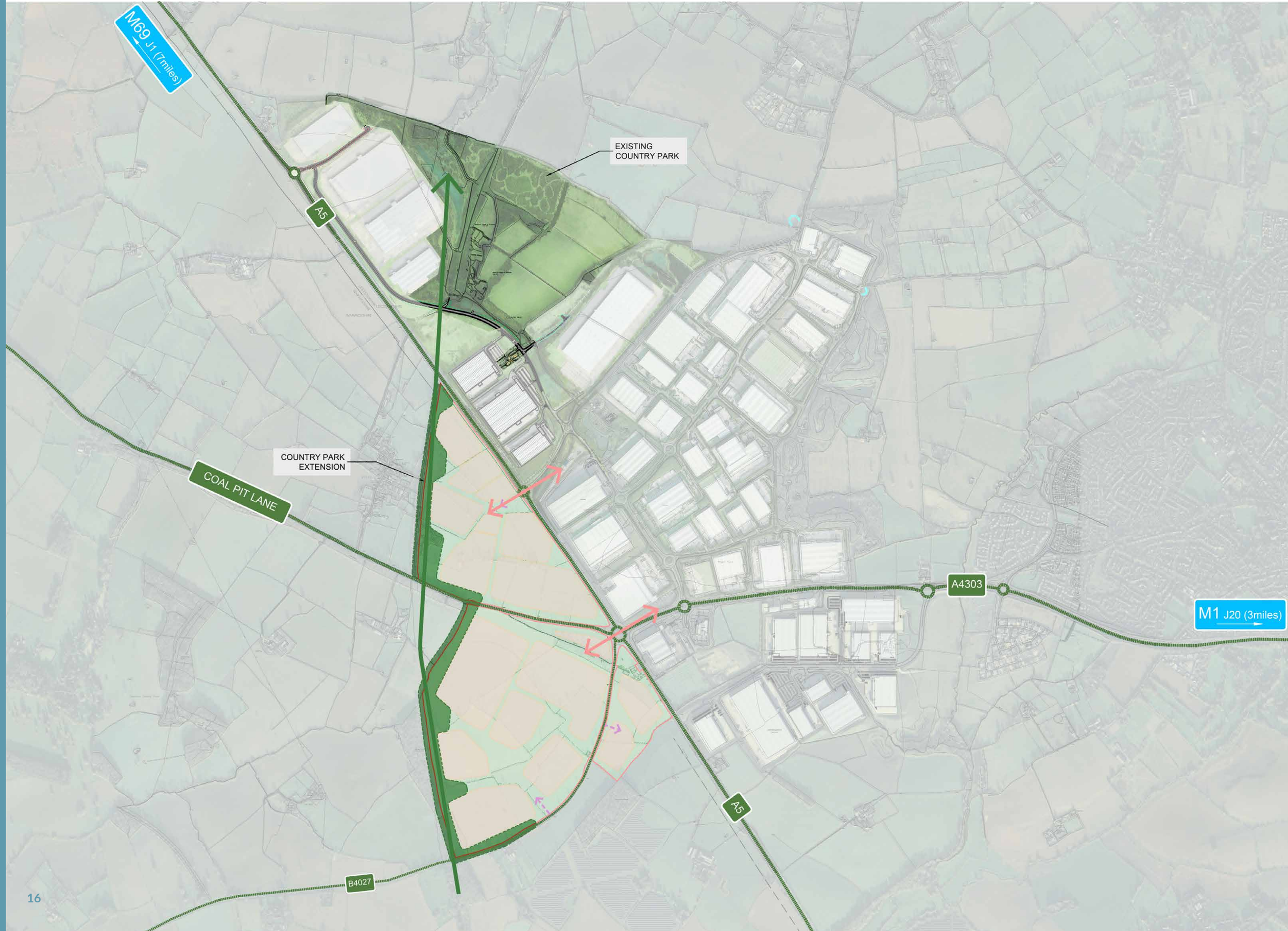


3.4 Landscaping

The proposals would be landscape-led to provide habitat enhancements to deliver significant biodiversity and amenity enhancements. This includes the potential for a linear country park to be delivered comprising community parkland and habitat creation along the western boundary of the site, for use both by the site employees and local community. Opportunities to link this with the existing 200 acre country park at MPN could also be explored.






M69 J1 (7miles)
A5
EXISTING
COUNTRY PARK
COUNTRY PARK
EXTENSION
COAL PIT LANE
A4303
M1 J20 (3miles)
A5
B4027

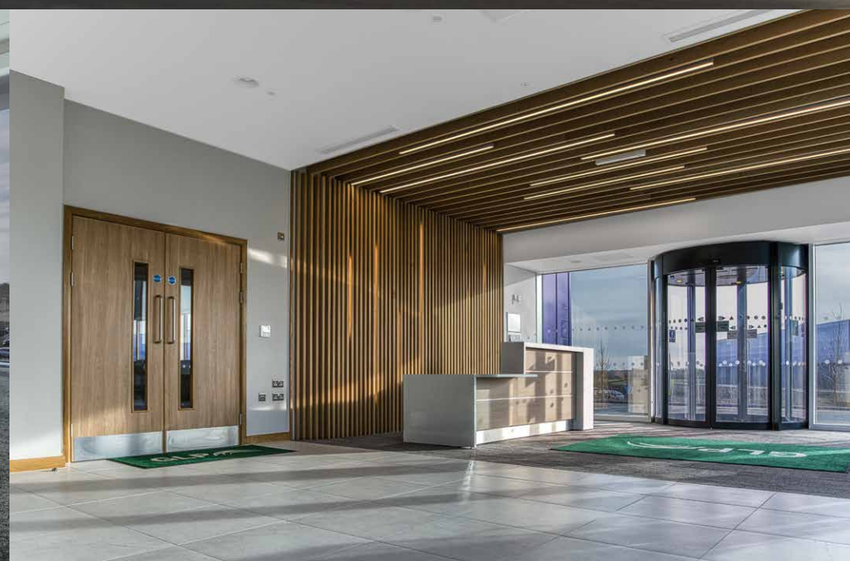
Bittesby Country Park forms an integral part of MPL and is a harmonious blend of diverse wildlife habitats, agricultural, community space, and educational engagement. Over half of Magna Park North was dedicated to Bittesby Country Park and open green public spaces, including woodlands, meadows, and wetlands integrated as part of a sustainable drainage system (SuDS). This creates a habitat for diverse wildlife, providing a sanctuary for both nature enthusiasts and the wider community.

The existing Park is not just a picturesque escape but also an educational haven. With interpretive resources and educational facilities located at key vantage points, it aims to foster an understanding of ecological resilience, climate adaptation, and the importance of sustainable landscapes.

The proposed development could allow for an extension to the already thriving Bittesby Country Park. This is an excellent opportunity to enrich wildlife; enhance the vertical green corridors; provide amenity space for the local communities; include scenic pedestrian walking routes & cycle paths.

3.5 Sustainability

At Magna Park Lutterworth, sustainability is a key priority. The development has involved investment in green spaces, energy-efficient buildings and initiatives aimed at reducing carbon footprints. Buildings have also been designed to ensure that any environmental impacts are reduced with the site being set within a fully landscaped parkland with stringent measures in place to preserve natural habitat and wildlife. This ethos would be carried through into the proposed western extension, with a focus on achieving a highly sustainable development with a focus on place-making, green infrastructure and biodiversity improvements.



3.6 Labour

MPL has good labour availability and attracts workers from a number of neighbouring authorities. The greatest proportion of workers (24%) at MPL are travelling from Leicester, with 13% from Rugby and Harborough respectively. Workers also travel from Coventry, Birmingham, Lutterworth, Hinckley and Nuneaton. There is also planned housing growth within the MPL catchment, which could provide an additional c. 17,000 workers over the next 20 years.

With the site being strategically located, drive times and distances to MPL are the following:

Lutterworth	2.3 miles	7 mins
Rugby	5.6 miles	12 mins
Hinckley	7.4 miles	12 mins
Coventry	14.9 miles	22 mins

The travel patterns of existing employees aligns with the already established public transport infrastructure that is in place. A number of bus routes serve MPL, bringing workers from Lutterworth, Leicester, Rugby and Hinckley. An expansion to MPL is therefore inherently sustainable as a public transport network is already established and there may be opportunities for future enhancement to the services.

4 Benefits

The proposed expansion to the west of the A5 provides a unique and exciting opportunity to build upon the established development of Magna Park Lutterworth, leveraging the existing infrastructure and strong transport links. A western expansion of MPL would allow for a high proportion of future employment need for Rugby to be concentrated in a single, sustainable location that has a proven track record of successful delivery over the past 30 years. This will deliver a number of significant benefits for Rugby Borough and the surrounding region.

4.1 An opportunity for a strategic expansion to a highly successful employment ecosystem

There are a significant number of advantages associated with larger logistics parks and the benefits associated with clustering of their uses including cost, management and environmental efficiencies from shared infrastructure and resources between businesses.

Logistics operations that form part of a cluster are much easier to co-ordinate and are therefore much more likely to be realised under a single ownership and management. Most UK based logistics developers predominately seek to maintain ownership of all their assets and associated infrastructure which enables better coordination and efficiencies between business which maximise the associated benefits. A larger site provides an opportunity to deliver large scale facilities that are increasingly required by major warehouse and industrial units.

A piecemeal approach to logistics development results in individual developments each without the critical mass to generate the level of investment required to facilitate the infrastructure needed to support this level of development and deliver sustainable economic development. The allocation of larger sites for Class B2 and B8 uses also has the ability to attract major occupiers in a range of sectors, including those seeking to serve regional and national markets. It is critical to provide space for a mix of sectors and employment uses that deliver a diversity of employment as a cohesive and connected business ecosystem is essential for the creation, growth and retention of innovative and economically prosperous businesses in the region.
The co – location of different business functions (e.g. offices, research and development or training facilities) alongside warehousing and manufacturing space is a means of improving operational efficiency, reducing estate costs and fostering stronger collaboration between different business units. The close proximity of different uses will also result in a higher proportion of full HGV loads which reduces both transportation costs and C02 emissions.

The proposed development in Rugby would also form a complementary extension to the existing Magna Park which is currently restricted to delivering strategic storage and distribution (Class B8) only in units in excess of 9,000sqm. The western extension therefore provides an opportunity to be able to accommodate both B2 and B8 occupiers in a mix of units, including the ability to provide smaller / incubator units to support SMEs, alongside larger units catering for manufacturing and logistics demand in this location.

4.2 Leveraging the established infrastructure

MPL already benefits from a number of bus services, linking the site to Rugby, Leicester, Harborough and Hinckley, which the proposed extension would be able to utilise and also explore opportunities for network enhancement. The proposals could also benefit from other on-demand public transport services already established such as Fox Connect and Liftshare.

Businesses operating from a proposed expansion to the west of MPL would also benefit from the site's unique position as a satellite location to DIRFT, with businesses able to capitalise on using the existing open rail terminal.
There are successful HGV routeing arrangements in place for MPL and this would be carried through to the new development, ensuring that restrictions on HGVs accessing nearby villages would continue.

Through further masterplanning, opportunities for other on-site amenities can be explored, including the provision of additional lorry parking to complement the provision of a service facility at MPL which is currently being built.
Further opportunities for training and education can also be explored, including links to the already established CLEAR Centre and other initiatives as part of the existing MPL.

There are a significant number of benefits associated with the proposed western extension of MPL, including:

Responds To Specifically Identified Needs (Unit Sizes, Heights, Location etc.

The Site's location in the Golden Logistics Triangle is regarded as a strategic hub for distribution and logistic operations. Research indicates that this area provides access to 95% of the British population, making it an ideal location for same-day and next-day delivery services.

Ability to cater for B2 and SME demand which cannot be catered for at MPL. The existing MPL in Harborough is subject to a planning policy restriction specifying that units must be B8 and over 9,000sqm. The same restriction does not need to be applied to an extension to MPL to the west of the A5 in Rugby, with the site instead being able to accommodate both B2 and B8 uses in a range of unit sizes, including move-on premises and mid-box units.

Provision of a Community Park

Access to parks and greenspaces is linked to increased physical activity and exercise, which helps to reduce obesity, diabetes and heart disease. The proposed development would be landscape-led to provide habitat enhancements to deliver significant biodiversity and amenity gains. The proposed development incorporates a country park along the western boundary of the site, to be available for use by site employees and the local community. Opportunities to link this with the existing 200 acre country park at MPN can also be explored.

Job Creation – Construction

Construction of the Site will create employment opportunities. It is estimated that the total direct construction employment could be around 4,000 jobs direct for the project, phased over the build period. This would in turn support a significant number of additional supply chain and other multiplier jobs in the region and country as a whole.

Jobs created during the construction phase would encompass a wide range of trades and sub-sectors, and are likely to include apprenticeship and training opportunities for local people. Construction GVA alone from the build directly would exceed £250m, with a potential further £400m in total from additional supply chain and other multiplier effects.

Job Creation – Operational

The proposed 166ha extension of Magna Park to the west of the A5 will create substantial job opportunities in the local area. Once completed, the extension could support a substantial 6,000 to 7,000 jobs, depending on occupier requirements. This would make a significant impact on local and regional employment, particularly in Lutterworth and Leicester. This may vary seasonally. At the sub regional level, the benefits associated with both supply chains as well as the wage spend of workers will support further employment creation in the sub region being around 3,000 jobs. Operational GVA could exceed £300m per annum in perpetuity, with a potential further £150m in total from additional supply chain and other multiplier effects in the East Midlands.

Job Creation – Types

These employment opportunities are likely to be in a range of sectors depending on the final occupants of the floorspace, but is likely to include roles in warehousing and distribution, wholesale, business administration, IT and professional services.

There are limited barriers to entry to many of the roles available, allowing school leavers, the long-term unemployed and people transitioning from other sectors to enter the workforce. There are also skills development and career growth opportunities available at Magna Park for those wishing to progress rapidly.

Research also indicates notable increases in professional and associate professional / technical occupations in the logistics sector, reflecting increased levels of automation as well as the prevalence of collocating offices with warehousing. This suggests that many of the new roles created will be highly skilled, and offer competitive salaries.

Value to the Local Economy

The 2020 business rates income for Magna Park was estimated at £24m, a proportion of which is retained locally. Applying this ratio to the future development proposals indicates future additional contributions of at least £16m. However, based on assessments of the most modern floorspace ratings, which are over double the existing park average, when built out the new development could achieve total business rates exceeding £40m per annum, creating a very significant income stream for the Council.

The business rates income from MPL in 2023/2024 meant that Harborough District Council was able to freeze council tax for all residents in 2024/2025.

As such, substantial increases in business rates will benefit Rugby Borough Council and its residents by reducing the cost of public services leading to tax savings for residents.

Social Value Benefits

The existing MPL supports the community and local voluntary organisations to deliver local projects within the geographical area surrounding MPL. The Lutterworth Area Community Fund has contributed over £1m to community projects in the local area. There is also an established Community Liaison Group for the purposes of providing information and updates on current development proposals and operations at MPL. Members include local parish councils and local interest groups.

A western expansion would be able to build upon these already established community initiatives and further extend the benefit to community groups within Rugby.

5 Summary / Conclusion

Logistics and manufacturing uses are an important part of Rugby Borough's economy as a business sector in its own right and as an enabler to the success of other businesses of all sizes and sectors. This aspect of recovery will not be possible without suitable strategic employment sites, to accommodate the necessary growth.

Allocation of the site would help drive further economic growth in Rugby and beyond, and provide a source of new employment opportunities, as the site has the benefits of an optimal commercially attractive location, away from large areas of sensitive residential receptors, but close to the strategic road network and with a local labour supply capable of accessing the site by sustainable modes.

The site is well related to the local highway network with access onto the A5 and A4303 / M1 via Magna Park Central, therefore, the site is well located in relation to the strategic network, which provide opportunities to travel further afield and to nearby centres of employment including Leicester, Harborough, Coventry and Hinckley, underpinning the locational strengths of the site and its appeal to this expanding business sector.

The site is also relatively unconstrained, being located wholly outside the Rugby Borough green belt.

The allocation of the site would build on the success of Magna Park and the associated existing local economic strengths in the logistics sector, making a readily deliverable, achievable and highly significant contribution to a strong and competitive regional economy.

The site is therefore entirely suitable for further strategic employment development and provides a further unique opportunity to form a logical and complementary extension to Magna Park.

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REGULATION 19 REPRESENTATION STATEMENT

Site: Land West of Magna Park, Lutterworth

Project Ref: 26007

Date: 13 March 2026

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1.0 Introduction

1.1 These representations are submitted to Rugby Borough Council ('RBC') in response to the Proposed Submission Local Plan, which was approved for Regulation 19 consultation from 30 January 2026 to 13 March 2026.

1.2 The representations are submitted jointly on behalf of GLP Europe, Nurton Developments Limited and Mr F. B. Dewes and Mr I. Dewes ('the Parties') and specifically relate to Site 325 – Land west of Magna Park ('the site').

1.3 As per the Council's assessment, Site 325 comprises four separate parcels of land. The site in its totality is located to the west of the A5, opposite Magna Park Lutterworth ('MPL'), which at present falls entirely within Harborough District Council and is Europe's largest dedicated distribution park. The site is entirely outside Green Belt and is available, suitable, achievable and deliverable for employment development within the plan period.

1.4 The submission of these representations follows representations made by the above parties in response to the RBC Local Plan Review Preferred Options Consultation (Regulation 18) in May 2025. These representations are included in full at Appendix 1 of this Report.

1.5 At Regulation 18 stage, joint representations were submitted which set out reasons why the Parties did not consider the proposed approach put forward in the draft Local Plan to be sound, principally due to:

- The original omission of land west of Magna Park as a 'broad location' for growth.
- The underlying employment land figures underestimated the residual strategic employment land need.

- The approach to identifying sequentially preferable sites is unsound due to the prioritisation of sites within the Green Belt, which does not accord with national planning policy.

1.6 The Regulation 18 Representations also provided reasons why the site would be a sustainable location for employment development due to its large labour catchment, its relationship to DIRFT (an SRFI), along with the other significant benefits of locating employment floorspace in this location.

1.7 The site is largely unconstrained, particularly from an ecological, landscape and heritage perspective, and is wholly outside Green Belt.

1.8 Notwithstanding this, the Regulation 19 Proposed Submission Local Plan continues to overlook allocation of the site.

1.9 The Parties do not consider that the Plan is legally compliant, sound or complies with the Duty to Cooperate.

1.10 Fundamentally, these issues result from a failure of the Plan to meet the objectively assessed employment need for Rugby, and because the proposed approach to allocating employment land is not based on a robust evidence base nor does it comply with national planning policy.

1.11 In order to make the Plan sound, we consider that the employment strategy set out in Strategic Policies S3 and S7 should be amended in terms of the quantum of employment land being planned for and the approach to the employment allocations.

1.12 Following this process, we consider that land west of MPL should be allocated for strategic employment development. These representations will demonstrate that:

a. Land west of MPL is a non-Green Belt site in a highly sustainable location for employment development in accordance with Paragraphs 110 and 115 of the NPPF; and

b. there is no credible evidence to support the contention that the site is constrained in highway terms.

1.13 Accordingly, the site should not have been discounted as a reasonable alternative and should be considered for allocation before the Council conclude there are exceptional circumstances to support the release of Green Belt as required by NPPF Paragraph 147. The Council cannot demonstrate that there are exceptional circumstances to support the proposed release of Green Belt which are fully evidenced and justified as per NPPF Paragraph 145.

1.14 The representations set out additional amendments needed to non-strategic policies within the Plan to ensure they are also sound, including with specific reference to the assessment of Site 325.

1.15 The remainder of this Representation Statement is structured as follows:

- Section 2.0 provides an update on the policy landscape and the increased support for employment development, particularly the Freight and Logistics sector;
- Section 3.0 sets out comments on the strategic draft policies, namely S3 and S7 and the reasons why these are fundamentally unsound;
- Section 4.0 comments on the non-strategic draft polices and suggested amendments;
- Section 5.0 specifically concerns site 325 and sets out why this is a deliverable site; and
- Section 6.0 summarises the conclusions.

1.16 This Statement should be read in conjunction with the Representation Forms, which provide feedback on specific policies within the Plan, as well as the other supporting evidence. For completeness, Representation Forms pursuant to the following draft policies are submitted:

- S3 – Strategy for Employment Land
- S7 – Employment Allocations
- CL1 – Net Zero Buildings
- CL3 – Water Supply, Quality and Efficiency
- E2 – Employment Development
- EN6 – Canopy Cover
- I1 – Transport
- Site 325

2.0 **The Context for Strategic Employment Development**

2.1 As set out in the Regulation 18 Representations submitted on behalf of the Parties, there is clear recognition of the need for Freight and Logistics floorspace at a national level, in particular with policy recognising the need for resilience of global supply chains due to the changed circumstances from Covid-19, the UK's changes in trade relationships, and the urgency of the need to promote jobs and boost economic growth.

2.2 This policy support is further strengthened in the draft NPPF that was published for consultation between December 2025 – March 2026. Whilst the document is in draft it can therefore only attract limit weight; the additional policies indicate a clear direction of travel that further strengthens existing national policy concerning the provision for Freight and Logistics development.

2.3 Specifically, Policy E2 of the draft NPPF states that *substantial* weight should be given to the economic benefits of proposals for commercial development which allow businesses to invest, expand and adapt; especially where this would support improvements in the Freight and Logistics sector.

2.4 In addition, draft Policy E3 sets out that, to support the effective and efficient movement of goods, development proposals for freight and logistics uses and associated infrastructure should:

(a) "Have good access to transport networks (including via sustainable transport modes where possible) appropriate to the type of development;

(b) Be sited and designed to limit environmental impacts (such as through the co-location or intensification of facilities to limit vehicle movements, and sensitive building design and landscaping). The

impact on local residents or other neighbouring uses should be acceptable, taking into account proposed mitigation, especially where night-time activity will be required; and

(c) Provide sufficient and secure parking for lorries or other vehicles to cater for the anticipated use."

2.5 The supporting text for the NPPF consultation draft states that the aim of these policies is to provide clear policy support for a wide range of businesses and to support long term economic growth both locally and nationally. The proposed changes aim to reflect changing business needs and the growth of different sectors, including data centres and Freight and Logistics.

2.6 Therefore, whilst the policies are still subject to change and timescales for adoption of the draft NPPF are yet to be confirmed, this provides evidence of continued Government support for the industrial and logistics sector, particularly in locations where existing logistics parks can be expanded, and opportunities already exist to minimise vehicle movements such as at MPL.

2.7 As part of the evidence base to support the RBC Regulation 19 Proposed Submission Local Plan, Iceni have prepared an addendum to the Coventry & Warwickshire Employment Needs Alignment Paper (dated November 2025).

2.8 This states that there is recent market evidence which indicates a clear slowdown in development activity over the last 18-24 months. It also comments that demand for strategic units has been driven by a number of exceptions, one-off factors which are unlikely to persist in the longer-term forecast period to 2045 and beyond. Factors such as Brexit, port disruptions such as the Suez Canal and the pandemic have driven stock holding requirements to secure UK supply chains. These drivers created a temporary uplift in demand that does not represent a longer-term trend.

2.9 We dispute the contention that any slowdown in development activity in recent years is evidence of a longer-term trend in reduced take-up rates. According to Savills, 2025 was the strongest year for take-up of big box units over the last three years. Take-up reached 33.4 million sq ft nationally – 14% up on 2024 and 29% above pre-pandemic levels[1].

2.10 Further information on demand and supply is included in the Employment Land Need Technical Note prepared by NDL in support of these representations.

2.11 As such, we consider there remains a need to positively plan for future employment growth and that existing and emerging national planning policy provides further support for the sector.

[1] https://www.savills.co.uk/research_articles/229130/383437-0/national-occupier-market-overview

3.0 **Comments on Strategic Policies**

3.1 This section of the Statement provides commentary on the draft Strategic Policies within the Plan, namely draft Policies S3 and S7.

3.2 Fundamentally, we consider these two policies unsound on the basis that they fail to meet the objectively assessed employment need for Rugby, and because the proposed approach to allocating employment land is not based on a robust evidence base nor does it comply with national planning policy.

3.3 The following deals with each of these Policies in turn.

S3 – Strategy for Employment Land

3.4 Draft Policy S3 sets out the quantum of employment land required to meet Rugby Borough's need in the period 2025-2042.

3.5 At Regulation 18 stage, our representations made the case that the employment need for Rugby Borough has been underestimated.

3.6 At Regulation 18 stage, the Plan was to cover the period 2024-2045. The Plan has since been amended, and the Regulation 19 consultation version is based on a period between 2025-2042. The table below sets out the reduced requirement that is proposed at Regulation 19 stage, compared to Regulation 18 stage.

Need Type	Regulation 18 (2024-2045) (sqm)	Regulation 19 (2025-2042) (sqm)
Strategic scale sites	761,250	791,525
Small sites	265,296	232,600
Unmet need from Coventry	180,000	10,000
Total	1,206,546	1,034,125

Table 1. Comparison in employment need between Regulation 18 & Regulation 19 stages.

3.7 Additionally, further information has also been published to support the Regulation 19 Plan. The following section comments on the updated evidence base before concluding on the quantum of employment need for Rugby Borough.

Strategic Scale Sites

3.8 At Regulation 18 stage, we provided commentary on the West Midlands Strategic Employment Sites Study (WMSESS) published by Iceni in August 2024, and the associated Coventry & Warwickshire HEDNA-WMSESS Alignment Paper ('the Alignment Paper') updated in November 2024.

3.9 Whilst we considered that WMSESS which underpins the Alignment Paper is a well-intentioned piece of work as it seeks to boost the allocation of strategic sites across the West Midlands, we raised a number of concerns with the methodology including that the assessment of existing supply of sites has been wholly uncritical, taking information provided by Local Planning Authorities at face value. It was our view that the resulting analysis therefore served to fundamentally undermine the principal purpose of the study, i.e. the allocation of a sufficient number of sites to serve the sub-regional economy for the next 20 years.

3.10 To support the Regulation 19 Consultation, an Addendum to the Coventry & Warwickshire Alignment Paper has been prepared by Iceni (dated November 2025). This Paper serves two roles:

- To correct the original WMSESS and subsequent HEDNA/WMSESS Alignment Paper in respect of supply and suppressed demand model.
- To respond to key issues raised by representations at Regulation 18 stage.

3.11 In respect of the first matter, it is noted that the Addendum Paper does revise some of the figures regarding the committed supply as presented in the original WMSESS. For example, the 100ha country park at Coventry Gateway has been taken out of the calculations of committed supply (although it is unclear why this has led to the residual need increasing by only 50 ha).

3.12 However, as set out in the Employment Land Need Technical Paper prepared by NDL, almost all the discrepancies in the assessment of committed supply have not been addressed.

3.13 The Addendum Paper also rebuts arguments about the pace of development over the last four years. We maintain the view that this is contradicted by completions data contained within the Development Needs Topic Paper. This is explained further in the NDL Employment Land Need Technical Note.

3.14 Based on the assessment work prepared by NDL, we contend that the requirement for strategic scale floorspace in Rugby over the Plan period should be 1.75 million sqm. This is almost 1 million sqm more than currently projected.

Coventry Unmet Need

3.15 The Iceni 2025 Update Paper makes no comment on the position of unmet need from Coventry.

3.16 Further, the Development Needs Topic Paper provides no explanation why the assumed unmet need for Coventry has been reduced from 180,000 sqm to 36,000 sqm.

3.17 The proposed allocations in the Regulation 19 Plan generate a small surplus of just over 10,000 sqm and it is suggested that this could contribute to the unmet need of Coventry. This is significantly different from the strategy proposed at Regulation 18 stage where the Plan was seeking to meet all of Coventry's unmet need of 180,000 sqm. There is no explanation for this change of approach in the evidence base.

3.18 We do not consider the reduction in unmet need from Coventry is justified. Coventry City Council has produced evidence post-submission of its Local Plan seeking to demonstrate that there is significantly more capacity in the supply of land through potential windfall development. This has been questioned by the Inspectors and is a matter for debate at the hearing session to the forthcoming examination. Instead, we conclude that there is a minimum shortfall between local need and supply of 269,000 sqm over the Rugby Local Plan period.

3.19 We also consider that the reduced scale of the unmet need for Coventry, and the Council's decision to now only meet a portion of this, is at odds with the proposed spatial strategy which allocates three of the five employment sites on the edge of Coventry.

Harborough Unmet Need

3.20 It is also notable that neither the Development Needs Topic Paper, nor the Iceni Addendum Report, make any reference to unmet needs from Harborough District, despite this being raised in our Regulation 18 representations. At Regulation 18 stage, we referred to an unmet need of 283,000 sqm based on the Strategic B8 Needs Sensitivity Report (Iceni, December 2024) produced for Harborough District Council (HDC) to inform its Regulation 19 Draft Local Plan.

3.21 Further information has since been published, namely the Leicester & Leicestershire Strategic Distribution Floorspace Needs Update and Apportionment Report for all Leicestershire LPAs – Iceni, October 2025.

3.22 The 2025 Leicestershire report generates a gross need of 823,000 sqm of road-based strategic distribution floorspace for Opportunity Area 6 (OA6) for the period 2023-2046. In terms of key employment areas, OA6 covers Magna Park, Lutterworth in Harborough and Junction 20 of the M1.

3.23 From this gross need figure is deducted completions for 2023/24 and commitments as of 1 April 2024, totalling 257,000 sqm (principally made up of plots MPS 9-11 and MPN 761, 6 & 7). This leaves a residual need of 566,400 sqm.

3.24 The HDC Regulation 19 Plan (March 2025) proposes allocations of 340,000 sqm on two sites at MPL for strategic distribution totalling 137.8 ha. This was to meet a residual need of between 100 and 140ha for the period 2024 to 2041. No land at Junction 20 of the M1 is proposed for employment allocation.

3.25 As such, it can be derived that HDC would need to allocate a further 266,400sqm (i.e. 566,400 sqm less 340,000 sqm) to meet the requirements set out in the 2025 Leicestershire report.

3.26 In addition to the above, we are also aware that the employment land consented as part of the Lutterworth East Sustainable Urban Extension (ref 24/00932/VAC) has resolution to grant to remove the unit size restriction (under app ref 19/00250/OUT), so that this floorspace could now deliver strategic B8 floorspace in units over 9,000 sqm. HDC have included this land as an additional existing commitment totalling 52,000 sqm.

3.27 GLP have also made representations to HDC to increase the floorspace capacity of the two emerging allocations at MPL from 340,000 sqm to 370,000 sqm total.

3.28 Taking these potential supply increases into account, this results in an unmet need in Opportunity Area 6 of 146,400sqm.

3.29 The Rugby Borough Duty to Cooperate (2026) makes reference to meetings between RBC and HDC regarding employment and transport matters. Notwithstanding this, there is no reference within the Local Plan documents or evidence base to RBC meeting the unmet need for Opportunity Area 6 and this is not accounted for within the employment need figures.

Quantum of Employment Need

3.30 Based on the above, and the amended Plan period, we consider that the employment need for Rugby Borough should be as detailed in the Table below, which also includes a comparison against the draft Local Plan's projections:

Element	Reg 19 Local Plan (sqm)	NDL's Analysis of the Requirement (sqm)	Difference
Strategic scale sites	791,525	1,750,065	958,540
Smaller sites	232,600	232,600	0
Unmet need from Coventry	10,000	269,000	259,000
Unmet need for strategic scale sites from Harborough	0	146,400	146,400
Total	**1,034,125**	**2,398,065**	**1,363,940**

Table 2. Assessment of employment land need for RBC

3.31 This is significantly above the quantum being planned for in the RBC Regulation 19 Local Plan.

3.32 Draft Strategic Policy S3 sets out that, in order to meet RBC's need for employment land, 1,034,000 sqm (approx. 287 hectares) of floorspace for use classes B2, E(g) (iii) and B8 will be planned for. This is to be across five proposed allocations.

3.33 As such, we consider that the quantum identified in draft Strategic Policy S3 is significantly below the full, objectively assessed need. We therefore consider that the policy cannot be sound as it is not positively prepared, justified or effective given it is not based on an appropriate evidence base detailing the full, objectively assessed needs of the borough.

3.34 Therefore, the Council should undertake a more detailed assessment of employment need having regard to factors highlighted in NDL's Technical Statement on Employment Land Need (included in full at Appendix 2).

Type of Employment Land

3.35 Notwithstanding our above concerns about the overall quantum of need being planned for, we also do not consider that the identified need, particularly for large scale Freight and Logistics, is being met effectively.

3.36 The proposed employment allocations set out in draft Policies S3 and S7 are as follows:

- Crowner Fields Farm, Ansty – 275,000 sqm
- Coton Park East – 115,000 sqm
- South West Rugby Phase 2 – 60,000 sqm
- Ansty Park North – 75,000 sqm
- Land at Walsgrave Hill – 290,000 sqm

3.37 Further information on each of the proposed employment allocations is included in Appendix 4 of the draft Plan.

3.38 Of the proposed allocations, 78.5% of the floorspace is located on sites situated at the edge of Coventry: Crowner Fields Farm, Ansty Park North & Land at Walsgrave Hill. All three of these allocations require the release of Green Belt land.

3.39 As set out in the NDL Employment Land Need Technical Note in more detail, the evidence base supporting the RBC Proposed Submission Plan confirms that the principal element of employment need for RBC to meet is for Freight and Logistics (Use Class B8). This is confirmed in the WMSESS, the Green Belt

Exceptional Circumstances Topic Paper, the Sustainability Appraisal and the Development Needs Topic Paper.

3.40 The draft NPPF advocates for identifying suitable locations for Freight and Logistics, with Policy E3 confirming the priority is for these to have good access to transport networks appropriate to the type of development.

3.41 Notably, the Addendum Paper to the WMSESS recommends that within Opportunity Area 7, the requirement is for 2-3 larger B8/mixed sites of circa 50 hectares; and 1-2 smaller B1/B2 sites.

3.42 It is clear from the evidence base that both Crowner Fields Farm and Walsgrave Hill have been identified to meet the need for larger B8/mixed sites of circa 50 hectares. This is confirmed in Paragraph 5.2.30 of the SA and paragraphs 3.38 and 3.39 of the Development Needs Topic Paper.

3.43 With reference to Walsgrave Hill, the site promoter (SEGRO) made representations to RBC at Regulation 18 stage setting out how the Walsgrave Hill site is well-placed to meet the strategic B8 employment needs of Rugby and the Coventry and Warwickshire area (as opposed to B2).

3.44 Despite this, the SA then goes on to state how directing new employment land to the edge of Coventry will be well-placed to deliver a mix of employment uses, likely to include an element of B8 but not be overly dominated by B8 (paragraph 6.3.3).

3.45 Indeed, one of the exceptional circumstances the Council is relying on in order to justify the release of Green Belt sites around Coventry for employment allocations is that this location is preferable for manufacturing uses (paragraph 2.51 of the Green Belt Exceptional Circumstances Topic Paper).

3.46 However, this approach is directly at odds with the Council's own evidence base which points towards a greater need for B8-employment uses and on the basis the sites are promoted to meet this B8 demand.

3.47 In contrast, land west of MPL has been discounted as a reasonable option for meeting employment need on the basis RBC do not consider it to be a suitable or sustainable location for B2 and R&D employment uses. This is exemplified at Paragraph 2.90 of the SA, which states:

> *"It is not realistic for Magna Park to deliver the same diversity and growth in manufacturing, and research and development uses that can be delivered by the proposed allocations at Ansty Park and Walsgrave Hill".*

3.48 The overall approach to the allocation of employment land is therefore confused as sites on the edge of Coventry have been allocated to specifically fulfil the need arising in Opportunity Area 7 for large B8 sites over 50+ hectares, yet the justification presented focuses on how this location will support the delivery of B2 and R&D uses. In taking this approach, other sites acknowledged to be "established logistics locations" such as Magna Park have been discounted and not fully assessed.

3.49 We therefore consider Policy S3 to be unsound on the basis that the proposed strategy for employment land fails to meet the area's objectively assessed need and is not justified as it does not consider all reasonable alternatives.

S7 – Employment Allocations

3.50 We also strongly object to draft Strategic Policies S3 and S7 on the basis that the overall strategy for the allocation of employment land is not sound, as it

is not supported by a robust evidence base and does not comply with national policy.

3.51 As set out above, the proposed employment allocations set out in draft Policies S3 and S7 are as follows:

- Crowner Fields Farm, Ansty – 275,000 sqm
- Coton Park East – 115,000 sqm
- South West Rugby Phase 2 – 60,000 sqm
- Ansty Park North – 75,000 sqm
- Land at Walsgrave Hill – 290,000 sqm

3.52 The proposed employment allocations differ from that presented at Regulation 18 stage in two ways:

- Reduction in the land allocated at Southwest Rugby Phase 2 – 60,000 sqm proposed compared to 130,000 sqm previously;
- Replacement of 350,000 sqm of land West of Prologis Park, Ryton with 290,000 sqm at Land at Walsgrave Hill.

3.53 Notably, the site at Prologis Park, Ryton has been replaced by the Walsgrave Hill site, although this site is also within the Green Belt, with the Council needing to demonstrate exceptional circumstances to support its release and allocation.

3.54 Land west of MPL is not included as an allocation. This is despite representations being made at Regulation 18 stage which demonstrated that this site comprises a sustainable western expansion to MPL capable of delivering significant benefits and which is wholly outside Green Belt and available, suitable, achievable and deliverable for employment development within the plan period.

3.55 At Regulation 18 stage, we raised significant concerns with the Sustainability Appraisal and the approach taken to identifying 'sequentially preferable sites'. Our representations were supported by legal advice setting out how the approach taken regarding the allocation of employment land was fundamentally flawed and unlawful. This was on the basis that the evidence base to support the Plan at this stage provided retrospective justification for the proposed allocations, as opposed to being an evidence-led process as required by both policy and law. An evidence-led process would include full assessment of 'reasonable alternatives', which, in the case of a plan proposing to allocate land in the Green Belt, should comprise assessment of meeting the identified need of land not in the Green Belt. This legal opinion is reprovided at Appendix 3 of these representations.

3.56 An updated Sustainability Appraisal (SA) has been prepared to support the Regulation 19 Local Plan. This supersedes the previous version.

3.57 The Council's approach to identifying the broad spatial strategy for employment land and reasonable alternatives is set out in Paragraphs 5.2.22 – 5.2.38 of the SA.

3.58 We continue to be of the view that the SA is not appropriate, particularly regarding the four reasonable alternative growth scenarios which were tested. These four scenarios are:

- Scenario 1 – the proposed submission approach
- Scenario 2 – Scenario 1 but with Walsgrave Hill replaced by Prologis/Mountpark
- Scenario 3 – Scenario 1 but with Walsgrave Hill replaced by North of Houlton
- Scenario 4 – Scenario 1 but with Walsgrave Hill replaced by 2 sites at Thurlaston

3.59 As such, in all four scenarios, the proposed allocations at Crowner Fields Farm, Coton Park East, South West Rugby (Phase 2) and Ansty Park North are held constant, with Walsgrave Hill replaced with alternative sites in Scenarios 2, 3 and 4.

3.60 Land west of MPL has continued to be excluded as a reasonable alternative and has not been tested within one of the alternative growth scenarios within the SA.

3.61 With specific reference to land west of MPL, Paragraph 5.2.36 of the SA sets out that the situation is broadly unchanged from Regulation 18 stage and makes reference to the explanation in the RBC Green Belt Exceptional Circumstances Topic Paper (dated December 2025).

3.62 Principally, RBC's key reasons for not identifying MPL as a reasonable alternative can be summarised as follows:

- Sustainability – RBC do not consider land west of MPL to be a sustainable location due to RBC regarding it as removed from both Rugby and Coventry and therefore it would give rise to long-distance car commuting from Leicester, Coventry, Nuneaton, Hinckley and Rugby. RBC state that the distances involved mean this would not be as convenient as for sites close to the edge of Coventry and, in contrast to those locations, active travel would not be possible;

- Highways impacts – RBC consider the site is likely to cause severe impacts on the Strategic Road Network (SRN) at the A426/A5 Gibbet Hill roundabout and highway capacity issues which would be difficult to mitigate against; and

- Type of employment floorspace – RBC consider that it is not realistic for land west of MPL to deliver the same diversity and growth in advanced manufacturing and research and development uses that could be delivered by proposed allocations at Ansty Park and Walsgrave Hill.

3.63 RBC also make reference to additional land at MPL being allocated for employment development within Harborough which, when combined, the proposed extensions both sides of the A5 would result in a further 4,000 jobs. RBC state that there is already competition for the limited labour pool at Rugby and this would increase the need for development to draw labour from further afield. As set out at Regulation 18 stage, MPL has a good labour pool and attracts workers from a number of locations, the travel patterns of which already align with established public transport infrastructure in place. Planned housing growth within the MPL catchment could provide an additional c. 17,000 workers over the next 20 years.

3.64 The representations will now consider why this approach is not sound, taking each of these points in turn.

Sustainability

3.65 NPPF Paragraph 110 states that:

> *"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken*

into account in both plan-making and decision-making." [emphasis added].

3.66 Further, Paragraph 115 of the NPPF states that:

> *"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
>
> *a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
>
> *b) safe and suitable access to the site can be achieved for all users;*
>
> *c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
>
> *d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach."*

3.67 NPPF Glossary defines 'Sustainable transport modes' as:

> *"Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport".*

3.68 As such, the NPPF requires development to be in a sustainable location. It is clear that this needs to be considered having regard to the nature of the use being proposed, not simply the location of the site. It is also necessary to have regard to the particular development proposed in order to determine whether a proposal would make a location sustainable.

3.69 A key locational requirement for employment development is being well-located to the SRN to provide trip reliability and optionality for logistics operators.

3.70 With regard to Site 325, MPL is strategically positioned within the Midlands "Golden Triangle" of logistics, offering excellent connectivity to major motorways such as the M1, M6 and M69. This prime location enables access to approximately 85% of the UK population within a four-hour truck drive-time.

3.71 The site is also well located to existing settlements at Lutterworth, Rugby, Coventry and Hinckley. Distances and drive times (from the AA Route Planner website) to the nearest urban edges of these cities/towns are as follows:

City / Town	Miles	Minutes Driving
Lutterworth	2.3	7
Rugby	5.6	12
Coventry	14.9	22
Hinckley	7.4	12

Table 3: Distance from major settlements

3.72 The Council's contention that locating further employment development at Magna Park would result in 'long-distance commuting' is not substantiated, and based on the distances above, we dispute this claim. It is also clear from the above that MPL is well-located in relation to a number of different urban centres.

3.73 In contrary to RBC's position, we consider that MPL and a western expansion would represent a highly sustainable location for employment development in line with the NPPF.

3.74 It is firstly relevant to note that the existing MPL seeks to maximise opportunities for sustainable travel. Existing staff working at MPL are encouraged to travel to work sustainably with occupiers implementing Travel Plans to promote sustainable transport modes.

3.75 The existing MPL is well connected to Lutterworth, with a shared footway/cycleway provided on the northern side of the A4303 Coventry Road providing good quality and well-lit walking and cycling infrastructure to Lutterworth.

3.76 The majority of staff employed at business within the existing MPL site work shift patterns. GLP have formed partnerships with local public transport operators to provide sustainable, efficient and cost-effective travel options to MPL. This includes regular bus services from across the local area, operated by Arriva, as follows:

- X45 – Lutterworth & Leicester
- X84 – Rugby, Lutterworth & Leicester
- 8 – Lutterworth & Hinckley

3.77 There is also a pay on demand service to MPL from rural areas of South Leicestershire in place (Fox Connect). In addition, some agency colleagues travel to site by minibus from Leicester City Centre and some occupiers engage coach firms to transport workers during peak periods.

3.78 A car sharing scheme is in place at MPL. GLP has also partnered with LiftShare to offer a free LiftShare scheme to all park employees, supporting key workers to access the park with ease, save on commuting costs and travel more sustainably. With over 580 members, it is estimated that MPL has removed 335,525 miles off the local roads, reduced 73 tonnes of CO2 emissions and saved its key workers a total of £84,000 over 5 years. The

Transport Note prepared by Apex includes evidence that this has removed vehicle trips from the network.

3.79 The existing MPL also includes electric vehicle charging infrastructure for staff and visitors. The most recently approved plots include electric cabling provision to cover c. 20% of the parking spaces.

3.80 Therefore, the existing MPL site is a sustainable location for employment development with a range of sustainable transport modes available and encouraged. The Transport Note prepared by Apex includes evidence that there has been a significant reduction in trip generation (per sqm) from MPL over time, which suggests that sustainable transport modes are being utilised and increasingly so as the park expands. There are significant benefits associated with co-location and locating additional floorspace adjacent to existing employment locations with established infrastructure which should carry substantial weight, and which have not been appropriately considered by RBC.

3.81 Land to the west of MPL is a sustainable location for locating additional employment development as it would be able to take advantage of, and provide improvements to, the established infrastructure already in place to promote sustainable transport patterns and facilitate active travel.

3.82 Any future development to the west of the A5 as an extension to MPL would be able to provide additional footways and cycleways to connect into the existing infrastructure which serves MPL in order to facilitate walking and cycling routes to Lutterworth. It is notable that the approved Lutterworth SUE development will deliver 2,750 dwellings in Lutterworth over the next 10-15 years, and these would be located within a reasonable cycling distance of the site.

3.83 Staff would also be able to utilise the bus services that currently serve MPL in order to promote active travel options for employees. Further opportunities to enhance the services could be explored as part of the proposed expansion.

3.84 Additionally, the existing car sharing scheme at MPL could be extended to new development to the west of the A5. This will also enable an increase in LiftShare matches as part of the scheme and increase the viability of the scheme and the usage, both for the existing MPL and its proposed extension.

3.85 Moreover, development of the site in Rugby could also encourage measures to facilitate the use of ultra-low and zero carbon emission vehicles, including a minimum of 20% electric vehicle charging points to be included.

3.86 An expansion to MPL into Rugby is therefore inherently sustainable and fully aligns with Paragraphs 110 and 115 of the NPPF by offering genuine choice of transport modes and maximising sustainable transport solutions to promote active travel.

3.87 Indeed, HDC has considered this a sustainable location for employment development, with the HDC Proposed Submission Plan allocating an additional 340,000 sqm of employment floorspace in two locations adjacent to MPL.

3.88 Moreover, the Strategic B8 Needs Sensitivity Report (December 2024), which Iceni prepared to support the HDC Local Plan, identifies the two locations for employment growth at MPL with 'green' ratings, with the assessment noting that the sites are attractive locations within/adjacent to an established logistics park, with strong access to the A5 and within close proximity to the M1 and in light of the sites also benefitting from the established public transport network servicing the MPL site.

3.89 Further evidence regarding the sustainability of the site is set out in the Transport Note prepared by Apex Transport Planning which accompanies these representations (Appendix 4). This considers the opportunities for sustainable transport and sets out a vision-led approach for increasing sustainable transport movements and constraining vehicle movements to and from the site, whilst also reducing background movements across the existing MPL through a joined up sustainable travel strategy and consolidation of operational vehicle movements. The Note demonstrates that the site is ideally located for accommodating employment uses and minimising key vehicle movements, as well as for facilitating the delivery of key strategic infrastructure improvements which would offer further benefits on the network.

3.90 In addition, the Regulation 18 representations were accompanied by a Labour Study prepared by CPRE. This demonstrated that MPL has good labour availability and attracts workers from a number of locations, rather than having to rely on workers from only one catchment. The Labour Study also set out that planned housing growth within the MPL catchment could provide an additional c. 17,000 workers over the next 20 years. This Labour Study is included as an Enclosure to the Transport Note in Appendix 4.

3.91 Another significant benefit of MPL is the proximity to the open-rail terminal at DIRFT which is c. 7m south on the A5. A number of businesses at MPL utilise the rail terminal, including ASDA and Britvic. Both MPL businesses transfer goods to the DIRFT rail head for onward transfer via rail to locations such as Mossend and Grangemouth in Scotland. This reduces road freight mileage and accords closely with draft NPPF Policy E3. The proposed expansion into Rugby would also benefit from close proximity to the rail terminal. This is a unique proposition and unlike other potential sites in Rugby, particularly those located on the eastern edge of Coventry, which are not located near rail terminals.

3.92 The site is therefore a sustainable location for employment development in relation to NPPF Paragraphs 110 and 115.

3.93 The Transport Note prepared by Apex also considers the connectivity of the site in comparison to the other sites favoured for allocation by RBC. The analysis provided clearly demonstrates that the land west of MPL and the RBC preferred sites have, as a worst case, broadly similar characteristics in terms of existing active travel infrastructure and distances to public transport services. Notwithstanding this, and as set out above, a key additional benefit of the land west of MPL is the ability for development in this location to utilise, and build-upon, the existing infrastructure provision at MPL.

Highways

3.94 To support the Regulation 19 Consultation, a Strategic Transport Assessment (STA) has been prepared by SLR. This is made up of three principal documents:

- Traffic Modelling Analysis and Overview, SLR, 28 October 2025.
- Non-Technical Summary Report to above, SLR, 11 December 2025.
- Addendum Report, 3 December 2025.

3.95 With specific reference to MPL, the STA sets out that there is likely to be highway capacity issues associated with delivering this site which would be difficult to mitigate against. The STA also references a significant amount of trips to/from the site predicted through the A426/A5 Gibbet Hill Roundabout and given the capacity constraints that already exist at this junction, considers it is likely that the volume of additional traffic would cause a severe impact on the SRN in this area.

3.96 These representations are accompanied by an additional Transport Planning Note prepared by DTA (Appendix 5). This sets out a number of fundamental concerns with the STA, primarily that it provides no evidence that site 325 should be discounted on traffic related grounds because it has not robustly been tested.

3.97 Our critique of the STA is summarised below.

3.98 Firstly, the site has not been properly modelled. The site is listed in Table 2 to the main STA report as "Local Plan Development Site" (page 17). It is also referenced on the keys to Figures 5 to 8 (pages 18 and 19) under a separate heading – Walsgrave and opposite Magna Park. However, the next reference is the site being included as an 'Excluded Site' on pages 126 and 127. The site was not included as an omission site – these were Walsgrave Hill and North of Houlton.

3.99 Paragraph 11.3 states that the suitability of the site, along with the two Thurlaston sites, is considered in a separate exercise presented within Appendix E. This exercise is actually presented in Appendix C, which forms a note dated 3 December 2025. It is to be noted that the main report, which includes this appendix, predates this (dated 28 October 2025).

3.100 The introduction to Appendix C confirms that these three sites have not been tested in detail within the core STA due to "*their uncertain nature*". Instead, paragraph 1.3 acknowledges that the note presents "*high level analysis of suitability (or lack of) for delivering these three sites as part of the Local Plan".*

3.101 The high-level assessment of the site that follows is set out in pages 2 to 13 of Appendix C. This includes employment of the standard Warwickshire County Council trip rates and a conclusion that the site will generate

"*significant additional traffic to an already congested part of the highway network*" (paragraph 4.5).

3.102 The trip rates used in the STA are unrealistically high, and the Transport Note prepared by Apex to accompany these representations includes the detailed trip rate assessment presented at Regulation 18 stage which was carried out for the proposed site based on observed patterns of movement from the existing (and adjacent) MPL . The clear overestimation of traffic generation from the site adopted by RBC undermines the validity of the STA. A revised assessment using properly derived trip rates is therefore essential.

3.103 Reference is then drawn to the A426/A5 Gibbet Hill roundabout. Paragraph 4.6 of Appendix C refers to the existing constraints at this junction. Paragraph 4.9 argues further that "*the site will require a solution to the issues observed at the Gibbet Hill junction to be identified and delivered to provide confidence the development impacts could be managed*".

3.104 The STA acknowledges that the Gibbet Hill junction is an existing constraint on the network. In a number of places, the STA concludes that its improvement is a requirement for the overall plan to be delivered. However, it seems that this issue has not been properly addressed as its initial assessment caused instability to the traffic model.

3.105 The model was then subsequently amended to assume that this junction was unconstrained to allow the wider model to function. However, it has materially affected the spatial strategy, which has sought to limit the scale of development in this broad location.

3.106 The STA has not provided any commentary on what mitigation is required to improve this junction, or any reference to the current funding in place.

3.107 Following the grant of planning permission for expansion of Magna Park and the sustainable urban extension – South of Lutterworth – improvements were proposed at the Gibbet Hill roundabout by both developments. However, Warwickshire County Council and National Highways subsequently agreed financial contributions from developers towards a more comprehensive scheme. This scheme also included funding from developments north of Rugby.

3.108 Warwickshire County Council has confirmed that payments totalling £3,133,081.61 have already been made towards the Gibbet Lane works, pursuant to 8 separate planning S106 agreements. All of this is held and not committed, except for £227,506.20 which was paid to National Highways under the s106 dated 20 January 2022 pursuant to application ref. R/20/0336 in relation to Land Off Long Hassocks agreement. A further £1,015,480.55 has been agreed to be paid pursuant to 6 other s106 agreements.

3.109 Additionally, Leicestershire County Council has confirmed that it is not holding funds towards the Gibbet Hill improvement scheme, although a maximum contribution of £1,214,490.24 has been secured pursuant to planning permission ref. 19/00250/OUT at Land East of Lutterworth, Gilmorton Road for highway improvement works at the Gibbet Hill roundabout either to be delivered in isolation or as part of a further scheme for the improvement of the Junction.

3.110 This demonstrates that payments totalling £5.3m have been secured across a number of consents towards an improvement scheme at Gibbet Hill, further detail of which can be provided ahead of the Examination.

3.111 In addition, there is a signalisation scheme required to be funded by Prologis in respect of its development of DIRFT III. It is understood that this scheme of improvement is no longer considered to be feasible and it is our

expectation that National Highways will seek a financial contribution in lieu of this scheme being delivered. This will increase the pool of collected monies to greater than £5.3 million.

3.112 Further future contributions can be expected to be forthcoming from other sources: -

- Any planning permission covering the c. 370,000 sqm promoted by GLP at Magna Park (and mostly allocated by the Reg 19 draft Harborough Local Plan).
- Any planning permission covering the site promoted by the Parties.
- Any planning permission covering the draft allocation of Coton Park East.

3.113 With regards to the latter two, it is relevant that RBC adopted a CIL charging schedule on 1 April 2024. This includes a £5/sqm CIL rate for employment floorspace (comprising industrial, light industrial and storage and distribution uses).

3.114 The masterplan for the land west of MPL proposes 581,175 sqm of employment floorspace.

3.115 Further, the Regulation 19 Plan proposes a draft allocation for Coton Park East to deliver 115,000 sqm of employment floorspace.

3.116 Added together, these sum close to 700,000 sqm and could generate approximately £3.5 million in CIL receipts. The latest Annual Infrastructure Funding Statement confirms that improvements to the Strategic Highways Network are a priority.

3.117 An improvement to the A426/A45 Gibbet Hill junction is identified in the RBC Infrastructure Delivery Statement (December 2025). This considers that the Plan is dependent on this being delivered (required by 2032), but that s106 funding from sites proposed for allocation in the Local Plan is unlikely to be sufficient given the relatively small increases in traffic flows and location of these sites.

3.118 Allocating land west of MPL for employment development could provide further contributions towards an improvement scheme at Gibbet Hill (through s106 and/or CIL monies) over and above what has already been secured, and thus assisting in unlocking further growth across the District.

3.119 Alongside this, National Highways (NH) is progressing a wider strategic improvement scheme for Gibbet Hill. NH commenced Stage 1 (Options Identification) in May 2024. As part of this process, junction improvement options were identified. These options have undergone a comprehensive assessment and appraisal including cost estimates; environmental assessment report; economic appraisal; outline business case and value for money assessment. The A5 Gibbet Hill improvement scheme is in the NH pipeline programme which has now progressed to Stage 2.

3.120 As such, there is a reasonable prospect of a scheme for Gibbet Hill coming forward within the plan period. There is a realistic likelihood that an improvement scheme will be included in the RIS3 programme due to be announced imminently. Alternatively, a developer funded improvement scheme is capable of being delivered in any event.

3.121 We have significant concerns with the approach taken in the STA given that neither the committed schemes, nor the strategic intervention have been modelled in any of the Local Plan tests. Accordingly, there is no assessment of site 325 and the impact this would have on Gibbet Hill. Therefore, as

currently prepared, the STA includes no evidence that site 325 can be discounted on traffic related grounds.

3.122 Thus, based on the evidence prepared to support the Local Plan, it is unknown at this stage whether site 325 can be accommodated or not. This is a crucial issue ahead of examination and a key point for an Inspector to consider ahead of concluding whether any Green Belt release to accommodate employment land is necessary.

3.123 Given the time constraints associated with the Regulation 19 consultation, these representations are not submitted with a modelling exercise at this stage. However, this is being progressed and will be provided ahead of the Hearing Sessions so that an Inspector can fully consider these matters.

3.124 The forthcoming modelling work will involve a run of the WCC strategic model to review traffic assignment and then assessment of the junction itself using the NH's microsimulation model of the junction, which has been prepared to support NH's own strategic intervention assessments.

3.125 At this time, it is therefore not possible to conclude that the site can be discounted on traffic related grounds because this has not been sufficiently modelled. The Plan is therefore unsound as it is not based on a robust evidence base and discounting the allocation of site 325 on highway capacity grounds is unfounded.

<u>Type of Employment Development</u>

3.126 In relation to discounting an allocation at MPL, the Green Belt Exceptional Circumstances Topic Paper & SA state the following:

- *"The WMSESS emphasises the importance to manufacturers of access to larger urban labour pools from which Magna Park is distant.*
- *Magna Park lacks proximity to Coventry and Warwickshire universities…*
- *As the park at present is a logistics location, there are not the opportunities for clustering and synergies that exist on the edge of Coventry given the presence of existing important manufacturers and research institutes there…"*

3.127 In the first instance, and as set out in our response to Strategic Policy S3, the WMSESS identifies a need for 70% of employment land to be allocated to meet B8 logistic need. Walsgrave Hill has been identified as meeting this need for B8, but the stated reasons for its selection for allocation refer to its attraction to B2/R&D occupiers.

3.128 In contrast, MPL has been discounted as it is seen as less favourable to accommodate advanced manufacturing and R&D although it is acknowledged to be an established "logistics location" in several parts of the Plan's evidence base.

3.129 Clearly, MPL is an established logistics location. It is strategically positioned within the Midlands "Golden Triangle" of logistics, offering excellent connectivity to the SRN and access to approximately 85% of the UK population within a four-hour truck drive-time.

3.130 The existing MPL development has largely provided B8 logistics floorspace to date, mainly because the existing development in Harborough is safeguarded for strategic storage and distribution (Class B8) uses only, with units to be in excess of 9,000 sqm as per Policy BE2 of the adopted HDC Local Plan.

3.131 This is also true of the two proposed allocations in the emerging HDC Local Plan (ref MP1 and MP2), both of which are designated for Class B8 uses.

3.132 Notwithstanding this, it is clear that there is also demand in this location for a more diverse range of employment uses beyond those falling neatly within a logistics and distribution B8 use.

3.133 GLP have received enquiries for manufacturing uses for the existing MPL but these are unable to be accommodated, including a recent enquiry from a bakery business looking to open a new factory. In addition, whilst the site has not been actively marketed, NDL have received interest from two manufacturers regarding the land west of MPL for 1 million and 2 million sqft of employment floorspace respectively.

3.134 MPL is already home to over 30 businesses, including a range of blue-chip businesses including Toyota, BT, ASDA (Walmart), Amazon, DHL and Britvic. One of the most recent customers at the Park is Centrica who occupy MPS6 and MPS7. Centrica, who employs 7,500 engineers and serves more than nine million homes across the UK, gained permission for the dual use of MPS6 as a storage and distribution facility and a Centre of Excellence for British Gas. The Centre of Excellence will comprise a combination of training, research and supporting office functions, and will bring together training activity with research and development of Net Zero products and services. This will help future-proof training by including solar, battery and hydrogen technologies across the full lifecycle of activities and provide opportunities for collaboration between training, scientists and entrepreneurs. The selection of MPS6 is an important development for Centrica given its aspirations to double the current number of Hive customers to 2.5 million, its commitment to Net Zero carbon, and to upskill and train 3,000 apprentices in green jobs.

3.135 This demonstrates that MPL is an attractive location for a range of occupiers, many of which provide a diverse range of ancillary functions to complement the primary B8 operations.

3.136 RBC would therefore not need to take the same approach to allocating land west of the A5 for solely B8 strategic distribution uses and could provide more flexibility for different types of employment uses to be accommodated in this location subject to market demand.

3.137 An expansion to the west of the A5 provides an opportunity to be able to accommodate both B2 and B8 occupiers in a mix of units. Given the size of the site, there is also an opportunity to provide smaller / incubator units to support SMEs, alongside larger units catering for manufacturing and logistics demand in this location.

3.138 It is also highly relevant the speed at which MPL North and South extensions were built and occupied, demonstrating an immediate demand for employment floorspace in this location. Also, despite the age of some of the older units at MPL, occupancy levels remain extremely high with only 4 unoccupied units (out of 50 units total) across the entire site (including the north and south extensions) as of Q1 2026. This demonstrates that MPL is a highly attractive location for a range of employment occupiers.

3.139 Additionally, MPL continues to provide essential skills training and financial support to the local community through a number of initiatives, including:

- Establishing the Lutterworth Area Community Projects Limited as a means to administer and manage the distribution of financial contributions. As of October 2025, the fund has donated over £1.4m to over 100 local organisations and charities.

- Creation of the Centre for Logistics Education and Research (CLEAR) which is a prime example of the social value that MPL provides. The partnership between GLP, North Warwickshire and South Leicestershire College (NWSCL) and GOX (formerly Wincanton) offers skills training and professional development at all levels across the spectrum of logistics and supply chain roles as well as applied research and associated facilities for up to 1,000 students. CLEAR continues to provide established educational links to Warwickshire. Furthermore, NWSLC are partners with Coventry, Leicester and Loughborough Universities. The opportunity exists for further university engagement and partnering at MPL through existing linkages.

- MPL is home to Creating Tomorrow College which is a Specialist Post-16 Institution for 16–25-year-old adults with SEND, with a mission to address the employment deficit for adults with learning needs. Creating Tomorrow College has a clear 5-year development strategy for growth in both cohort resources and curriculum offers, and is located in the Iron Mountain Building at MPL adjacent to the CLEAR campus.

- Planning permission has been granted for a truck parking / services facility within the MPL development. The 9-acre site currently under construction will provide overnight truck parking, amenity building and HGV EV charging stations. Works to provide the services has commenced on site and an operator has been identified, anticipating delivery of the facility in 2026 which will be open to customers on the park as well as the public.

- Planning permission has also been granted for an Innovation Centre at MPL which will provide a space to host innovation events for the customers on the park and wider logistics industry. The focus of these innovation events will be on sustainability and construction within the

logistics sector. The Innovation Centre, which is currently under construction, will be launched in Summer 2026.

3.140 A western expansion would be able to build upon these already established community initiatives and further extend the benefit to community groups within Rugby.

3.141 As such, we strongly dispute the contention that MPL would not be a suitable location to meet the identified employment needs within Rugby and the wider sub-region.

3.142 A western expansion to MPL would provide an opportunity to further diversify the uses in this well-established employment location, with future occupiers able to build synergies with the blue-chip businesses already in occupation at the Park. Future development could also build upon the already established community initiatives and would provide significant benefits to the wider District.

Green Belt Release & Demonstrating Exceptional Circumstances

3.143 The failure of RBC to consider the site as a reasonable alternative to meet employment need raises fundamental soundness issues with the Plan. As demonstrated, the site is an available site located solely outside the Green Belt but has been discounted by RBC in favour of the approach in the Regulation 19 Plan which proposes the allocation of 3 employment sites (out of 5 proposed allocations in total) within the Green Belt. This approach has not been fully evidenced or justified and is contrary to national planning policy.

3.144 Paragraph 145 of the NPPF states:

"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans." [emphasis added].

3.145 Paragraph 146 then reads:

"Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means." [emphasis added].

3.146 Further, Paragraph 147 of the NPPF sets out 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" [emphasis added].

3.147 The NPPF is clear that the starting point for the release of Green Belt site in the Plan is predicated on there being "exceptional circumstances" which need to be fully evidenced and justified. There is a need for all other reasonable options to be fully examined before the Council can conclude that exceptional circumstances exist.

3.148 In this case, it is clear that the Council has failed to fully examine all other reasonable options for meeting its identified need for development, given that land west of MPL has been discounted as a reasonable option. This is despite the site being wholly located outside the Green Belt and available for employment development.

3.149 As per the preceding section, the reasons for RBC discounting site 325 as a reasonable alternative are flawed for the following reasons:

- The site is a sustainable location for locating additional employment development in accordance with Paragraphs 110 and 115 of the NPPF as development in this location would be able to take advantage of, and provide improvements to, the established infrastructure servicing MPL in order to promote sustainable transport patterns and facilitate active travel.

- There is no credible evidence presented to support the site being discounted on highway capacity issues. As set out in the Transport Note at Appendix 5 of the representations, we have significant concerns with the approach taken in the Council's STA, particularly given that this does not assess site 325 and the impact this would have on the Gibbet Hill roundabout. Therefore, as currently prepared, the STA includes no evidence that site 325 can be discounted on traffic related grounds.

- The overall approach to the allocation of employment land is confused as sites on the edge of Coventry have been allocated to specifically fulfil the need arising in Opportunity Area 7 for large B8 sites over 50+ hectares, yet the justification presented focuses on how this location will support the delivery of B2 and R&D uses. In taking this approach, other sites acknowledged to be "established logistics locations" such as Magna Park have been discounted and not fully assessed.

- There are significant benefits associated with the clustering of employment floorspace which have been ignored. A western expansion to MPL would provide an opportunity to further diversify the uses in this well-established employment location, with future occupiers able to build synergies with the blue-chip businesses already in occupation

at the Park. Future development could also build upon the already established community initiatives and would provide significant benefits to the wider District.

3.150 It has also not acknowledged in the Green Belt Exceptional Circumstances Topic Paper that site 325 is largely unconstrained in ecology, heritage and landscape terms. The Stage 2 Site Assessment concludes the following in relation to site 325:

- Ecology - An initial ecological assessment indicated that the site was not within an Impact Risk Zone of a Site of Special Scientific Interest, nor a Local Wildlife Site, and nor was it comprised of more than 20% medium to high distinctiveness habitat. The site was not further assessed for ecological constraints.

- The overall landscape sensitivity of the site is Medium/Low. The site comprises arable and pastoral fields located within a broadly rural landscape to the west and warehousing development and transport infrastructure to the east. There are no known cultural heritage or historic features within the site and views from and into the surrounding RPGs are unlikely to be affected by the development. The site is of recreational value due to the location of PRoWs within and surrounding the site. Views into the site are filtered from the surrounding transport infrastructure. The A5 and B4027 and surrounding warehousing development detracts from the tranquillity and visual value of the site.

- There were no designated heritage assets identified within 50 metres of the site.

3.151 In relation to landscape impacts, it is also relevant that the draft Policies Map identifies the site as an Area Suitable for Wind Turbine Development. As per draft Policy CL2, wind turbines in such circumstances are defined as being greater than 40m in height.

3.152 Therefore, it is clear that the site is largely unconstrained for employment development. This is in contrast to a number of the proposed employment allocations. Notably, Walsgrave Hill has significant heritage and ecology constraints, with the Stage 2 Site Options Assessment concluding the following:

> *"Given the location of Coombe Pool SSSI, ancient woodland at Hill Park Wood LWS, and Combe Abbey LWS immediately adjacent to the site, there are significant constraints to development at this site and other alternative sites for development should be considered in the first instance"* [emphasis added].

3.153 It is also notable that the Walsgrave Hill site has been reviewed in Green Belt terms, with the Council concluding that only a small part of the site would constitute grey belt. As per the masterplan prepared by the site promoter, this area of 'grey belt' is indicated for a country park, with the built development being located on the Green Belt land. Development would therefore cause significant harm to the purposes of the Green Belt in this location.

3.154 Notwithstanding, in line with Paragraph 147, the requirement is to fully review all reasonable options outside Green Belt before considering if there are exceptional circumstances to alter Green Belt boundaries (taking into account grey belt or otherwise). This approach has not been taken.

3.155 Given that site 325 has been discounted, despite it being solely outside Green Belt and an available, suitable and achievable site which can deliver employment floorspace to meet the identified need within the Plan period, the Plan does not accord with NPPF Paragraph 147 as it has not fully examined all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries.

3.156 Moreover, the NPPF requires the Council to establish exceptional circumstances which are fully evidence and justified to support Green Belt release. The evidence base is flawed in this regard, and the proposed release of Green Belt site is not justified.

3.157 As above, site 325 has been discounted as a reasonable alternative despite it being a largely unconstrained and available site within the Green Belt. The Council explicitly acknowledge that, given the size of the land promoted at MPL means that this could, if allocated, remove the need for Green Belt employment allocations (paragraph 2.84 of the Green Belt Exceptional Circumstances Topic Paper).

3.158 Secondly, the evidence to support the Council's conclusions on transport considerations is flawed. A critique of the STA is included in DTA's Transport Note (included in Appendix 5), with the relevant extract included below:

2.12 In this case a process was deployed that was the opposite to that required by the guidance was undertaken by the Council:-

- *Rugby identified the need for employment. As set out in the Technical Statement on Employment Land Needs, the approach they took to considering sites was wrong because whilst they identify a need for B8 development, they chose to allocate sites*

(in the Green Belt) on a locational basis on the assumption they would be more attractive to B1/ B2 uses.

- *Those chosen sites for proposed allocations when then assessed through Strategic Transport Assessment. They then used that process (but not on a like for like basis) to seek to discount three sites (of which Land at Magna Park is one).*
- *In other words, Rugby have chosen the location for development and then are seeking to set the evidence base around that pre-determined strategy.*

2.13 This process is wrong and runs contrary to the purpose of the process which is to allow proper consideration of alternatives to be assessed, by overall economic performance, against the benefits and dis-benefits of each potential employment option.

2.14 This flaw cannot be rectified by subsequent transport appraisal work and can only be rectified by a fundamental review of the strategic and spatial employment allocation options within the District.

3.159 Thirdly, the overall approach to the allocation of employment land is flawed as sites on the edge of Coventry have been allocated to specifically fulfil the need arising in Opportunity Area 7 for large B8 sites over 50+ hectares, yet the justification presented focuses on how this location will support the delivery of B2 and R&D uses. In taking this approach, other sites acknowledged to be "established logistics locations" such as Magna Park have been discounted and not fully assessed.

3.160 The Council's rationale for the release of Green Belt land to meet employment need is therefore not fully evidenced or justified, given the significant flaws within the Local Plan evidence base as identified above. This is contrary to the requirements of the NPPF.

3.161 The Plan is therefore not sound as the Council cannot demonstrate exceptional circumstances to alter the Green Belt boundaries which are fully evidence and justified. The Plan does not comprise an appropriate strategy which takes into account the reasonable alternatives, nor is it consistent with national planning policy.

4.0 **Comments on Draft Non-Strategic Policies**

4.1 This section of the Representations includes commentary on the draft non-strategic policies.

Policy CL1 – Net Zero Buildings

4.2 Draft Policy CL1 requires new buildings to be designed and built to be net zero carbon in operation. To achieve this, sets out that new buildings **must**:

i. be ultra-low energy;
ii. be fossil fuel free (except where the use of fossil fuels is technically necessary for emergency and life-safety systems or essential systems serving buildings with critical functions); and
iii. generate at least the same amount of renewable electricity on-site as the electricity they demand over the course of a year, such demand including all regulated and unregulated energy use; or
iv. if iii. is not technically achievable for a particular building typology in its context, on-site renewable energy generation shall be fully maximised as practicable. A reasonably practical maximum PV generation shall be 120kWh per square metre of building footprint per year, or solar PV panels of an area equating to 70% of the building's footprint. Where it is claimed that the fullest practical extent is less than this, this must be justified by evidence demonstrating why a reduced amount is proposed and what design steps have been taken to strive to achieve this policy's stated target.

4.3 Our position is that draft Policy CL1 is overly onerous and is not deliverable.

4.4 Firstly, requiring buildings to be designed and built to net zero carbon in operation would require coordination with building occupiers at the initial

design stage. This would simply not be possible for many developments in the Freight and Logistics sector where buildings are often delivered speculatively without a tenant identified.

4.5 Secondly, the requirement for renewable energy is essentially a condition to install PV to an equal or greater capacity than the electrical usage of the building. This may work for residential developments, however Freight and Logistics buildings often include automated systems or significant levels of vehicle (car, van and truck) charging making this unlikely to be achievable.

4.6 There are also significant constraints to grid capacity which severely limits the size of PV array which may be installed on any development. This limit is set by National Grid in many areas of the Midlands due to capacity issues within the grid that are not capable of being solved by individual developers.

4.7 For example, at Magna Park North, National Grid have imposed a current limit of 50kWp which would equate to less than 10% of a typical warehouse usage. It would not be possible to install PVs beyond this as the grid cannot accommodate this and is restricted by National Grid. It is our understanding that the National Grid issues are unlikely to be fully resolved until sometime after 2033.

4.8 As such, the current wording would essentially prevent and Freight and Logistics buildings from being developed.

4.9 We note that the draft Local Plan is supported by a Net Zero Carbon Policy Evidence Base Report (dated 13 November 2025). This fails to acknowledge challenges of connecting to the grid as set out above.

4.10 There is also real risk of RBC losing out on development and potential growth if it has more onerous (and unachievable) policies than elsewhere within the

region. This is particularly true for the Freight and Logistics sector which is more footloose and prioritises locations near the Strategic Road Network.

4.11 As such, in order to ensure the policy is deliverable (and therefore sound), we suggest the wording is updated to the below which would align with the Policy wording being proposed as part of Harborough DC's Draft Local Plan.

All development must:

a) minimise carbon emissions during construction, which may include use of low-carbon construction materials, and adopting energy-efficient construction practices;

b) where relevant, demonstrate that demolition of existing buildings is justified in comparison to their retention and re-use, and where buildings are retained, integrate measures to make these more energy and resource efficient in accordance with criteria 3 and 5 below;

c) where demolition of existing buildings is required, demonstrate the reuse of demolition and construction waste;

d) demonstrate the integration of passive design measures, including delivering cooling without increasing carbon emissions, such as through optimal building orientation, natural ventilation, solar shading and the use of thermal mass to regulate indoor temperatures;

e) be supported by a water efficiency statement that outlines, in priority order, measures to reduce water consumption, reuse water, or offset its use and achieve minimum water efficiency equivalent to 110 litres per person per day for any residential use, or non-residential development to achieve at least 3 credits in the Wat01 Measure for water in the BREEAM New Construction standard; and

f) Demonstrate how waste will be minimised during construction and during the operation of the development.

Non-residential development

a) All non-residential and mixed-use developments proposing 1000 sqm or more net additional floorspace are required to achieve a final (post-construction stage) certified rating of Excellent as part of a fully fitted assessment within BREEAM New Construction. A whole life-cycle assessment should be undertaken as part of this assessment for major development.

b) Major non-residential and mixed-use refurbishment developments are required to achieve a final (post-construction) certified rating of Excellent under BREEAM UK Non-Domestic Refurbishment and Fit-out(or equivalent scheme). A whole life-cycle assessment should be undertaken as part of this assessment.

CL3 – Water Supply, Quality and Efficiency

4.12 Draft Policy CL3 requires new major non-residential development to achieve full credits for category Wat 01 of BREEAM, unless demonstrated impracticable.

4.13 As per our comments on Draft Policy CL1, we consider this Policy requirement is overly prescriptive and is likely to be difficult to achieve depending on site circumstances, particularly for Freight and Logistics developments.

4.14 In order to ensure the policy is deliverable, the wording should be updated to require new major non-residential developments to achieve at least 3 credits in the Wat01 Measure for water in the BREEAM New Construction standard.

Policy E2 – Employment Development

4.15 Draft Policy E2 (Part E) states that, outside of settlement boundaries, development for employment uses will only be permitted where:

i. It would not undermine the continuance of an existing viable agricultural use; and
ii. It would comprise the conversion or redevelopment at a similar scale of building that has been in existence for at least ten years; or
iii. It would comprise a proportionate expansion of an existing building in employment use; or
iv. It would comprise the infilling of a vacant area within a site in employment use.

4.16 As discussed in Section 3.0 of this Statement, the draft NPPF strengthens support for employment development, with draft Policy E2 stating that substantial weight should be given to the economic benefits of proposals for commercial development.

4.17 It is therefore important for Local Plan's to positively plan for employment growth. As such, we consider Draft Policy E2 should be more flexible to enable employment development to come forward on unallocated sites where this meets an identified need, subject to meeting the requirements within the draft NPPF. The policy is not currently sound as it does not accord with national planning policy.

4.18 As such, we request that the following wording is included in Policy E2:

"*Where evidence indicates an need or demand for additional employment land (Eg(iii), B2 and/or B8) that cannot be met from land allocated in the plan, the Council will consider favourably proposals that meet the identified need which:*

b. *Have good access to transport networks (including via sustainable transport modes where possible) appropriate to the type of development;*

c. *Be sited and designed to limit environmental impacts (such as through the co-location or intensification of facilities to limit vehicle movements, and sensitive building design and landscaping). The impact on local residents or other neighbouring uses should be acceptable, taking into account proposed mitigation, especially where night-time activity will be required; and*

d. *Provide sufficient and secure parking for lorries or other vehicles to cater for the anticipated use."*

Policy EN6 – Canopy Cover

4.19 Draft Policy EN6 requires all major development to increase the post-development canopy cover to at least 20% of the site area (excluding areas of the site that are high or very high distinctiveness habitats), unless such requirement is demonstrated to be incompatible with delivering biodiversity net gain requirements on site.

4.20 We do not consider that this policy requirement acknowledges site context.

4.21 The evidence referred to in the paragraph 5.20 to support the policy (i.e. *The Canopy Cover of England's Towns and Cities… (Doick, K.J. et al, 2017)*) specifically relates to tree cover in urban areas, recommending a minimum canopy cover target of 20% for UK towns and cities (15% for coastal locations).

4.22 The supporting text to the draft Policy itself (para 5.17) recognises that there may be sites where achieving 20% is not possible or desirable and, in such

circumstances, the Council may negotiate an alternative level of canopy cover.

4.23 Therefore, rather than prescribing a standard to comply with, the policy should instead look to encourage tree planting on schemes whilst also having regard to other site constraints and characteristics. This will ensure that any policy is deliverable and achievable.

I1 – Transport

4.24 Part B of draft Policy I1 sets out that development shall be located where car travel can be minimised and opportunities for walking, cycling and public transport can be maximised.

4.25 This is not currently sound as it does not accord with National Policy and specifically the definition of 'Sustainable Transport Modes' within the NPPF which is as follows:

> *"Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport".*

4.26 The policy wording should therefore be expanded to include reference to ultra-low and zero emission vehicles, and car sharing, as appropriate sustainable transport modes.

4.27 This will assist in ensuring that the policy reflects the nuances and needs of different development typologies, and between urban and rural locations. For example, freight and logistic uses need to be located in proximity to the Strategic Road Network as opposed to within urban locations where walking and cycling can be maximised, but such locations can be made sustainable

by promoting other forms of sustainable transport including ultra-low and zero emissions vehicles, car sharing and public transport.

4.28 Therefore, in order to make the policy sound, it should be reworded as follows:

B. Development shall:

i. be located where car travel can be minimised and opportunities for ***sustainable transport modes, including walking and cycling, ultra-low and zero emissions vehicles, car sharing and public transport,*** *can be maximised.*

Summary

4.29 This Section has provided commentary on the non-strategic policies within the draft Plan and set out specific wording amendments to make the policies sound.

5.0 **Comments on Site 325 – Land West of Magna Park**

5.1 This section provides comments in relation to the assessment of Site 325 – Land west of Magna Park.

5.2 Site 325 comprises four separate parcels of land, identified in the Council's Stage 2 Site Assessment Report (updated December 2025) as follows:

- Site 106: Land opposite MP Lutterworth
- Site 57: North of Coal Pit Lane
- Site 36: Cross-in-Hand Farm, Willey
- Site 35: Cross in Hand Farm, Monks Kirby

5.3 The landholdings are also included as a single combined site in the Council's Stage 2 Site Assessment Report as 'Strategic Site 325: Land adjacent Magna Park'. This provides an evaluation of the site against a number of topic areas: Transport, Ecology, Landscape, Heritage, 'Other Constraints' and Opportunities/Benefits.

5.4 In relation to Strategic Site 325, the Stage 2 Site Assessment sets out the following:

- Transport – The surrounding road network is relatively uncongested, with a congestion rating of 5, with 1 being the most congested and 6 being less congested. It makes reference to the STA and its conclusions on capacity constraints at the A426/Gibbet Hill roundabout. The PTAL level is 1a and that the overall accessibility of the site is ranked 90 of the 125 sites considered as part of Rugby's current site assessment.

- Ecology - An initial ecological assessment indicated that the site was not within an Impact Risk Zone of a Site of Special Scientific Interest,

nor a Local Wildlife Site, and nor was it comprised of more than 20% medium to high distinctiveness habitat. The site was not further assessed for ecological constraints.

- Landscape – The overall landscape sensitivity of the site is Medium/Low. The site comprises arable and pastoral fields located within a broadly rural landscape to the west and warehousing development and transport infrastructure to the east. There are no known cultural heritage or historic features within the site and views from and into the surrounding RPGs are unlikely to be affected by the development. The site is of recreational value due to the location of PRoWs within and surrounding the site. Views into the site are filtered from the surrounding transport infrastructure. The A5 and B4027 and surrounding warehousing development detracts from the tranquillity and visual value of the site.

- Heritage – There were no designated heritage assets identified within 50 metres of the site.

- Other constraints – Reference to less than 2% of the site being within Green Belt, but acknowledgement of representations made at regulation 18 stage regarding the promotion of the land wholly outside Green Belt.

- Opportunities / benefits – Employment (B2, B8 and E). Potential to deliver significant green infrastructure/country park.

5.5 Notwithstanding the above, the Site Assessment states that the site is not to be progressed. This is despite the Assessment explicitly acknowledging that neither heritage nor ecology constraints have been identified, landscape

sensitivity is medium/low, the site is wholly outside Green Belt, and the surrounding road network is relatively uncongested.

5.6 The reasons for ruling the site are due to the access by the site by non-car modes being poor, that the site is not proximate to its future workforce and that transport modelling has indicated that the site could cause highway capacity issues which would be difficult to mitigate.

5.7 The site assessment then refers to the Green Belt Exceptional Circumstances Topic Paper and the commentary within it which is described as 'other factors which were important in the decision not to progress this site'. Specifically, these are:

(1) "The opportunities for diversification of employment land are lower here given that it is a distribution-focussed location in comparison to the edge of Coventry which has existing universities, research institutes and clusters of manufacturing and R&D uses.

(2) Given the existing high quantity of, largely B8, employment floorspace on this stretch of the A5 at Magna Park, with proposals for further expansion in Harborough District, locating a further large employment site here is likely to drive long-distance commuting."

5.8 A response to each of these points is provided in more detail in our response to the Strategic Policies. For completeness, these are summarised below.

5.9 Firstly, the site is a sustainable location for locating additional employment development in accordance with Paragraphs 110 and 115 of the NPPF as development in this location would be able to take advantage of, and provide improvements to, the established infrastructure servicing MPL in order to promote sustainable transport patterns and facilitate active travel.

5.10 Secondly, there is no credible evidence to support RBC's discounting of the site on highway capacity issues as this has not been sufficiently modelled. As set out in the Transport Note at Appendix 5 of the representations, we have significant concerns with the approach taken in the Council's STA, particularly given that this does not assess site 325 and the impact this would have on the Gibbet Hill roundabout. Therefore, as currently prepared, the STA includes no evidence that site 325 can be discounted on traffic related grounds.

5.11 Thirdly, a western expansion to MPL would provide an opportunity to further diversify the uses in this well-established employment location, with future occupiers able to build synergies with the blue-chip businesses already in occupation at the Park. Future development could also build upon the already established community initiatives and would provide significant benefits to the wider District.

5.12 As such, we do not agree with the reasons that Site 325 has been discounted from further assessment.

5.13 We also do not consider that as part of the assessment, sufficient weight is given to the site being largely unconstrained in ecology, heritage, landscape and local highways terms, its location wholly outside Green Belt, or the significant benefits of the development.

5.14 The proposals to extend MPL to the west of the A5 provide an opportunity to deliver employment floorspace to meet an identified need for Freight and Logistics floorspace (Class B8) in Rugby and the wider sub-region in a largely unconstrained location outside the Green Belt.

5.15 Providing this type of employment floorspace in this location would deliver a number of significant benefits, particularly due to the relationship of the

site to the existing MPL and the opportunity this offers in terms of building on the established principles underpinning the existing distribution park. A western extension will be able to build on MPL's proven success, leveraging the existing infrastructure and strong transport links.

5.16 An expansion at MPL would allow for a high proportion of future employment needs to be concentrated in a single, sustainable location that has a proven track record of successful delivery over the past 30 years. It is important to note the speed at which the Magna Park North and South extensions were built and occupied, demonstrating an immediate demand for employment floorspace in this location. Also, despite the age of some of the older units at MPL, occupancy levels remain extremely high with only 4 units unoccupied (out of 50 units total) across the entire site (including north and south extensions) as of Q1 2025.

5.17 Whilst the existing MPL development in Harborough is safeguarded for strategic storage and distribution (Class B8) uses only, with units to be in excess of 9,000sqm as per Policy BE2 of the adopted HDC Local Plan, an expansion to MPL to the west of the A5 provides an opportunity to be able to accommodate both B2 and B8 occupiers in a mix of units. Given the size of the site, there is also an opportunity to provide smaller / incubator units to support SMEs, alongside larger units catering for manufacturing and logistics demand in this location.

5.18 The plans submitted at Regulation 18 stage (included in Appendix 6 of this Statement) show how built development on the site could be positioned, with a 35% plot density equating to the delivery of just over 580,000 sqm of employment floorspace. The proposals would be landscape-led to provide habitat enhancements to deliver significant biodiversity and amenity enhancements. This includes the potential for a country park to be delivered comprising community parkland and habitat creation along the western

boundary of the site, for use both by the site employees and local community. Opportunities to link this with the existing 200-acre country park at MPN are being explored.

5.19 Business operating from a proposed expansion to the west of MPL would also benefit from the site's unique position as a satellite location to DIRFT, with businesses able to capitalise on using the existing open rail terminal.

5.20 There are successful HGV routeing arrangements in place for MPL, and this would be carried through to the new development, ensuring that restrictions on HGVs accessing nearby villages would continue.

5.21 As detailed above, MPL already benefits from a number of bus services, linking the site to Rugby, Leicester, Harborough and Hinckley, which the proposed extension would be able to utilise and also explore opportunities for network enhancement. The proposals could also benefit from other on-demand public transport services already established such as Fox Connect and LiftShare.

5.22 Through further masterplanning, opportunities for other on-site amenities can be explored, including the provision of additional lorry parking to complement the provision of a service facility at MPL which is currently being built.

5.23 Further opportunities for training and education could also be explored, including links to the already established CLEAR Centre and other initiatives as part of the existing MPL.

5.24 There are a significant number of benefits associated with the proposed western extension of MPL, including:

Ability to Respond to Specifically Identified Needs – Unit Sizes, Heights, Location, etc.

5.25 The site's location in the Golden Logistics Triangle is regarded as a strategic hub for distribution and logistic operations. Research indicates that this area provides access to 95% of the British population, making it an ideal location for same-day and next-day delivery services.

5.26 As identified, the site is largely unconstrained in ecology, heritage and landscape terms and therefore would be suitable to accommodate buildings of appropriate sizes and heights to meet the operational requirements of modern occupiers. Due to the size of the site, buildings of c. 1m sqft could be accommodated which is a unique offering of this site, and unlikely to be achieved at other sites promoted for employment development in RBC.

5.27 It is also relevant that the draft Policies Map identifies the site as an Area Suitable for Wind Turbine Development. As per draft Policy CL2, wind turbines in such circumstances are defined as being greater than 40m in height.

5.28 This suggests that the site is less sensitive in landscape terms and could therefore potentially accommodate taller buildings which are suitable to meet the needs of modern occupiers.

Job Creation

5.29 The proposed 166ha extension of MPL to the west of the A5 will create substantial job opportunities in the local area, both during the construction and operation phase.

5.30 During the construction phase, it is estimated that over 3,000 direct construction jobs could be supported per annum, across a wide range of trades and sub-sectors. It is anticipated that the Proposed Development will lead to opportunities for apprenticeships and training during the construction phase, alongside opportunities for existing local contractors. The GVA benefit of the direct construction phase could exceed £200m.

5.31 The proposals will also support a further indirect and induced additional jobs at the local and wider regional level during the construction phase, equivalent to around a further 1,800 jobs supported through the development process. Total national GVA benefits of the construction phase would be expected to exceed £500m.

5.32 Once operational, the proposals would support permanent employment opportunities in Rugby and the surrounding area.

5.33 During the operational phase, the proposals for around 580,000 sqm could generate in excess of 4,000 jobs, assuming employment densities in line with the existing MPL occupiers. This may vary seasonally. At the sub regional level, the benefits associated with both supply chains as well as the wage spend of workers will support further employment creation in the sub region being around 2,600 jobs.

5.34 The direct annual GVA benefits of the scheme are estimated to be around £260m, rising to over £400m taking into account regional multiplier benefits.

5.35 These employment opportunities are likely to be in a range of sectors depending on the final occupants of the floorspace but is likely to include roles in warehousing and distribution, manufacturing, wholesale, business administration, IT and professional services.

5.36 Research indicates notable increases in professional and associate professional / technical occupations in the logistics sector, reflecting increased levels of automation as well as the prevalence of collocating offices with warehousing. Logistics sector jobs postings in 2021 in the South East Midlands reported that 65% of requirements were for technical workers including project managers, sales managers, supply chain analysts and software developers / engineers.

CIL Income

5.37 Rugby Borough Council's CIL Charging Schedule came into effect from 1 April 2024. This includes a £5 per sqm rate for industrial, light industrial and storage and distribution uses (B2 / B8).

5.38 Based on a proposed floorspace of 580,000 sqm, the proposed extension could contribute £2,900,000 in CIL revenue for RBC.

5.39 RBC's latest Annual Infrastructure Funding Statement confirms that improvements to the Strategic Highways Network are a priority and as such, the development could provide a significant CIL receipt to be used towards SRN improvements – including at Gibbet Hill.

Business Rates

5.40 The 2020 annual business rates income for MPL was estimated at £24m, a proportion of which is retained locally. Applying this ratio to the future development proposals indicates future additional contributions of at least £16m, however this is expected to be substantially higher based on the new and higher quality floorspace.

5.41 The business rates income from MPL in 2023/2024 meant that Harborough District Council was able to freeze Council Tax for all residents in 2024/2025.

5.42 As such, substantial increases in business rates will benefit Rugby Borough Council and its residents by reducing the cost of public services leading to tax savings for residents.

Transport & Sustainability

5.43 A western extension to MPL would allow the new development to take advantage of established infrastructure already in place to promote sustainable transport patterns. Staff would be able to utilise the bus services that currently serve MPL as well as the potential for additional highways contributions to support sustainable modes of travel.

5.44 In addition, these representations are accompanied by a Transport Note prepared by Apex Transport Planning (Appendix 4) which considers the opportunities for sustainable transport and sets out a vision-led approach for increasing sustainable transport movements and constraining vehicle movements to and from the site, whilst also reducing background movements across the existing MPL through a joined up sustainable travel strategy and consolidation of operational vehicle movements. The Note demonstrates that the site is ideally located for accommodating employment uses and minimising key vehicle movements, as well as for facilitating the delivery of key strategic infrastructure improvements which would offer further benefits on the network.

Green Infrastructure & Biodiversity

5.45 As detailed above, the proposals would be landscape-led to provide habitat enhancements to deliver significant biodiversity and amenity enhancements.

This includes the potential for a country park to be delivered comprising community parkland and habitat creation along the western boundary of the site, for use both by the site employees and local community. Opportunities to link this with the existing 200-acre country park at MPN could also be explored.

Community Initiatives

5.46 As detailed above, the existing MPL supports the community and local voluntary organisations to deliver local projects within the geographical area surrounding MPL. The Lutterworth Area Community Fund has contributed over £1m to community projects in the local area. There is also an established Community Liaison Group for the purposes of providing information and updates on current development proposals and operations at MPL. Members include local parish councils and local interest groups, including representatives from communities located in RBC including Willey, Pailton, Monks Kirby and Stretton under Fosse.

5.47 A western expansion would be able to build upon these already established community initiatives and further extend the benefit to community groups within Rugby.

5.48 Therefore, as demonstrated, there are significant benefits associated with locating employment development to the west of MPL, including for this to be a highly sustainable development given the ability to leverage the existing infrastructure associated with MPL. The site is also deliverable given it is available for development, in a suitable location, and achievable within the plan period.

5.49 As such, the site is therefore a reasonable option for locating employment land and, given its location outside the Green Belt, should be considered for

allocation before considering whether exceptional circumstances exist to justify Green Belt release in line with NPPF Paragraph 147.

5.50 Further details on the proposals for site 325 and the overall benefits are included in the accompanying Vision Document (Appendix 7).

6.0 Conclusion

6.1 These representations are submitted to Rugby Borough Council ('RBC') in response to the Proposed Submission Local Plan.

6.2 The representations are submitted jointly on behalf of GLP Europe, Nurton Developments Limited, Mr F. B. Dewes and Mr I. Dewes and specifically relate to Site 325 – Land west of Magna Park ('the site').

6.3 As per the Council's assessment, Site 325 comprises four separate parcels of land. The site in its totality is located to the west of the A5, opposite Magna Park Lutterworth, which at present falls entirely within Harborough District Council and is Europe's largest dedicated distribution park. The site is entirely outside Green Belt and is available, suitable, achievable and deliverable for employment development within the plan period.

6.4 The Proposed Submission Local Plan continues to overlook allocation of the site, despite it being a highly sustainable location for employment development, especially to serve the Freight and Logistics sector, being relatively unconstrained, particularly from an ecology and heritage perspective, and falling wholly outside the Green Belt.

6.5 Therefore, the Parties do not consider that the Plan is legally compliant, sound or complies with the Duty to Cooperate.

6.6 Fundamentally, these issues result from a failure of the Plan to meet the objectively assessed employment need for Rugby and that the proposed approach to allocating employment land is not based on a robust evidence base nor does it comply with national planning policy.

6.7 In order to make the Plan sound, we consider that the employment strategy set out in Strategic Policies S3 and S7 should be amended in terms of the quantum of employment land being planned for and the approach to the employment allocations.

6.8 Following this process, we consider that land west of Magna Park Lutterworth should be allocated for strategic employment development. These representations have demonstrated that:

a. this is a non-Green Belt site which is a highly sustainable location for employment location in accordance with Paragraphs 110 and 115 of the NPPF; and
b. there is no evidence to support the contention that the site is constrained in highway terms.

6.9 Accordingly, the site should not have been discounted as a reasonable alternative and should be considered for allocation before the Council conclude there are exceptional circumstances to support the release of Green Belt as required by NPPF Paragraph 147. The Council cannot demonstrate that there are exceptional circumstances to support the proposed release of Green Belt which are fully evidenced and justified as per NPPF Paragraph 145.

6.10 We trust the Council will take these points into account prior to submission of the Plan for examination, and we would welcome the opportunity to work collaboratively with the Council to address the soundness issues identified. Should these objections remain unresolved following submission of the Plan, we respectfully request that the Parties are given the opportunity to discuss these matters further at the Examination Hearing Sessions.

APPENDIX 1

Regulation 18 Representations

APPENDIX 2

Technical Statement on Employment Land Need

APPENDIX 3

Legal Opinion

APPENDIX 4

Transport Note – Sustainable Travel (Apex)

APPENDIX 5

Transport Planning Note (DTA)

APPENDIX 6

Plans

APPENDIX 7

Site 325 Vision Document

Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	**Ref:** **(For official use only)**

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Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
	**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*	
Title		Ms
First Name		Lauren
Last Name		Whiteley
Job Title (where relevant)		Associate
Organisation (where relevant)	GLP Europe, Nurton Developments Limited and Mr F. B. Dewes and Mr I. Dewes	Barker Planning Town Planning Ltd
Address Line 1		[redacted]
Line 2		[redacted]
Line 3		[redacted]
Line 4		
Post Code		[redacted]
Telephone Number		[redacted]

E-mail Address (where relevant)		[redacted]

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	CL1	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	x
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	x

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy CL1 requires new buildings to be designed and built to be net zero carbon in operation. To achieve this, sets out that new buildings **must**:

i. be ultra-low energy;
ii. be fossil fuel free (except where the use of fossil fuels is technically necessary for emergency and life-safety systems or essential systems serving buildings with critical functions); and
iii. generate at least the same amount of renewable electricity on-site as the electricity they demand over the course of a year, such demand including all regulated and unregulated energy use; or
iv. if iii. is not technically achievable for a particular building typology in its context, on-site renewable energy generation shall be fully maximised as practicable. A reasonably practical maximum PV generation shall be 120kWh per square metre of building footprint per year, or solar PV panels of an area equating to 70% of the

building's footprint. Where it is claimed that the fullest practical extent is less than this, this must be justified by evidence demonstrating why a reduced amount is proposed and what design steps have been taken to strive to achieve this policy's stated target.

Our position is that draft Policy CL1 is overly onerous and is not deliverable.

Firstly, requiring buildings to be designed and built to net zero carbon in operation would require coordination with building occupiers at the initial design stage. This would simply not be possible for many developments in the Freight and Logistics sector where buildings are often delivered speculatively without a tenant identified.

Secondly, the requirement for renewable energy is essentially a condition to install PV to an equal or greater capacity than the electrical usage of the building. This may work for residential developments, however Freight and Logistics buildings often include automated systems or significant levels of vehicle (car, van and truck) charging making this unlikely to be achievable.

There are also significant constraints to grid capacity which severely limits the size of PV array which may be installed on any development. This limit is set by National Grid in many areas of the Midlands due to capacity issues within the grid that are not capable of being solved by individual developers.

For example, at Magna Park North, National Grid have imposed a current limit of 50kWp which would equate to less than 10% of a typical warehouse usage. It would not be possible to install PVs beyond this as the grid cannot accommodate this and is restricted by National Grid. It is our understanding that the National Grid issues are unlikely to be fully resolved until sometime after 2033.

As such, the current wording would essentially prevent and Freight and Logistics buildings from being developed.

We note that the draft Local Plan is supported by a Net Zero Carbon Policy Evidence Base Report (dated 13 November 2025). This fails to acknowledge challenges of connecting to the grid as set out above.

There is also real risk of RBC losing out on development and potential growth if it has more onerous (and unachievable) policies than elsewhere within the region.

This is particularly true for the Freight and Logistics sector which is more footloose and prioritises locations near the Strategic Road Network.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to ensure the policy is deliverable (and therefore sound), we suggest the wording is updated to the below which would align with the Policy wording being proposed as part of Harborough DC's Draft Local Plan.

All development must:

a) minimise carbon emissions during construction, which may include use of low-carbon construction materials, and adopting energy-efficient construction practices;
b) where relevant, demonstrate that demolition of existing buildings is justified in comparison to their retention and re-use, and where buildings are retained, integrate measures to make these more energy and resource efficient in accordance with criteria 3 and 5 below;
c) where demolition of existing buildings is required, demonstrate the reuse of demolition and construction waste;
d) demonstrate the integration of passive design measures, including delivering cooling without increasing carbon emissions, such as through optimal building orientation, natural ventilation, solar shading and the use of thermal mass to regulate indoor temperatures;
e) be supported by a water efficiency statement that outlines, in priority order, measures to reduce water consumption, reuse water, or offset its use and achieve minimum water efficiency equivalent to 110 litres per person per day for any residential use, or non-residential development to achieve at least 3 credits in the Wat01 Measure for water in the BREEAM New Construction standard; and
f) Demonstrate how waste will be minimised during construction and during the operation of the development.

Non-residential development
a) All non-residential and mixed-use developments proposing 1000 sqm or more net additional floorspace are required to achieve a final (post-construction stage) certified rating of Excellent as part

of a fully fitted assessment within BREEAM New Construction. A whole life-cycle assessment should be undertaken as part of this assessment for major development.

b) *Major non-residential and mixed-use refurbishment developments are required to achieve a final (post-construction) certified rating of Excellent under BREEAM UK Non-Domestic Refurbishment and Fit-out(or equivalent scheme). A whole life-cycle assessment should be undertaken as part of this assessment.*

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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Line 4		
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Telephone Number		[redacted]

E-mail Address (where relevant)		[redacted]

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	CL3	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	x
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	x

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
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As per our comments on Draft Policy CL1, we consider this Policy requirement is overly prescriptive and is likely to be difficult to achieve depending on site circumstances, particularly for Freight and Logistics developments. It is therefore not effective because it is not deliverable.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to ensure the policy is deliverable, the wording should be updated to require new major non-residential developments to achieve at least 3 credits in the Wat01 Measure for water in the BREEAM New Construction standard.

(Continue on a separate sheet /expand box if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	E2	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	x
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	x

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
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Draft Policy E2 (Part E) states that, outside of settlement boundaries, development for employment uses will only be permitted where:

i. It would not undermine the continuance of an existing viable agricultural use; and
ii. It would comprise the conversion or redevelopment at a similar scale of building that has been in existence for at least ten years; or
iii. It would comprise a proportionate expansion of an existing building in employment use; or
iv. It would comprise the infilling of a vacant area within a site in employment use.

As discussed in Section 3.0 of our supporting Statement, the draft NPPF strengthens support for employment development, with draft Policy E2 stating that substantial weight should be given to the economic benefits of proposals for commercial development.

It is therefore important for Local Plan's to positively plan for employment growth. As such, we consider Draft Policy E2 should be more flexible to enable employment development to come forward on unallocated sites where this meets an identified need, subject to meeting the requirements within the draft NPPF. The policy is not currently sound as it does not accord with national planning policy.

(Continue on a separate sheet /expand box if necessary)

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We request that the following wording is included in Policy E2:

"Where evidence indicates an need or demand for additional employment land (Eg(iii), B2 and/or B8) that cannot be met from land allocated in the plan, the Council will consider favourably proposals that meet the identified need which:

a. Have good access to transport networks (including via sustainable transport modes where possible) appropriate to the type of development;
b. Be sited and designed to limit environmental impacts (such as through the co-location or intensification of facilities to limit vehicle movements, and sensitive building design and landscaping). The impact on local residents or other neighbouring uses should be acceptable, taking into account proposed mitigation, especially where night-time activity will be required; and
c. Provide sufficient and secure parking for lorries or other vehicles to cater for the anticipated use."

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	EN6	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	x
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	x

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
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Draft Policy EN6 requires all major development to increase the post-development canopy cover to at least 20% of the site area (excluding areas of the site that are high or very high distinctiveness habitats), unless such requirement is demonstrated to be incompatible with delivering biodiversity net gain requirements on site. We do not consider that this policy requirement acknowledges site context.

The evidence referred to in the paragraph 5.20 to support the policy (i.e. *The Canopy Cover of England's Towns and Cities… (Doick, K.J. et al, 2017)*) specifically relates to tree cover in urban areas, recommending a minimum canopy cover target of 20% for UK towns and cities (15% for coastal locations).

The supporting text to the draft Policy itself (para 5.17) recognises that there may be sites where achieving 20% is not possible or desirable and, in such circumstances, the Council may negotiate an alternative level of canopy cover. Therefore, rather than prescribing a standard to comply with, the policy should

instead look to encourage tree planting on schemes whilst also having regard to other site constraints and characteristics. This will ensure that any policy is deliverable and achievable.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

EN6 Canopy cover
All major development, excluding change of use and development in Rugby town centre, shall seek to increase the post-development canopy cover ~~to at least 20% of the site area~~ (excluding areas of the site that are high or very high distinctiveness habitats) unless such requirement is demonstrated to be incompatible with delivering biodiversity net gain requirements on site.

~~Where the canopy cover of the site exceeds 20% before development, the proposal should ensure retention of at least the existing level of canopy cover.~~

In meeting the requirements of this policy, existing canopy should be retained first, before considering new planting.

Within Rugby town centre (as defined on the policies map) development shall seek to maximise opportunities for canopy cover and other green infrastructure including green roofs.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

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Telephone Number		[redacted]

E-mail Address (where relevant)		[redacted]

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	I1	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	x
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	x

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
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Part B of draft Policy I1 sets out that development shall be located where car travel can be minimised and opportunities for walking, cycling and public transport can be maximised. This is not currently sound as it does not accord with National Policy and specifically the definition of 'Sustainable Transport Modes' within the NPPF which is as follows:

> *"Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport".*

The policy wording should therefore be expanded to include reference to ultra low and zero emission vehicles, and car sharing, as appropriate sustainable transport modes.

This will assist in ensuring that the policy reflects the nuances the needs of different development typologies, and between urban and rural locations. For example, freight and logistic uses need to be located in proximity to the Strategic Road Network as opposed to within urban locations where walking and cycling can be maximised, but such locations can be made sustainable by promoting other forms of sustainable transport including ultra low and zero emissions vehicles, car sharing and public transport.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

B. Development shall:

i. be located where car travel can be minimised and opportunities for ***sustainable transport modes, including walking and cycling, ultra low and zero emissions vehicles, car sharing and public transport****, can be maximised.*

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To further explain the amendments needed to the plan to make it legally compliant, sound and compliant with the Duty to Cooperate, in light of the supporting evidence submitted.

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

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Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	**Ref:** **(For official use only)**

Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026 By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in the subject line, OR by post to**: Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
	**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*	
Title		Ms
First Name		Lauren
Last Name		Whiteley
Job Title (where relevant)		Associate
Organisation (where relevant)	GLP Europe, Nurton Developments Limited and Mr F. B. Dewes and Mr I. Dewes	Barker Planning Town Planning Ltd
Address Line 1		[redacted]
Line 2		[redacted]
Line 3		[redacted]
Line 4		
Post Code		[redacted]
Telephone Number		[redacted]

E-mail Address (where relevant)		[redacted]

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	S3	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	X
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	X

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy S3 sets out the quantum of employment land required to meet Rugby Borough's need in the period 2025-2042. At Regulation 18 stage, our representations made the case that the employment need for Rugby Borough has been underestimated.

At Regulation 18 stage, the Plan was to cover the period 2024-2045. The Plan has since been amended, and the Regulation 19 consultation version is based on a period between 2025-2042. The table below sets out the reduced requirement that is proposed at Regulation 19 stage, compared to Regulation 18 stage.

Need Type	**Regulation 18 (2024-2045) (sqm)**	**Regulation 19 (2025-2042) (sqm)**
Strategic scale sites	761,250	791,525

Small sites	265,296	232,600
Unmet need from Coventry	180,000	10,000
Total	1,206,546	1,034,125

Table 1. Comparison in employment need between Regulation 18 & Regulation 19 stages.

Additionally, further information has also been published to support the Regulation 19 Plan. The following section comments on the updated evidence base before concluding on the quantum of employment need for Rugby Borough.

Strategic Scale Sites

At Regulation 18 stage, we provided commentary on the West Midlands Strategic Employment Sites Study (WMSESS) published by Iceni in August 2024, and the associated Coventry & Warwickshire HEDNA-WMSESS Alignment Paper ('the Alignment Paper') updated in November 2024.

Whilst we considered that WMSESS which underpins the Alignment Paper is a well-intentioned piece of work as it seeks to boost the allocation of strategic sites across the West Midlands, we raised a number of concerns with the methodology including that the assessment of existing supply of sites has been wholly uncritical, taking information provided by Local Planning Authorities at face value. It was our view that the resulting analysis therefore served to fundamentally undermine the principal purpose of the study, i.e. the allocation of a sufficient number of sites to serve the sub-regional economy for the next 20 years.

To support the Regulation 19 Consultation, an Addendum to the Coventry & Warwickshire Alignment Paper has been prepared by Iceni (dated November 2025). This Paper serves two roles:

- To correct the original WMSESS and subsequent HEDNA/WMSESS Alignment Paper in respect of supply and suppressed demand model.
- To respond to key issues raised by representations at Regulation 18 stage.

In respect of the first matter, it is noted that the Addendum Paper does revise some of the figures regarding the committed supply as presented in the original WMSESS. For example, the 100ha country park at Coventry Gateway has been taken out of the

calculations of committed supply (although it is unclear why this has led to the residual need increasing by only 50 ha).

However, as set out in the Employment Land Need Technical Paper prepared by NDL, almost all of the discrepancies in the assessment of committed supply have not been addressed.

The Addendum Paper also rebuts arguments about the pace of development over the last four years. We maintain the view that this is contradicted by completions data contained within the Development Needs Topic Paper. This is explained further in the NDL Employment Land Need Technical Note.

Based on the assessment work prepared by NDL, we contend that the requirement for strategic scale floorspace in Rugby over the Plan period should be 1.75 million sqm. This is almost 1 million sqm more than currently projected.

Coventry Unmet Need

The Iceni 2025 Update Paper makes no comment on the position of unmet need from Coventry.

Further, the Development Needs Topic Paper provides no explanation why the assumed unmet need for Coventry has been reduced from 180,000 sqm to 36,000 sqm.

The proposed allocations in the Regulation 19 Plan generate a small surplus of just over 10,000 sqm and it is suggested that this could contribute to the unmet need of Coventry. This is significantly different from the strategy proposed at Regulation 18 stage where the Plan was seeking to meet all of Coventry's unmet need of 180,000 sqm. There is no explanation for this change of approach in the evidence base.

We do not consider the reduction in unmet need from Coventry is justified. Coventry City Council has produced evidence post-submission of its Local Plan seeking to demonstrate that there is significantly more capacity in the supply of land through potential windfall development. This has been questioned by the Inspectors and is a matter for debate at the hearing session to the forthcoming examination. Instead, we conclude that there is a minimum shortfall between local need and supply of 269,000 sqm over the Rugby Local Plan period.

We also consider that the reduced scale of the unmet need for Coventry, and the Council's decision to now only meet a portion of this, is at odds with the proposed spatial strategy which allocates three of the five employment sites on the edge of Coventry.

Harborough Unmet Need

It is also notable that neither the Development Needs Topic Paper, nor the Iceni Addendum Report, make any reference to unmet needs from Harborough District, despite this being raised in our Regulation 18 representations. At Regulation 18 stage, we referred to an unmet need of 283,000 sqm based on the Strategic B8 Needs Sensitivity Report (Iceni, December 2024) produced for Harborough District Council (HDC) to inform its Regulation 19 Draft Local Plan.

Further information has since been published, namely the Leicester & Leicestershire Strategic Distribution Floorspace Needs Update and Apportionment Report for all Leicestershire LPAs – Iceni, October 2025.

The 2025 Leicestershire report generates a gross need of 823,000 sqm of road-based strategic distribution floorspace for Opportunity Area 6 (OA6) for the period 2023-2046. In terms of key employment areas, OA6 covers Magna Park, Lutterworth in Harborough and Junction 20 of the M1.

From this gross need figure is deducted completions for 2023/24 and commitments as of 1 April 2024, totalling 257,000 sqm (principally made up of plots MPS 9-11 and MPN 761, 6 & 7). This leaves a residual need of 566,400 sqm.

The HDC Regulation 19 Plan (March 2025) proposes allocations of 340,000 sqm on two sites at MPL for strategic distribution totalling 137.8 ha. This was to meet a residual need of between 100 and 140ha for the period 2024 to 2041. No land at Junction 20 of the M1 is proposed for employment allocation.

As such, it can be derived that HDC would need to allocate a further 266,400sqm (i.e. 566,400 sqm less 340,000 sqm) to meet the requirements set out in the 2025 Leicestershire report.

In addition to the above, we are also aware that the employment land consented as part of the Lutterworth East Sustainable Urban Extension (ref 24/00932/VAC) has resolution to grant to remove the unit size restriction (under app ref 19/00250/OUT), so that this floorspace could now deliver strategic B8 floorspace in units over 9,000 sqm. HDC have included this land as an additional existing commitment totalling 52,000 sqm.

GLP have also made representations to HDC to increase the floorspace capacity of the two emerging allocations at MPL from 340,000 sqm to 370,000 sqm total.

Taking these potential supply increases into account, this results in an unmet need in Opportunity Area 6 of 146,400sqm.

The Rugby Borough Duty to Cooperate (2026) makes reference to meetings between RBC and HDC regarding employment and transport matters. Notwithstanding this, there is no reference within the Local Plan documents or evidence base to RBC meeting the unmet need for Opportunity Area 6 and this is not accounted for within the employment need figures.

Quantum of Employment Need

Based on the above, and the amended Plan period, we consider that the employment need for Rugby Borough should be as detailed in the Table below, which also includes a comparison against the draft Local Plan's projections:

Element	**Reg 19 Local Plan (sqm)**	**NDL's Analysis of the Requirement (sqm)**	**Difference**
Strategic scale sites	791,525	1,750,065	958,540
Smaller sites	232,600	232,600	0
Unmet need from Coventry	10,000	269,000	259,000
Unmet need for strategic scale	0	146,400	146,400

sites from Harborough			
Total	**1,034,125**	**2,398,065**	**1,363,940**

Table 2. Assessment of employment land need for RBC

This is significantly above the quantum being planned for in the RBC Regulation 19 Local Plan.

Draft Strategic Policy S3 sets out that, in order to meet RBC's need for employment land, 1,034,000 sqm (approx. 287 hectares) of floorspace for use classes B2, E(g)(iii) and B8 will be planned for. This is to be across five proposed allocations.

As such, we consider that the quantum identified in draft Strategic Policy S3 is significantly below the full, objectively assessed need. We therefore consider that the policy cannot be sound as it is not positively prepared, justified or effective given it is not based on an appropriate evidence base detailing the full, objectively assessed needs of the borough.

Therefore, the Council should undertake a more detailed assessment of employment need having regard to factors highlighted in NDL's Technical Statement on Employment Land Need (included in full at Appendix 2).

<u>Type of Employment Land</u>

Notwithstanding our above concerns about the overall quantum of need being planned for, we also do not consider that the identified need, particularly for large scale Freight and Logistics, is being met effectively.

The proposed employment allocations set out in draft Policies S3 and S7 are as follows:

- Crowner Fields Farm, Ansty – 275,000 sqm
- Coton Park East – 115,000 sqm
- South West Rugby Phase 2 – 60,000 sqm
- Ansty Park North – 75,000 sqm
- Land at Walsgrave Hill – 290,000 sqm

Further information on each of the proposed employment allocations is included in Appendix 4 of the draft Plan.

Of the proposed allocations, 78.5% of the floorspace is located on sites situated at the edge of Coventry: Crowner Fields Farm, Ansty Park North & Land at Walsgrave Hill. All three of these allocations require the release of Green Belt land.

As set out in the NDL Employment Land Need Technical Note in more detail, the evidence base supporting the RBC Proposed Submission Plan confirms that the principal element of employment need for RBC to meet is for Freight and Logistics (Use Class B8). This is confirmed in the WMSESS, the Green Belt Exceptional Circumstances Topic Paper, the Sustainability Appraisal and the Development Needs Topic Paper.

The draft NPPF advocates for identifying suitable locations for Freight and Logistics, with Policy E3 confirming the priority is for these to have good access to transport networks appropriate to the type of development.

Notably, the Addendum Paper to the WMSESS recommends that within Opportunity Area 7, the requirement is for 2-3 larger B8/mixed sites of circa 50 hectares; and 1-2 smaller B1/B2 sites.

It is clear from the evidence base that both Crowner Fields Farm and Walsgrave Hill have been identified to meet the need for larger B8/mixed sites of circa 50 hectares. This is confirmed in Paragraph 5.2.30 of the SA and paragraphs 3.38 and 3.39 of the Development Needs Topic Paper.

With reference to Walsgrave Hill, the site promoter (SEGRO) made representations to RBC at Regulation 18 stage setting out how the Walsgrave Hill site is well-placed to meet the strategic B8 employment needs of Rugby and the Coventry and Warwickshire area (as opposed to B2).

Despite this, the SA then goes on to state how directing new employment land to the edge of Coventry will be well-placed to deliver a mix of employment uses, likely to include an element of B8 but not be overly dominated by B8 (paragraph 6.3.3).

Indeed, one of the exceptional circumstances the Council is relying on in order to justify the release of Green Belt sites around Coventry for employment allocations is that this location is preferable for manufacturing uses (paragraph 2.51 of the Green Belt Exceptional Circumstances Topic Paper).

However, this approach is directly at odds with the Council's own evidence base which points towards a greater need for B8-employment uses and on the basis the sites are promoted to meet this B8 demand.

In contrast, land west of MPL has been discounted as a reasonable option for meeting employment need on the basis RBC do not consider it to be a suitable or sustainable location for B2 and R&D employment uses. This is exemplified at Paragraph 2.90 of the SA, which states:

"It is not realistic for Magna Park to deliver the same diversity and growth in manufacturing and research and development uses that can be delivered by the proposed allocations at Ansty Park and Walsgrave Hill".

The overall approach to the allocation of employment land is therefore confused as sites on the edge of Coventry have been allocated to specifically fulfil the need arising in Opportunity Area 7 for large B8 sites over 50+ hectares, yet the justification presented focuses on how this location will support the delivery of B2 and R&D uses. In taking this approach, other sites acknowledged to be "established logistics locations" such as Magna Park have been discounted and not fully assessed.

We therefore consider Policy S3 to be unsound on the basis that the proposed strategy for employment land fails to meet the area's objectively assessed need and is not justified as it does not consider all reasonable alternatives.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Plan sound, the employment strategy set out in S3 should be amended in terms of the quantum of employment land being planned for and the approach to the employment allocations. Land west of Magna Park Lutterworth should be allocated for strategic employment development.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To further explain the amendments needed to the plan to make it legally compliant, sound and compliant with the Duty to Cooperate, in light of the supporting evidence submitted.

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Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	**Ref:** **(For official use only)**

Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026 By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in the subject line, OR by post to**: Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
	**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*	
Title		Ms
First Name		Lauren
Last Name		Whiteley
Job Title (where relevant)		Associate
Organisation (where relevant)	GLP Europe, Nurton Developments Limited and Mr F. B. Dewes and Mr I. Dewes	Barker Planning Town Planning Ltd
Address Line 1		[redacted]
Line 2		[redacted]
Line 3		[redacted]
Line 4		
Post Code		[redacted]
Telephone Number		[redacted]

E-mail Address (where relevant)		[redacted]

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	S7	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	X
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	X

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We strongly object to draft Strategic Policies S3 and S7 on the basis that the overall strategy for the allocation of employment land is not sound, as it is not supported by a robust evidence base and does not comply with national policy.

The proposed employment allocations set out in draft Policies S3 and S7 are as follows:

- Crowner Fields Farm, Ansty – 275,000 sqm
- Coton Park East – 115,000 sqm
- South West Rugby Phase 2 – 60,000 sqm
- Ansty Park North – 75,000 sqm
- Land at Walsgrave Hill – 290,000 sqm

The proposed employment allocations differ from that presented at Regulation 18 stage in two ways:

- Reduction in the land allocated at Southwest Rugby Phase 2 – 60,000 sqm proposed compared to 130,000 sqm previously;
- Replacement of 350,000 sqm of land West of Prologis Park, Ryton with 290,000 sqm at Land at Walsgrave Hill.

Notably, the site at Prologis Park, Ryton has been replaced by the Walsgrave Hill site, although this site is also within the Green Belt, with the Council needing to demonstrate exceptional circumstances to support its release and allocation.

Land west of MPL is not included as an allocation. This is despite representations being made at Regulation 18 stage which demonstrated that this site comprises a sustainable western expansion to MPL capable of delivering significant benefits and which is wholly outside Green Belt and available, suitable, achievable and deliverable for employment development within the plan period.

At Regulation 18 stage, we raised significant concerns with the Sustainability Appraisal and the approach taken to identifying 'sequentially preferable sites'. Our representations were supported by legal advice setting out how the approach taken regarding the allocation of employment land was fundamentally flawed and unlawful. This was on the basis that the evidence base to support the Plan at this stage provided retrospective justification for the proposed allocations, as opposed to being an evidence-led process as required by both policy and law. An evidence-led process would include full assessment of 'reasonable alternatives', which, in the case of a plan proposing to allocate land in the Green Belt, should comprise assessment of meeting the identified need of land not in the Green Belt. This legal opinion is reprovided at Appendix 3 of these representations.

An updated Sustainability Appraisal (SA) has been prepared to support the Regulation 19 Local Plan. This supersedes the previous version.

The Council's approach to identifying the broad spatial strategy for employment land and reasonable alternatives is set out in Paragraphs 5.2.22 – 5.2.38 of the SA.

We continue to be of the view that the SA is not appropriate, particularly regarding the four reasonable alternative growth scenarios which were tested. These four scenarios are:

- Scenario 1 – the proposed submission approach
- Scenario 2 – Scenario 1 but with Walsgrave Hill replaced by Prologis/Mountpark
- Scenario 3 – Scenario 1 but with Walsgrave Hill replaced by North of Houlton
- Scenario 4 – Scenario 1 but with Walsgrave Hill replaced by 2 sites at Thurlaston

As such, in all four scenarios, the proposed allocations at Crowner Fields Farm, Coton Park East, South West Rugby (Phase 2) and Ansty Park North are held constant, with Walsgrave Hill replaced with alternative sites in Scenarios 2, 3 and 4.

Land west of MPL has continued to be excluded as a reasonable alternative and has not been tested within one of the alternative growth scenarios within the SA.

With specific reference to land west of MPL, Paragraph 5.2.36 of the SA sets out that the situation is broadly unchanged from Regulation 18 stage and makes reference to the explanation in the RBC Green Belt Exceptional Circumstances Topic Paper (dated December 2025).

Principally, RBC's key reasons for not identifying MPL as a reasonable alternative can be summarised as follows:

- Sustainability – RBC do not consider land west of MPL to be a sustainable location due to RBC regarding it as removed from both Rugby and Coventry and therefore it would give rise to long-distance car commuting from Leicester, Coventry, Nuneaton, Hinckley and Rugby. RBC state that the distances involved mean this would not be as convenient as for sites close to the edge of Coventry and, in contrast to those locations, active travel would not be possible;

- Highways impacts – RBC consider the site is likely to cause severe impacts on the Strategic Road Network (SRN) at the A426/A5 Gibbet

Hill roundabout and highway capacity issues which would be difficult to mitigate against; and

- Type of employment floorspace – RBC consider that it is not realistic for land west of MPL to deliver the same diversity and growth in advanced manufacturing and research and development uses that could be delivered by proposed allocations at Ansty Park and Walsgrave Hill.

RBC also make reference to additional land at MPL being allocated for employment development within Harborough which, when combined, the proposed extensions both sides of the A5 would result in a further 4,000 jobs. RBC state that there is already competition for the limited labour pool at Rugby and this would increase the need for development to draw labour from further afield. As set out at Regulation 18 stage, MPL has a good labour pool and attracts workers from a number of locations, the travel patterns of which already align with established public transport infrastructure in place. Planned housing growth within the MPL catchment could provide an additional c. 17,000 workers over the next 20 years.

The representations will now consider why this approach is not sound, taking each of these points in turn.

Sustainability

NPPF Paragraph 110 states that:

> *"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."* [emphasis added].

Further, Paragraph 115 of the NPPF states that:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach."

NPPF Glossary defines 'Sustainable transport modes' as:

"Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport".

As such, the NPPF requires development to be in a sustainable location. It is clear that this needs to be considered having regard to the nature of the use being proposed, not simply the location of the site. It is also necessary to have regard to the particular development proposed in order to determine whether a proposal would make a location sustainable.

A key locational requirement for employment development is being well-located to the SRN to provide trip reliability and optionality for logistics operators.

With regard to Site 325, MPL is strategically positioned within the Midlands "Golden Triangle" of logistics, offering excellent connectivity to major motorways such as the M1, M6 and M69. This prime location enables access to approximately 85% of the UK population within a four-hour truck drive-time.

The site is also well located to existing settlements at Lutterworth, Rugby, Coventry and Hinckley. Distances and drive times (from the AA Route Planner website) to the nearest urban edges of these cities/towns are as follows:

City / Town	Miles	Minutes Driving
Lutterworth	2.3	7
Rugby	5.6	12
Coventry	14.9	22
Hinckley	7.4	12

Table 3: Distance from major settlements

The Council's contention that locating further employment development at Magna Park would result in 'long-distance commuting' is not substantiated, and based on the distances above, we dispute this claim. It is also clear from the above that MPL is well-located in relation to a number of different urban centres.

In contrary to RBC's position, we consider that MPL and a western expansion would represent a highly sustainable location for employment development in line with the NPPF.

It is firstly relevant to note that the existing MPL seeks to maximise opportunities for sustainable travel. Existing staff working at MPL are encouraged to travel to work sustainably with occupiers implementing Travel Plans to promote sustainable transport modes.

The existing MPL is well connected to Lutterworth, with a shared footway/cycleway provided on the northern side of the A4303 Coventry Road providing good quality and well-lit walking and cycling infrastructure to Lutterworth.

The majority of staff employed at business within the existing MPL site work shift patterns. GLP have formed partnerships with local public transport operators to provide sustainable, efficient and cost-effective travel options to MPL. This includes regular bus services from across the local area, operated by Arriva, as follows:

- X45 – Lutterworth & Leicester
- X84 – Rugby, Lutterworth & Leicester
- 8 – Lutterworth & Hinckley

There is also a pay on demand service to MPL from rural areas of South Leicestershire in place (Fox Connect). In addition, some agency colleagues travel to site by minibus from Leicester City Centre and some occupiers engage coach firms to transport workers during peak periods.

A car sharing scheme is in place at MPL. GLP has also partnered with LiftShare to offer a free LiftShare scheme to all park employees, supporting key workers to access the park with ease, save on commuting costs and travel more sustainably. With over 580 members, it is estimated that MPL has removed 335,525 miles off the local roads, reduced 73 tonnes of CO2 emissions and saved its key workers a total of £84,000 over 5 years. The Transport Note prepared by Apex includes evidence that this has removed vehicle trips from the network.

The existing MPL also includes electric vehicle charging infrastructure for staff and visitors. The most recently approved plots include electric cabling provision to cover c. 20% of the parking spaces.

Therefore, the existing MPL site is a sustainable location for employment development with a range of sustainable transport modes available and encouraged. The Transport Note prepared by Apex includes evidence that there has been a significant reduction in trip generation (per sqm) from MPL over time, which suggests that sustainable transport modes are being utilised and increasingly so as the park expands. There are significant benefits associated with co-location and locating additional floorspace adjacent to existing employment locations with established infrastructure which should carry substantial weight and which have not been appropriately considered by RBC.

Land to the west of MPL is a sustainable location for locating additional employment development as it would be able to take advantage of, and provide improvements to, the established infrastructure already in place to promote sustainable transport patterns and facilitate active travel.

Any future development to the west of the A5 as an extension to MPL would be able to provide additional footways and cycleways to connect into the existing infrastructure which serves MPL in order to facilitate walking and cycling routes to Lutterworth. It is notable that the approved Lutterworth SUE development will deliver

2,750 dwellings in Lutterworth over the next 10-15 years, and these would be located within a reasonable cycling distance of the site.

Staff would also be able to utilise the bus services that currently serve MPL in order to promote active travel options for employees. Further opportunities to enhance the services could be explored as part of the proposed expansion.

Additionally, the existing car sharing scheme at MPL could be extended to new development to the west of the A5. This will also enable an increase in LiftShare matches as part of the scheme and increase the viability of the scheme and the usage, both for the existing MPL and its proposed extension.

Moreover, development of the site in Rugby could also encourage measures to facilitate the use of ultra low and zero carbon emission vehicles, including a minimum of 20% electric vehicle charging points to be included.

An expansion to MPL into Rugby is therefore inherently sustainable and fully aligns with Paragraphs 110 and 115 of the NPPF by offering genuine choice of transport modes and maximising sustainable transport solutions to promote active travel.

Indeed, HDC has considered this a sustainable location for employment development, with the HDC Proposed Submission Plan allocating an additional 340,000 sqm of employment floorspace in two locations adjacent to MPL.

Moreover, the Strategic B8 Needs Sensitivity Report (December 2024), which Iceni prepared to support the HDC Local Plan, identifies the two locations for employment growth at MPL with 'green' ratings, with the assessment noting that the sites are attractive locations within/adjacent to an established logistics park, with strong access to the A5 and within close proximity to the M1 and in light of the sites also benefitting from the established public transport network servicing the MPL site.

Further evidence regarding the sustainability of the site is set out in the Transport Note prepared by Apex Transport Planning which accompanies these representations (Appendix 4). This considers the opportunities for sustainable transport and sets out a vision-led approach for increasing sustainable transport movements and constraining vehicle movements to and from the site, whilst also reducing background movements across the existing MPL through a joined up sustainable travel strategy and consolidation of operational vehicle movements. The Note demonstrates that the site is ideally located for accommodating employment uses and minimising key

vehicle movements, as well as for facilitating the delivery of key strategic infrastructure improvements which would offer further benefits on the network.

In addition, the Regulation 18 representations were accompanied by a Labour Study prepared by CPRE. This demonstrated that MPL has good labour availability and attracts workers from a number of locations, rather than having to rely on workers from only one catchment. The Labour Study also set out that planned housing growth within the MPL catchment could provide an additional c. 17,000 workers over the next 20 years. This Labour Study is included as an Enclosure to the Transport Note in Appendix 4.

Another significant benefit of MPL is the proximity to the open-rail terminal at DIRFT which is c. 7m south on the A5. A number of businesses at MPL utilise the rail terminal, including ASDA and Britvic. Both MPL businesses transfer goods to the DIRFT rail head for onward transfer via rail to locations such as Mossend and Grangemouth in Scotland. This reduces road freight mileage and accords closely with draft NPPF Policy E3. The proposed expansion into Rugby would also benefit from close proximity to the rail terminal. This is a unique proposition and unlike other potential sites in Rugby, particularly those located on the eastern edge of Coventry, which are not located near rail terminals.

The site is therefore a sustainable location for employment development in relation to NPPF Paragraphs 110 and 115.

The Transport Note prepared by Apex also considers the connectivity of the site in comparison to the other sites favoured for allocation by RBC. The analysis provided clearly demonstrates that the land west of MPL and the RBC preferred sites have, as a worst case, broadly similar characteristics in terms of existing active travel infrastructure and distances to public transport services. Notwithstanding this, and as set out above, a key additional benefit of the land west of MPL is the ability for development in this location to utilise, and build-upon, the existing infrastructure provision at MPL.

<u>Highways</u>

To support the Regulation 19 Consultation, a Strategic Transport Assessment (STA) has been prepared by SLR. This is made up of three principal documents:

- Traffic Modelling Analysis and Overview, SLR, 28 October 2025.
- Non-Technical Summary Report to above, SLR, 11 December 2025.
- Addendum Report, 3 December 2025.

With specific reference to MPL, the STA sets out that there is likely to be highway capacity issues associated with delivering this site which would be difficult to mitigate against. The STA also references a significant amount of trips to/from the site predicted through the A426/A5 Gibbet Hill Roundabout and given the capacity constraints that already exist at this junction, considers it is likely that the volume of additional traffic would cause a severe impact on the SRN in this area.

These representations are accompanied by an additional Transport Planning Note prepared by DTA (Appendix 5). This sets out a number of fundamental concerns with the STA, primarily that it provides no evidence that site 325 should be discounted on traffic related grounds because it has not robustly been tested.

Our critique of the STA is summarised below.

Firstly, the site has not been properly modelled. The site is listed in Table 2 to the main STA report as "Local Plan Development Site" (page 17). It is also referenced on the keys to Figures 5 to 8 (pages 18 and 19) under a separate heading – Walsgrave and opposite Magna Park. However, the next reference is the site being included as an 'Excluded Site' on pages 126 and 127. The site was not included as an omission site – these were Walsgrave Hill and North of Houlton.

Paragraph 11.3 states that the suitability of the site, along with the two Thurlaston sites, is considered in a separate exercise presented within Appendix E. This exercise is actually presented in Appendix C, which forms a note dated 3 December 2025. It is to be noted that the main report, which includes this appendix, predates this (dated 28 October 2025).

The introduction to Appendix C confirms that these three sites have not been tested in detail within the core STA due to "*their uncertain nature*". Instead, paragraph 1.3 acknowledges that the note presents "*high level analysis of suitability (or lack of) for delivering these three sites as part of the Local Plan".*

The high-level assessment of the site that follows is set out in pages 2 to 13 of Appendix C. This includes employment of the standard Warwickshire County Council

trip rates and a conclusion that the site will generate "*significant additional traffic to an already congested part of the highway network*" (paragraph 4.5).

The trip rates used in the STA are unrealistically high, and the Transport Note prepared by Apex to accompany these representations includes the detailed trip rate assessment presented at Regulation 18 stage which was carried out for the proposed site based on observed patterns of movement from the existing (and adjacent) MPL . The clear overestimation of traffic generation from the site adopted by RBC undermines the validity of the STA. A revised assessment using properly derived trip rates is therefore essential.

Reference is then drawn to the A426/A5 Gibbet Hill roundabout. Paragraph 4.6 of Appendix C refers to the existing constraints at this junction. Paragraph 4.9 argues further that "*the site will require a solution to the issues observed at the Gibbet Hill junction to be identified and delivered to provide confidence the development impacts could be managed*".

The STA acknowledges that the Gibbet Hill junction is an existing constraint on the network. In a number of places, the STA concludes that its improvement is a requirement for the overall plan to be delivered. However, it seems that this issue has not been properly addressed as its initial assessment caused instability to the traffic model.

The model was then subsequently amended to assume that this junction was unconstrained to allow the wider model to function. However, it has materially affected the spatial strategy, which has sought to limit the scale of development in this broad location.

The STA has not provided any commentary on what mitigation is required to improve this junction, or any reference to the current funding in place.

Following the grant of planning permission for expansion of Magna Park and the sustainable urban extension – South of Lutterworth – improvements were proposed at the Gibbet Hill roundabout by both developments. However, Warwickshire County Council and National Highways subsequently agreed financial contributions from developers towards a more comprehensive scheme. This scheme also included funding from developments north of Rugby.

Warwickshire County Council has confirmed that payments totalling £3,133,081.61 have already been made towards the Gibbet Lane works, pursuant to 8 separate planning S106 agreements. All of this is held and not committed, except for £227,506.20 which was paid to National Highways under the s106 dated 20 January 2022 pursuant to application ref. R/20/0336 in relation to Land Off Long Hassocks agreement. A further £1,015,480.55 has been agreed to be paid pursuant to 6 other s106 agreements.

Additionally, Leicestershire County Council has confirmed that it is not holding funds towards the Gibbet Hill improvement scheme, although a maximum contribution of £1,214,490.24 has been secured pursuant to planning permission ref. 19/00250/OUT at Land East of Lutterworth, Gilmorton Road for highway improvement works at the Gibbet Hill roundabout either to be delivered in isolation or as part of a further scheme for the improvement of the Junction.

This demonstrates that payments totalling £5.3m have been secured across a number of consents towards an improvement scheme at Gibbet Hill, further detail of which can be provided ahead of the Examination.

In addition, there is a signalisation scheme required to be funded by Prologis in respect of its development of DIRFT III. It is understood that this scheme of improvement is no longer considered to be feasible and it is our expectation that National Highways will seek a financial contribution in lieu of this scheme being delivered. This will increase the pool of collected monies to greater than £5.3 million.

Further future contributions can be expected to be forthcoming from other sources:

- Any planning permission covering the c. 370,000 sqm promoted by GLP at Magna Park (and mostly allocated by the Reg 19 draft Harborough Local Plan).
- Any planning permission covering the site promoted by the Parties.
- Any planning permission covering the draft allocation of Coton Park East.

With regards to the latter two, it is relevant that RBC adopted a CIL charging schedule on 1 April 2024. This includes a £5/sqm CIL rate for employment floorspace (comprising industrial, light industrial and storage and distribution uses).

The masterplan for the land west of MPL proposes 581,175 sqm of employment floorspace.

Further, the Regulation 19 Plan proposes a draft allocation for Coton Park East to deliver 115,000 sqm of employment floorspace.

Added together, these sum close to 700,000 sqm and could generate approximately £3.5 million in CIL receipts. The latest Annual Infrastructure Funding Statement confirms that improvements to the Strategic Highways Network are a priority.

An improvement to the A426/A45 Gibbet Hill junction is identified in the RBC Infrastructure Delivery Statement (December 2025). This considers that the Plan is dependent on this being delivered (required by 2032), but that s106 funding from sites proposed for allocation in the Local Plan is unlikely to be sufficient given the relatively small increases in traffic flows and location of these sites.

Allocating land west of MPL for employment development could provide further contributions towards an improvement scheme at Gibbet Hill (through s106 and/or CIL monies) over and above what has already been secured, and thus assisting in unlocking further growth across the District.

Alongside this, National Highways (NH) is progressing a wider strategic improvement scheme for Gibbet Hill. NH commenced Stage 1 (Options Identification) in May 2024. As part of this process, junction improvement options were identified. These options have undergone a comprehensive assessment and appraisal including cost estimates; environmental assessment report; economic appraisal; outline business case and value for money assessment. The A5 Gibbet Hill improvement scheme is in the NH pipeline programme which has now progressed to Stage 2.

As such, there is a reasonable prospect of a scheme for Gibbet Hill coming forward within the plan period. There is a realistic likelihood that an improvement scheme will be included in the RIS3 programme due to be announced imminently. Alternatively, a developer funded improvement scheme is capable of being delivered in any event.

We have significant concerns with the approach taken in the STA given that neither the committed schemes, nor the strategic intervention have been modelled in any of the Local Plan tests. Accordingly, there is no assessment of site 325 and the impact this would have on Gibbet Hill. Therefore, as currently prepared, the STA includes no evidence that site 325 can be discounted on traffic related grounds.

Thus, based on the evidence prepared to support the Local Plan, it is unknown at this stage whether site 325 can be accommodated or not. This is a crucial issue ahead of examination and a key point for an Inspector to consider ahead of concluding whether any Green Belt release to accommodate employment land is necessary.

Given the time constraints associated with the Regulation 19 consultation, these representations are not submitted with a modelling exercise at this stage. However, this is being progressed and will be provided ahead of the Hearing Sessions so that an Inspector can fully consider these matters.

The forthcoming modelling work will involve a run of the WCC strategic model to review traffic assignment and then assessment of the junction itself using the NH's microsimulation model of the junction, which has been prepared to support NH's own strategic intervention assessments.

At this time, it is therefore not possible to conclude that the site can be discounted on traffic related grounds because this has not been sufficiently modelled. The Plan is therefore unsound as it is not based on a robust evidence base and discounting the allocation of site 325 on highway capacity grounds is unfounded.

<u>Type of Employment Development</u>

In relation to discounting an allocation at MPL, the Green Belt Exceptional Circumstances Topic Paper & SA state the following:

- *"The WMSESS emphasises the importance to manufacturers of access to larger urban labour pools from which Magna Park is distant.*
- *Magna Park lacks proximity to Coventry and Warwickshire universities…*
- *As the park at present is a logistics location, there are not the opportunities for clustering and synergies that exist on the edge of Coventry given the presence of existing important manufacturers and research institutes there…"*

In the first instance, and as set out in our response to Strategic Policy S3, the WMSESS identifies a need for 70% of employment land to be allocated to meet B8

logistic need. Walsgrave Hill has been identified as meeting this need for B8, but the stated reasons for its selection for allocation refer to its attraction to B2/R&D occupiers.

In contrast, MPL has been discounted as it is seen as less favourable to accommodate advanced manufacturing and R&D although it is acknowledged to be an established "logistics location" in several parts of the Plan's evidence base.

Clearly, MPL is an established logistics location. It is strategically positioned within the Midlands "Golden Triangle" of logistics, offering excellent connectivity to the SRN and access to approximately 85% of the UK population within a four-hour truck drive-time.

The existing MPL development has largely provided B8 logistics floorspace to date, mainly because the existing development in Harborough is safeguarded for strategic storage and distribution (Class B8) uses only, with units to be in excess of 9,000 sqm as per Policy BE2 of the adopted HDC Local Plan.

This is also true of the two proposed allocations in the emerging HDC Local Plan (ref MP1 and MP2), both of which are designated for Class B8 uses.

Notwithstanding this, it is clear that there is also demand in this location for a more diverse range of employment uses beyond those falling neatly within a logistics and distribution B8 use.

GLP have received enquiries for manufacturing uses for the existing MPL but these are unable to be accommodated, including a recent enquiry from a bakery business looking to open a new factory. In addition, whilst the site has not been actively marketed, NDL have received interest from two manufacturers regarding the land west of MPL for 1 million and 2 million sqft of employment floorspace respectively.

MPL is already home to over 30 businesses, including a range of blue-chip businesses including Toyota, BT, ASDA (Walmart), Amazon, DHL and Britvic. One of the most recent customers at the Park is Centrica who occupy MPS6 and MPS7. Centrica, who employs 7,500 engineers and serves more than nine million homes across the UK, gained permission for the dual use of MPS6 as a storage and distribution facility and a Centre of Excellence for British Gas. The Centre of Excellence will comprise a combination of training, research and supporting office functions, and will bring together training activity with research and development of Net Zero products and

services. This will help future-proof training by including solar, battery and hydrogen technologies across the full lifecycle of activities and provide opportunities for collaboration between training, scientists and entrepreneurs. The selection of MPS6 is an important development for Centrica given its aspirations to double the current number of Hive customers to 2.5 million, its commitment to Net Zero carbon, and to upskill and train 3,000 apprentices in green jobs.

This demonstrates that MPL is an attractive location for a range of occupiers, many of which provide a diverse range of ancillary functions to complement the primary B8 operations.

RBC would therefore not need to take the same approach to allocating land west of the A5 for solely B8 strategic distribution uses and could provide more flexibility for different types of employment uses to be accommodated in this location subject to market demand.

An expansion to the west of the A5 provides an opportunity to be able to accommodate both B2 and B8 occupiers in a mix of units. Given the size of the site, there is also an opportunity to provide smaller / incubator units to support SMEs, alongside larger units catering for manufacturing and logistics demand in this location.

It is also highly relevant the speed at which MPL North and South extensions were built and occupied, demonstrating an immediate demand for employment floorspace in this location. Also, despite the age of some of the older units at MPL, occupancy levels remain extremely high with only 4 unoccupied units (out of 50 units total) across the entire site (including the north and south extensions) as of Q1 2026. This demonstrates that MPL is a highly attractive location for a range of employment occupiers.

Additionally, MPL continues to provide essential skills training and financial support to the local community through a number of initiatives, including:

- Establishing the Lutterworth Area Community Projects Limited as a means to administer and manage the distribution of financial contributions. As of October 2025, the fund has donated over £1.4m to over 100 local organisations and charities.

- Creation of the Centre for Logistics Education and Research (CLEAR) which is a prime example of the social value that MPL provides. The partnership between GLP, North Warwickshire and South Leicestershire College (NWSCL) and GOX (formerly Wincanton) offers skills training and professional development at all levels across the spectrum of logistics and supply chain roles as well as applied research and associated facilities for up to 1,000 students. CLEAR continues to provide established educational links to Warwickshire. Furthermore, NWSLC are partners with Coventry, Leicester and Loughborough Universities. The opportunity exists for further university engagement and partnering at MPL through existing linkages.

- MPL is home to Creating Tomorrow College which is a Specialist Post-16 Institution for 16–25-year-old adults with SEND, with a mission to address the employment deficit for adults with learning needs. Creating Tomorrow College has a clear 5-year development strategy for growth in both cohort resources and curriculum offers, and is located in the Iron Mountain Building at MPL adjacent to the CLEAR campus.

- Planning permission has been granted for a truck parking / services facility within the MPL development. The 9-acre site currently under construction will provide overnight truck parking, amenity building and HGV EV charging stations. Works to provide the services has commenced on site and an operator has been identified, anticipating delivery of the facility in 2026 which will be open to customers on the park as well as the public.

- Planning permission has also been granted for an Innovation Centre at MPL which will provide a space to host innovation events for the customers on the park and wider logistics industry. The focus of these innovation events will be on sustainability and construction within the logistics sector. The Innovation Centre which is currently under construction will be launched in Summer 2026.

A western expansion would be able to build upon these already established community initiatives and further extend the benefit to community groups within Rugby.

As such, we strongly dispute the contention that MPL would not be a suitable location to meet the identified employment needs within Rugby and the wider sub-region.

A western expansion to MPL would provide an opportunity to further diversify the uses in this well-established employment location, with future occupiers able to build synergies with the blue-chip businesses already in occupation at the Park. Future development could also build upon the already established community initiatives and would provide significant benefits to the wider District.

Green Belt Release & Demonstrating Exceptional Circumstances

The failure of RBC to consider the site as a reasonable alternative to meet employment need raises fundamental soundness issues with the Plan. As demonstrated, the site is an available site located solely outside the Green Belt, but has been discounted by RBC in favour of the approach in the Regulation 19 Plan which proposes the allocation of 3 employment sites (out of 5 proposed allocations in total) within the Green Belt. This approach has not been fully evidenced or justified, and is contrary to national planning policy.

Paragraph 145 of the NPPF states:

> *"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans."* [emphasis added].

Paragraph 146 then reads:

> *"Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means."* [emphasis added].

Further, Paragraph 147 of the NPPF sets out 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"* [emphasis added].

The NPPF is clear that the starting point for the release of Green Belt site in the Plan is predicated on there being "exceptional circumstances" which need to be fully evidenced and justified. There is a need for all other reasonable options to be fully examined before the Council can conclude that exceptional circumstances exist.

In this case, it is clear that the Council has failed to fully examine all other reasonable options for meeting its identified need for development, given that land west of MPL has been discounted as a reasonable option. This is despite the site being wholly located outside the Green Belt and available for employment development.

As per the preceding section, the reasons for RBC discounting site 325 as a reasonable alternative are flawed for the following reasons:

- The site is a sustainable location for locating additional employment development in accordance with Paragraphs 110 and 115 of the NPPF as development in this location would be able to take advantage of, and provide improvements to, the established infrastructure servicing MPL in order to promote sustainable transport patterns and facilitate active travel.

- There is no credible evidence presented to support the site being discounted on highway capacity issues. As set out in the Transport Note at Appendix 5 of the representations, we have significant concerns with the approach taken in the Council's STA, particularly given that this does not assess site 325 and the impact this would have on the Gibbet Hill roundabout. Therefore, as currently prepared, the STA includes no evidence that site 325 can be discounted on traffic related grounds.

- The overall approach to the allocation of employment land is confused as sites on the edge of Coventry have been allocated to specifically fulfil the need arising in Opportunity Area 7 for large B8 sites over 50+ hectares, yet the justification presented focuses on how this location

will support the delivery of B2 and R&D uses. In taking this approach, other sites acknowledged to be "established logistics locations" such as Magna Park have been discounted and not fully assessed.

- There are significant benefits associated with the clustering of employment floorspace which have been ignored. A western expansion to MPL would provide an opportunity to further diversify the uses in this well-established employment location, with future occupiers able to build synergies with the blue-chip businesses already in occupation at the Park. Future development could also build upon the already established community initiatives and would provide significant benefits to the wider District.

It has also not acknowledged in the Green Belt Exceptional Circumstances Topic Paper that site 325 is largely unconstrained in ecology, heritage and landscape terms. The Stage 2 Site Assessment concludes the following in relation to site 325:

- Ecology - An initial ecological assessment indicated that the site was not within an Impact Risk Zone of a Site of Special Scientific Interest, nor a Local Wildlife Site, and nor was it comprised of more than 20% medium to high distinctiveness habitat. The site was not further assessed for ecological constraints.

- The overall landscape sensitivity of the site is Medium/Low. The site comprises arable and pastoral fields located within a broadly rural landscape to the west and warehousing development and transport infrastructure to the east. There are no known cultural heritage or historic features within the site and views from and into the surrounding RPGs are unlikely to be affected by the development. The site is of recreational value due to the location of PRoWs within and surrounding the site. Views into the site are filtered from the surrounding transport infrastructure. The A5 and B4027 and surrounding warehousing development detracts from the tranquillity and visual value of the site.

- There were no designated heritage assets identified within 50 metres of the site.

In relation to landscape impacts, it is also relevant that the draft Policies Map identifies the site as an Area Suitable for Wind Turbine Development. As per draft Policy CL2, wind turbines in such circumstances are defined as being greater than 40m in height.

Therefore, it is clear that the site is largely unconstrained for employment development. This is in contrast to a number of the proposed employment allocations. Notably, Walsgrave Hill has significant heritage and ecology constraints, with the Stage 2 Site Options Assessment concluding the following:

> *"Given the location of Coombe Pool SSSI, ancient woodland at Hill Park Wood LWS, and Combe Abbey LWS immediately adjacent to the site, there are significant constraints to development at this site and other alternative sites for development should be considered in the first instance"* [emphasis added].

It is also notable that the Walsgrave Hill site has been reviewed in Green Belt terms, with the Council concluding that only a small part of the site would constitute grey belt. As per the masterplan prepared by the site promoter, this area of 'grey belt' is indicated for a country park, with the built development being located on the Green Belt land. Development would therefore cause significant harm to the purposes of the Green Belt in this location.

Notwithstanding, in line with Paragraph 147, the requirement is to fully review all reasonable options outside Green Belt before considering if there are exceptional circumstances to alter Green Belt boundaries (taking into account grey belt or otherwise). This approach has not been taken.

Given that site 325 has been discounted, despite it being solely outside Green Belt and an available, suitable and achievable site which can deliver employment floorspace to meet the identified need within the Plan period, the Plan does not accord with NPPF Paragraph 147 as it has not fully examined all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries.

Moreover, the NPPF requires the Council to establish exceptional circumstances which are fully evidence and justified to support Green Belt release. The evidence base is flawed in this regard, and the proposed release of Green Belt site is not justified.

As above, site 325 has been discounted as a reasonable alternative despite it being a largely unconstrained and available site within the Green Belt. The Council explicitly acknowledge that, given the size of the land promoted at MPL means that this could, if allocated, remove the need for Green Belt employment allocations (paragraph 2.84 of the Green Belt Exceptional Circumstances Topic Paper).

Secondly, the evidence to support the Council's conclusions on transport considerations is flawed. A critique of the STA is included in DTA's Transport Note (included in Appendix 5), with the relevant extract included below:

> *2.12 In this case a process was deployed that was the opposite to that required by the guidance was undertaken by the Council:-*
>
> - *Rugby identified the need for employment. As set out in the Technical Statement on Employment Land Needs, the approach they took to considering sites was wrong because whilst they identify a need for B8 development, they chose to allocate sites (in the Green Belt) on a locational basis on the assumption they would be more attractive to B1/ B2 uses.*
> - *Those chosen sites for proposed allocations when then assessed through Strategic Transport Assessment. They then used that process (but not on a like for like basis) to seek to discount three sites (of which Land at Magna Park is one).*
> - *In other words, Rugby have chosen the location for development and then are seeking to set the evidence base around that pre-determined strategy.*
>
> *2.13 This process is wrong and runs contrary to the purpose of the process which is to allow proper consideration of alternatives to be assessed, by overall economic performance, against the benefits and dis-benefits of each potential employment option.*
>
> *2.14 This flaw cannot be rectified by subsequent transport appraisal work and can only be rectified by a fundamental review of the strategic and spatial employment allocation options within the District.*

Thirdly, the overall approach to the allocation of employment land is flawed as sites on the edge of Coventry have been allocated to specifically fulfil the need arising in

Opportunity Area 7 for large B8 sites over 50+ hectares, yet the justification presented focuses on how this location will support the delivery of B2 and R&D uses. In taking this approach, other sites acknowledged to be "established logistics locations" such as Magna Park have been discounted and not fully assessed.

The Council's rationale for the release of Green Belt land to meet employment need is therefore not fully evidenced or justified, given the significant flaws within the Local Plan evidence base as identified above. This is contrary to the requirements of the NPPF.

The Plan is therefore not sound as the Council cannot demonstrate exceptional circumstances to alter the Green Belt boundaries which are fully evidence and justified. The Plan does not comprise an appropriate strategy which takes into account the reasonable alternatives, nor is it consistent with national planning policy.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Plan sound, the employment strategy set out in S7 should be amended in terms of the quantum of employment land being planned for and the approach to the employment allocations. Land west of Magna Park Lutterworth should be allocated for strategic employment development.

(Continue on a separate sheet /expand box if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To further explain the amendments needed to the plan to make it legally compliant, sound and compliant with the Duty to Cooperate, in light of the supporting evidence submitted.

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:
https://www.rugby.gov.uk/w/privacy#development-strategy
The Planning Inspectorate's privacy notice can be accessed here:
https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices

Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	**Ref:** **(For official use only)**

Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026 By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in the subject line, OR by post to**: Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
	**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*	
Title		Ms
First Name		Lauren
Last Name		Whiteley
Job Title (where relevant)		Associate
Organisation (where relevant)	GLP Europe, Nurton Developments Limited and Mr F. B. Dewes and Mr I. Dewes	Barker Planning Town Planning Ltd
Address Line 1		[redacted]
Line 2		[redacted]
Line 3		[redacted]
Line 4		
Post Code		[redacted]
Telephone Number		[redacted]

E-mail Address (where relevant)		[redacted]

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy		Policies Map	
Site ID	325				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	x
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	x

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to our accompanying submission for further information.

Site 325 comprises four separate parcels of land, identified in the Council's Stage 2 Site Assessment Report (updated December 2025) as follows:

- Site 106: Land opposite MP Lutterworth
- Site 57: North of Coal Pit Lane
- Site 36: Cross-in-Hand Farm, Willey
- Site 35: Cross in Hand Farm, Monks Kirby

The landholdings are also included as a single combined site in the Council's Stage 2 Site Assessment Report as 'Strategic Site 325: Land adjacent Magna Park'. This provides an evaluation of the site against a number of topic areas: Transport, Ecology, Landscape, Heritage, 'Other Constraints' and Opportunities/Benefits.

In relation to Strategic Site 325, the Stage 2 Site Assessment sets out the following:

- Transport – The surrounding road network is relatively uncongested , with a congestion rating of 5, with 1 being the most congested and 6 being less congested. It makes reference to the STA and its conclusions on capacity constraints at the A426/Gibbet Hill roundabout. The PTAL level is 1a and that the overall accessibility of the site is ranked 90 of the 125 sites considered as part of Rugby's current site assessment.

- Ecology - An initial ecological assessment indicated that the site was not within an Impact Risk Zone of a Site of Special Scientific Interest, nor a Local Wildlife Site, and nor was it comprised of more than 20% medium to high distinctiveness habitat. The site was not further assessed for ecological constraints.

- Landscape – The overall landscape sensitivity of the site is Medium/Low. The site comprises arable and pastoral fields located within a broadly rural landscape to the west and warehousing development and transport infrastructure to the east. There are no known cultural heritage or historic features within the site and views from and into the surrounding RPGs are unlikely to be affected by the development. The site is of recreational value due to the location of PRoWs within and surrounding the site. Views into the site are filtered from the surrounding transport infrastructure. The A5 and B4027 and surrounding warehousing development detracts from the tranquillity and visual value of the site.

- Heritage – There were no designated heritage assets identified within 50 metres of the site.

- Other constraints – Reference to less than 2% of the site being within Green Belt, but acknowledgement of representations made at regulation 18 stage regarding the promotion of the land wholly outside Green Belt.

- Opportunities / benefits – Employment (B2, B8 and E). Potential to deliver significant green infrastructure/country park.

Notwithstanding the above, the Site Assessment states that the site is not to be progressed. This is despite the Assessment explicitly acknowledging that neither heritage nor ecology constraints have been identified, landscape sensitivity is medium/low, the site is wholly outside Green Belt and the surrounding road network is relatively uncongested.

The reasons for ruling the site are due to the access by the site by non-car modes being poor, that the site is not proximate to its future workforce and that transport modelling has indicated that the site could cause highway capacity issues which would be difficult to mitigate.

The site assessment then refers to the Green Belt Exceptional Circumstances Topic Paper and the commentary within it which is described as 'other factors which were important in the decision not to progress this site'. Specifically, these are:

(1) *"The opportunities for diversification of employment land are lower here given that it is a distribution-focussed location in comparison to the edge of Coventry which has existing universities, research institutes and clusters of manufacturing and R&D uses.*

(2) *Given the existing high quantity of, largely B8, employment floorspace on this stretch of the A5 at Magna Park, with proposals for further expansion in Harborough District, locating a further large employment site here is likely to drive long-distance commuting."*

A response to each of these points is provided in more detail in our comprehensive response to the Strategic Policies. For completeness, these are summarised below.

Firstly, the site is a sustainable location for locating additional employment development in accordance with Paragraphs 110 and 115 of the NPPF as development in this location would be able to take advantage of, and provide improvements to, the established infrastructure servicing MPL in order to promote sustainable transport patterns and facilitate active travel.

Secondly, there is no evidence to support RBC's discounting the site on highway capacity issues as this has not been sufficiently modelled.

Thirdly, a western expansion to MPL would provide an opportunity to further diversify the uses in this well-established employment location, with future occupiers able to build synergies with the blue-chip businesses already in

occupation at the Park. Future development could also build upon the already established community initiatives and would provide significant benefits to the wider District.

As such, we do not agree with the reasons that Site 325 has been discounted from further assessment.

We also do not consider that as part of the assessment, sufficient weight is given to the site being largely unconstrained in ecology, heritage, landscape and local highways terms, its location wholly outside Green Belt, or the significant benefits of the development.

The proposals to extend MPL to the west of the A5 provide an opportunity to deliver employment floorspace to meet an identified need in Rugby and the wider sub-region in a largely unconstrained location outside the Green Belt.

Providing employment floorspace in this location would deliver a number of significant benefits, particularly due to the relationship of the site to the existing MPL and the opportunity this offers in terms of building on the established principles underpinning the existing distribution park. A western extension will be able to build on MPL's proven success, leveraging the existing infrastructure and strong transport links.

An expansion at MPL would allow for a high proportion of future employment needs to be concentrated in a single, sustainable location that has a proven track record of successful delivery over the past 30 years. It is important to note the speed at which the Magna Park North and South extensions were built and occupied, demonstrating an immediate demand for employment floorspace in this location. Also, despite the age of some of the older units at MPL, occupancy levels remain extremely high with only 4 units unoccupied (out of 50 units total) across the entire site (including north and south extensions) as of Q1 2025.

Whilst the existing MPL development in Harborough is safeguarded for strategic storage and distribution (Class B8) uses only, with units to be in excess of 9,000sqm as per Policy BE2 of the adopted HDC Local Plan, an expansion to MPL to the west of the A5 provides an opportunity to be able to accommodate both B2 and B8 occupiers in a mix of units. Given the size of the site, there is also an opportunity to provide smaller / incubator units to support SMEs, alongside larger units catering for manufacturing and logistics demand in this location.

The accompanying plans show how built development on the site could be positioned, with a 35% plot density equating to the delivery of just over 580,000 sqm of employment floorspace. The proposals would be landscape-led to provide habitat enhancements to deliver significant biodiversity and amenity enhancements. This includes the potential for a country park to be delivered comprising community parkland and habitat creation along the western boundary of the site, for use both by the site employees and local community. Opportunities to link this with the existing 200 acre country park at MPN are being explored.

Business operating from a proposed expansion to the west of MPL would also benefit from the site's unique position as a satellite location to DIRFT, with businesses able to capitalise on using the existing open rail terminal.

There are successful HGV routeing arrangements in place for MPL and this would be carried through to the new development, ensuring that restrictions on HGVs accessing nearby villages would continue.

As detailed above, MPL already benefits from a number of bus services, linking the site to Rugby, Leicester, Harborough and Hinckley, which the proposed extension would be able to utilise and also explore opportunities for network enhancement. The proposals could also benefit from other on-demand public transport services already established such as Fox Connect and Liftshare.

Through further masterplanning, opportunities for other on-site amenities can be explored, including the provision of additional lorry parking to complement the provision of a service facility at MPL which is currently being built.

Further opportunities for training and education could also be explored, including links to the already established CLEAR Centre and other initiatives as part of the existing MPL.

There are a significant number of benefits associated with the proposed western extension of MPL, including:

<u>Ability to Respond to Specifically Identified Needs – Unit Sizes, Heights, Location etc.</u>

The site's location in the Golden Logistics Triangle is regarded as a strategic hub for distribution and logistic operations. Research indicates that this area provides access to 95% of the British population, making it an ideal location for same-day and next-day delivery services.

As identified, the site is largely unconstrained in ecology, heritage and landscape terms and therefore would be suitable to accommodate buildings of appropriate sizes and heights to meet the operational requirements of modern occupiers. Due to the size of the site, buildings of c. 1m sqft could be accommodated which is a unique offering of this site, and unlikely to be achieved at other sites promoted for employment development in RBC.

It is also relevant that the draft Policies Map identifies the site as an Area Suitable for Wind Turbine Development. As per draft Policy CL2, wind turbines in such circumstances are defined as being greater than 40m in height.

This suggests that the site is less sensitive in landscape terms and could therefore potentially accommodate taller buildings which are suitable to meet the needs of modern occupiers.

Job Creation

The proposed 166ha extension of MPL to the west of the A5 will create substantial job opportunities in the local area, both during the construction and operation phase.

During the construction phase, it is estimated that over 3,000 direct construction jobs could be supported per annum, across a wide range of trades and sub-sectors. It is anticipated that the Proposed Development will lead to opportunities for apprenticeships and training during the construction phase, alongside opportunities for existing local contractors. The GVA benefit of the direct construction phase could exceed £200m.

The proposals will also support a further indirect and induced additional jobs at the local and wider regional level during the construction phase, equivalent to around a further 1,800 jobs supported through the development process. Total national GVA benefits of the construction phase would be expected to exceed £500m.

Once operational, the proposals would support permanent employment opportunities in Rugby and the surrounding area.

During the operational phase, the proposals for around 580,000 sqm could generate in excess of 4,000 jobs, assuming employment densities in line with the existing MPL occupiers. This may vary seasonally. At the sub regional level, the benefits associated with both supply chains as well as the wage spend of workers will support further employment creation in the sub region being around 2,600 jobs.

The direct annual GVA benefits of the scheme are estimated to be around £260m, rising to over £400m taking into account regional multiplier benefits.

These employment opportunities are likely to be in a range of sectors depending on the final occupants of the floorspace but is likely to include roles in warehousing and distribution, manufacturing, wholesale, business administration, IT and professional services.

Research indicates notable increases in professional and associate professional / technical occupations in the logistics sector, reflecting increased levels of automation as well as the prevalence of collocating offices with warehousing. Logistics sector jobs postings in 2021 in the South East Midlands reported that 65% of requirements were for technical workers including project managers, sales managers, supply chain analysts and software developers / engineers.

<u>CIL Income</u>

Rugby Borough Council's CIL Charging Schedule came into effect from 1 April 2024. This includes a £5 per sqm rate for industrial, light industrial and storage and distribution uses (B2 / B8).

Based on a proposed floorspace of 580,000 sqm, the proposed extension could contribute £2,900,000 in CIL revenue for RBC.

RBC's latest Annual Infrastructure Funding Statement confirms that improvements to the Strategic Highways Network are a priority and as such, the development could provide a significant CIL receipt to be used towards SRN improvements – including at Gibbet Hill.

Business Rates

The 2020 annual business rates income for MPL was estimated at £24m, a proportion of which is retained locally. Applying this ratio to the future development proposals indicates future additional contributions of at least £16m, however this is expected to be substantially higher based on the new and higher quality floorspace.

The business rates income from MPL in 2023/2024 meant that Harborough District Council was able to freeze Council Tax for all residents in 2024/2025.

As such, substantial increases in business rates will benefit Rugby Borough Council and its residents by reducing the cost of public services leading to tax savings for residents.

Transport & Sustainability

A western extension to MPL would allow the new development to take advantage of established infrastructure already in place to promote sustainable transport patterns. Staff would be able to utilise the bus services that currently serve MPL as well as the potential for additional highways contributions to support sustainable modes of travel.

In addition, these representations are accompanied by a Transport Note prepared by Apex Transport Planning which considers the opportunities for sustainable transport and sets out a vision-led approach for increasing sustainable transport movements and constraining vehicle movements to and from the site, whilst also reducing background movements across the existing MPL through a joined up sustainable travel strategy and consolidation of operational vehicle movements. The Note demonstrates that the site is ideally located for accommodating employment uses and minimising key vehicle movements, as well as for facilitating the delivery of key strategic infrastructure improvements which would offer further benefits on the network.

Green Infrastructure & Biodiversity

The proposals would be landscape-led to provide habitat enhancements to deliver significant biodiversity and amenity enhancements. This includes the potential for a country park to be delivered comprising community parkland and habitat creation

along the western boundary of the site, for use both by the site employees and local community. Opportunities to link this with the existing 200 acre country park at MPN could also be explored.

Community Initiatives

The existing MPL supports the community and local voluntary organisations to deliver local projects within the geographical area surrounding MPL. The Lutterworth Area Community Fund has contributed over £1m to community projects in the local area. There is also an established Community Liaison Group for the purposes of providing information and updates on current development proposals and operations at MPL. Members include local parish councils and local interest groups, including representatives from communities located in RBC including Willey, Pailton, Monks Kirby and Stretton under Fosse.

A western expansion would be able to build upon these already established community initiatives and further extend the benefit to community groups within Rugby.

Therefore, as demonstrated, there are significant benefits associated with locating employment development to the west of MPL, including for this to be a highly sustainable development given the ability to leverage the existing infrastructure associated with MPL. The site is also deliverable given it is available for development, in a suitable location, and achievable within the plan period.

As such, the site is a reasonable option for locating employment land and, given its location outside the Green Belt, should be considered for allocation before considering whether exceptional circumstances exist to justify Green Belt release in line with NPPF Paragraph 147.

Further details on the proposals for site 325 and the overall benefits are included in the accompanying Vision Document.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Site 325 is a reasonable option for locating employment land and, given its location outside the Green Belt, should be considered for allocation before considering whether exceptional circumstances exist to justify Green Belt release in line with NPPF Paragraph 147.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To further explain the amendments needed to the plan to make it legally compliant, sound and compliant with the Duty to Cooperate, in light of the supporting evidence submitted.

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

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APPENDIX 4

Transport Note – Sustainable Travel (Apex)

Land West of Magna Park

Transport Note – Sustainable Travel

Client: **GLP, Nurton Developments and the Dewes Family**

12 March 2026

Document Reference: **C25078/TN02**

QUALITY MANAGEMENT

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NOTICE

This report has been prepared for GLP, Nurton Developments and the Dewes Family in accordance with the terms and conditions of appointment. Apex Transport Planning Ltd cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

The material presented in this report is confidential. This report has been prepared and is intended solely for GLP, Nurton Developments and the Dewes Family for use in relation to the Land West of Magna Park project.

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1. INTRODUCTION

1.1 Overview

1.1.1 This Transport Note (TN) has been produced in relation to the proposed employment allocations on land west of Magna Park Lutterworth (the 'site'), as part of Rugby Borough Council's (RBC) Proposed Submission Local Plan.

1.1.2 The TN considers the appropriateness of the approach taken by RBC in respect of the Transport Evidence base which has been submitted in support of their Proposed Submission Local Plan. This TN has specifically considered the connectivity of the site by sustainable modes in comparison to other candidate sites also set out in the Submission Local Plan.

1.1.3 The site is referred to in the RBC evidence base as Site 325 – Land Adjacent to Magna Park. It is estimated to be able to accommodate c. 580,000 sqm (c.6.2 million sq ft) of B2 / B8 employment use, although within the RBC Evidence base it has been assessed based on total floorspace of c. 583,175 sqm.

1.1.4 The TN demonstrates that the site is well located for accommodating employment uses and minimising vehicle movements. It also demonstrates that the site is well located for access by sustainable modes comparing favourably to other competing sites that have been promoted through the plan preparation and is therefore fully in accordance with the NPPF, specifically paragraphs 110 and 115.

1.1.5 The process followed by Rugby in considering the proposed allocations, in terms of their connectivity by sustainable modes, is not sufficiently robust and does not reflect the benefits that would be realised from a site being located adjacent to Magna Park - an existing and established industrial and logistics campus that already has a critical mass.

1.1.6 This TN demonstrates that the site has been disregarded as a draft allocation for inappropriate and unjustified reasons, in relation to sustainable transport, to support that decision. On that basis, the plan as currently drafted cannot be considered sound.

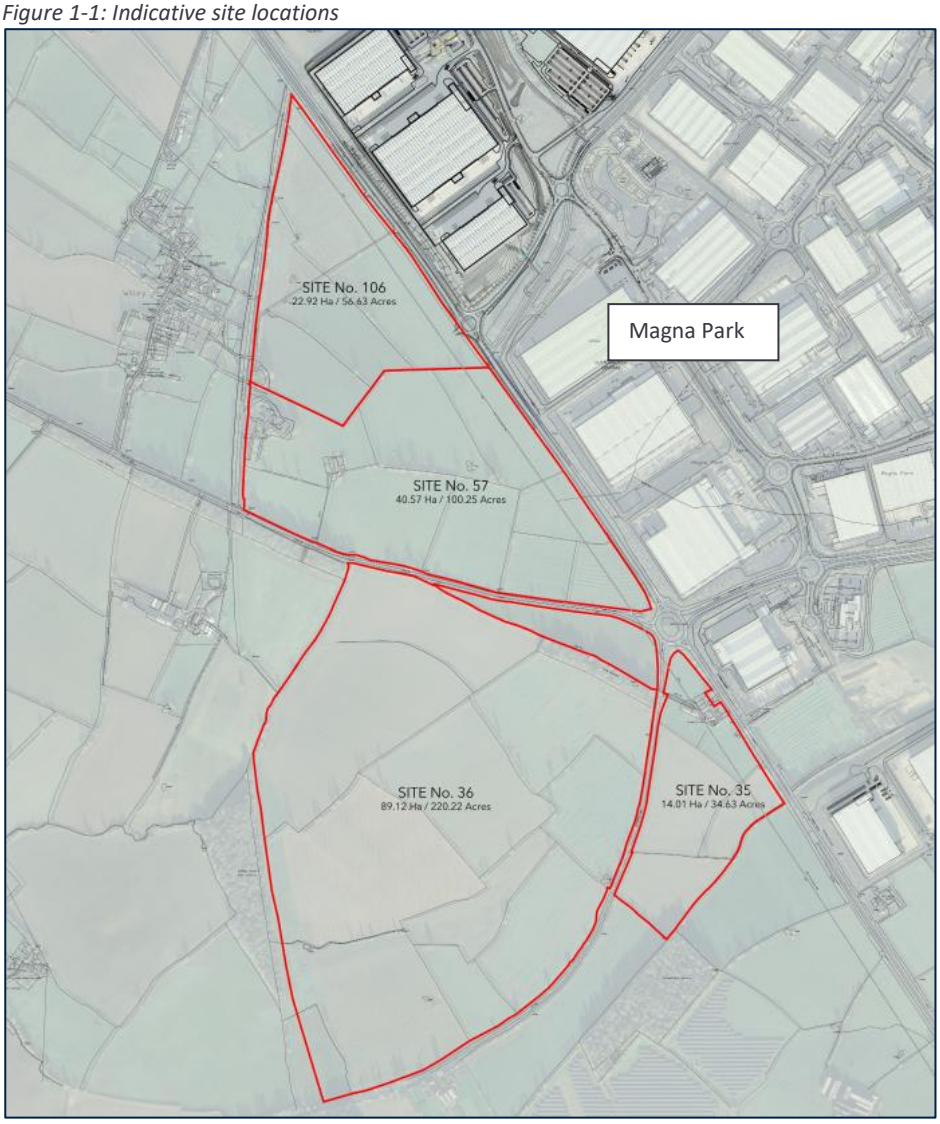
1.1.7 This report should be read alongside that prepared by DTA Transport which deals with highway capacity and transport modelling issues which demonstrates that the appropriate assessment processes have not been followed.

1.2 Site Location and Context

1.2.1 Magna Park is located within the 'Golden Triangle', a region that is pivotal to the UK's supply chain and distribution networks due to its central location and connectivity to the strategic road network (SRN). The Golden Triangle area is within a four-hour drive of 90% of the British population, and specifically in the context of Magna Park Lutterworth, has good access to the SRN including the M1 and M6 motorways, and the A5 trunk road, all of which provides for efficient transportation and logistics operations, minimising impacts on the local highway network.

1.2.2 The sites included within the red line boundary and which are considered in this note are identified as 'Site 106: Land opposite MP Lutterworth', 'Site 57: North of Coal Pit Lane', 'Site 36: Cross-in-Hand Farm, Willey' and 'Site 35: Cross in Hand Farm, Monks Kirby' within the draft Local Plan. These are shown indicatively in Figure 1-1. The four land parcels have been considered together for the purposes of this note.

Figure 1-1: Indicative site locations



1.2.3 The site also benefits from being just 10km to the north of the DIRFT III Strategic Rail Freight Interchange (SRFI), accessed directly from the A5. The facility forms part of the wider strategic logistics hub at Daventry International Rail Freight Terminal and provides a nationally significant rail connected freight facility. The terminal enables freight to be transported directly by rail between major ports and inland distribution centres, reducing reliance on long distance HGV movements on the highway network.

1.2.4 The proximity of the site to this facility represents a significant operational and sustainability advantage. It provides future occupiers with the opportunity to utilise rail freight services for the import and export of goods and materials, supporting more efficient supply chains and reducing reliance on road-based freight movements over longer distances. This can also contribute to a reduction in road-based freight movements, promoting a shift of freight from road to rail and support more sustainable freight distribution.

1.2.5 In addition, the route to the DIRFT III Rail Freight terminal is also almost entirely via the Strategic Road Network (SRN). As such, journeys between the site and the rail terminal would largely occur on the SRN, minimising impacts on the local highway network while supporting efficient freight and logistics operations and enabling the integration of road and rail freight movements.

1.3 Rugby Borough Council Site Assessment

1.3.1 RBC have published an evidence base to support the Proposed Submission Local Plan. As part of this, there were a number of documents produced relating to site selection. This included a 'Stage 2 Site Assessment Report' which provides a summary evaluation of the site. It states:

> *"The site has an average connectivity score of 15 with a maximum of 24, placing it within Band E relative to the borough as a whole.*
>
> *National Highways haven't commented on this site combined site, but did comment on its component sites (see above). In terms of the capacity of the road network, an assessment of junctions within a nominated distance of the site was undertaken to determine congestion levels at peak and non-peak times. The roads surrounding the site were assigned a congestion rating of category 5, with 1 being the most congested and 6 being less congested.*
>
> *The Strategic Transport Assessment forecasts the site to generate significant trip numbers through the A426/Gibbet Hill Roundabout which already suffers from capacity constraints, and at the A5/Cross in Hand roundabout. It concluded that given the lack of realistic active travel options and limited bus services, there would likely be significant highway capacity issues caused by this site which could not be easily mitigated.*
>
> *The distance to the nearest bus stop from the site is 220m.*
>
> *The Public Transport Accessibility Level (PTAL) is a measure of the accessibility of a location to the public transport network, taking into account walk access time and service availability. The site has a PTAL score of 1a for both AM and PM which would not be improved by proposed and recent public transport improvements. PTAL is measured on a 1-6 scale, with 1 being the least accessible and 6 being the most accessible.*
>
> *Using other data, including an assessment of walking and cycling, and locations from the site accessible within a 1-hour bus journey, the overall accessibility of the site is ranked 90 of the 125 sites considered as part of Rugby's current site assessment. This measures accessibility at a middle layer super output area level, rather than site specific accessibility. So it only provides information on accessibility for the part of the borough in which the site lies."*

1.3.2 As clearly detailed, the analysis in relation to the accessibility of the site is provided on a middle layer super output area level (MSOA), so does not necessarily provide exact comparisons between competing sites, particularly where there are large MSOA's. The analysis also takes no account of the benefits of the co-location of the site adjacent to the existing Magna Park site.

1.3.3 The site benefits from existing sustainable travel measures in place at Magna Park which can be extended into the scheme. The site can also deliver enhancements and improvements which would benefit the existing Magna Park site and assist in reducing vehicle movements associated with the existing site.

1.3.4 Therefore the delivery of this site can assist in reducing vehicle movements from existing Magna Park users through improving the overall sustainable transport offering. This will also include additional car sharing matches through the increase in employees in the area (with car sharing being an excellent travel option), as well as potentially increasing the frequency of bus services or ensuring the ongoing viability of bus services, particularly given the positive relationship between GLP and Arriva for the existing site.

1.3.5 In respect of transport matters, the evidence comprises two main documents which were prepared jointly on behalf of Rugby Borough Council and Warwickshire County Council:

- Rugby Strategic Transport Assessment – Prepared by SLR and dated 28th October 2025

- Rugby Strategic Transport Assessment Addendum Report – also prepared by SLR and dated 3rd December 2025

1.3.6 Collectively the principal purpose of the reports is:

To provide an overview of the work that has been undertaken to appraise the implications, on the transport network, of the options for development identified through as part of identification of RBCs New Local Plan.

1.3.7 A more detailed review of these transport related reports has been provided within the DTA transport report.

1.3.8 A Sustainability Appraisal has been produced by RBC as part of the evidence base which considers all sites. This specifically references the Strategic Transport Assessment and states:

"Considering the above existing constraints, the lack of realistic cycling and walking opportunities, and limited bus service provision, combined with the significant trip generation predicted for this site, it is likely that there would be highway capacity issues associated with delivering this site which would be difficult to mitigate against"

1.3.9 It also states that:

"The operators of Magna Park, GLP, have a track record of delivering bus provision for staff. However, the distances involved mean this would not be as convenient as for sites close to the edge of Coventry and, in contrast to those locations, active travel would not be possible."

1.3.10 These statements are wholly inaccurate as the site will be connected to existing walking and cycling networks that connect directly to Lutterworth and is also well connected to existing public transport networks. The location of the site close to the existing Magna Park offers significant benefits for reducing vehicle movements including, but not limited to;

- shared servicing vehicles
- increased car sharing opportunities
- enhancements to bus services

1.3.11 There has been a significant reduction in trip generation (per sqm) from Magna Park over time, as evidenced in the previous work, which suggests that this is already occurring as the park has expanded. There are benefits of co-location which should carry significant weight and have not been appropriately considered.

1.3.12 This TN focuses on how the accessibility of the site has been considered by RBC, to demonstrate that the statements made on the sustainability of the site should be reconsidered and further, detailed examination should be undertaken. The site should be considered more positively in this regard and is fully in accordance with NPPF paragraph 110 given the site is sustainable and offers a genuine choice of modes of travel, as evidenced through the operation of the existing site and the significant reduction in trip generation over time.

1.4 Previous Representations

1.4.1 Previous representations were submitted in support of Magna Park West to the Local Plan Regulation 18 consultation in 2025. This included a Transport Note produced by Apex entitled *"Vision for Sustainable Travel and Consideration of Highway Impacts"* (Report Ref: C25078.TN01). For ease of reference, that report has been appended to this note in Appendix A.

1.4.2 The evidence submitted within TN01 demonstrated that the site is suitably located for access by sustainable modes, can deliver a suitable vehicular access strategy and can facilitate the delivery of

highway improvements. It was also confirmed that the scheme would also be designed, and any future application submitted, to accord with the requirements and aims of the NPPF, specifically paragraph 87(b) relating to logistics and distribution schemes, and paragraphs 109-118 relating to considering transport impacts. In particular an application would be supported by a comprehensive vision-led transport assessment, developed and discussed in detail with the relevant planning and highway authorities during the preparation stage of any such planning application.

1.5 Structure

1.5.1 The structure of the remainder of this report is as follows:

- Section 2: considers the **existing sustainable transport connectivity**
- Section 3: presents analysis of **employee home locations** and how these connect to **public transport** services
- Section 4: provides a **comparative review of the transport sustainability** of the site against other potential allocation sites
- Section 5: provides a summary and conclusions

2. ACCESS BY SUSTAINABLE MODES OF TRAVEL

2.1 Introduction

2.1.1 This section sets out the existing connectivity of the site to the surrounding areas by sustainable modes of travel and demonstrates its proximity to public transport, facilities, services and residential areas. This shows the existing situation, and therefore the baseline position which will be improved in order to deliver the west of Magna Park site.

2.1.2 This reproduces elements of, and builds upon, the details set out in the note produced previously to support the proposed allocation site. Further to the initial connectivity assessment within the previous note, consideration is also given to the home locations of employees and the opportunity for travel by public transport.

2.1.3 The site is located adjacent to similar employment uses at Magna Park which generate significant levels of movement by all modes. As such, the broad connectivity of the site by sustainable modes of travel has been established and accepted for industrial and employment uses. The Magna Park site also has implemented a significant level of sustainable travel measures to minimise car use for employees and visitors, which can also be utilised and expanded upon by the delivery of the land west of Magna Park site. Notwithstanding this, a review of the existing walking, cycling and public transport networks has been set out in this section.

2.2 NPPF Sustainable Travel Definition

2.2.1 The NPPF defines sustainable travel modes as *"Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport."*

2.2.2 As such, in considering the sustainable travel options all these modes must be taken into account in the decision making process. This section considers access by all these modes, including demonstrating that there is an existing and successful car sharing scheme in operation at Magna Park, which can be extended to the site and from which both the existing and proposed sites can benefit (i.e. a greater level of car share matches).

2.3 Electric Vehicle Charging

2.3.1 The site can provide a high level of electric vehicle charging infrastructure for staff and visitors (to cover at least 20% of all parking spaces), as well as electric charging points in service yards to further encourage sustainable travel by ultra low and zero emission vehicles. This is consistent with the recently approved implemented provision at the existing Magna Park site, including the most recent reserved matters application, where electric cabling provision covering c.20% of all spaces has been agreed by the highway authority (Harborough Borough Council Ref: 25/01737/REM).

2.3.2 In addition, the site benefits from close proximity to an approved lorry park facility within the existing Magna Park site. This is accessed from Mere Lane within a short distance of the A5. This facility will include a number of refuelling options, including electric charging for operational vehicles from which the proposed site would benefit. This also assists with promoting and encouraging ultra low and zero emission vehicle use for operational vehicles for occupiers of the site, which further enhances the sustainable location of the site in accordance with the NPPF.

2.4 Walking

2.4.1 Walking is the most important mode of travel at a local level and offers the greatest potential to replace short car journeys.

Infrastructure

2.4.2 The site is well located to connect to the well-established industrial/employment area, Magna Park, to the east of the site. The surrounding area already accommodates pedestrian movements for the existing (and committed) industrial and employment uses.

2.4.3 The northern part of the site (site no. 106) is connected to a shared footway / cycleway which runs partly along the A5 and also crosses the A5 at a dropped kerb crossing point. This links to an off-carriageway route which runs into Magna Park via a public right of way, as well as a shared footway / cycleway which runs adjacent to Mere Lane, which in turn connects to a footway running adjacent to Argosy Way / Hunter Boulevard which in turn link to a shared footway / cycleway running along the northern side of the A4303 Coventry Road.

2.4.4 The shared footway/cycleway provided on the northern side of the A4303 Coventry Road connects Magna Park to Lutterworth, providing good quality and well-lit infrastructure to the east of the site.

2.4.5 There is no infrastructure between Hunter Boulevard and the Cross in Hand Roundabout, or along Coal Pit Lane or the B4027 linking to the wider site. As part of the delivery of the land west of Magna Park site, active travel infrastructure such as footways and cycleways will be provided which will connect to the existing infrastructure which serves Magna Park. This will include suitable crossings, as required. There is sufficient highway verge or site frontage in order to accommodate shared footway / cycleway routes and therefore enable a connection from the site to the existing infrastructure. This will also enable connections to the closest bus stops, albeit as part of the scheme discussions would be held with operators aiming to extend services into the site.

2.4.6 The site is in a location that does or can benefit from infrastructure that would be attractive to potential future employees who wish to walk to and from the site, and there are/will be continuous routes to the nearest bus stops and connecting into Lutterworth.

Distances

2.4.7 To enable an assessment of the viability of walking between the site and residential areas, it is appropriate to establish the maximum distance that people are generally prepared to walk for work purposes.

2.4.8 There are a number of publications which suggest guidance for appropriate and acceptable walking distances. For reference, these have been summarised as follows.

- CIHT - Guidelines for Providing for Journeys on Foot (2000): suggests preferred maximum distances for commuting are up to 2km and states that the average walking journey is approximately 1km.
- Department for Transport (DfT) – Manual for Streets (2007): MfS states that 'walkable neighbourhoods' are typically characterised by having a range of facilities within 10 minutes walking distance (c. 800 metres) – i.e. this would include employment uses. MfS also acknowledges that this is not an upper limit and references previous planning policy guidance in that it is generally acknowledged that walking offers the greatest potential to replace short car trips, particularly under 2km.

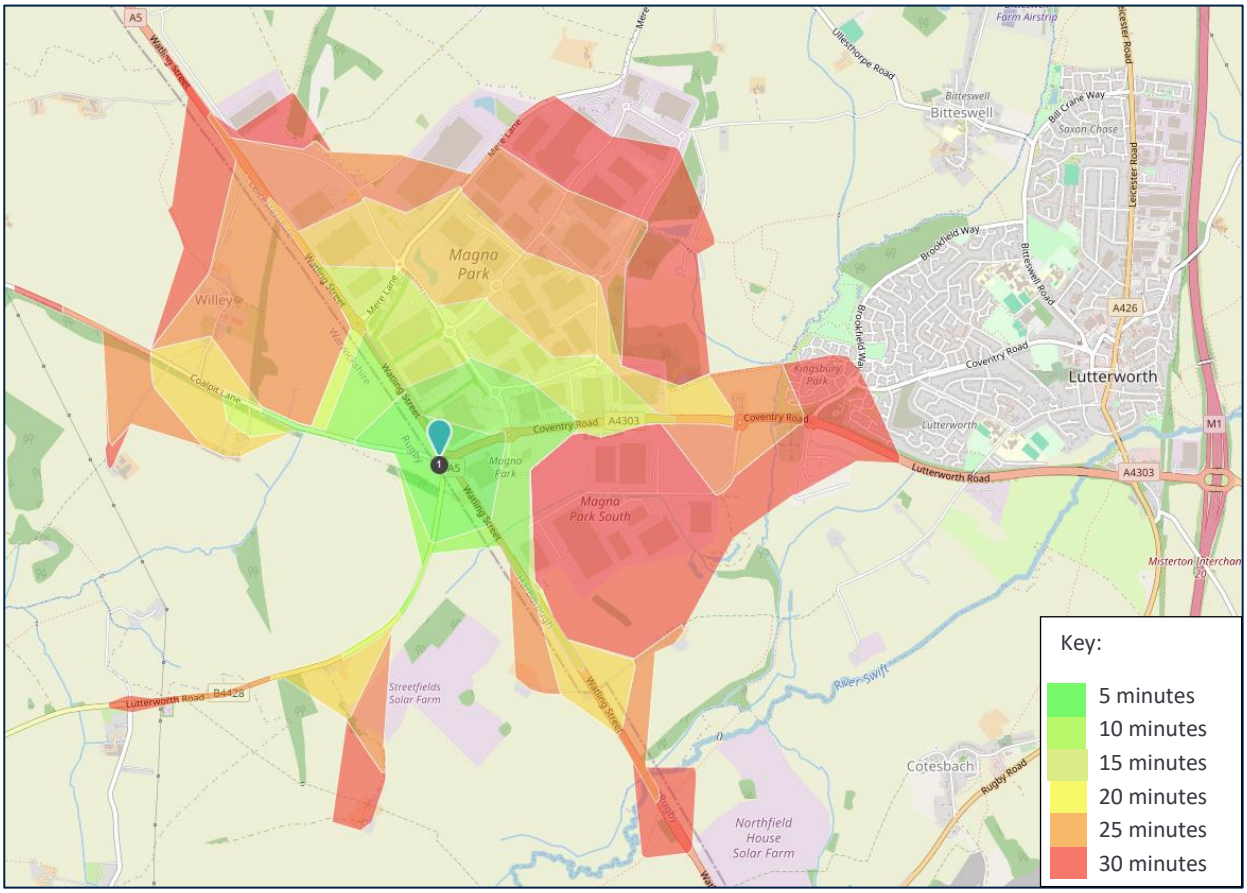
- CIHT (2015) – Planning for Walking: In relation to shorter trips in particular, (section 2.1) states that across Britain about '80% of journeys shorter than 1 mile (1.6km) are made wholly on foot'.
- DfT – National Travel Survey 2016 Report (NTS2016)– This suggests on page 16 that 80% of all trips under 1 mile (1.6km) were made by walking. Page 19 suggests that the average walking trip was 16 minutes in time (equating to around 1.3km based on a walking speed of 3mph).
- DMRB – Although recently superseded by CD143, TA91/05 Provision for Non-Motorised Users provided useful guidance on walking and cycling distances, which remains helpful in this regard. Paragraph 2.2 of TA91/05 states that 2 miles (3.2km) is *'a distance that could easily be walked by the majority of people'*. Paragraph 2.3 also continues by stating that *'Walking is used to access a wide variety of destinations including places of work, normally within a range of up to 2 miles'* (3.2km).

2.4.9 As such, based on guidance, it is considered that suitable walking distances could be up to 3.2km. This equates to around a 40-minute walk travelling at 3mph. However, distances of 2km are considered more likely for walking journeys.

2.4.10 Figure 2-1 provides walking time contours from the central site access for a 30 minute walk from the site (broadly equivalent to a 2.4km distance, shown at c.400m / five minute intervals). The nearest bus stops and the western residential areas of Lutterworth are within suitable walking distances. As such, a proportion of employees (and visitors) could travel to the site on foot.

2.4.11 The contour plans do not show walking movements on the majority of parcels 35 and 36, purely due to the software only generating contours on the highway network or public rights of way and the significant majority of these two parcels are undeveloped and restricted land. As such the contours are shown to be closely following Coal Pit Lane and the B4428, although all units constructed within the site would be accessible by walking through suitable footways.

Figure 2-1: Walking isochrones



Source: Openroute Service
Note – parcels 35 and 36 will also accessible by walking through a network of footways within any potential development, but the majority of these sites do not include contour colouring, as these do not have public rights of way or roads running through them.

2.4.12 Walking will form a part of the movement strategy and vision for sustainable travel and improvements will be delivered as part of any forthcoming development. This will be subject to a walking infrastructure assessment at the planning application stage, and full details of suitable measures will be identified at that stage.

2.5 Cycling

Routes and Infrastructure

2.5.1 Magna Park already has an extensive network of infrastructure catering for sustainable transport modes, including a shared pedestrian/cycleway connecting Magna Park to Lutterworth along the A4303.

2.5.2 There are no cycle routes along Coal Pit Lane or the B4027 connecting to the southern part of the site, but there is the potential for delivering these improvements within the highway verge of the site boundary. There is also the potential for extending the route along the A5 from the Mere Lane roundabout to the Coal Pit Lane roundabout.

2.5.3 Cycling will form a significant part of the movement strategy, and improvements will be delivered as part of any forthcoming development to connect the land west of Magna Park to its surrounds. This will be subject to a cycling infrastructure assessment at the planning application stage, and full details of suitable measures will be identified at that stage.

2.5.4 Cycling will therefore be a viable and attractive option to travel to and from the site, particularly from Lutterworth.

Distances

2.5.5 There are a number of publications which suggest guidance for appropriate and acceptable cycling distances for commuting purposes. Two of the key guidance documents have been summarised as follows.

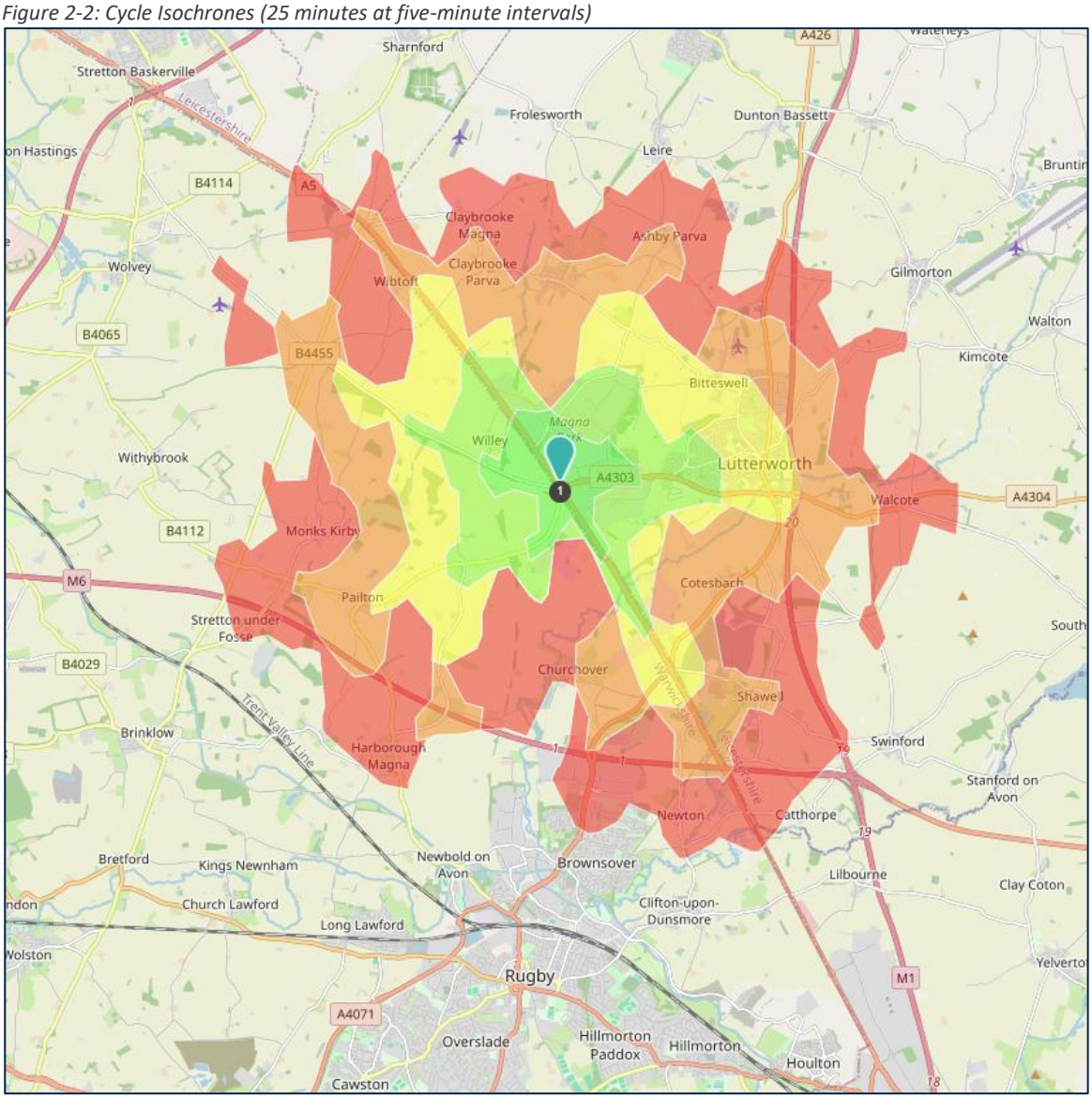
- DfT – LTN1/20 Cycle Infrastructure Design (paragraph 2.2.2) – states that "Two out of every three personal trips are less than five miles in length, an achievable distance to cycle for most people" (c.8km).
- Although recently superseded by CD143, TA91/05 states (paragraph 2.11) that *'Cycling is used for accessing a variety of different destinations, including places of work, up to a range of around 5 miles.'* At paragraph 2.9, TA91/05 states that 5 miles (c.8km) is a distance *'that could easily be cycled by the majority of people'.*

2.5.6 It has been assumed that journeys of up to 8km are within an acceptable cycling distance. A cycling journey of 8km would equate to approximately a 25 minute trip.

2.5.7 The Openroute Service has been used to generate cycle isochrones at five minute intervals up to a total of 25 minutes (c.8km) using roads and cycle routes (i.e. not straight line distances). This has been shown in Figure 2-2. The isochrones are generated based on speeds, dependent on the surface and highway type. The majority (if not all) of the routes used would be paved and as such would be subject to an 18kph speed based on the parameters in the software. A five minute isochrone would therefore cover a distance of c. 1.5km, with a 25 minute isochrone covering a distance of c.7.5km. As such, this is broadly in accordance with the relevant design guidance (indeed, cycle journeys to the site could originate from slightly greater distances, up to 8km from the site, in accordance with the guidance).

2.5.8 The analysis shows cycling isochrones along the A5 connecting to Rugby to the north, which it is recognised is unlikely to occur due to the nature of this route along the Strategic Road Network (SRN). The key route from the site is likely to connect to Lutterworth, which is within an appropriate cycling distance and would be connected by a good quality and off-carriageway route. The isochrones are shown within Figure 2-2.

Figure 2-2: Cycle Isochrones (25 minutes at five-minute intervals)



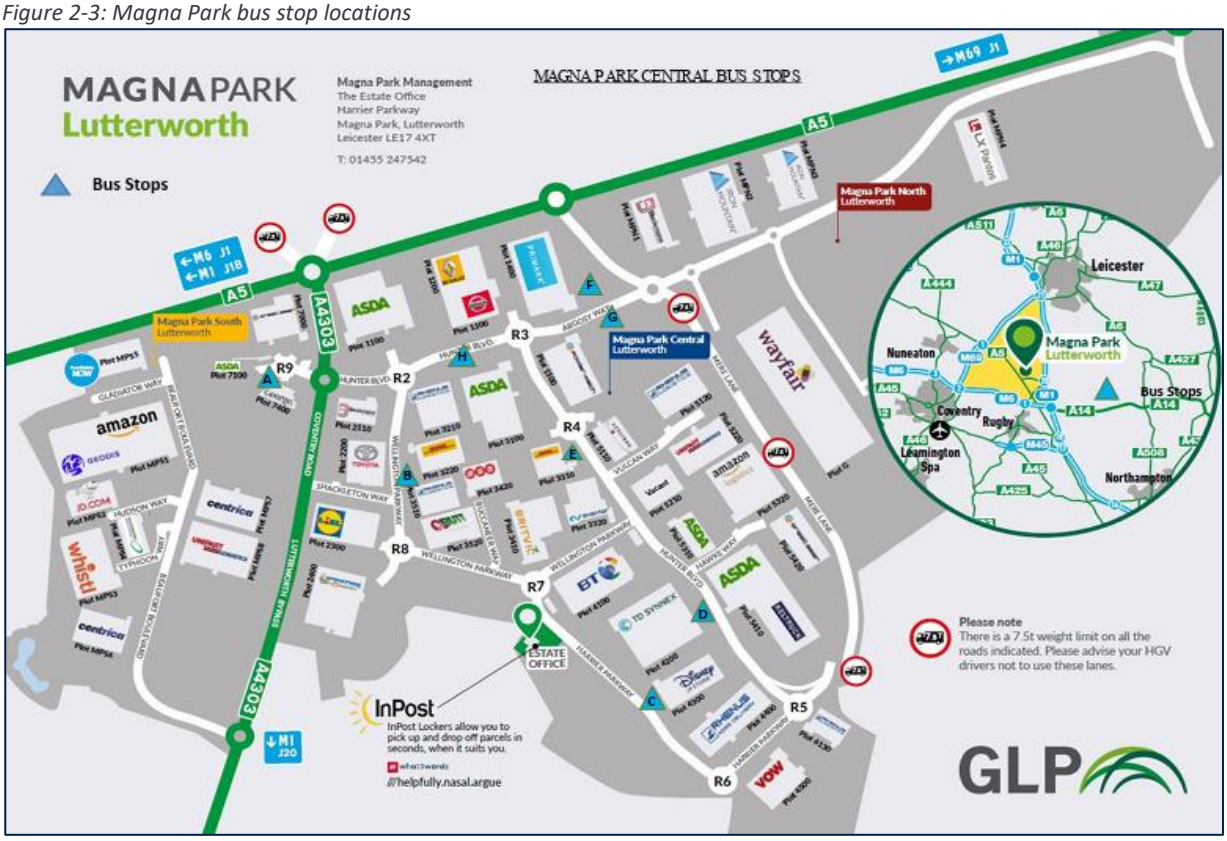
Source: Openroute Service

2.5.9 As such, travelling to the site by cycle is a feasible and realistic option for some employees of the site, particularly those travelling to and from Lutterworth. Any housing delivery as part of Lutterworth East is also within the cycling catchment and would be connected via continuous cycle routes.

2.6 Public Transport

2.6.1 Magna Park, located to the east of the site, already has an extensive network of infrastructure catering for sustainable transport modes, including regular bus services. The bus stop locations within Magna Park are shown in Figure 2-3. The closest existing bus stop to the site is approximately 500m from the site boundary on Argosy Way, from the Site 106 parcel or 450m from the Site 35/36 parcels to the George Building Stop. The closest bus stops from the boundary of all parcels are therefore within 500m, equating to approximately a 6-minute walk.

Figure 2-3: Magna Park bus stop locations



Source: GLP

2.6.2 Figure 2-3 highlights the existing bus stop locations within the vicinity of the site. However, given the scale of the site, additional bus stops would be provided within the land to the west of Magna Park site, and discussions would be held as part of any planning application with operators to extend the existing services into the site and/or increase frequencies.

2.6.3 This is the existing situation and positive discussions were held with Arriva on 4th March 2026 with Arriva confirming that they would consider it appropriate and viable to accommodate bus stops within the site and divert / extend existing services, subject to agreement on the access strategy as part of the planning application.

2.6.4 During the discussions with Arriva, they indicated that extensions to services into the site are likely to be possible and viable, subject to the access strategy, and can be incorporated together with other improvements they are considering, such as enhancing services to Leicester (through improved journey times and frequencies) and different routing on the service to Rugby to capture more potential employee locations. There may also be an opportunity to extend existing services to provide connections to Nuneaton and Earl Shilton which they will explore.

2.6.5 Arriva recognise the importance of the existing Magna Park site for the viability of existing services and work closely with GLP to ensure that the demand for services is maximised. Such discussions would continue as part of any forthcoming planning application to ensure that public transport access is integral to the delivery of the site.

2.6.6 This would likely include a contribution towards the improvement in services which would benefit both existing Magna Park occupiers and staff and offers potential to further encourage a switch to public transport among existing Magna Park employees.

2.6.7 The existing services travelling to Magna Park include:

- Leicester: Services X45 & X84, every hour Monday to Sunday including early morning and late-night buses on Weekday. X45 now operates on Sundays to/from Magna Park.
- Lutterworth: Services 8, X45 & X84, every hour Monday to Saturday including early morning and late-night buses on Weekdays
- Hinckley: Service 8, every hour Monday to Saturday including early mornings
- Rugby: Service X84, every hour Monday to Saturday

2.6.8 The three combined services therefore each provide hourly services (average of a 15-minute combined frequency during morning and evening peak times) which link to the key local destinations of Leicester, Lutterworth, Hinckley and Rugby. This enables employees to travel to and from the site from all key local residential areas. The bus timetable has also been scheduled to align with shift patterns.

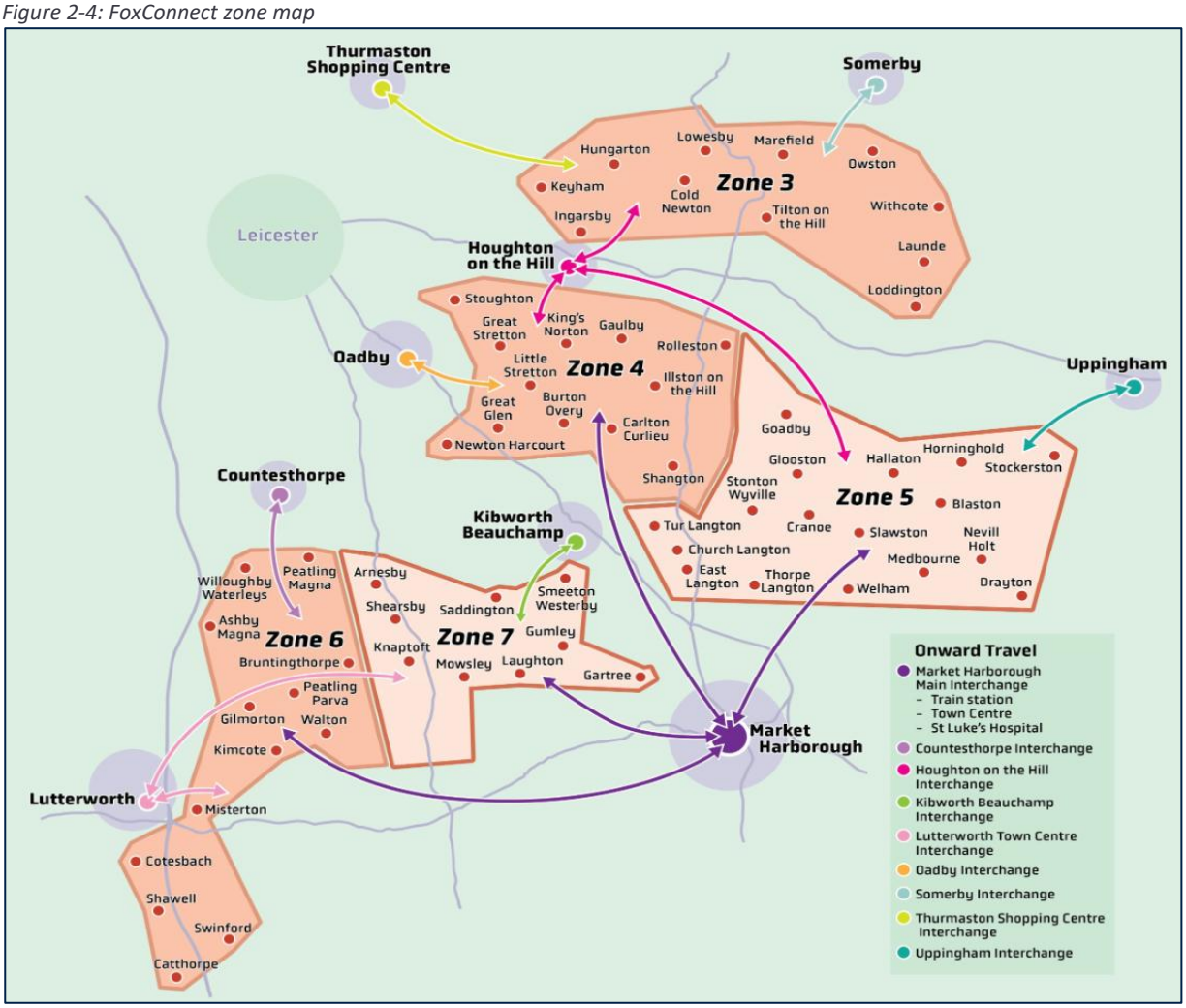
2.6.9 Additionally, Magna Park has a club members travel scheme administered by Arriva, where members can benefit from reduced price tickets and convenient access through direct debit payments. This would be extended to employees of the site, if it came forward, therefore the site has the benefit of utilising an existing and proven scheme.

2.7 FoxConnect

2.7.1 Magna Park is also served by the Market Harborough FoxConnect scheme, which is a new on-demand transport service which launched in March 2025. This is a Leicestershire based service which would be accessible to employees of the site and opportunities would be explored to extend this service into the site (and Rugby). In addition to this, opportunities would also be explored to connect into a similar service in Rugby or to establish a similar service as part of the development of the land west of Magna Park site.

2.7.2 The FoxConnect scheme connects rural communities to Market Harborough's town centre and neighbouring villages, including Lutterworth. The service is app based, where the user can choose where they want to get picked-up and dropped-off, meaning it is a convenient and flexible public transport option for travelling to Magna Park that would provide a further travel option for potential future employees of Magna Park West. The FoxConnect zone map is provided at Figure 2-4.

Figure 2-4: FoxConnect zone map



Source: FoxConnect

2.8 Car Sharing

2.8.1 A car sharing scheme is already in place at Magna Park operated by Liftshare and currently has over 580 members. Liftshare has estimated that the scheme has removed 335,525 miles of vehicle journeys off the local roads and reduced 73 tonnes of carbon dioxide emissions as a result.

2.8.2 The existing Magna Park car sharing scheme will be extended to encompass the site. This scheme is established and can readily be extended to potential future employees of the site. As noted above, this will also enable an increase in Liftshare matches as part of the scheme thereby increasing the viability of the scheme and the usage, both for the site itself and at Magna Park. There is already evidence that this may have contributed to reducing vehicle trips from the network and the delivery of the site has the potential to further increase the level of car sharing journeys on the surrounding network. The reduction in trips over time at Magna Park is set out in the initial Transport Note provided in Appendix A, within Section 10-2.

2.8.3 This successful and established scheme being rolled out to the land west of Magna Park further demonstrates the site's adherence to sustainable travel modes in accordance with the NPPF.

2.9 On-site facilities

2.9.1 Within and adjacent to the existing Magna Park site there are country parks and wooded areas which provide opportunities for employees to access leisure areas during breaks without needing to leave the wider site area.

2.9.2 Within the land west of Magna Park site, there is an opportunity for the future provision of a central hub incorporating food (or other) retail and/or leisure facilities. Such provision, will enable the containment of movements on the site during the working day. Any such new facilities would be subject to further consideration of their potential impact on existing local facilities.

2.10 Summary of Sustainable Travel

2.10.1 The site is situated in a location which is accessible by sustainable modes of travel. It is well suited to accommodate an employment scheme, being in a location where infrastructure can be delivered to connect into existing pedestrian and cycle networks. It is possible to walk to the site from some local areas within suitable distances via continuous footways (with delivered new infrastructure), and the site is also connected by good quality cycle routes to Lutterworth, making cycling a realistic and attractive option for potential future employees.

2.10.2 Bus services are extensive and suitable for serving typical shift working patterns, as well as connecting to four key residential areas. The site also benefits from being connected to the FoxConnect on demand service. As such, there are good options for travel by bus.

2.10.3 There is a realistic choice of modes of travel for commuting, which will assist in constraining the level of vehicle generation from the site and minimise the impact of the development.

2.10.4 The site benefits from existing sustainable travel measures in place at Magna Park which can be extended into the scheme. The site can also deliver enhancements and improvements which would benefit the existing Magna Park site and assist in reducing vehicle movements associated with the existing site.

2.10.5 The site will be committed to promoting a sustainable transport hierarchy in accordance with the aims of local policy and the vision-led approach supporting any planning application would encourage a high level of sustainable transport, as well as assist in reducing vehicle movements from existing Magna Park users through improving the overall sustainable transport offering. This will also include additional car sharing matches through the increase in employees in the area (with car sharing being an excellent travel option), as well as potentially increasing the frequency of bus services or ensuring the ongoing viability of bus services.

2.10.6 The site location will encourage and promote sustainable travel behaviour, attract employees who choose to travel by sustainable modes and is therefore fully in accordance with sustainable transport policies in the NPPF.

2.10.7 The NPPF paragraph 110 states the following:

> *"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."*

2.10.8 The land west of Magna Park site, is in a location which both is and can be made sustainable – in NPPF terms:

- It has good access by public transport, which can be diverted through the site as well as offering an enhancement to existing services
- It will be connected to Lutterworth via off-carriageway walking and cycling routes
- The co-location to the existing Magna Park site offers benefits from economies of scale and the ability to tie into successful existing and established sustainable transport offerings, such as a car share scheme
- The proximity to the approved lorry park, will enable access for operational vehicles to fast electric charging. Each unit on the site will also be provided with a high level of electric vehicle charging. This will encourage the use of low emission vehicles.
- As such, there is a genuine choice of sustainable travel modes, as defined in the NPPF and the site is and can be made sustainable through deliverable and viable connections to the infrastructure in the existing Magna Park and surrounding highway network.

2.10.9 The location of the site and the genuine connections by sustainable travel, defined in NPPF terms, should also be considered in plan making based on a site's location, as well as in the round. This is a proposal for an industrial site adjacent to and well connected by the SRN, which minimises the impact on the surrounding local highway network and residents from these types of uses. The site is well connected by sustainable travel considering this location and facilitates the use of low emission vehicles, as well as benefiting from the co-location with the existing Magna Park.

2.10.10 On this basis, the site is fully in accordance with the NPPF paragraph 110 and we strongly disagree with the conclusion reached by RBC as part of its supporting evidence in this regard.

3. WORKFORCE CATCHMENT AREA AND PUBLIC TRANSPORT ACCESSIBILITY

3.1 Overview

3.1.1 This section presents analysis of the workforce catchment for the existing Magna Park which provides a strong indication of the likely staff travel demand to land West of Magna Park given the close proximity, comparable accessibility characteristics and nature of the existing and proposed development/businesses.

3.1.2 The analysis within this section considers the existing employee home locations and the potential for accessing the existing Magna Park site via public transport services, which by extension has been considered to apply to the proposed site at land west of Magna Park.

3.1.3 This includes consideration of the home postcodes of existing Magna Park staff captured within a labour study commissioned by GLP in April 2025 and prepared by CBRE. This information has been analysed to consider the opportunity for access by direct bus services which would serve land West of Magna Park. The CBRE analysis also identifies current and future trends in labour supply for the catchment area of Magna Park, which have been considered and summarised. For ease of reference, the full report produced by CBRE has been provided in Appendix B.

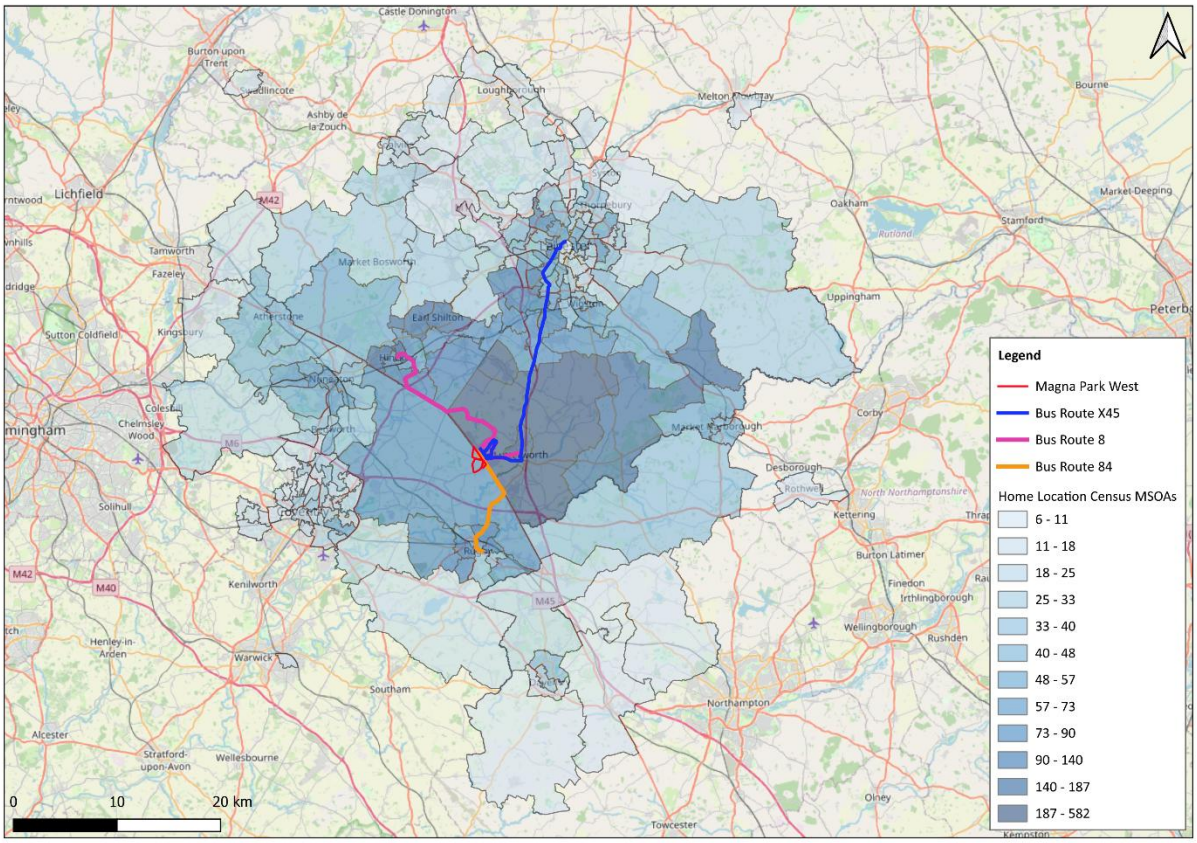
3.2 Census Analysis

3.2.1 Analysis of Census origin destination data has been undertaken for employees of the Mid-layer Super Output Area (MSOA) within which the majority of Magna Park is located (MSOA E02005372: Harborough 006). Whilst the MSOA covers a large area, Magna Park represents one of the largest areas of employment within the boundary, so the majority of employee movements into the area, are related to Magna Park. On this basis, the area wide analysis is considered appropriate for the purposes of considering the origins of likely employees.

3.2.2 Data has been analysed from the 2011 Census due to the Covid-19 restrictions that were in place during the time of the 2021 Census. Magna Park was well established by 2011, so the locations of employees at that time are considered to remain valid for the purposes of this analysis.

3.2.3 The data identifies over 9,700 journeys to work to destinations within the MSOA (with an estimate of at least 6,000 employees working at Magna Park in 2011, therefore the majority of the employees in the MSOA) and therefore this provides a large dataset from which an understanding of the likely journey origins for employees at Magna Park West can be forecast. The data has been analysed, and origin MSOAs with fewer than six trips filtered out. Figure 3-1 illustrates the distribution of employees' home locations at a MSOA level, shown alongside the location of the land west of Magna Park site boundary and the existing bus routes which directly serve Magna Park.

Figure 3-1: 2011 Census Journey to Work Trip Origins for MSOA E02005372: Harborough 006

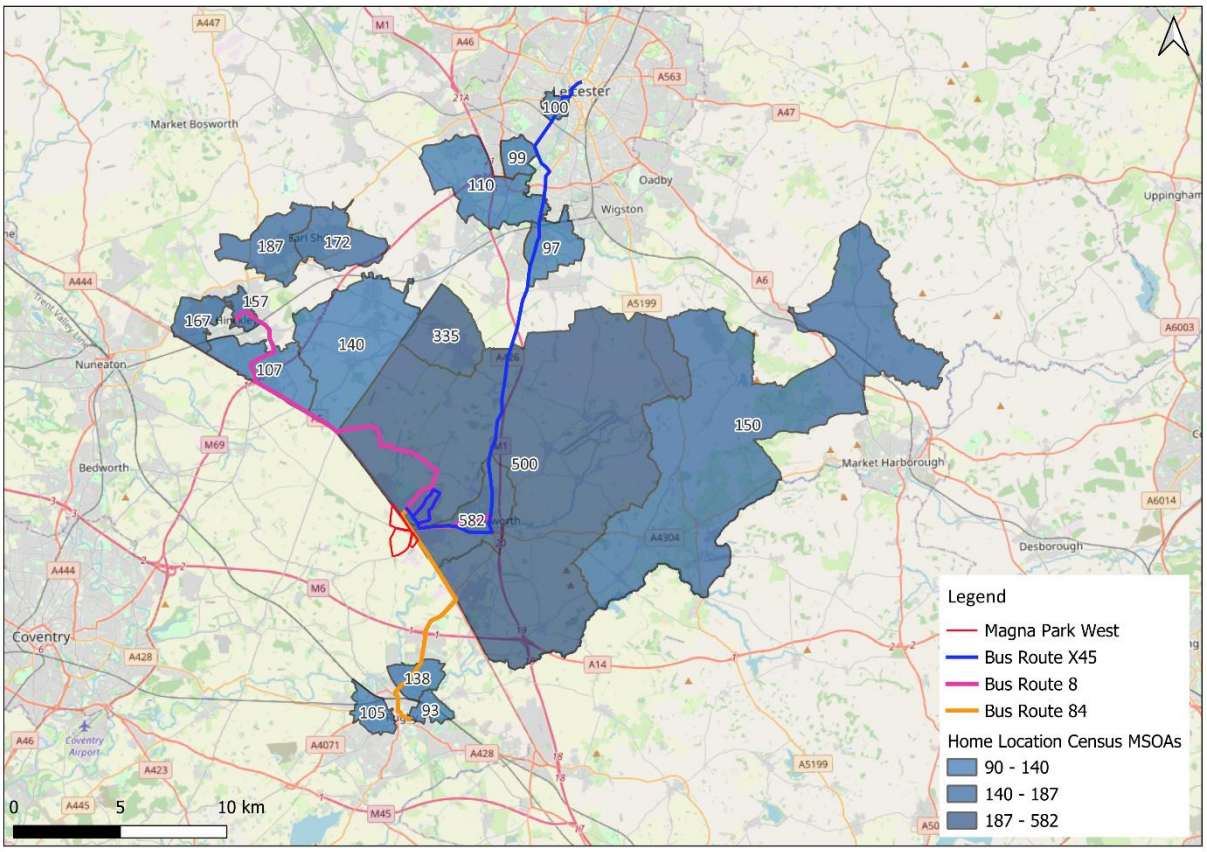


Source: OpenStreetMap

3.2.4 The data in Figure 3-1 illustrates the highest concentrations of employees within the MSOAs closest to the site, and within areas to the southwest of Leicester city centre, central Rugby and Hinckley.

3.2.5 Figure 3-2 identifies MSOAs from which 90 or more trips to the Harbourgh 006 MSOA are generated. Collectively, this represents almost 40% of journey origins to the MSOA. This has been used to visually demonstrate the proximity of key home locations.

Figure 3-2: MSOAs Generating 90 or Greater Trips to Work in MSOA E02005372: Harborough 006



Source: OpenStreetMap

3.2.6 Figure 3-2 demonstrates in greater detail that the locations align well with the existing bus provision serving Magna Park and routing adjacent to Magna Park West. This is to be expected given the high level of bus use for employees travelling to the site and as the bus services would attract employees to working at Magna Park.

3.2.7 On this basis, the site to the west of Magna Park is well located in respect of likely employee home locations, which would enable staff to travel to the site sustainably by bus. This would be further enhanced through any improvements to services which would be explored if the site were to come forwards, continuing the positive discussions with Arriva in this regard.

3.3 Public Transport Journey Times

3.3.1 The current bus timetables for the X45, 8 and 84 services have been reviewed for journey times from some of the key journey origins identified through the Census data analysis presented in the preceding section. Table 3-1 summarises the bus journey times to the nearest existing stop to Magna Park West.

Table 3-1: Bus Journey Times to Magna Park

From	Bus Journey Time to Magna Park[1]
Leicester City Centre (St Margaret's Bus Station)	70 minutes
Blaby	35 minutes
Lutterworth	20 minutes
Rugby (Clifton Road)	25 minutes
Rugby (Brownsover)	15 minutes
Burbage	25 minutes
Hinckley	37 minutes

[1] Magna Park times based upon timetabled journeys to existing stops adjacent to Eddie Stobart Logistics

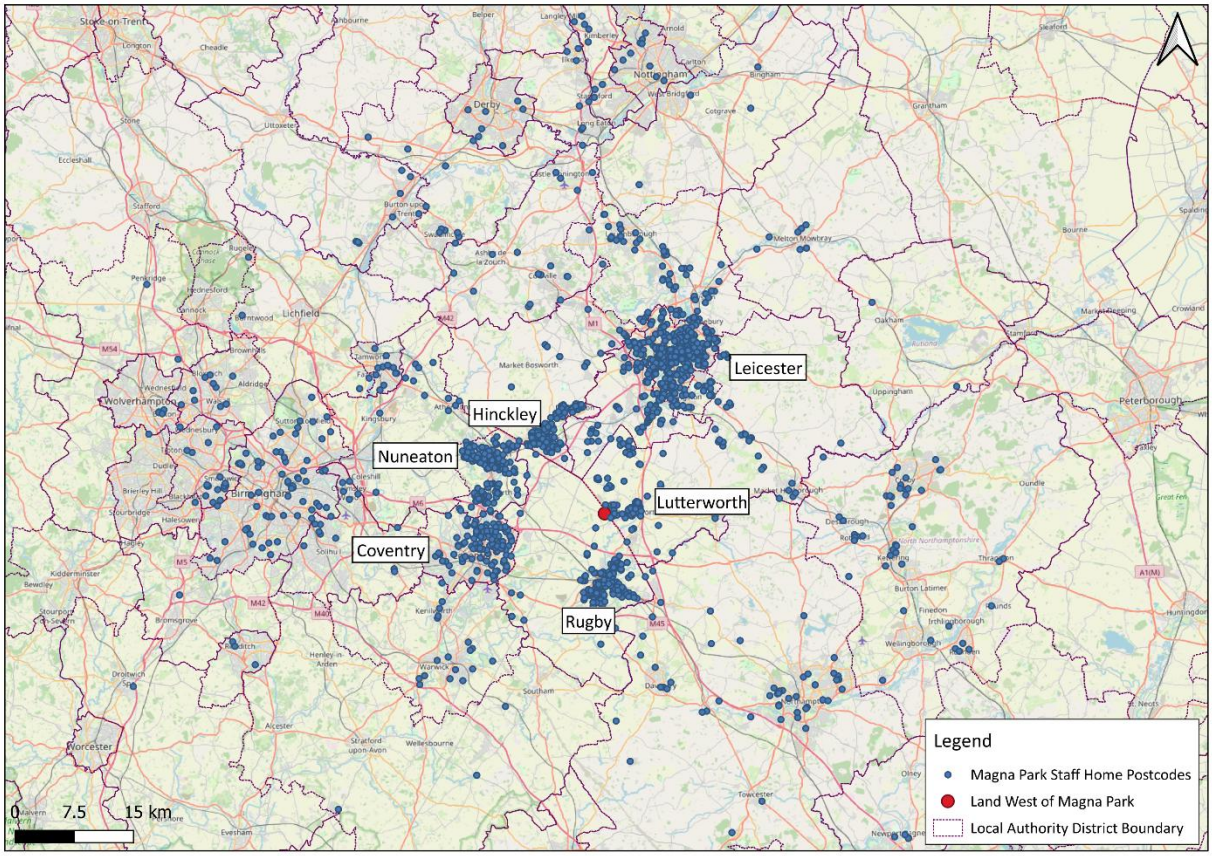
3.3.2 Data from the National Travel Survey (NTS) demonstrates that the duration of commuting trips has consistently been around half an hour since 2002. The journey times by public transport to Magna Park from the origins summarised in Table 3-1, with the exception of Leicester city centre, fall within this catchment, indicating the opportunity for sustainable travel for journeys to work.

3.3.3 As set out in Section 2, Arriva are currently exploring the potential for enhancing the service times connecting to Leicester which will further improve the attractiveness of this bus route to connect to Magna Park. The delivery of the land west of Magna Park site would maximise the ongoing viability of this enhanced service.

3.4 Workforce Catchment Areas

3.4.1 A map showing the existing Magna Park workforce postcodes is shown in Figure 3-3, as taken from the data captured by the CBRE report commissioned by GLP (included in Appendix B). This does not include all employees of the site, but provides a good representation of the key locations that employees reside.

Figure 3-3: Magna Park Workforce Catchment Area



Source: OpenStreetMap

3.4.2 The data in Figure 3-3 closely reflects the 2011 Census data analysis, demonstrating that Magna Park is principally attracting staff from Leicester, Lutterworth, Rugby, Hinckley, Nuneaton and Coventry. Magna Park, and the land west of Magna Park site, are well connected to many of these areas with good public transport services, as set out in Sections 2 and 3.2. Bus services are available from Magna Park to Leicester, Lutterworth, Hinckley and Rugby, all of which have hourly services across the day and link into staff shift times. As such, these services provide an excellent opportunity for the land

west of Magna Park site to promote realistic and attractive public transport options to employees living in these locations.

3.4.3 The CBRE study also found that 67% of the workers are travelling within a 30-minute drivetime to Magna Park. Figure 3-3 highlights the high-density clusters of workers in a number of areas which demonstrates that car sharing is a realistic option for travel to Magna Park, further supported by the Magna Park Liftshare scheme which currently has over 580 members. This Magna Park car sharing scheme would be extended for use in the land west of Magna Park site and promoted to potential future employees. This would increase the number of users of the system and therefore the number of car sharing matches, which in turn would assist in reducing the level of car use at the existing Magna Park site, as well as constraining vehicles associated with the land west of Magna Park site. It is considered that this is realistic, as employees of Magna Park and the land west of Magna Park site are likely to work similar shift patterns, therefore further increasing the propensity to car share.

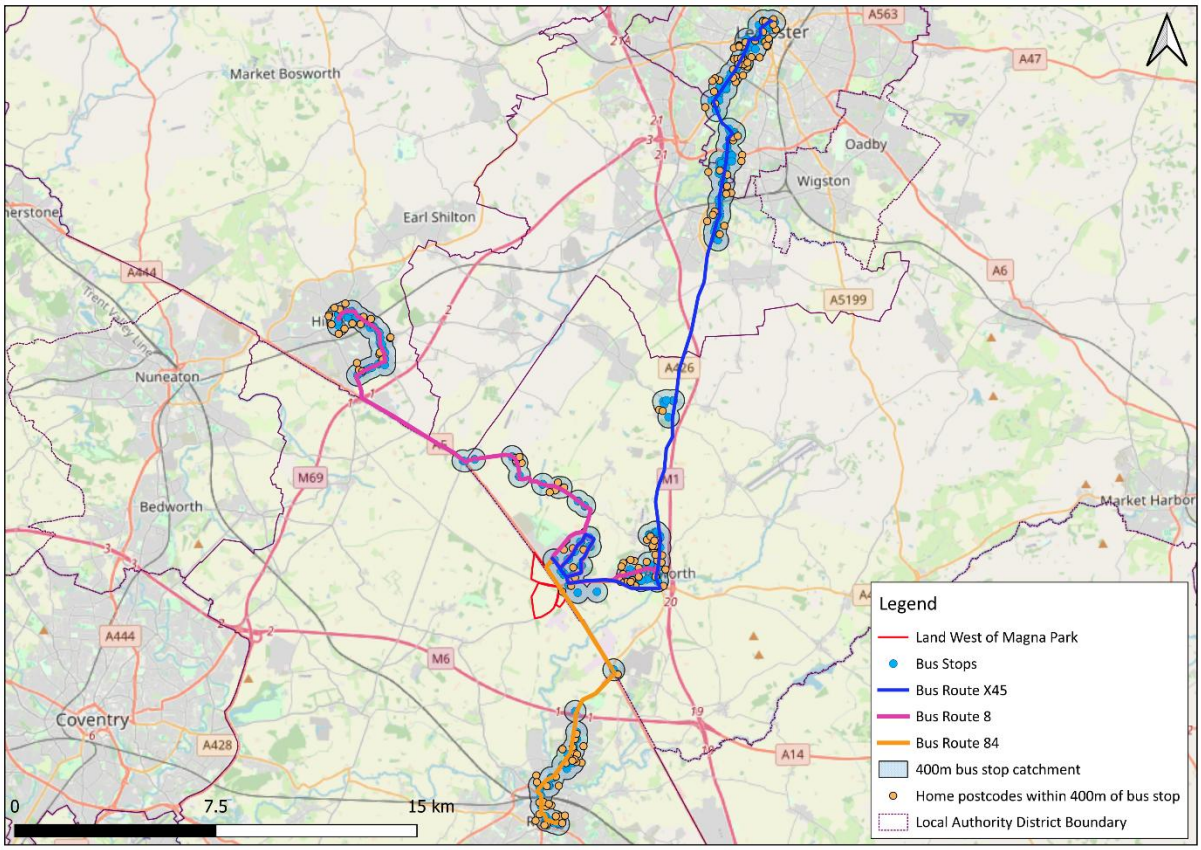
3.4.4 Figure 3-3 additionally demonstrates that there are clusters of workers located in Lutterworth which is within an appropriate cycling distance, with Magna Park and Lutterworth connected via cycling infrastructure. As such, cycling can offer a realistic travel option for existing staff at Magna Park and will therefore likely offer a realistic travel option to future employees at the land west of Magna Park site. The large residential allocation to the east of Lutterworth would also be within cycling distance. There would also be potential for providing a cycle buddy scheme or similar so that cyclists can also share journeys, further increasing the likelihood of cycling as a realistic and attractive mode of travel. Numerous travel planning measures would also be adopted to further encourage cycling to and from the site.

3.5 Public Transport Opportunity

3.5.1 The Magna Park staff postcode data has been analysed to further consider the attractiveness of the site's accessibility by public transport. Bus stops along the corridors served by buses directly connecting to Magna Park have been mapped into GIS software. Straight-line catchments have then been taken at intervals of 400m, 800m and 1,200m of these bus stops to establish the number of postcodes falling within these distances. These represent approximate 5 minute interval distances for walking to and from a stop.

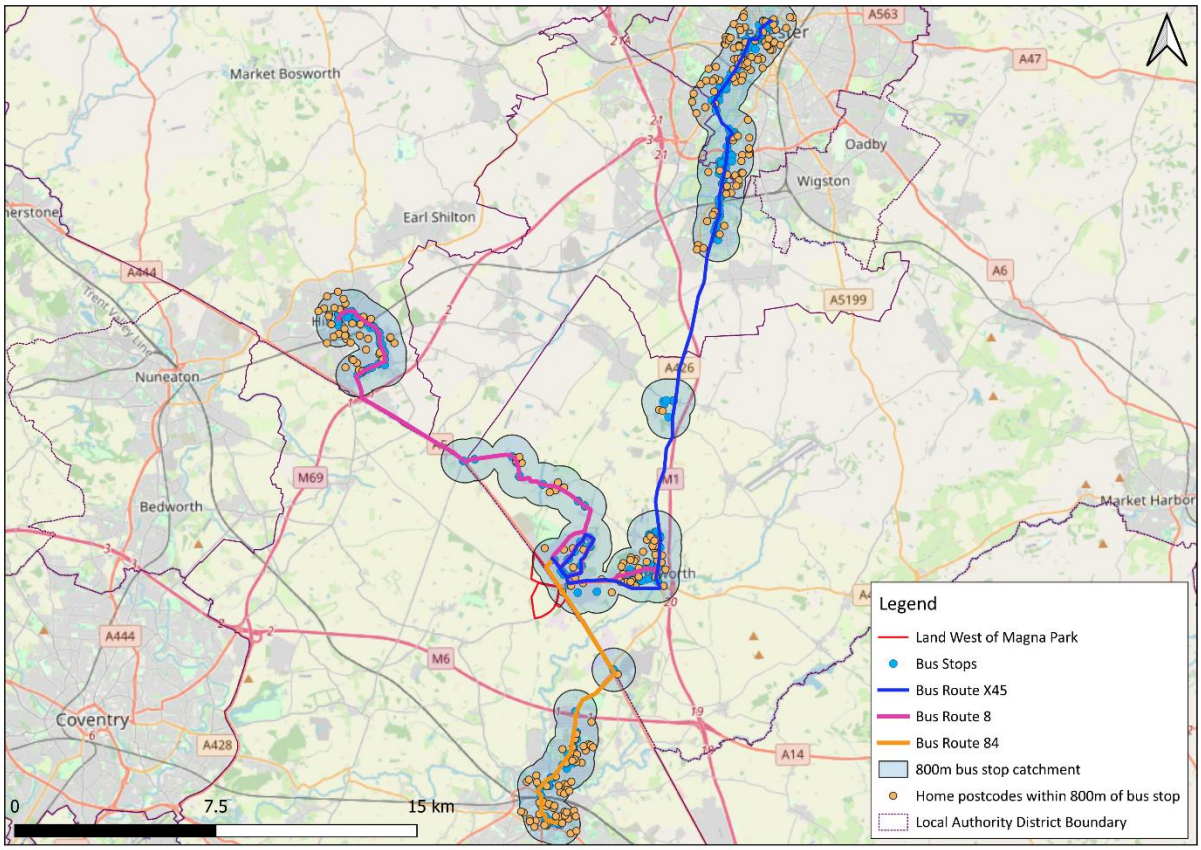
3.5.2 Figure 3-4, Figure 3-5 and Figure 3-6 present the results of this analysis, with the resultant number of postcodes within each threshold distance summarised in Table 3-2. In undertaking this analysis, it was noted that some respondents to the CBRE survey had provided what appeared to be workplace postcodes consistent with locations within Magna Park itself. These results have been removed from the calculations presented in Table 3-2 for robustness. The results are not all employees at Magna Park, but the employees that were captured in the CBRE analysis, therefore a percentage comparison is considered suitable as a representation.

Figure 3-4: Magna Park Staff Postcodes Falling within 400m of Existing Bus Stops



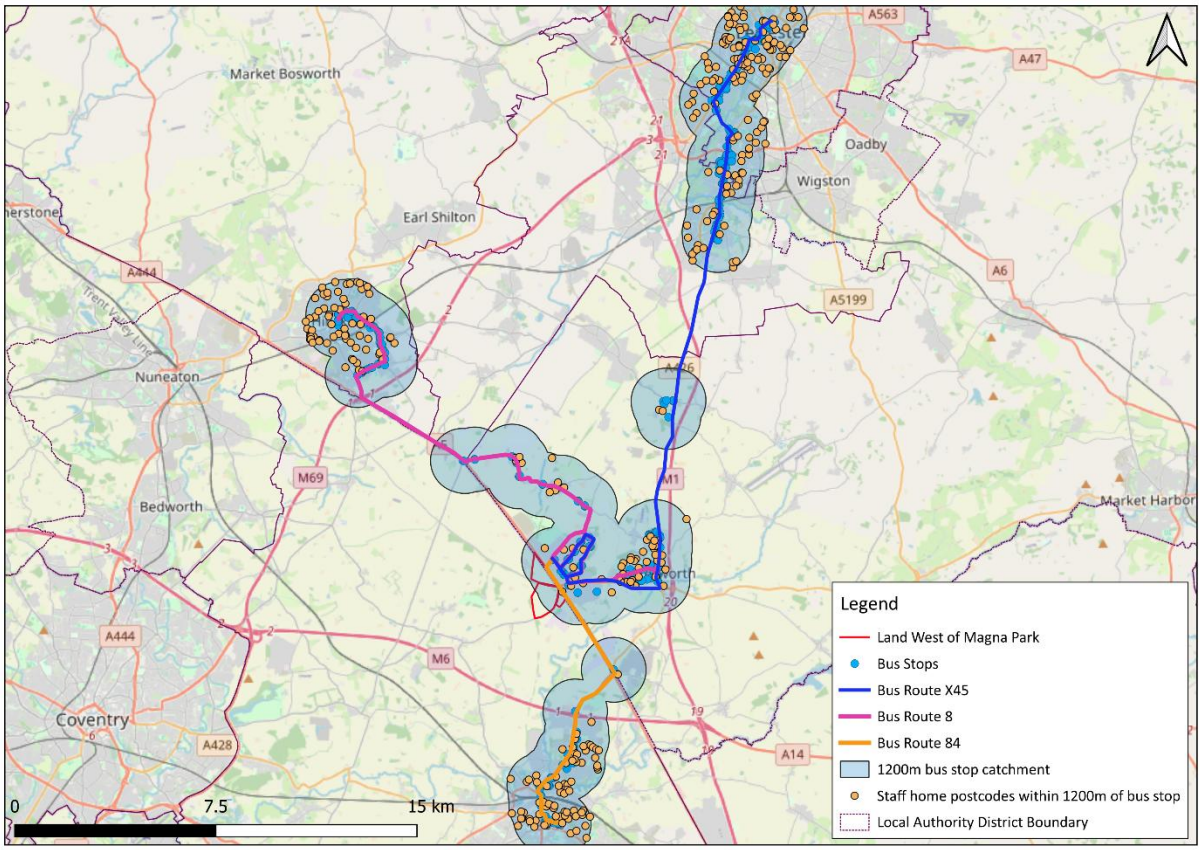
Source: OpenStreetMap

Figure 3-5: Magna Park Staff Postcodes Falling within 800m of Existing Bus Stops



Source: OpenStreetMap

Figure 3-6: Magna Park Staff Postcodes Falling within 1,200m of Existing Bus Stops



Source: OpenStreetMap

Table 3-2: Summary of Existing Magna Park Staff Postcodes within proximity of bus stops Identified

Threshold	No. Postcodes	%
Total within 1,200m catchment of bus stops	1,587	100
Within 400m catchment of bus stops	155	9.8
Within 800m catchment of bus stops	259	16.3
Within 1,200m catchment of bus stops	360	22.7

** Distance of bus stops served by Bus Routes X45, 8 and 84 directly connecting to Magna Park*

3.5.3 The analysis summarised in Table 3-2 demonstrates that in the region of 20% of employees of Magna Park live within a 1km walk of a bus stop providing a service that directly connects to the site. Around 10% of employees live within just a 400m walk. As such, this further demonstrates that travel by bus is a viable and attractive option for a significant proportion of employees. Additional employees generated by the development of land to the west of Magna Park would further support the existing bus services (and planned improvements), assisting to ensure the viability and potentially enabling enhancements which would also benefit existing users. The services all ensure they connect to shift times at Magna Park which would further encourage and promote travel by bus to employees.

3.5.4 This is all based on the existing routing of services. As part of any forthcoming application and existing ongoing discussions with Arriva, there is an opportunity to explore the re-routing and extension of services to capture a greater percentage of employees to further encourage travel by bus.

3.5.5 As such, this analysis further demonstrates how well connected the site is by bus and that this is a viable and attractive mode of travel for a significant proportion of staff, fully in accordance with NPPF paragraph 110.

3.6 Future Trends

3.6.1 The CBRE study demonstrates that there is a strong supply of labour at Magna Park, benefiting from the extent of the catchment that incorporates a number of large urban areas. Overall, the supply demand ratio for the catchment area is 8.54 which sits comfortably above the national average (2024) of 5.98, suggesting good labour availability at the park. As such, this provides good opportunities for businesses locating to an employment site in this area as a strong supply of labour results in easier recruitment, operational efficiency and growth potential. Additionally, it can positively impact sustainable travel as there is enhanced local employment and opportunities to reduce carbon footprint. It also minimises travel distances for employment opportunities in this sector, as employees can travel to Magna Park rather than a further distance elsewhere.

3.6.2 In addition, the future planned housing developments within the MPL catchment area could provide an additional 17,000 workers over the next 20 years. It is therefore considered that the labour availability can support the demand for workers in this area, and Magna Park (and by extension land west of Magna Park) is ideally situated to benefit from this, particularly given the extensive bus service connections linking to a number of key urban areas.

3.6.3 Overall, the strategic location of the land west of Magna Park can help businesses thrive by leveraging the strong labour supply and fostering a supportive, collaborative environment, in addition to supporting the forecast labour demand.

4. COMPARISON OF POTENTIAL ALLOCATION SITES CONNECTIVITY

4.1 Overview

4.1.1 This section provides a comparison of the land at Magna Park site against other potential site allocations in relation to the connectivity by sustainable modes. This has also considered the analysis undertaken by RBC within its evidence base.

4.2 DfT Connectivity Tool Score

4.2.1 The DfT Connectivity Tool has been used by RBC within the site selection methodology at Stage 2a 'detailed site assessment' as a means of feeding into the assessment of competing development locations.

4.2.2 The Connectivity Tool has been developed by DfT to provide a metric which measures an individual's ability to reach a range of destinations within a 60-minute journey using various modes of travel, weighted by people's overall proclivity to take those options. The metric provides a relative score for 15 million 100-metre square areas across England and Wales, with the starting location with the best connectivity scoring 100, and all other locations scored relative to this. The tool measures connectivity to education, leisure and community, employment, healthcare, shopping and social visit destinations and enables users to interrogate connectivity scores overall or by destination.

4.2.3 The scores are calculated nationally for each 100-metre grid square; however, the tool also enables users to apply connectivity banding for each local authority area. This ranks grid squares into ten bands from A-J to provide an assessment of how well connected each grid square is relative to its local authority area. It is these scores which have been referred to within the site assessment methodology. As referred to in paragraph 1.3.1, the local plan assessment stated that the location of Magna Park West currently scores within Band E relative to the Borough as a whole.

4.2.4 However, this assessment only considers the site's overall connectivity relative to other locations within Rugby Borough. As Section 3 of this note evidences, a high proportion of employees at Magna Park originate from locations to the north and east of the site within Harborough Borough Council / Leicestershire and the same would be expected for development on the land west of Magna Park site given the nature and accessibility of the proposed land use.

4.2.5 Furthermore, as a prospective employment site, the overall destination score that has been presented is less helpful for comparison purposes as this takes into account the locations' connectivity to education, health, leisure, shopping and other workplace locations. These metrics are not valid for an employment site and as such, this analysis is flawed. The connectivity score of the location should only be to residential areas and as such the analysis undertaken in comparing sites in this manner should be afforded negligible weight.

4.2.6 Finally, the Connectivity Tool guidance note on 'Applying The Connectivity Tool'[2] acknowledges that, *"Scores should … be used with other contextual considerations when considering places which predominantly have trips at times of day different to those at which trips are made on average (for example, a school or a logistics facility employing shift workers)."*

4.2.7 On this basis, the connectivity tool used in this manner to compare industrial employment sites is not considered appropriate. A more detailed site-specific assessment should be undertaken, as is set out in the following sections.

[2] https://connectivity-tool.dft.gov.uk/help/applying-connectivity-tool

4.3 Connectivity by Sustainable Modes Comparison

4.3.1 An initial comparison of the connectivity of the site with the RBC Local Plan preferred employment allocations was undertaken within the previous Transport Note (as included in Appendix A). This included the consideration of distances to bus stops, rail stations and existing footway / cycleway infrastructure. This has been summarised in Table 3-1 of Appendix A and this also considers other relevant and key points in relation to sustainable travel. The analysis all remains valid, although this has been expanded on and considered in more detail in relation to the following key comparison sites within this section:

- Land at Walsgrave Hill (Site 121)
- Land north of Ansty Park, Ansty, Coventry (Site 14)
- Land bound by M69, M6 and B4029 (Site 95)
- Land north of Houlton (Site 130)

4.3.2 As such, where any changes are noted from the previous work, this note provides the most up to date position.

4.3.3 The summary of the land west of Magna Park site is as follows

Land west of Magna Park, Lutterworth (Site 35, 36, 57 & 106)		
Footways		A shared footway / cycleway connects to the boundary of Site 106 linking the site to Mere Lane. A shared footway / cycleway is also provided on the northern side of the A4303 Coventry Road which connects Magna Park to Lutterworth, providing good quality and well-lit infrastructure to the east of the site.
Cycleways/Routes		A shared footway / cycleway connects to the boundary of Site 106 linking the site to Mere Lane. A shared footway / cycleway is also provided on the northern side of the A4303 Coventry Road which connects Magna Park to Lutterworth, providing good quality and well-lit infrastructure to the east of the site.
Buses	**Distance to stops**	450m
	Service Frequency	Four services per hour to four key destinations (Rugby, Coventry, Lutterworth and Leicester) serving the existing Magna Park.
Train Station		Rugby Train station (c.7.4km to the south of the site in a straight line distance)
Co-located with existing employment?		Yes – Adjacent to the existing Magna Park site. This is a key benefit and the proposed site would be connected to the existing site via suitable walking and cycling routes. It would benefit from the infrastructure serving that site.
Other		FoxConnect and a Magna Park LiftShare scheme are already in place at the existing Magna Park and can be extended to serve the site. A similar service to FoxConnect serving Rugby could also be explored. Discussions have been held with Arriva and there is an opportunity for extending and enhancing existing services into the site.

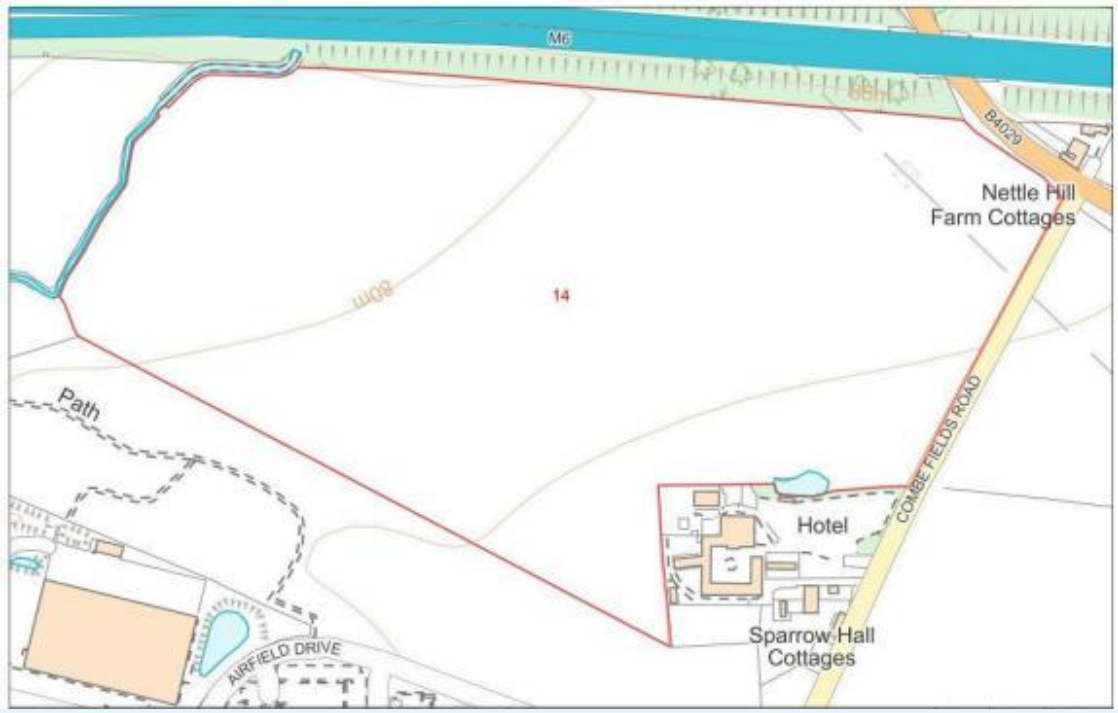
4.3.4 The other key comparison sites are set out as follows.

Land at Walsgrave Hill (Site 121)

Notes: Map extracted from Rugby Borough Council Stage 2 Site Options Assessment, December 2025

Footways		Within the vicinity of the site, there are no existing footways along Combe Fields Road to the east of the development site. There are also footways routing along Central Boulevard on its northern boundary. There are alternative pedestrian links which route over the A46 via a pedestrian footbridge to west of the site which connects to Farber Road.
Cycleways/Routes		There are no cycleways provided along Combe Fields Road to the east of the site but there are existing cycleways provided along Central Boulevard to the north of the development site which routes into Ansty Park to the east and to Hinckley Road to the west.
Buses	**Distance to stops**	c.260m to the north of the development site
	Service Frequency	30 minute frequency for service X30, with the service providing a connection to Coventry and a more irregular service broadly every 2 hours for the 84 which connects to Nuneaton
Train Station		Coventry Arena Rail station c.5.7km to the west in a straight-line distance, although this only provides an hourly service in each direction. Coventry Rail Station – (6.8km to the southwest of the site – straight line distance) this provides access to a higher frequency of service and destinations.
Co-located with existing employment?		Yes - It is situated within close proximity to Ansty Park which is situated to the east of the site.
Other		Located to the west of an existing employment site – there may be opportunities to use LiftShare. However, it does not appear there is a site specific scheme in place. RBC rated the site PTAL score as 1a for both the AM and PM periods.

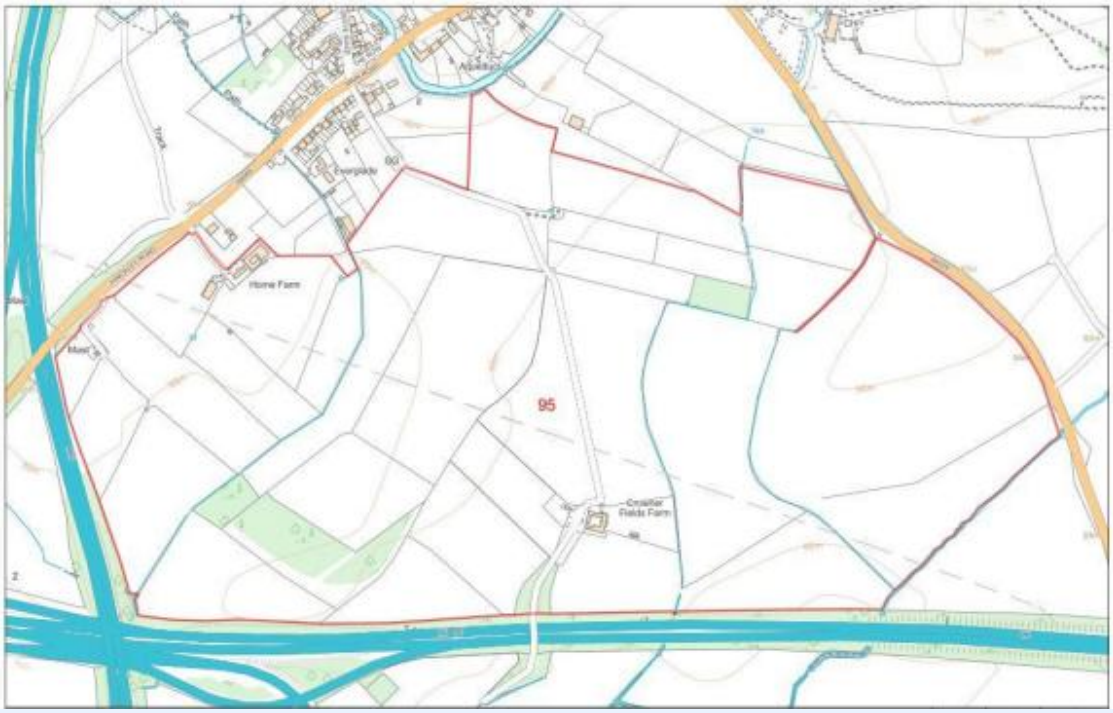
Land North of Ansty Park, Ansty, Coventry (Site 14)



Notes: Map extracted from Rugby Borough Council Stage 2 Site Options Assessment, December 2025

Footways		Site is accessed through the existing Ansty Park. Existing footway on at least one side of the Airfield Drive carriageway which is assumed can be connected into the site. Although the site does not have access via a footway currently, as none are provided on Combe Fields Road.
Cycleways/Routes		There is no existing cycle infrastructure connecting to the site, and this does not extend through the existing Ansty park connecting to Combe Fields Road.
Buses	**Distance to stops**	800m (assuming access via Airfield Drive)
	Service Frequency	30-minute frequency of service from one service connecting the site to Coventry
Train Station		Coventry Arena Train station (6.6 km to the west of the site in a straight line distance) although this only provides an hourly service in each direction. Coventry Rail Station – (8.4km to the southwest of the site in a straight line distance) this provides access to a higher frequency of service and destinations.
Co-located with existing employment?		Yes - is situated to the north of the existing employment area, Antsy Park.
Other		Located to the north of an existing employment site – there may be opportunities to use LiftShare. However, it does not appear there is a site specific scheme in place. RBC rated the site PTAL score as 1a for both the AM and PM periods.

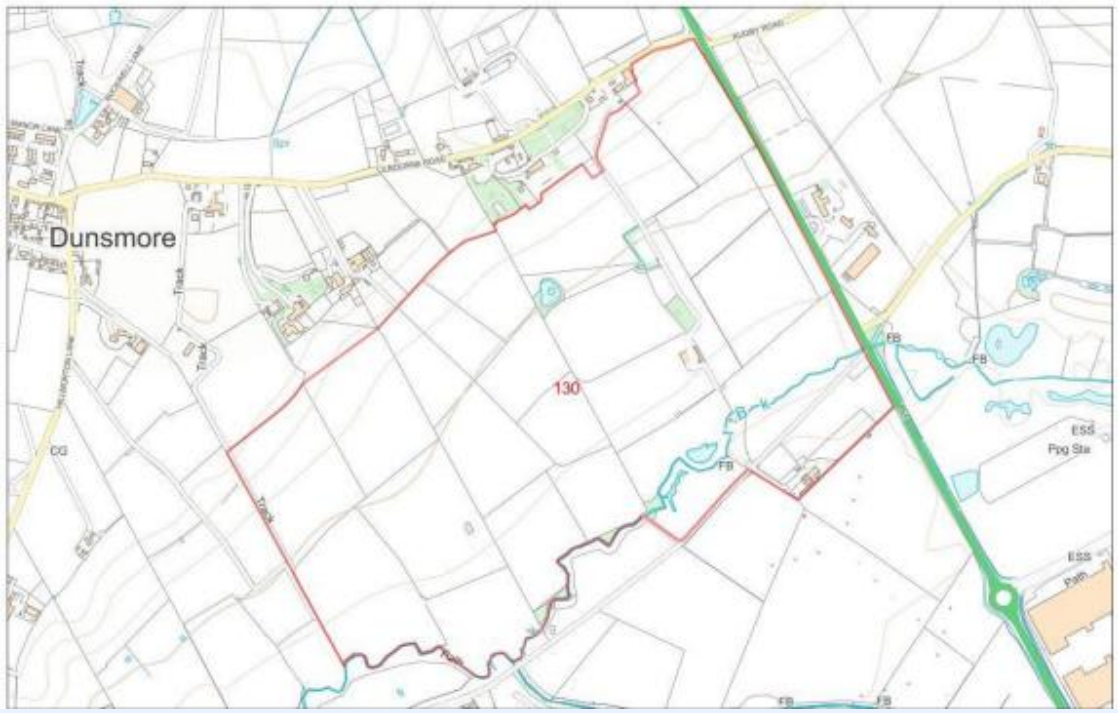
Land Bound by M69, M6 and B4029 (Site 95)



Notes: Map extracted from Rugby Borough Council Stage 2 Site Options Assessment, December 2025

Footways		The site is accessed from the B4065, where a footway is provided along the eastern side of the B4065 carriageway which is assumed to connect into the site.
Cycleways/Routes		There is no existing cycle infrastructure within the vicinity of the site.
Buses	**Distance to stops**	145m
	Service Frequency	There are a minimal level of services from the closest stops, which link Coventry to Nuneaton broadly every two hours. These therefore serve a minimal catchment area. There is not an appropriate walking route connecting to the stops to the south in Ansty Park and these are a significant distance from the site.
Train Station		Coventry Arena Rail station – 5.6km to the west of the development site in a straight line distance, although this only provides an hourly service in each direction. Coventry Rail Station – (8.3km to the southwest of the site in a straight line distance) - providing access to a higher frequency of service and destinations.
Co-located with existing employment?		No - the site is situated to the north of the Ansty Park development but is separated from this development by the M6. As such, there are less opportunities for benefits from a co-location and all large vehicle movements would need to route through the M6 Junction 2 to travel between the sites.
Other		There may be an opportunity to connect with the existing Ansty Park and extend the X30 bus service, albeit this is considered undesirable as it will impact the frequency and directness of that service. The site has limited and unattractive existing sustainable transport links and is disconnected from existing employment areas by the M6 and M69. RBC rated the site PTAL score as 1a for both the AM and PM periods.

Land North of Houlton (Site 130)



Notes: Map extracted from Rugby Borough Council Stage 2 Site Options Assessment, December 2025

Footways		There is no footway infrastructure along Lilbourne Road to the north of the site and the A5 to the east of the site. To the south of the site, Hillmorton Road can be used to access the bus stops situated along the Houlton Way.
Cycleways/Routes		There is no existing cycle infrastructure within the vicinity of the development site.
Buses	**Distance to stops**	The closest bus stop is situated c.1.05km to the north of the site, further bus stops are provided to the southwest of the site along Houlton Way c.4.2km, although this is considered extremely unlikely to be a distance people would walk to a stop.
	Service Frequency	Services are minimal with just two services per day provided in relation to the L1 service. These link to Rugby.
Train Station		Rugby Rail Station is c.3.6km to the west of the development site in a straight-line distance
Co-located with existing employment?		Partially – the site is situated to the northwest of the existing DIRFT site which is situated on the eastern side of the A5. This is not connected by any footways, with the connection only being along the SRN on the A5. As such, there is less opportunity for movements between the sites, or for example, users to benefit from public transport services which connect to that site.
Other		Located to the southeast of the site is an existing employment site – there maybe opportunities to use LiftShare. However, it does not appear there is a site specific scheme in place. The site scored a PTAL score of 0, which indicates that has no public transport accessibility.

4.3.5 The analysis clearly demonstrates that the land west of Magna Park site and the RBC preferred sites have, as a worst case, broadly similar characteristics in terms of existing active travel infrastructure and distances to public transport services. Indeed, the land west of Magna Park is considered better connected, particularly by bus services than all of the sites considered in this analysis. It has a significantly better location for sustainable travel connections than land north of Houlton (Site 130) and Land Bound by M69, M6 and B4029 (Site 95).

4.3.6 In terms of bus routes, the land west of Magna Park site provides access to four services connecting to four key local areas. None of the other sites has this level of bus service provision. Sites either have very limited to non-existent provision, or services connecting to these sites provide access to a limited number of destinations.

4.3.7 Sites 95 and 130 are considered to have a less suitable location for access by all sustainable modes and less potential for improvements to connect to existing infrastructure. Public transport accessibility is poor and would require considerable improvement to provide attractive alternatives to the private car.

4.3.8 None of the other sites benefits from access to the FoxConnect service or have an existing and well used car sharing scheme in place with Liftshare that they could utilise and enhance. As such, for public transport services, the land west of Magna Park site is considered to be situated in the best location.

4.3.9 The land west of Magna Park site benefits from measures that have been implemented at Magna Park and has the opportunity for delivering sustainable infrastructure which will connect with existing facilities and public transport routes. The ability to access existing infrastructure and deliver improvements to all modes of travel, which will also benefit the existing Magna Park site, provide a key advantage for the delivery of the land west of Magna Park.

4.3.10 This will enable the land west of Magna Park site to constrain vehicle movements and the vision-led approach for the site would also be to assist in removing background traffic across the existing Magna Park site through improvements to the sustainable transport offering. This would minimise the impact of any additional vehicle movements on the network.

4.3.11 On this basis, it is considered that the conclusion reached by RBC (in its Sustainability Appraisal as detailed in Section 1), in relation to the sustainable connectivity of the site, is flawed and has not been considered in a reasonable or consistent manner against other sites. The site is clearly a sustainable location for employment-based development and conforms with paragraphs 110 and 115 of the NPPF. Therefore, the connectivity by sustainable modes is not a valid or appropriate reason by which to disregard this site for allocation.

5. SUMMARY AND CONCLUSION

5.1.1 This Transport Note has reviewed the sustainable transport connectivity of the land west of Magna Park and the approach taken by Rugby Borough Council (RBC) in assessing the site through the Local Plan evidence base.

5.1.2 The analysis demonstrates that the site benefits from its immediate proximity to the established Magna Park employment area, which already supports a range of sustainable transport measures including regular bus services, walking and cycling infrastructure, a well established car sharing scheme and demand responsive transport services. These measures provide a strong existing baseline which can readily be extended to serve the site, with further opportunities to enhance sustainable transport provision alongside any future scheme, benefiting both existing and potential future employees.

5.1.3 Evidence relating to workforce origins and travel patterns shows that Magna Park draws employees from nearby key urban areas including Leicester, Rugby, Hinckley and Lutterworth, all of which are connected to the site by existing public transport services (as well as Lutterworth being connected by direct walking / cycling infrastructure). A significant proportion of the existing workforce (approximately 20%) can access the site via the existing direct bus services. This demonstrates that travel by sustainable modes already forms part of the established travel pattern to the area and that additional development on the site would help support the viability and potential enhancement of these services.

5.1.4 The review also identifies clear limitations in the methodology used by RBC when assessing the site. In particular, the reliance on high-level connectivity metrics and broad geographic analysis does not adequately reflect site specific circumstances or the clear benefits associated with the co-location of development alongside the existing Magna Park site.

5.1.5 When compared with other potential employment allocation sites promoted through the Local Plan process, the land west of Magna Park performs at least comparably, and in several respects more favourably, in terms of sustainable transport connectivity.

5.1.6 Accordingly, the evidence demonstrates that the site represents a sustainable location for employment development in transport terms and accords with paragraphs 110 and 115 of the NPPF. The Council has not demonstrated, through a robust or proportionate evidence base, that sustainable transport connectivity represents a constraint to development at this location. On the contrary, the available evidence indicates that the site benefits from a range of existing and deliverable sustainable transport options. Furthermore, the delivery of development at this location provides a clear opportunity to further enhance sustainable transport provision serving both the proposed development and the existing Magna Park employment area. Sustainable transport connectivity is therefore not a valid or appropriate reason to disregard the site for allocation.

5.1.7 In these circumstances, there is no robust evidence to justify discounting the site for allocation on the basis of sustainable transport connectivity. The exclusion of the site for allocation on these grounds would therefore raise questions as to whether the Plan has been positively prepared and justified in accordance with national policy.

Appendix A Transport Note – Vision for Sustainable Travel and Consideration of Highway Impacts

Land West of Magna Park

Transport Note – Vision for Sustainable Travel and Consideration of Highway Impacts

Client: **GLP**

16 May 2025

Document Reference: **C25078/TN01**

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Appendices

Appendix A Parameters Plan

EXECUTIVE SUMMARY

Overview

This Transport Note (TN) considers matters relating to the proposed employment allocations on land west of Magna Park Lutterworth, as part of Rugby Borough Council's (RBC) consultation on its Local Plan Preferred Options March 2025 document.

This note has been prepared to make transport representations to Rugby Borough Council's (RBC) consultation on its Regulation 18 Local Plan Preferred Options March 2025 document.

The sites included within the red line boundary for the land west of Magna Park, which form the subject of this note, are identified as 'Site 106: Land opposite MP Lutterworth', 'Site 57: North of Coal Pit Lane', 'Site 36: Cross-in-Hand Farm, Willey' and 'Site 35: Cross in Hand Farm, Monks Kirby' within the draft Local Plan.

The land west of Magna Park site is estimated to be able to accommodate c. 576,000 sqm (c.6.2 million sq ft) of B2 / B8 employment use.

Magna Park is located within the 'Golden Triangle', a region that is pivotal to the UK's supply chain and distribution networks due to its central location and connectivity to the strategic road network (SRN). The Golden Triangle area is within a four-hour drive of 90% of the British population, and specifically in the context of Magna Park Lutterworth, has good access to the SRN including the M1 and M6 motorways, and the A5 trunk road, all of which provides for efficient transportation and logistics operations.

Sustainable Transport

Magna Park already has an extensive network of infrastructure catering for sustainable transport modes, including a shared pedestrian/cycleway connecting Magna Park to Lutterworth, and regular bus services from four key settlements. Magna Park also already implements successful travel planning initiatives.

It is possible to walk to the land west of Magna Park site from some local areas within suitable distances via continuous footways (connected via new infrastructure delivered as part of the scheme), and the site is also connected by good quality cycle routes to Lutterworth, making cycling a realistic and attractive option for potential future employees.

Bus services are extensive and suitable for serving typical shift working patterns, as well as connecting to four key residential areas (Leicester, Lutterworth, Hinckley and Rugby). The site also benefits from being connected to the FoxConnect on demand service. As such, there are good options for travel by bus.

The site will be committed to promoting a sustainable transport hierarchy in accordance with the aims of local policy and the vision-led approach supporting any planning application would encourage a high level of sustainable transport, as well as assist in reducing vehicle movements from existing Magna Park users through improving the overall sustainable transport offering. This will also include additional car sharing matches through the increase in employees in the area (with car sharing being an excellent travel option), as well as potentially increasing the frequency of bus services or ensuring the ongoing viability of bus services.

RBC commissioned an initial comparative analysis of the sustainable locations of local plan candidate sites and have set out the preferred sites based on this analysis. Given the assessments are based on MSOA or LSOA data, these are not site specific and therefore do not consider the exact transport situation or context at each individual candidate site. As such, this note provides a direct comparison considering the context of each of the preferred sites against the land west of Magna Park. This shows that the land west of Magna Park is considered to provide the best location for access to public transport, whilst all sites are broadly similar in terms of access to active travel infrastructure.

The land west of Magna Park site benefits from measures that have been implemented at Magna Park and has the opportunity for delivering sustainable infrastructure which will connect with existing facilities and public transport routes. The ability to access existing infrastructure and deliver improvements to all modes of travel, which will also benefit the existing Magna Park site, provide a key advantage for the delivery of the land west of Magna Park.

Economies of Scale and Labour

In addition, there are economies of scale in respect of co-locating distribution and commercial operations adjacent to and within established commercial hubs such as Magna Park Lutterworth. It is now common place for business operators to coordinate shipments and deliveries, ensuring that vehicles travel at full capacity and minimising the number of trips that take place. This happens at a significant scale in Magna Park currently. These efficiencies are lost if such operations are spread more thinly across the district or county.

Magna Park is ideally situated to benefit from planned growth in the local area to connect to existing and future labour. can positively impact sustainable travel as there is enhanced local employment and opportunities to reduce carbon footprint. It also minimises travel distances for employment opportunities in this sector, as employees can travel to Magna Park rather than a further distance elsewhere.

Delivery of Improvements

The site can deliver improvements to the pedestrian and cycle network to enable continuous connections to the various parcels from the existing infrastructure.

Discussions would be held with public transport operators seeking to extend all existing bus services to Magna Park to route through the site, where feasible. If needed, a reasonable and proportionate contribution can be made to increase the frequency of one service, particularly during peak travel times, to further enhance the quality of services available to both existing and potential future employees.

The site also has the potential for providing a reasonable and proportionate contribution towards the FoxConnect service, as well as increasing the patronage of this service through the increased number of employees in the Magna Park area.

The site will encourage and promote sustainable transport via travel planning measures, which would utilise existing measures in place for Magna Park, this would include utilising the site specific car sharing scheme and expanding the number of users.

The land west of Magna Park site would therefore seek to generate a higher level of sustainable transport use than the existing levels at Magna Park. This will reduce the vehicle trip generation to lower levels than are currently experienced at the existing Magna Park.

The measures implemented as part of the delivery of the land west of Magna Park site will also assist in reducing vehicle movements at the existing Magna Park site through the benefits gained from an increased number of units and employees (i.e. more car sharing, walking and cycle buddying, increased linking of operational vehicle movements).

As such, the sustainable travel measures and co-location of distribution sites will assist in mitigating the vehicle movements generated by a potential development, in a way that may not be possible for other competing sites.

Trip Rates and Traffic Impacts

Historic applications have been reviewed in relation to agreed trip rates and generation for Magna Park, and these have been compared to surveys obtained in 2025. This showed that traffic flows have reduced significantly between the period 2013/14 to 2025, by up to nearly 7,000 (26%) trips per day within the study area, and around 600 (30%-40%) trips in each of the network peak hours.

Potential reasons for the reduction in flows from the site are considered to be as follows:

- **Covid-19:** the pandemic has resulted in permanent changes to traffic behaviours, either in how frequent trips are made, or how they are now made (e.g. mode share shift).
- **Route optimisation**: Advances in technology have enabled better route planning and optimisation, reducing the number of trips needed to deliver goods.
- **Increased vehicle capacity**: Improvements in vehicle design and logistics strategies have allowed for larger loads, meaning fewer trips are needed to transport the same amount of goods.
- **Consolidation of shipments**: Companies are increasingly consolidating shipments to maximize efficiency, reducing the frequency of trips. A benefit realised as Magna Park expands.
- **Sustainability initiatives**: There is a growing emphasis on reducing carbon footprints, leading to more efficient use of vehicles and fewer trips.
- **Economic factors**: Rising fuel costs and other economic pressures have incentivised companies to find ways to reduce transportation costs, including minimising the number of trips.
- **Improved technologies**: Improved technology in warehouses has reduced the number of staff required within warehouses.

As such, this demonstrates that there may be greater capacity on the network than previously accepted when the existing Magna Park sites were approved.

The surveys also established trip rates for 2025 for Magna Park. The trips generated by the land east of Magna Park site would be significantly offset by the reduction in flows that have occurred at Magna Park since the 2013/14 traffic surveys were undertaken. This historic baseline position has been accepted by the highway and planning authorities and mitigation agreed accordingly. The increase in flows over and above this previously accepted position is relatively minimal in the AM peak hour and there is a minor benefit in the PM peak hour.

Based on these surveys, a vision-led approach for the vehicle trip generation on the land west of Magna Park site would be to achieve a 10% reduction on the obtained 2025 trip rates.

Transport assessments are also now required to undertake a vision-led assessment, whereby various scenarios are considered. When this takes place as part of a detailed transport assessment supporting a planning application, it is expected that the assessment scenarios will forecast the continued downward trend in vehicle trip generation and consider a reduced vehicle trip rate scenario for both the land west of Magna Park, and Magna Park itself.

A high level analysis of traffic flow changes has been considered at the Cross in Hand roundabout and the A5 Gibbet Hill roundabout. This has been based on comparisons in background traffic between pre and post pandemic flows.

At the Cross in Hand roundabout, the development impacts at the junction are significantly offset by the reduced traffic flows that have occurred since the position agreed prior to the pandemic, and if needed, the site can facilitate the delivery of a suitable mitigation scheme.

A comparable analysis of traffic flows at A5 Gibbet Hill roundabout has been undertaken which shows that traffic flows have reduced by up to 20% at the junction since pre-Covid conditions in the peak hours, and the

distribution by arm at the junction has also changed significantly. As such, any modelling undertaken previously using pre-Covid traffic flows is likely to be overly robust, and it is recommended that new detailed modelling is undertaken at the planning application stage, using up to date traffic survey data. This should also reflect the vision-led scenario testing for future year assessments and consider the vision-led approach for the site to increase the level of sustainable travel in comparison to the existing Magna Park levels.

The land west of Magna Park site is also forecast to send just 20% of traffic movements through this junction, which would lead to a minimal change in overall movements compared with the previously accepted position given the demonstrated significant reduction in flows at this junction.

Contributions have already been secured from developers to mitigate development impacts at the A5 Gibbet Hill roundabout junction. At least £5.2 million has been paid and this figure is currently pooled for the purpose of delivering junction improvements at A5 Gibbet Hill roundabout. The mitigation provided in relation to the Magna Park South site is also related to the impact of a significantly higher level of vehicle movements than is currently being generated.

If needed, the site could also provide a reasonable and proportionate contribution towards the delivery of an improvement scheme at the junction, although a strategic scheme has been identified by HDC, with an estimated cost of £4.2mil for its delivery, and existing funding appears to be in place to deliver this.

The land west of Magna Park site could also provide a reasonable and proportionate contribution towards any identified further costs for a scheme, to ensure that a suitable and viable scheme can be delivered in a reasonable timeframe outside of the National Highways Road Investment Strategy (RIS) process, if needed.

Conclusions and Next Steps

To conclude, it is apparent that a demand exists for a B2 / B8 warehousing and logistics development, and there are significant advantages of positioning this development within existing warehousing and logistics hubs, particularly in the Magna Park location.

The site will encourage and promote sustainable transport and generate a higher level of sustainable transport use than the existing levels at Magna Park. Suitable sustainable transport infrastructure improvements can be delivered to encourage sustainable travel. This will aid in reducing the vehicle trip generation to lower levels than are currently experienced at the existing Magna Park.

It is considered that there should be capacity on the network for accommodating development at the land west of Magna Park site, subject to more detailed analysis, and there should be viable highway mitigation solutions to deliver the site appropriately and without a severe impact. Further and more detailed analysis and traffic modelling will be undertaken as part of any future work relating to the land west of Magna Park site.

Detailed vision-led transport assessments would be required at the planning application stage, in accordance with normal best practice, to determine the impacts of the site and the necessary mitigation strategy.

1. INTRODUCTION

1.1 Overview

1.1.1 This Transport Note (TN) considers matters relating to the proposed employment allocations on land west of Magna Park Lutterworth, as part of Rugby Borough Council's (RBC) consultation on its Local Plan Preferred Options March 2025 document.

1.1.2 This note has been prepared to make transport representations to Rugby Borough Council's (RBC) consultation on its Regulation 18 Local Plan Preferred Options March 2025 document.

1.1.3 The land west of Magna Park site is estimated to be able to accommodate c. 576,000 sqm (c.6.2 million sq ft) of B2 / B8 employment use.

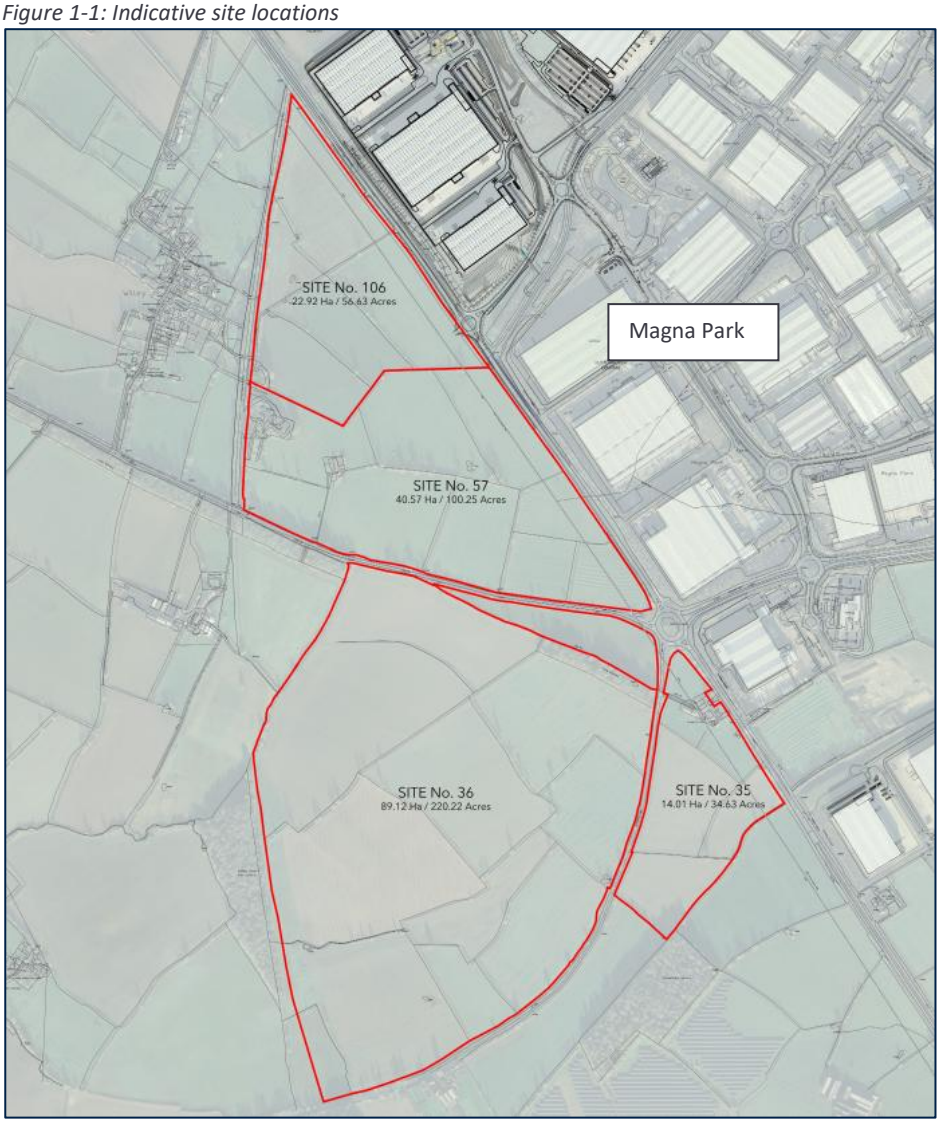
1.1.4 The note considers the opportunities for sustainable transport and sets out a vision-led approach for increasing sustainable transport movements and constraining vehicle movements to and from the site, whilst also reducing background movements across the existing Magna Park through a joined up sustainable travel strategy and consolidation of operational vehicle movements.

1.1.5 The note demonstrates that the site is well located for accommodating employment uses and minimising vehicle movements, as well as for facilitating the delivery of key strategic infrastructure improvements which would offer further benefits on the network. It also demonstrates that the site has a preferential location for access by sustainable modes than other competing sites.

1.1.6 Magna Park is located within the 'Golden Triangle', a region that is pivotal to the UK's supply chain and distribution networks due to its central location and connectivity to the strategic road network (SRN). The Golden Triangle area is within a four-hour drive of 90% of the British population, and specifically in the context of Magna Park Lutterworth, has good access to the SRN including the M1 and M6 motorways, and the A5 trunk road, all of which provides for efficient transportation and logistics operations.

1.1.7 The sites included within the red line boundary and which are considered in this note are identified as 'Site 106: Land opposite MP Lutterworth', 'Site 57: North of Coal Pit Lane', 'Site 36: Cross-in-Hand Farm, Willey' and 'Site 35: Cross in Hand Farm, Monks Kirby' within the draft Local Plan. These are shown indicatively in Figure 1-1. The four land parcels have been considered together for the purposes of this note.

Figure 1-1: Indicative site locations



1.1.8 At this stage of the local plan process, a review of numerous sources of information has been undertaken. This has demonstrated that the site is suitably located for access by sustainable modes, can deliver a suitable vehicular access strategy and can facilitate the delivery of highway improvements.

1.1.9 The scheme would also be designed, and any future application submitted, to accord with the requirements and aims of the NPPF, specifically paragraph 87(b) relating to logistics and distribution schemes, and paragraphs 109-118 relating to considering transport impacts. In particular an application would be supported by a comprehensive vision-led transport assessment, with this vision-led approach being reflected in this Transport Note. This will be developed and discussed in detail with the relevant planning and highway authorities during the preparation stage of any such planning application.

1.2 Structure

1.2.1 The structure of the remainder of this report is as follows:

- Section 2: undertakes a review of the **RBC LP Initial Site Analysis** prepared by SLR
- Section 3: considers the **existing Connectivity by Sustainable Modes**

- Section 4: provides a review of the **CBRE Magna Park, Lutterworth** document on employee trends at Magna Park
- Section 5: sets out the **potential Development density, Proposed Access Strategy and Transport Improvements and an overall transport vision**
- Section 6: presents **approved Magna Park trip rates**
- Section 7: summarises obtained **Magna Park traffic surveys** from 2025
- Section 8: sets out up to date **Magna Park trip rates** derived from the 2025 traffic surveys
- Section 9: provides **trip generation estimates for the land west of Magna Park site**, using the 2025 Magna Park traffic surveys
- Section 10: provides a high level consideration of the **impacts** of the land west of Magna Park site
- Section 11: Provides a **summary and conclusions**

2. REVIEW OF LOCAL PLAN INITIAL SITE ANALYSIS

2.1 Overview

2.1.1 SLR were commissioned by Warwickshire County Council (WCC) and RBC to undertake an initial assessment of the transport network implications resulting from the delivery of development sites identified by RBC through the Local Plan 'Call for Site' process. The objective of the assessment was to identify any sites which may be constrained by existing transport choice and highway capacity issues, prior to them being considered for allocation within the Plan. This was completed by identifying:

- The existing levels of accessibility to different modes of transport across the study area alongside the development locations; and
- How this accessibility may be improved by measures WCC has already identified through the Bus Service Improvement Plan (BSIP).

2.1.2 A Technical Note (TN) was produced by SLR in February 2025. The TN detailed the methodology adopted for the assessment as well as the high level results for each key stage.

2.1.3 The methodology adopted for the assessment undertaken by SLR is presented in three stages, each of which resulted in a data tables score, as well as a rank of each middle layer super output area (MSOA), lower layer super output area (LSOA) and site, to determine which sites, based on this analysis, are more likely to be exposed to increased transport choice through the location of development and/or less likely to be constrained by congestion.

2.1.4 Given the assessments are based on MSOA or LSOA data, these are not site specific and therefore do not consider the exact transport situation or context at each individual candidate site.

2.2 Existing Multi-Modal Accessibility Analysis

2.2.1 The analysis of existing accessibility levels for each area utilised Mobile Network Data (MND) and TRACC, a multi-model transport accessibility software, to identify how accessible Rugby town and the surrounding areas are using different transport modes.

2.2.2 SLR used the most recently acquired MND from WCC for the 2022/23 period to conduct an initial review of travel patterns. This analysis focused on assessing the proportion of different modes of travel and the average distance travelled at the MSOA level. The data was then further disaggregated to the LSOA level for more detailed insights.

2.2.3 Table 2-1 shows the proportion of journeys at an MSOA level which are classified as highway (i.e. car travel), 'slow mode' (walk or cycle) or rail.

Table 2-1: MSOA Modal Share

MSOA Name	Classification	No. of Sites	AM Period			PM Period		
			Highway	Slow Mode	Rail	Highway	Slow Mode	Rail
Rugby 002	Urban City and Town	3	79%	20%	1%	84%	14%	2%
Rugby 003	Urban City and Town	9	78%	19%	3%	79%	18%	3%
Rugby 004	Rural Town and Fringe	18	83%	17%	0%	88%	12%	0%
Rugby 007	Urban City and Town	8	83%	16%	1%	86%	13%	1%
Rugby 010	Urban City and Town	3	81%	19%	1%	83%	16%	1%
Rugby 012	Rural Village and Dispersed	28	85%	15%	0%	90%	10%	0%
Rugby 013	Rural Village and Dispersed	44	81%	18%	0%	92%	8%	1%
Rugby 014	Rural Village and Dispersed	11	78%	21%	1%	82%	17%	1%

2.2.4 The modal share analysis indicates a higher proportion of active and rail travel in the urban areas. The land west of Magna Park site lies within MSOA Rugby 013 which is considered as 'Rural Village and Dispersed'. This analysis suggests a reduced rate of travel via active travel modes to sites within this MSOA. However, the analysis only measures accessibility at a MSOA level, rather than site specific accessibility. As such, the conclusions made from the multi-modal accessibility analysis are not considered representative of each site specific location and therefore are not considered suitable to forecast the likely travel behaviours of the west of Magna Park site, nor other competing sites.

2.3 Public Transport Accessibility Level (PTAL) Analysis

2.3.1 Using the TRACC software, PTAL scores across RBC were calculated using public transport data from Q2 (April to June) 2024. This was undertaken for the MSOAs, LSOAs and sites. The land West of Magna Park site lies within MSOA Rugby 013 and LSOA Rugby 013B.

2.3.2 Each PTAL grid square represents the distance to the nearest public transport node and service frequency at those nodes. The result is a grade from 1 to 6 (including sub-divisions 1a, 1b, 6a and 6b), where a PTAL of 1a indicates poor access to the location by public transport, and a PTAL of 6b indicates excellent access by public transport.

2.3.3 A summary of the PTAL scores at MSOA level and LSOA level are shown in Table 2-2 and Table 2-3.

Table 2-2: MSOA PTAL

MSOA Name	AM	PM
Rugby 002	2	2
Rugby 003	2	2
Rugby 004	1a	1a
Rugby 007	1a	1a
Rugby 010	1a	1a
Rugby 012	1a	1a
Rugby 013	1a	1a
Rugby 014	1a	1a

Table 2-3: LSOA PTAL

LSOA Name	AM	PM
Rugby 002G	2	2
Rugby 003A	1b	1b
Rugby 003B	1a	1a
Rugby 003C	3	3
Rugby 003D	2	2
Rugby 004A	1a	1a
Rugby 004C	1a	1a
Rugby 004D	1a	1a
Rugby 004E	1a	1a
Rugby 007E	1a	1a
Rugby 007J	1a	1a
Rugby 010B	1a	1a
Rugby 010C	1a	1a
Rugby 012B	1b	1a
Rugby 012C	1a	1a
Rugby 012D	1a	1a
Rugby 012E	0	0
Rugby 012F	0	0
Rugby 012G	1a	1a
Rugby 013A	0	0
Rugby 013B	1a	1a
Rugby 013C	1a	1a
Rugby 013D	0	0
Rugby 014A	1a	1a

Rugby 014B	1a	1a
Rugby 014D	1a	1a
Rugby 014E	0	0

2.3.4 The land west of Magna Park site is shown to have a PTAL score of 1a for both the AM and PM periods for both the MSOA and LSOA. The site ranked at 15th out of 94 when considering all the sites assessed.

2.3.5 The PTAL analysis included within the SLR assessment uses site specific information and as such is considered applicable when considering the sustainability of the site. Although it is noted that the site does not achieve a high PTAL score, the assessment does demonstrate that the site achieves a much greater ranking than other sites assessed, and additionally achieves the same ranking, if not greater, than the sites which RBC has initially considered sequentially preferable (sites 14, 17, 18, 50, 61, 64, 95, 130 and 133).

2.3.6 Additionally, this is based on existing infrastructure and does not consider the measures that can be delivered by the site, such as on-site bus stops and increases in service frequencies through discussions with bus service providers and increasing the critical mass of employees concentrated in this area, which would increase the public transport accessibility score for this site. As such, based on the SLR assessment, the site scores at least as well as the other sites RBC considers sequentially preferable and has the potential for a significantly better public transport access, as considered in Section 3.7 of this report.

2.4 Bus Origin-Destination Accessibility Analysis

2.4.1 TRACC Origin-Destination calculations were undertaken to identify MSOAs which are accessible by bus within 1 hour during the AM (07:00 to 10:00) and PM (16:00 to 19:00) periods. As per the PTAL assessment, bus service and route data for Q2 2024 was utilised.

2.4.2 MSOA Rugby 013 was ranked 8 out of 8 within the table. However, this ranking applies to the area level as a whole, rather than being site specific. Given that there are 44 sites located within this MSOA, the conclusions made from the bus origin-destination accessibility analysis are generalised and are not considered representative of each site. Therefore, it is not clear from this how the land west of Magna Park site actually performs as this is calculated as an average across the 44 sites. On this basis, the information presented for this section is not considered an appropriate gauge by which to measure and compare the sustainability of individual sites.

2.5 Public Transport Improvement Accessibility Assessment

2.5.1 WCC provided SLR with the latest information on proposed BSIP measures in Rugby. This has been reviewed to select the key plans which can be considered using the TRACC software including new services and stops, timetable revisions and select infrastructure improvements.

2.5.2 MSOA Rugby 013 performs the same for the PTAL scores and ranks inclusive of the BSIP adjustments.

2.5.3 Rugby 013 MSOA has the lowest score in the BSIP inclusive bus O-D accessibility assessment. This is due to the calculation in TRACC being unable to complete any ‘bus only’ trips due to the MSOA centroid’s location and dispersed natures of the stops and services in the surrounding area. As set out in the bus origin-destination accessibility analysis, information presented at a MSOA level is not considered an appropriate gauge by which to measure and compare the sustainability of individual sites.

2.6 RBC Local Plan Preferred Option Consultation Document March 2025

2.6.1 Following the assessment undertaken by SLR for WCC and RBC, RBC have selected the preferred employment allocations, which are summarised in Table 2-4. This did not include the land west of Magna Park site.

Table 2-4: RBC S7 Preferred Employment Allocations

Site Ref.	Site Name	Floorspace
64	Coton Park East	Circa 115,000 sqm
17	South West Rugby employment phase 2	Circa 130,000 sqm
14	North of Ansty Park	Circa 75,000 sqm
95	Crowner Fields Farm and Home Farm, Ansty	Circa 275,000 sqm
328	Prologis Park West and Mountpark, Ryton-on-Dunsmore	Circa 350,000 sqm
Total		**945,000 sqm**

2.6.2 The preferred sites are based on the analysis using MSOA and LSOA area data. As such, a more detailed comparison of the preferred sites against the land west of Magna Park site is provided in Section 3.7.

2.7 Summary

2.7.1 An assessment of existing accessibility conditions and those predicted to result from the inclusion of BSIP measures was undertaken by SLR using Mobile Network Data (MND) and TRACC travel time analysis software. The output consists of a data table which presents the 124 Local Plan sites, which have been ranked by accessibility using calculations at an MSOA and LSOA level.

2.7.2 The ranking and the 'sustainability' of the site has been based on the MSOA and LSOA level area and therefore only provides information on accessibility for the part of the borough in which the site lies. As such, the assessments are not considered representative of each site and further site specific analysis has been undertaken (in Section 3.7) to provide a more suitable comparison more fully considering the context of each preferred employment site.

3. EXISTING CONNECTIVITY BY SUSTAINABLE MODES OF TRAVEL

3.1 Introduction

3.1.1 This section sets out the existing connectivity of the site to the surrounding areas by sustainable modes of travel and demonstrates its proximity to public transport, facilities, services and residential areas. This shows the existing situation, and therefore the baseline position which can be improved in order to deliver the west of Magna Park site.

3.1.2 The site is located adjacent to similar employment uses at Magna Park which generate significant levels of movement by all modes. As such, the broad connectivity of the site by sustainable modes of travel has been established and accepted for industrial and employment uses. The Magna Park site also has implemented a significant level of sustainable travel measures to minimise car use for employees and visitors, which can also be utilised and expanded upon by the delivery of the land west of Magna Park site. Notwithstanding this, a review of the existing walking, cycling and public transport networks has been set out in this section.

3.2 Walking

3.2.1 Walking is the most important mode of travel at a local level and offers the greatest potential to replace short car journeys.

Infrastructure

3.2.2 The site is well located to connect to the well-established industrial/employment area, Magna Park, to the east of the site. The surrounding area already accommodates pedestrian movements for the existing (and committed) industrial and employment uses.

3.2.3 The northern part of the site (site no. 106) is connected to a shared footway / cycleway which runs partly along the A5 and also crosses the A5 at a dropped kerb crossing point. This links to an off-carriageway route which runs into Magna Park via a public right of way, as well as a shared footway / cycleway which runs adjacent to Mere Lane, which in turn connects to a footway running adjacent to Argosy Way / Hunter Boulevard which in turn link to a shared footway / cycleway running along the northern side of the A4303 Coventry Road.

3.2.4 The shared footway/cycleway provided on the northern side of the A4303 Coventry Road connects Magna Park to Lutterworth, providing good quality and well-lit infrastructure to the east of the site.

3.2.5 There is no infrastructure between Hunter Boulevard and the Cross in Hand Roundabout, or along Coal Pit Lane or the B4027 linking to the wider site. As part of the delivery of the land east of Magna Park site, active travel infrastructure such as footways and cycleways will be provided which will connect to the existing infrastructure which serves Magna Park. This will include suitable crossings, as required. There is sufficient highway verge or site frontage in order to accommodate shared footway / cycleway routes and therefore enable a connection from the site to the existing infrastructure. This will also enable connections to the closest bus stops, albeit as part of the scheme discussions would be held with operators aiming to extend services into the site.

3.2.6 It is considered that the site is in a location that does or can benefit from infrastructure that would be attractive to potential future employees who wish to walk to and from the site, and there are/will be continuous routes to the nearest bus stops and into Lutterworth.

Distances

3.2.7 To enable an assessment of the viability of walking between the site and residential areas, it is appropriate to establish the maximum distance that people are generally prepared to walk for work purposes.

3.2.8 There are a number of publications which suggest guidance for appropriate and acceptable walking distances. For reference, these have been summarised as follows.

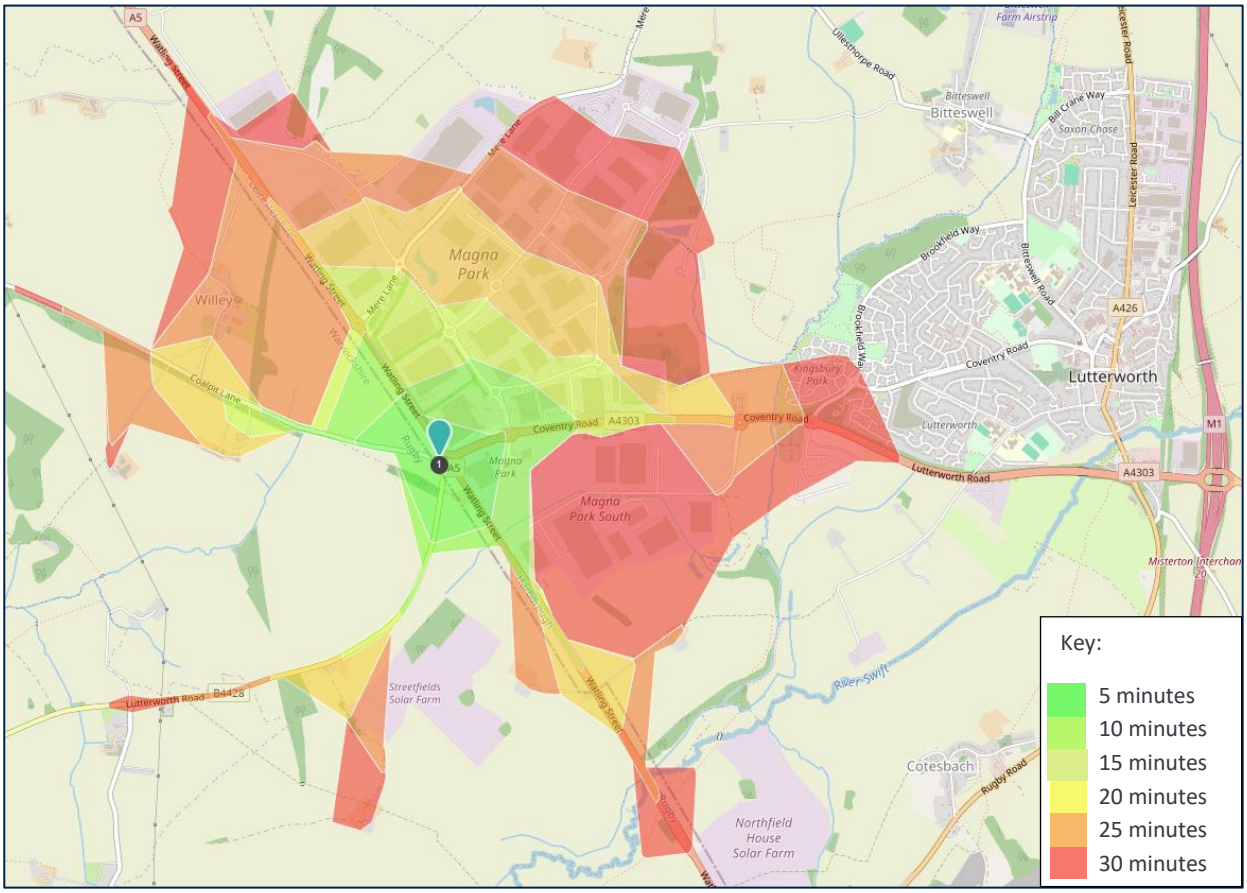
- CIHT - Guidelines for Providing for Journeys on Foot (2000): suggests preferred maximum distances for commuting are up to 2km and states that the average walking journey is approximately 1km.
- Department for Transport (DfT) – Manual for Streets (2007): MfS states that 'walkable neighbourhoods' are typically characterised by having a range of facilities within 10 minutes walking distance (c. 800 metres) – i.e. this would include employment uses. MfS also acknowledges that this is not an upper limit and references previous planning policy guidance in that it is generally acknowledged that walking offers the greatest potential to replace short car trips, particularly under 2km.
- CIHT (2015) – Planning for Walking: In relation to shorter trips in particular, (section 2.1) states that across Britain about '80% of journeys shorter than 1 mile (1.6km) are made wholly on foot'.
- DfT – National Travel Survey 2016 Report (NTS2016)– This suggests on page 16 that 80% of all trips under 1 mile (1.6km) were made by walking. Page 19 suggests that the average walking trip was 16 minutes in time (equating to around 1.3km based on a walking speed of 3mph).
- DMRB – Although recently superseded by CD143, TA91/05 Provision for Non-Motorised Users provided useful guidance on walking and cycling distances, which remains helpful in this regard. Paragraph 2.2 of TA91/05 states that 2 miles (3.2km) is *'a distance that could easily be walked by the majority of people'*. Paragraph 2.3 also continues by stating that *'Walking is used to access a wide variety of destinations including places of work, normally within a range of up to 2 miles'* (3.2km).

3.2.9 As such, based on guidance, it is considered that suitable walking distances could be up to 3.2km. This equates to around a 40-minute walk travelling at 3mph. However, distances of 2km are considered more likely for walking journeys.

3.2.10 Figure 3-1 provides walking time contours from the central site access for a 30 minute walk from the site (broadly equivalent to a 2.4km distance, shown at c.400m / five minute intervals). The nearest bus stops and the western residential areas of Lutterworth are within suitable walking distances. As such, a proportion of employees (and visitors) could travel to the site on foot.

3.2.11 The contour plans do not show walking movements on the majority of parcels 35 and 36, purely due to the software only generating contours on the highway network or public rights of way and the significant majority of these two parcels are undeveloped and restricted land. As such the contours are shown to be closely following Coal Pit Lane and the B4428, although all units constructed within the site would be accessible by walking through suitable footways.

Figure 3-1: Walking isochrones



Source: Openroute Service
Note – parcels 35 and 36 will also accessible by walking through a network of footways within any potential development, but the majority of these sites do not include contour colouring, as these do not have public rights of way or roads running through them.

3.2.12 Walking will form a part of the movement strategy and vision for sustainable travel and improvements will be delivered as part of any forthcoming development. This will be subject to a walking infrastructure assessment at the planning application stage, and full details of suitable measures will be identified at that stage.

3.3 Cycling

Routes and Infrastructure

3.3.1 Magna Park already has an extensive network of infrastructure catering for sustainable transport modes, including a shared pedestrian/cycleway connecting Magna Park to Lutterworth along the A4303.

3.3.2 There are no cycle routes along Coal Pit Lane or the B4027 connecting to the southern part of the site, but there is the potential for delivering these improvements within the highway verge of the site boundary. There is also the potential for extending the route along the A5 from the Mere Lane roundabout to the Coal Pit Lane roundabout.

3.3.3 Cycling will form a significant part of the movement strategy, and improvements will be delivered as part of any forthcoming development to connect the land west of Magna Park to its surrounds. This will be subject to a cycling infrastructure assessment at the planning application stage, and full details of suitable measures will be identified at that stage.

Distances

3.3.4 There are a number of publications which suggest guidance for appropriate and acceptable cycling distances for commuting purposes. Two of the key guidance documents have been summarised as follows.

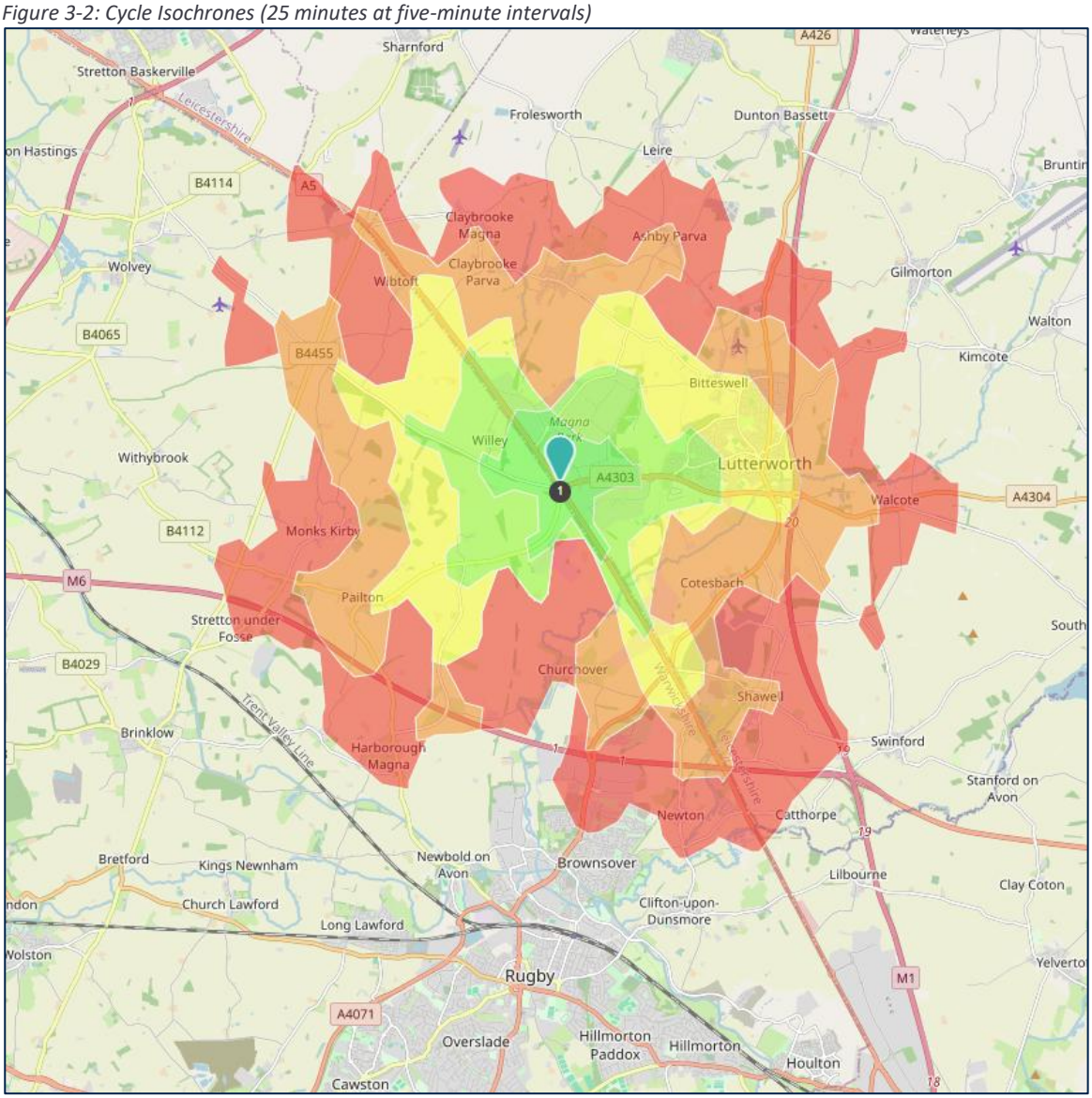
- DfT – LTN1/20 Cycle Infrastructure Design (paragraph 2.2.2) – states that *"Two out of every three personal trips are less than five miles in length, an achievable distance to cycle for most people"* (c.8km).
- Although recently superseded by CD143, TA91/05 states (paragraph 2.11) that *'Cycling is used for accessing a variety of different destinations, including places of work, up to a range of around 5 miles.'* At paragraph 2.9, TA91/05 states that 5 miles (c.8km) is a distance *'that could easily be cycled by the majority of people'.*

3.3.5 It has been assumed that journeys of up to 8km are within an acceptable cycling distance. A cycling journey of 8km would equate to approximately a 25 minute trip.

3.3.6 The Openroute Service has been used to generate cycle isochrones at five minute intervals up to a total of 25 minutes (c.8km) using roads and cycle routes (i.e. not straight line distances). This has been shown in Figure 3-2. The isochrones are generated based on speeds, dependent on the surface and highway type. The majority (if not all) of the routes used would be paved and as such would be subject to an 18kph speed based on the parameters in the software. A five minute isochrone would therefore cover a distance of c. 1.5km, with a 25 minute isochrone covering a distance of c.7.5km. As such, this is broadly in accordance with the relevant design guidance (indeed, cycle journeys to the site could originate from slightly greater distances, up to 8km from the site, in accordance with the guidance).

3.3.7 The analysis shows cycling isochrones along the A5 connecting to Rugby to the north, which it is recognised is unlikely to occur due to the nature of this route along the Strategic Road Network (SRN). The key route from the site is likely to connect to Lutterworth, which is within an appropriate cycling distance and would be connected by a good quality and off-carriageway route. The isochrones are shown within Figure 3-2.

Figure 3-2: Cycle Isochrones (25 minutes at five-minute intervals)



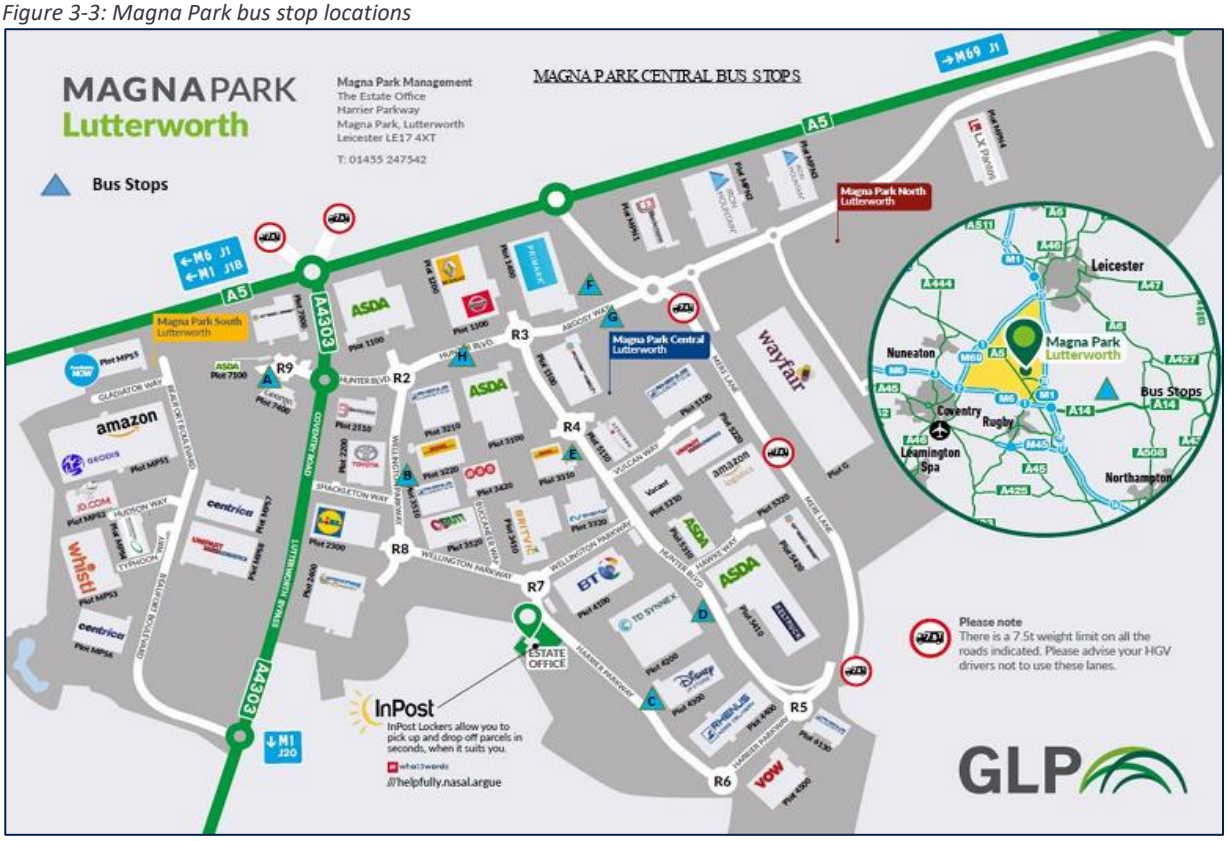
Source: Openroute Service

3.3.8 As such, travelling to the site by cycle is considered a feasible and realistic option for some employees of the site, particularly those travelling to and from Lutterworth.

3.4 Public Transport

3.4.1 Magna Park, located to the east of the site, already has an extensive network of infrastructure catering for sustainable transport modes, including regular bus services. The bus stop locations within Magna Park are shown in Figure 3-3. The closest bus stop to the site is approximately 500m from the site boundary on Argosy Way, from the Site 106 parcel or 450m from the Site 35/36 parcels to the George Building Stop. The closest bus stops from the boundary of all parcels are therefore within 500m, equating to approximately a 6 minute walk.

Figure 3-3: Magna Park bus stop locations



Source: GLP

3.4.2 Figure 3-3 highlights the existing bus stop locations within the vicinity of the site. However, given the scale of the site, additional bus stops would be provided within the site, and discussions would be held with operators to extend the Magna Park services into the site and/or increase frequencies. This would likely include a contribution towards the improvement in services which would benefit existing Magna Park users and further encourage a switch to public transport from existing Magna Park employees.

3.4.3 The services travelling to Magna Park include:

- Leicester: Services X45 & X84, every hour Monday to Sunday including early morning and late-night buses on Weekday. X45 now operates on Sundays to/from Magna Park.
- Lutterworth: Services 8, X45 & X84, every hour Monday to Saturday including early morning and late-night buses on Weekdays
- Hinckley: Service 8, every hour Monday to Saturday including early mornings
- Rugby: Service X84, every hour Monday to Saturday

3.4.4 The three combined services therefore each provide hourly services (average of a 15 minute combined frequency during morning and evening peak times) which link to the key local destinations of Leicester, Lutterworth, Hinckley and Rugby. This enables employees to travel to and from the site from all key local residential areas. The site benefits from being situated adjacent to Harborough District Council (HDC) / Leicestershire County Council (LCC) (within which Magna Park is situated), whereby additional bus services are available compared with other comparable sites located elsewhere in RBC.

3.4.5 Additionally, Magna Park has a club members travel scheme administered by Arriva, where members can benefit from reduced price tickets and convenient access through direct debit payments. This

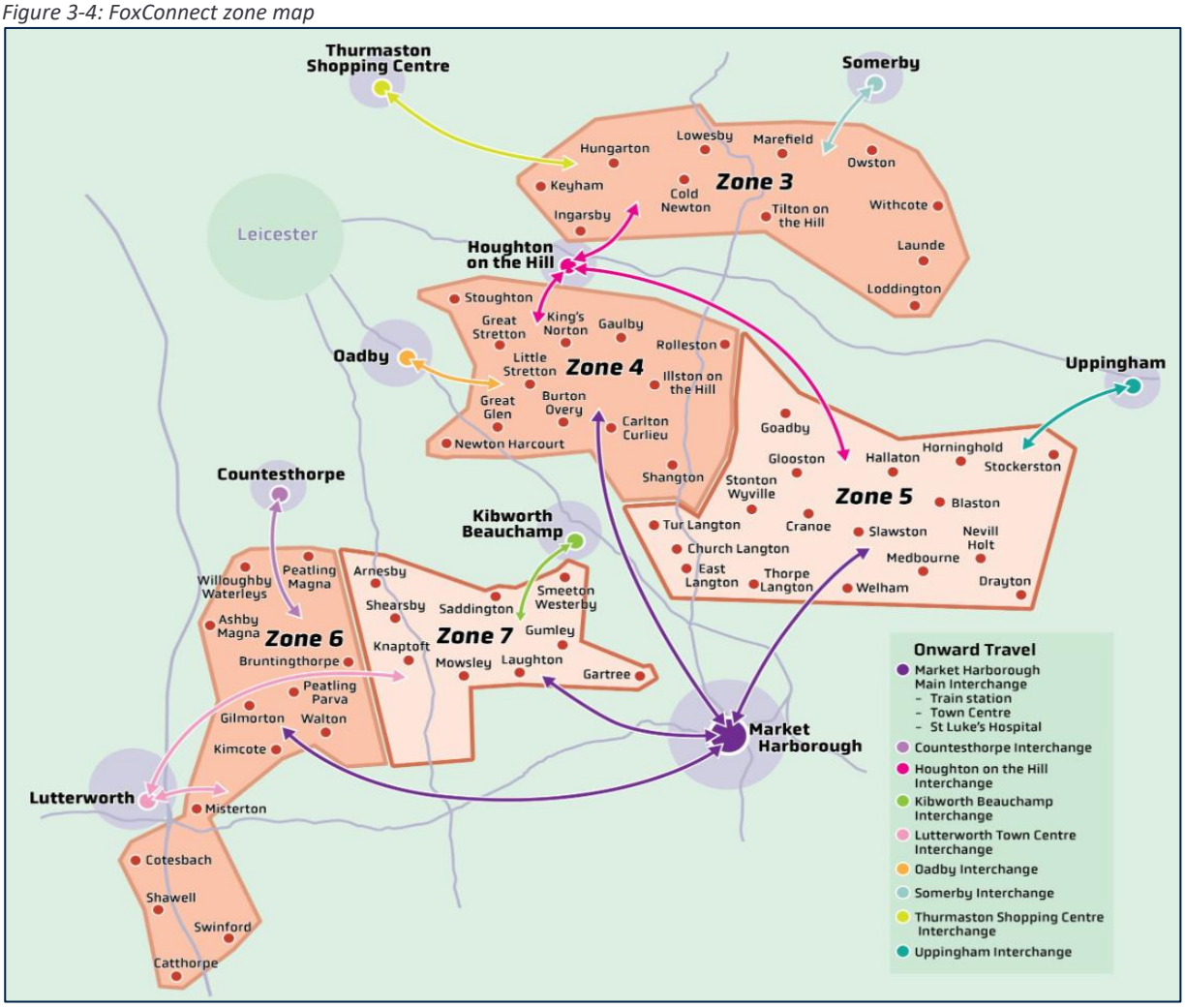
would be extended to employees of the site, were this to come forwards, therefore the site has the benefit of utilising an existing and proven scheme.

3.5 FoxConnect

3.5.1 Magna Park is also served by the Market Harborough FoxConnect scheme, which is a new on-demand transport service which launched in March 2025. The FoxConnect scheme connects rural communities to Market Harborough's town centre and neighbouring villages, including Lutterworth. The service is app based, where the user can choose where they want to get picked-up and dropped-off, meaning it is a convenient and flexible public transport option for travelling to Magna Park. The FoxConnect zone map is provided at Figure 3-4.

3.5.2 As such, the FoxConnect scheme is already in place and being utilised by existing Magna Park employees and can be utilised by potential future employees of the site, who would also assist in ensuring the ongoing viability of the service.

Figure 3-4: FoxConnect zone map



Source: FoxConnect

3.6 Car Sharing

3.6.1 A car sharing scheme is in place at Magna Park operated by Liftshare and currently has over 580 members. Liftshare has estimated that the scheme has removed 335,525 miles of vehicle journeys off the local roads and reduced 73 tonnes of CO^2 emissions as a result.

3.6.2 The existing Magna Park car sharing scheme will be extended to encompass the site. This scheme is already in place, therefore can be extended to potential future employees of the site. This will also enable an increase in LiftShare matches as part of the scheme and increase the viability of the scheme and the usage, both for the site itself and at Magna Park. There is already evidence that this has removed vehicle trips from the network and the delivery of the site has the potential to further increase the level of journeys on the surrounding network.

3.7 Connectivity by Sustainable Modes Comparison

3.7.1 The connectivity of the site with the RBC Local Plan preferred employment allocations has been undertaken based on the distance to bus stops, rail stations and existing footway / cycleway infrastructure. This has been summarised in Table 3-1, which also considers other relevant and key points in relation to sustainable travel.

Table 3-1: Sustainable Travel Comparison between sites

Site	Location	Footways	Cycleways / Routes	Bus Stops	Train Station	Other
35, 36, 57 & 106 - Proposals	To the west of Magna Park Lutterworth, Leicestershire.	A shared footway / cycleway connects to the boundary of Site 106 linking the site to Mere Lane. A shared footway / cycleway is also provided on the northern side of the A4303 Coventry Road which connects Magna Park to Lutterworth, providing good quality and well-lit infrastructure to the east of the site.	A shared footway / cycleway connects to the boundary of Site 106 linking the site to Mere Lane. A shared footway / cycleway is also provided on the northern side of the A4303 Coventry Road which connects Magna Park to Lutterworth, providing good quality and well-lit infrastructure to the east of the site.	450m – four services per hour to four key destinations (Rugby, Coventry, Lutterworth and Leicester) serving the existing Magna Park.	Rugby Train station (7km to the south of the site – straight line distance)	FoxConnect and a Magna Park LiftShare scheme are already in place at the existing Magna Park and can be extended to serve the site.
64	Coton Park East, Central Park Drive, Rugby	The site is accessed from Central Park Drive. Footways located on Central Park Drive and Castle Mound Way providing connections into the site.	A shared footway / cycleway is provided on Central Park Drive and Castle Mound Way providing connections into the site.	175m – good bus services provided, with a 20 minute combined frequency of service across three bus services, albeit to a limited number of locations	Rugby Train station (3km to the south of the site – straight line distance)	Located to the east of an existing employment site – there may be opportunities to use LiftShare. However, it does not appear there is a site specific scheme in place.
17	South West Rugby	Site is accessed through Phase 1 of Symmetry Park. Footways provided as part of Phase 1, and existing footways along the B4429 routing east into Dunchurch.	It is not clear what cycle provision is being provided as part of Phase 1. There is no existing cycle infrastructure connecting to the site. NCN Route 41 can be accessed approximately 1.4km to the southeast of the site.	465m – if connecting north to Coventry Road this provides access to a 15 minute service. However, access to this is along an unlit public right of way.	Rugby Train station (6km to the north of the site – straight line distance)	Located to the north of an existing employment site – there may be opportunities to use LiftShare. However, it does not appear there is a site specific scheme in place.
14	Land north of Ansty Park, Ansty, Coventry	Site is accessed through the existing Ansty Park. Existing footway on at least one side of the Airfield Drive carriageway which is assumed can be connected into the	There is no existing cycle infrastructure connecting to the site, and this does not extend through the existing Ansty park connecting to Combe Fields Road.	450m – 30 minute frequency of service from one service connecting the site to Coventry	Coventry Arena Train station (5.7km to the west of the site – straight line distance)	Located to the north of an existing employment site – there may be opportunities to use LiftShare. However, it does not appear there is a site

		site. Although the site does not have access via a footway currently, as none are provided on Combe Fields Road.				specific scheme in place.
95	Land bound by M69, M6 and B4029, Ansty	The site is accessed from the B4065. A footway is provided along the eastern side of the B4065 carriageway which is assumed to connect into the site.	There is no existing cycle infrastructure within the vicinity of the site.	145m – there are a minimal level of services from the closest stops	Coventry Arena Train station (4.8km to the west of the site – straight line distance)	There may be an opportunity to connect with the existing Ansty Park and extend the X30 bus service, albeit this is considered undesirable as it will impact the frequency and directness of that service. The site has limited and unattractive existing sustainable transport links and is disconnected from existing employment areas by the M6 and M69.
328	Land West of Prologis Park	The site is accessed from the A423. Footways are located along the A423.	There is no existing cycle infrastructure within the vicinity of the site.	150m – served by one bus service with a poor frequency of one service every two hours Separated from the additional 21a service by the River Avon.	Coventry Train station (5.7km to the northwest of the site – straight line distance)	Located to the west of an existing employment site – there may be opportunities to use LiftShare. However, it does not appear there is a site specific scheme in place.

3.7.2 Table 3-1 demonstrates that the land west of Magna Park site and the RBC preferred sites have broadly similar locations in terms of existing active travel infrastructure and distances to public transport services.

3.7.3 In terms of bus routes, the land west of Magna Park site provides access to four services connecting to four key local areas. None of the other sites has this level of bus service provision, as they are not situated in a similar location on the border of HDC / LCC adjacent to an existing employment site within the adjacent district. The frequencies are broadly similar at sites 17 and 64, but the services connect to a limited number of destinations.

3.7.4 Sites 95 and 328 are considered to have a less suitable location for access by all sustainable modes and less potential for improvements to connect to existing infrastructure. Public transport services are worse, with less potential for improvements.

3.7.5 None of the other sites benefits from access to the FoxConnect service or has an existing and well used car sharing scheme in place with Liftshare. As such, for public transport services, the land west of Magna Park site is considered to be situated in the best location.

3.7.6 The land west of Magna Park site benefits from measures that have been implemented at Magna Park and has the opportunity for delivering sustainable infrastructure which will connect with existing facilities and public transport routes. The ability to access existing infrastructure and deliver improvements to all modes of travel, which will also benefit the existing Magna Park site, provide a key advantage for the delivery of the land west of Magna Park.

3.7.7 This will enable the land west of Magna Park site to constrain vehicle movements and the vision-led approach for the site would also be to assist in removing background traffic across the existing Magna Park site through improvements to the sustainable transport offering. This would minimise the impact of any additional vehicle movements on the network.

3.8 Summary of Sustainable Travel

3.8.1 The site is situated in a location which is accessible by sustainable modes of travel. It is well suited to accommodate an employment scheme, being in a location where infrastructure can be delivered to connect into existing pedestrian and cycle networks. It is possible to walk to the site from some local areas within suitable distances via continuous footways (with delivered new infrastructure), and the site is also connected by good quality cycle routes to Lutterworth, making cycling a realistic and attractive option for potential future employees.

3.8.2 Bus services are extensive and suitable for serving typical shift working patterns, as well as connecting to four key residential areas. The site also benefits from being connected to the FoxConnect on demand service. As such, there are good options for travel by bus.

3.8.3 There is a realistic choice of modes of travel for commuting, which will assist in constraining the level of vehicle generation from the site and minimise the impact of the development.

3.8.4 The site benefits from existing sustainable travel measures in place at Magna Park which can be extended into the scheme. The site can also deliver enhancements and improvements which would benefit the existing Magna Park site and assist in reducing vehicle movements associated with the existing site.

3.8.5 The site will be committed to promoting a sustainable transport hierarchy in accordance with the aims of local policy and the vision-led approach supporting any planning application would encourage a high level of sustainable transport, as well as assist in reducing vehicle movements from existing Magna Park users through improving the overall sustainable transport offering. This will also include additional car sharing matches through the increase in employees in the area (with car sharing being an excellent travel option), as well as potentially increasing the frequency of bus services or ensuring the ongoing viability of bus services.

3.8.6 The site location will encourage and promote sustainable travel behaviour, attract employees who choose to travel by sustainable modes and is therefore fully in accordance with sustainable transport policies in the Local Plan and NPPF.

4. REVIEW OF CBRE MAGNA PARK LABOUR STUDY

4.1 Overview

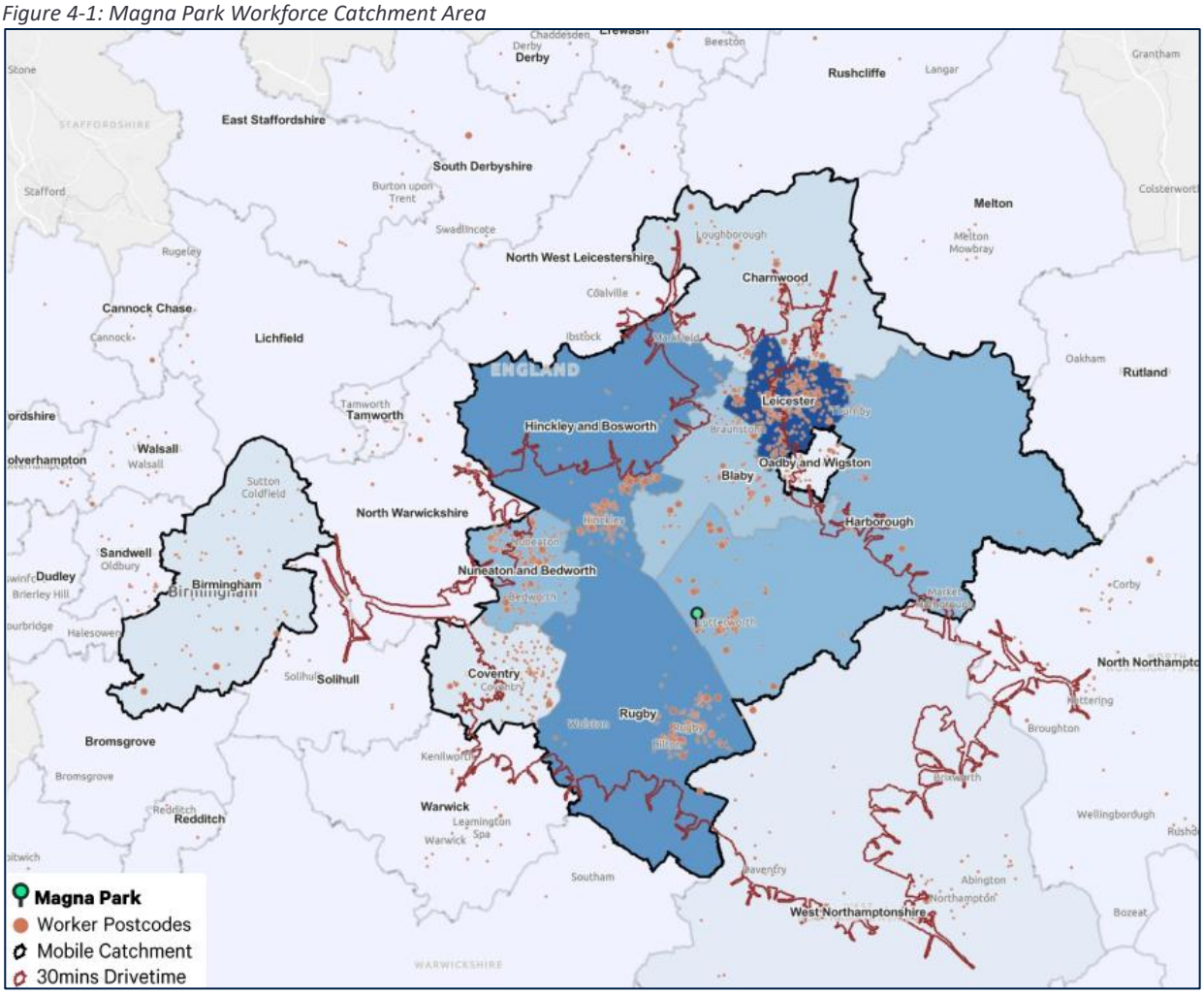
4.1.1 A labour study was undertaken for GLP in April 2025 by CBRE, which identified the home locations of existing employees at Magna Park. This study has been reviewed in this section, as it provides useful background to where future workers are likely to be located for the land west of Magna Park site, therefore assist in targeting suitable sustainable transport measures.

4.1.2 The CBRE report also identifies current and future trends in labour supply for the catchment area of Magna Park, which have been considered.

4.2 Workforce Catchment Areas

4.2.1 A map showing the existing Magna Park workforce postcodes, together with a 30 minute drivetime and mobile catchment area is shown in Figure 4-1, as taken from the CBRE report.

Figure 4-1: Magna Park Workforce Catchment Area



Source: CBRE Magna Park, Lutterworth Labour Study

4.2.2 Figure 4-1 demonstrates that Magna Park is currently attracting workers from the cities of Leicester, Coventry and Birmingham, as well as local towns of Lutterworth, Rugby, Hinckley and Nuneaton. Magna Park, and the land west of Magna Park site, are well connected to the majority of these areas with good public transport services, as set out in Section 3. In summary, bus services are available from Magna Park to Leicester, Lutterworth, Hinckley and Rugby, all of which have hourly services

across the day. As such, these services provide an excellent opportunity for the land west of Magna Park site to promote realistic and attractive public transport options to employees living in these locations.

4.2.3 The study also found that 67% of the workers are travelling within a 30-minute drivetime to Magna Park. Figure 4-1 highlights the high density clusters of workers in a number of areas which demonstrates that car sharing is a realistic option for travel to Magna Park, further supported by the Magna Park Liftshare scheme which currently has over 580 members. This Magna Park car sharing scheme will be extended for use in the land west of Magna Park site and promoted to potential future employees. This will increase the number of users of the system and therefore the number of car sharing matches, which in turn will assist in reducing the level of car use at the existing Magna Park site, as well as constraining vehicles associated with the land west of Magna Park site. It is considered that this is realistic, as employees of Magna Park and the land west of Magna Park site are likely to work similar shift patterns, therefore further increasing the propensity to car share.

4.2.4 Figure 4-1 additionally demonstrates that there are clusters of workers located in Lutterworth which is within an appropriate cycling distance. As such, cycling can offer a realistic travel option for existing workers at Magna Park and will therefore likely offer a realistic travel option to future employees at the land west of Magna Park site. There would also be potential for providing a cycle buddy scheme or similar so that cyclists can also share journeys, further increasing the likelihood of cycling as a realistic and attractive mode of travel. Numerous travel planning measures will also be adopted to further encourage cycling to and from the site.

4.3 Future Trends

4.3.1 The CBRE study demonstrates that there is a strong supply of labour at Magna Park, benefiting from the extent of the catchment that incorporates a number of large urban areas. Overall, the supply demand ratio for the catchment area is 8.54 which sits comfortably above the national average (2024) of 5.98, suggesting good labour availability at the park. As such, this provides good opportunities for businesses locating to an employment site in this area as a strong supply of labour results in easier recruitment, operational efficiency and growth potential. Additionally, it can positively impact sustainable travel as there is enhanced local employment and opportunities to reduce carbon footprint. It also minimises travel distances for employment opportunities in this sector, as employees can travel to Magna Park rather than a further distance elsewhere.

4.3.2 In addition, the future planned housing developments as part of the Local Plan in HDC could provide an additional 17,000 workers over the next 20 years. There would also be additional growth in RBC. It is therefore considered that the labour availability can support the demand for workers in this area, and Magna Park is ideally situated to benefit from this, particularly given the extensive bus service connections linking to a number of key urban areas.

4.3.3 Overall, the strategic location of the land west of Magna Park can help businesses thrive by leveraging the strong labour supply and fostering a supportive, collaborative environment, in addition to supporting the forecast labour demand.

5. DEVELOPMENT, ACCESS STRATEGY AND VISION

5.1 Development Density

5.1.1 The land west of Magna Park site is estimated to be able to accommodate c. 576,000 sqm (c.6.2 million sq ft) of B2 / B8 employment use. This is based on a 35% site density and this forecasted floorspace has been used within this report to forecast trip generation and consider the potential impacts at a high level. The site parameters plan has been provided in Appendix A.

5.2 Site Location Benefits

5.2.1 The site is situated within the highly connected "Golden Triangle" logistics hub, in close proximity to the M1 and M6 motorways and the A5 trunk road.

5.2.2 Magna Park, as an established logistics cluster, already supports sustainable modes through infrastructure such as shared cycleways, bus routes (e.g. X45, X84), the FoxConnect on-demand transport service, and a Liftshare scheme. These provisions support modal shift and emissions reduction, demonstrating compliance with sustainable transport policies.

5.2.3 The land west of Magna Park site would leverage existing sustainable transport infrastructure while also contributing to its enhancement, benefiting the new and current operations. The site would also benefit and enhance the existing Liftshare scheme. As such, this offers benefits for further encouraging and increasing sustainable travel for the existing Magna Park site, as well as delivering a high proportion of sustainable travel on the site itself.

5.2.4 There are also economies of scale in respect of co-locating distribution and commercial operations adjacent to and within established commercial hubs such as Magna Park. It is now common place for business operators to coordinate shipments and deliveries, ensuring that vehicles travel at full capacity and minimising the number of trips that take place. This happens at a significant scale in Magna Park currently. These efficiencies are lost if such operations are spread more thinly across the district or county. As such, it is beneficial to locate a new employment site of this scale in close proximity to an existing, such as Magna Park. As such, the location of the land west of Magna Park site offers a potential benefit for reducing HGV movements.

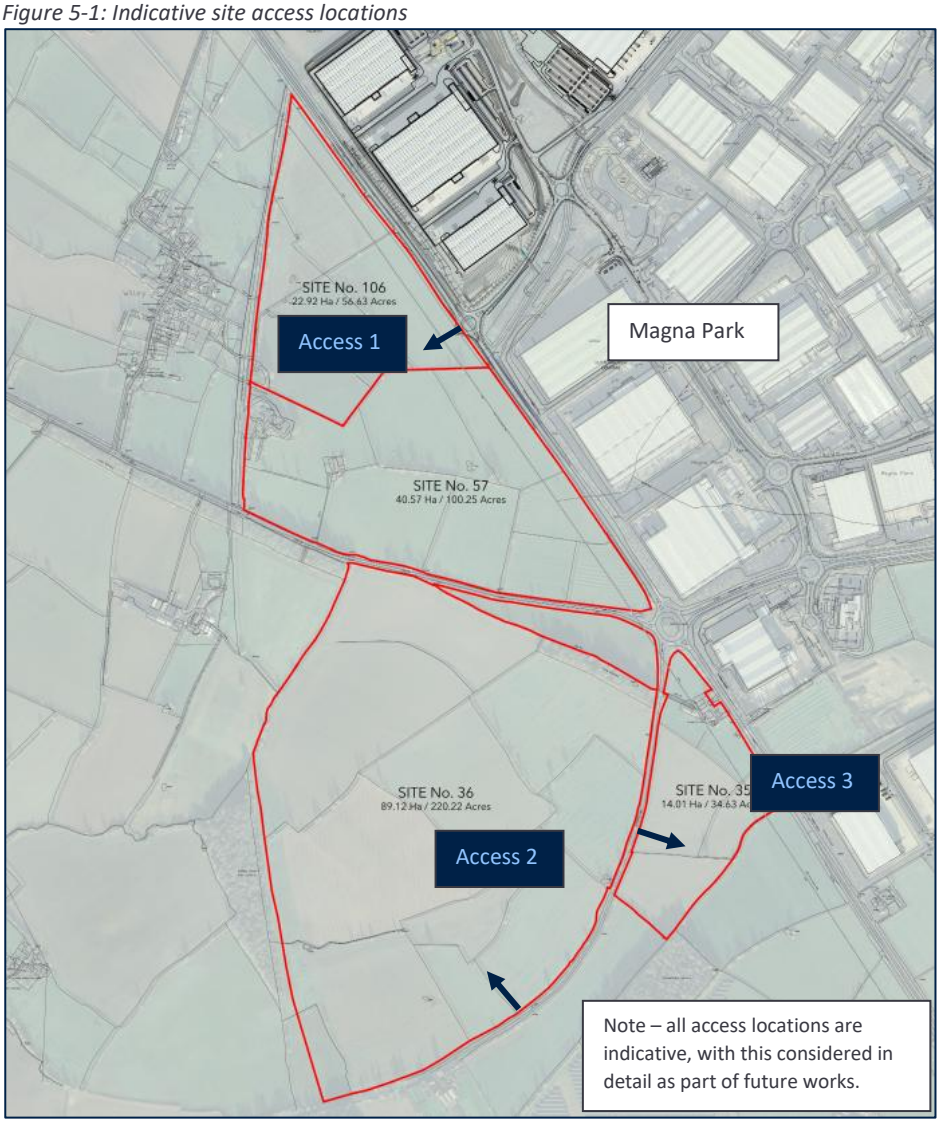
5.3 Vehicular Access Strategy

5.3.1 The site would obtain vehicular access from three separate locations, the first would be an access into plot 106 from the Mere Lane roundabout. A spur into the site is already in place at this location, so this would be extended into the site. This would serve plots 106 and 57.

5.3.2 The second and third access points would be provided into parcels 35 and 36 from the B4027 Lutterworth Road. These could be provided anywhere along the frontage subject to a detailed consideration of any constraints for these sites and ensuring that the access connects appropriately to any internal layout. Priority junctions with or without right turn lanes are considered appropriate as accesses into each parcel, and the location of the access points would ensure appropriate visibility is provided for the speed limit.

5.3.3 The indicative locations of the vehicular accesses into the site have been shown in Figure 5-1.

Figure 5-1: Indicative site access locations



5.3.4 The vehicle access strategy will ensure that a significant proportion of the overall site is accessed via the Mere Lane roundabout and as such, not all vehicle movements will travel through the Cross in Hand roundabout. Based on historic work undertaken for adjacent approved applications (Symmetry Park), it is likely that around 15-20% of light vehicles and 10% to 15% of HGVs will travel north on the A5.

5.3.5 In addition, based on the Symmetry Park analysis, up to around 6% of light vehicle movements will travel west on the B4027 Lutterworth Road, therefore some traffic to and from accesses 2 and 3 would also not travel through the Cross in Hand Roundabout.

5.3.6 As such, it is considered that the access strategy will disperse vehicle movements on the network appropriately and over different arms at the Cross in Hand roundabout, as well as vehicles being removed from this junction by travelling either north on the A5 or west on the B4027.

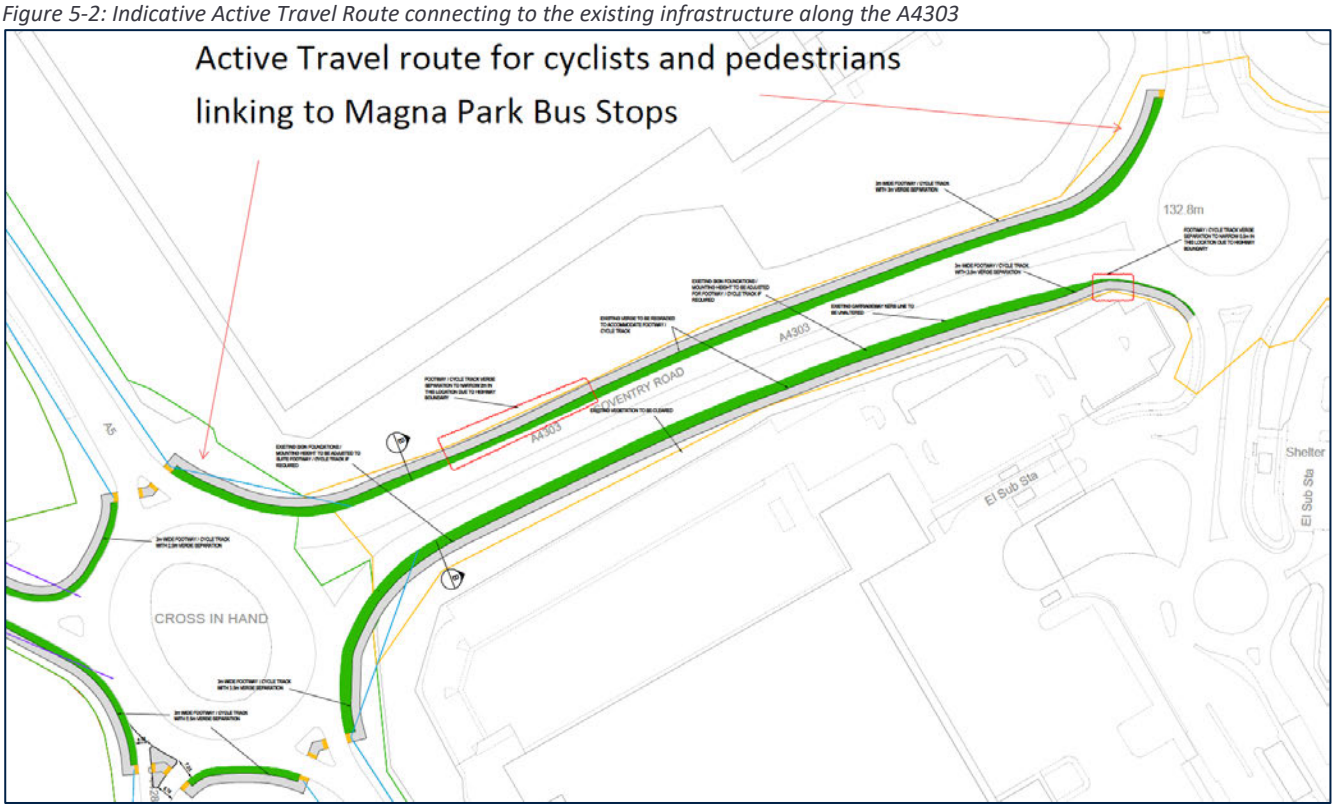
5.4 Pedestrian and Cycle Access Strategy

5.4.1 The site can deliver improvements to the pedestrian and cycle network to enable continuous connections to the various parcels from the existing infrastructure.

5.4.2 As part of concept work undertaken by Stantec, active travel route connections were considered connecting the B4027 / Cross in Hand roundabout to the A4303 to connect to the closest bus stops and the shared footway / cycleway on the A4303. This considered the adopted highway extents along the A4303 and at the Cross in Hand roundabout and showed a deliverable route is achievable. This has been reproduced to show how parcels 35 and 36 can be connected to the adopted highway.

5.4.3 The relevant snapshot of the concept drawing has been reproduced in Figure 5-2. This route can be delivered by the land west of Magna Park site, and a further plan can be produced as part of any forthcoming future work or planning applications.

Figure 5-2: Indicative Active Travel Route connecting to the existing infrastructure along the A4303



Source: Stantec Drawing No: 332211051-STN-HGB-XX-DR-C-0106

5.4.4 The infrastructure can include dropped kerb crossings on the relevant arms at the Cross in Hand roundabout to connect the site to the existing routes. There is an existing crossing on the A4303 to the east of the Hunter Boulevard Roundabout which allows users to connect to the existing route running on the northern side of Coventry Road.

5.4.5 The shared footway / cycleway would continue along the B4027 connecting to the site accesses on each side as all land required for this connection is within the adopted highway or the site boundary. As such, a suitable footway / cycleway can be delivered which connects parcels 35 and 36 to the existing route, and in turn this links to Lutterworth. Pedestrian access points can be provided into the northern parts of each parcel, if needed, to minimise distances to all units on the site.

5.4.6 In relation to parcels 57 and 106, it is considered that there are two ways to gain access to this part of the site for active travel movements and both could be delivered as part of any forthcoming planning application. Firstly, the route shown in Figure 5-2 can be extended along the west side of the A5 to link to the existing route which crosses the A5 within the vicinity of the Mere Lane roundabout. This can be delivered as a shared footway / cycleway route along its length to enable a continuous route to be provided from Lutterworth along the A4303 and A5 into the site access. As this also runs adjacent to

the site boundary, there should also be an opportunity to provide a walking / cycling access into the southern part of the parcel 57 boundary, to minimise the distance travelled by pedestrians and cyclists.

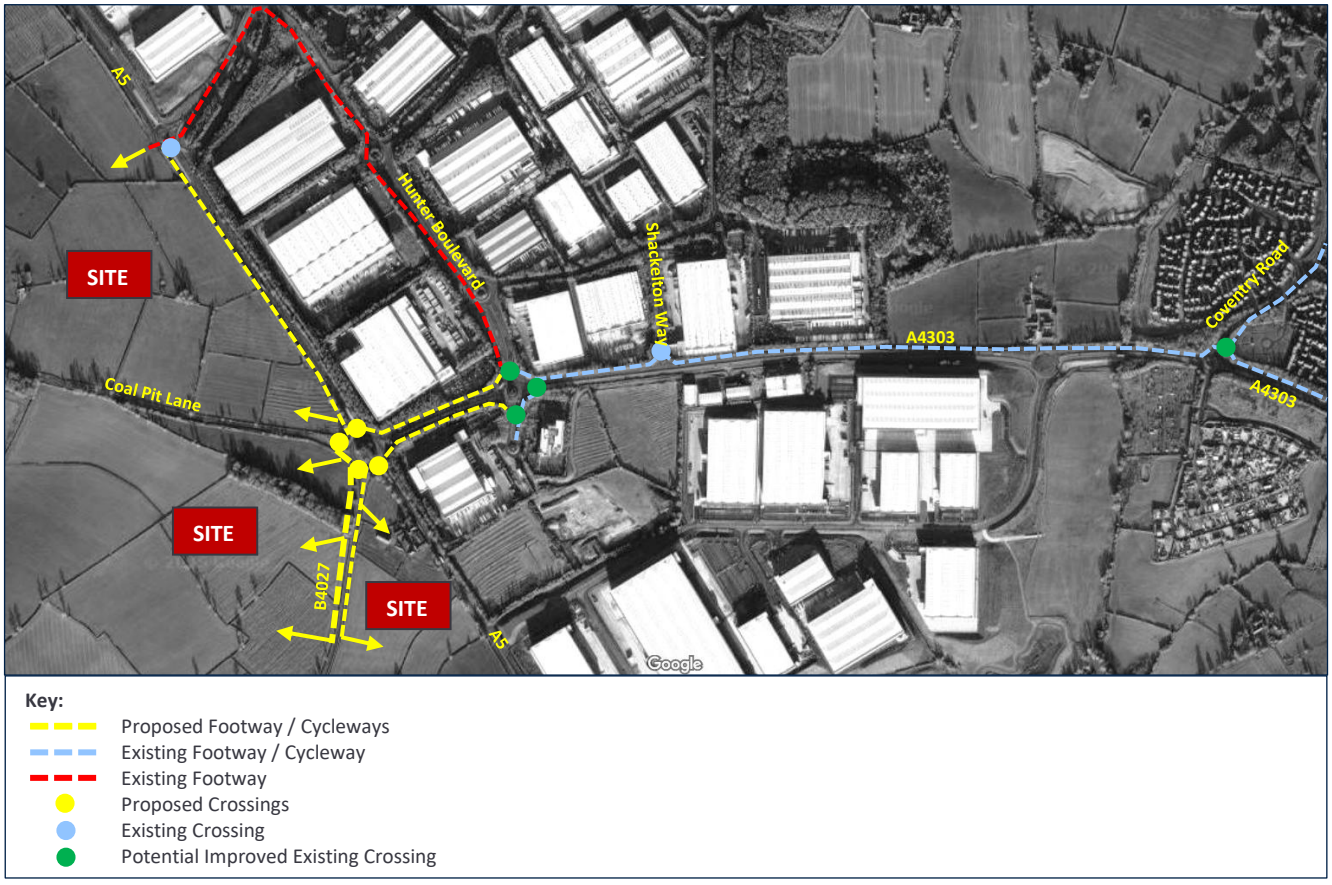
5.4.7 The second route would be utilising the existing route which is in place and crosses the A5 at the Mere Lane roundabout. This then runs along Mere Lane and Argosy Way / Hunter Boulevard, in turn linking to the A4303. This is a footway and as such would accommodate pedestrian movements, including those accessing the closest stops on Argosy Way.

5.4.8 These two separate routes will allow all parcels of land access to the closest bus stops, as well as a continuous off-carriageway cycle route connecting to Lutterworth.

5.4.9 In addition to these improvements, the site can also deliver improved crossings, if these are considered beneficial and appropriate by the highway authority and subject to a road safety audit considering vehicle movements. For example, signal crossings could be provided for cyclists at side road junctions from the A4303, particularly if these junctions are signalised (for example at the Cross in Hand roundabout, where a signalisation scheme has been identified by LCC – as set out in Section 10). Signalised crossings could also be provided at Hunter Boulevard and Coventry Road, if these are viable, agreeable and safe. Such crossings would provide a benefit for existing and proposed future users.

5.4.10 The active travel improvements and routes are shown indicatively in Figure 5-3 in the context of the site.

Figure 5-3: Indicative active travel improvements on the network



Source: Google Maps

5.4.11 In addition to the physical off-site measures, there will also be extensive travel planning measures put in place as part of the development to further encourage active travel. These would also link in with travel planning measures for the existing Magna Park site to further encourage uptake across both sites and provide a benefit from an increased number of users. This can include measures such as the following:

- Providing high quality, safe and secure covered cycle parking, as well as showers and lockers for all units
- Providing high quality active travel infrastructure and lighting within the site
- A Travel Information Pack would be produced and available for all employees, including information on active travel routes
- Approaching local outdoor clothing and cycle shops to explore the potential for discounts for employees on the purchase of waterproof clothing and cycling equipment
- Promoting a walking / cycle buddying scheme so people can travel together. This can improve the feeling of safety and facilitate social inclusion
- Providing a puncture repair kit and/or spare inner tubes in all units
- Promoting national and local travel awareness events and campaigns
- Implementing cycle training and cycle security events on the site

5.4.12 As such, the promotion of active travel will be a key component of the delivery of the site, and the measures and mitigation would build upon those implemented for the existing Magna Park and aim to provide a benefit for both the existing users as well as potential future users.

5.5 Public Transport Access Strategy

5.5.1 As set out in Section 3, the Magna Park site is well served by existing public transport services with stops located throughout the park and three services linking to the park, which at peak times of service offer a combined four services per hour. These link to Leicester, Lutterworth, Hinckley and Rugby.

5.5.2 Currently, service X45 and X84 both follow a loop throughout Magna Park, with the X84 routing along the A5 adjacent to the site. As such, it may be feasible to extend these services through the site and this would be discussed with operators accordingly. On this basis, it may be helpful to provide a bus gate between parcel 57 and 36 and this could be investigated accordingly, to minimise any delay to the bus services. High quality stops would be provided throughout the site to include real time information and all internal routes designed to accommodate buses appropriately.

5.5.3 There may also be potential for routing bus service 8 through the site, although this may have more implications for timetabling, albeit it will be beneficial to the operator to extend the services to assist in increasing patronage and discussions will be held with them accordingly.

5.5.4 Arriva operates all three services so any future discussions will seek to extend all existing services to route through the site, where feasible. If needed, a reasonable and proportionate contribution can be made to increase the frequency of one service, particularly during peak travel times, to further enhance the quality of services available to both existing and potential future employees.

5.5.5 Seperately from the Arriva services, the FoxConnect service is a new on demand service which has recently launched. The development has the potential for providing a reasonable and proportionate contribution towards this service, as well as increasing the patronage of this service through the increased number of employees in the Magna Park area. As such, the delivery of the site to the west of Magna Park would ensure the ongoing viability of this service (as well as the Arriva services), providing a benefit to both existing and potential future users.

5.5.6 In addition to these measures, the existing Magna Park has a club members travel scheme, where employees can benefit from discounts on bus travel. As set out in Section 3, this would be extended to employees of the site, were this to come forwards, therefore the site has the benefit of utilising an existing and proven scheme.

5.5.7 In addition, all bus services will be promoted to employees through the travel information pack, including information on routes, timetables and promotion of travel route planner websites. This information will also be available on noticeboards throughout the site.

5.5.8 The site will target an increase in public transport use over and above the levels at the existing Magna Park. The site benefits from the existing measures in place at Magna Park, as well as three separate bus services, plus FoxConnect, and this will assist in discussions with the public transport operators when considering the extension of services.

5.6 Car Sharing

5.6.1 The existing Magna Park site has a site specific car sharing scheme, as outlined in Section 3. This will be extended to include the land west of Magna Park site, which will provide an increase in members and therefore likely car sharing matches. This will improve the ongoing viability of the scheme, as well as assist in reducing vehicle movements both for the existing Magna Park employees and potential future employees of the site. The existing evidence suggests the car sharing scheme has already removed a significant level of vehicle movements from the network, and this would be extended into the land west of Magna Park site.

5.6.2 The car sharing scheme will be fully promoted to all potential future employees on the site, including information on cost savings. To further encourage car sharing, preferential car sharing spaces can be provided for each unit and a guaranteed ride home policy can be adopted by each occupier.

5.7 Overall Vision-Led Transport Approach

5.7.1 The site will encourage and promote sustainable transport and generate a higher level of sustainable transport use than the existing levels at Magna Park. This will reduce the vehicle trip generation to lower levels than are currently experienced at the existing Magna Park, as detailed in the following chapters.

5.7.2 The measures implemented as part of the delivery of the land west of Magna Park site will also assist in reducing vehicle movements at the existing Magna Park site through the benefits gained from an increased number of units and employees (i.e. more car sharing, walking and cycle buddying, increased linking of operational vehicle movements). The benefits are set out in more detail in Section 10.2.

5.7.3 The overall vision-led approach would therefore be for a scheme with a level of sustainable travel in excess of the existing Magna Park, which minimises and constrains vehicle movements on the wider network, as well as consolidating and minimising operational vehicle movements through the location of numerous similar operators within a close proximity. There are economies of scale in respect of co-locating distribution and commercial operations adjacent to and within established commercial hubs such as Magna Park. The efficiencies are lost if such operations are spread more thinly across the district or county and there would be a further benefit to consolidating operational vehicle movements through the delivery of the land west of Magna Park site.

5.7.4 As such, the sustainable travel measures and co-location of distribution sites will assist in mitigating the vehicle movements generated by a potential development, in a way that may not be possible for other competing sites.

5.7.5 Although there is a key focus on sustainable transport measures for the scheme, the potential impacts on the highway have also been considered in more detail in the following chapters, including a bespoke and robust forecast of vehicle generation. This also sets out a target for vehicle trip generation in the context of the existing Magna Park. The vehicle generation and high level impacts have been considered at key local junctions on the A5, in the context of changes in background and Magna Park traffic flows, before and after the pandemic.

6. BACKGROUND CONDITIONS – ACCEPTED TRIP RATES FOR MAGNA PARK

6.1 Overview

6.1.1 The existing Magna Park site has been subject to an extensive planning history dating back to c.1985, which on review of the HDC planning portal contains limited information. However, more recently (c.10 year period) there are several planning applications, which are pertinent when considering baseline traffic flows, trip rates, traffic analysis, modelling and mitigation. At a high level these have been considered within this section to inform the likely trip generation for the land west of Magna Park site, albeit the site would adopt a vision-led approach, seeking to maximise sustainable transport and reduce vehicle trips to lower levels than are currently occurring at Magna Park.

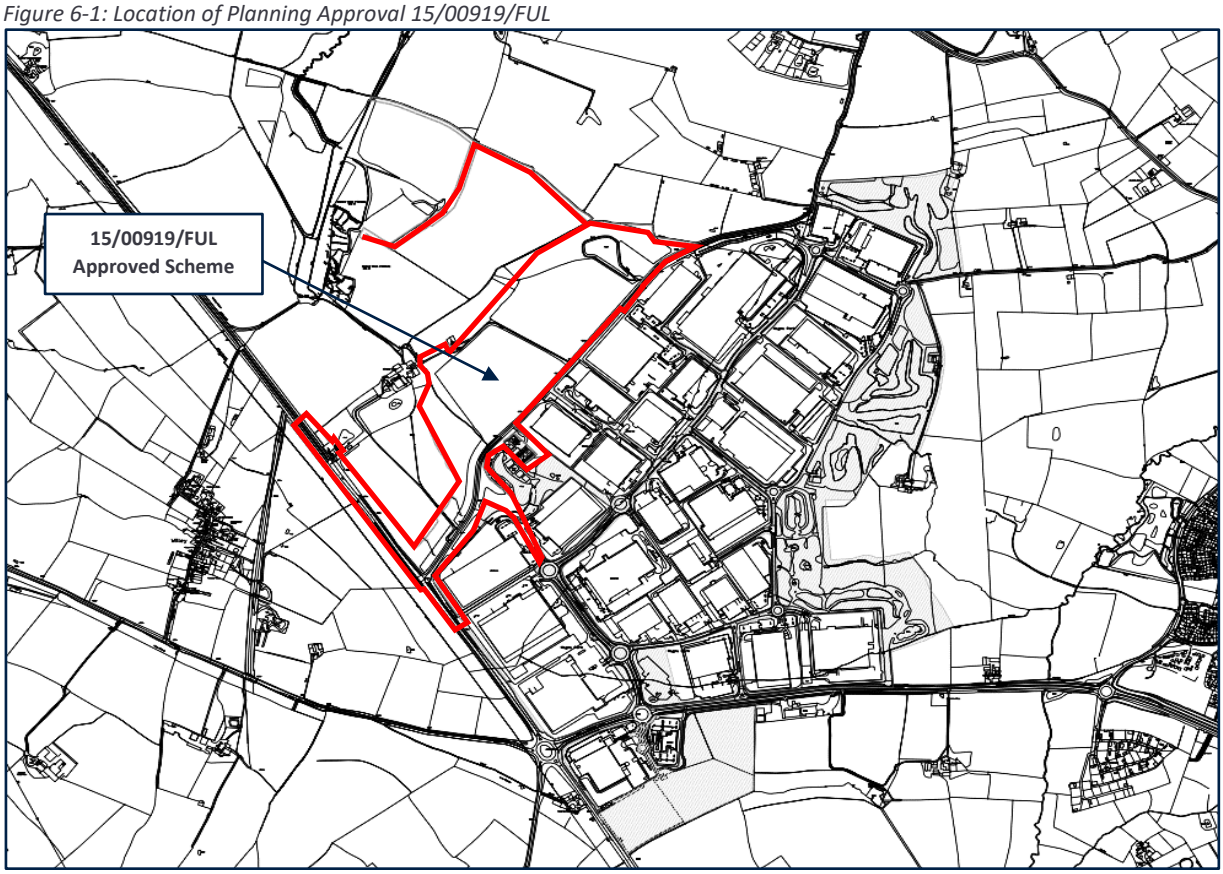
6.2 Approved Magna Park Trip Rates

Magna Park Extension (App Ref: 15/00919/FUL)

6.2.1 In June 2015 a planning application was submitted to HDC seeking approval for the "*erection of 100,844 sqm Storage and Distribution centre (B8) with ancillary B1(a) offices on land adjoining and linked to Magna Park, including formation of access road from Magna Park, erection of gatehouse, creation of roundabouts, partial realignment of Mere Lane and upgrading of A5 to dual carriageway*".

6.2.2 The application was approved in October 2016, is constructed and has been operational for a number of years. The site is Plot G (100,843 sqm) and operated by Wayfair (UK) Ltd with its location shown at Figure 6-1.

Figure 6-1: Location of Planning Approval 15/00919/FUL



Source: Drawing No. 3662-16 prepared by Chetwood Architects

6.2.3 The application was supported by a Transport Assessment (TA) produced by URS (now part of AECOM group) dated June 2015. This includes assessments at the A5 / Mere Lane, the Cross in Hand

roundabout, as well as junctions on the A4303 corridor. The proposals included a new roundabout for the A5 / Mere Lane, which has since been constructed.

6.2.4 The URS TA forecast the development traffic generation, which was based upon site specific trip rates from Magna Park. Appendix P of the TA provided a '*Magna Park Trip Generation Report*' for Magna Park.

6.2.5 The *Magna Park Trip Generation Report* was produced in August 2013 to provide trip rate information for the operational Magna Park at that time, which was based on obtained Automatic Traffic Counts (ATC's) undertaken in June 2013. At the time of the ATC's Magna Park had 757,018 sqm of occupied floorspace over c.30 units and provided c.6,000 jobs.

6.2.6 The report was produced to provide information as an alternative to the TRICS Database, which was considered to have limited comparable sites for floor areas above 20,000 sqm. The trip rates established by URS within its report were used as the basis for the trip generation calculations for distribution sites that were (at the time) being brought forward within Magna Park. This approach and range of occupiers and unit sizes reinforced the reliability of site specific data and provided, at that time, a robust estimate of trip generation of units with a B2 / B8 use.

6.2.7 Whilst the report states that Appendix B shows the exact location of the surveys, the report does not include this information, however, paragraph 3.1.2 states that the ATCs were installed on Hunter Boulevard and located *"north of the main access roundabout and therefore recorded all traffic entering and leaving the Park by this route."* The second ATC was installed on Shackelton Way *"to the north of the access to the Toyota building and therefore this has been excluded from the trip generation calculation."*

6.2.8 The report confirms that the June 2013 survey flows (now 12 years old) were combined in order to establish the arrivals and departures for the entire Magna Park. As such, to derive site specific trip rates the total surveyed flows were calculated using the 757,018 sqm occupied floorspace within Magna Park at the time of the surveys. The resultant average trip rates (per 100 sqm) are shown at Table 6-1.

Table 6-1: Magna Park Calculated Trip Rates from 2013 surveys (per 100 sqm)

Vehicle Class.	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			24-hour		
	Arrival	Departure	Two-way	Arrival	Departure	Two-way	Arrival	Departure	Two-way
Light Vehicles	0.129	0.032	0.161	0.036	0.100	0.136	1.290	1.058	2.348
HGVs	0.012	0.016	0.028	0.009	0.012	0.021	0.218	0.292	0.510
Magna Park Total	**0.141**	**0.048**	**0.189**	**0.045**	**0.112**	**0.157**	**1.508**	**1.350**	**2.858**

Source: URS TA Supporting Planning Application 15/00919/FUL in HDC

6.2.9 The report indicates that the average trip rates reflect the entire Magna Park operations, which would be suitable to be applied to proposed developments with more than one unit. However, additional analysis was also undertaken to confirm 85th percentile trip rates, as shown at Table 6-2, which was considered to be more robust should a single unit seek to be delivered.

Table 6-2: Magna Park Calculated 85th Percentile Trip Rates from 2013 surveys (per 100 sqm)

Vehicle Class.	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			24-hour		
	Arrival	Departure	Two-way	Arrival	Departure	Two-way	Arrival	Departure	Two-way
Light Vehicles	0.140	0.042	0.182	0.043	0.104	0.147	1.440	1.160	2.60
HGVs	0.015	0.021	0.036	0.01	0.013	0.023	0.264	0.326	0.59
Magna Park Total	**0.155**	**0.063**	**0.218**	**0.053**	**0.117**	**0.170**	**1.704**	**1.486**	**3.190**

Source: URS TA Supporting Planning Application 15/00919/FUL in HDC

6.2.10 The report does not provide trip rates per hour over an entire 24-hour period.

6.2.11 Paragraph 6.5 of the URS TA confirms that these site-specific trip rates were agreed with both the Local Highway Authority, Leicestershire County Council and National Highways for the purpose of forecasting development traffic generation for future applications at Magna Park.

Land At Mere Lane (App Ref: 15/01531/OUT)

6.2.12 In October 2015, a hybrid planning application was submitted to HDC seeking approval for the following elements:

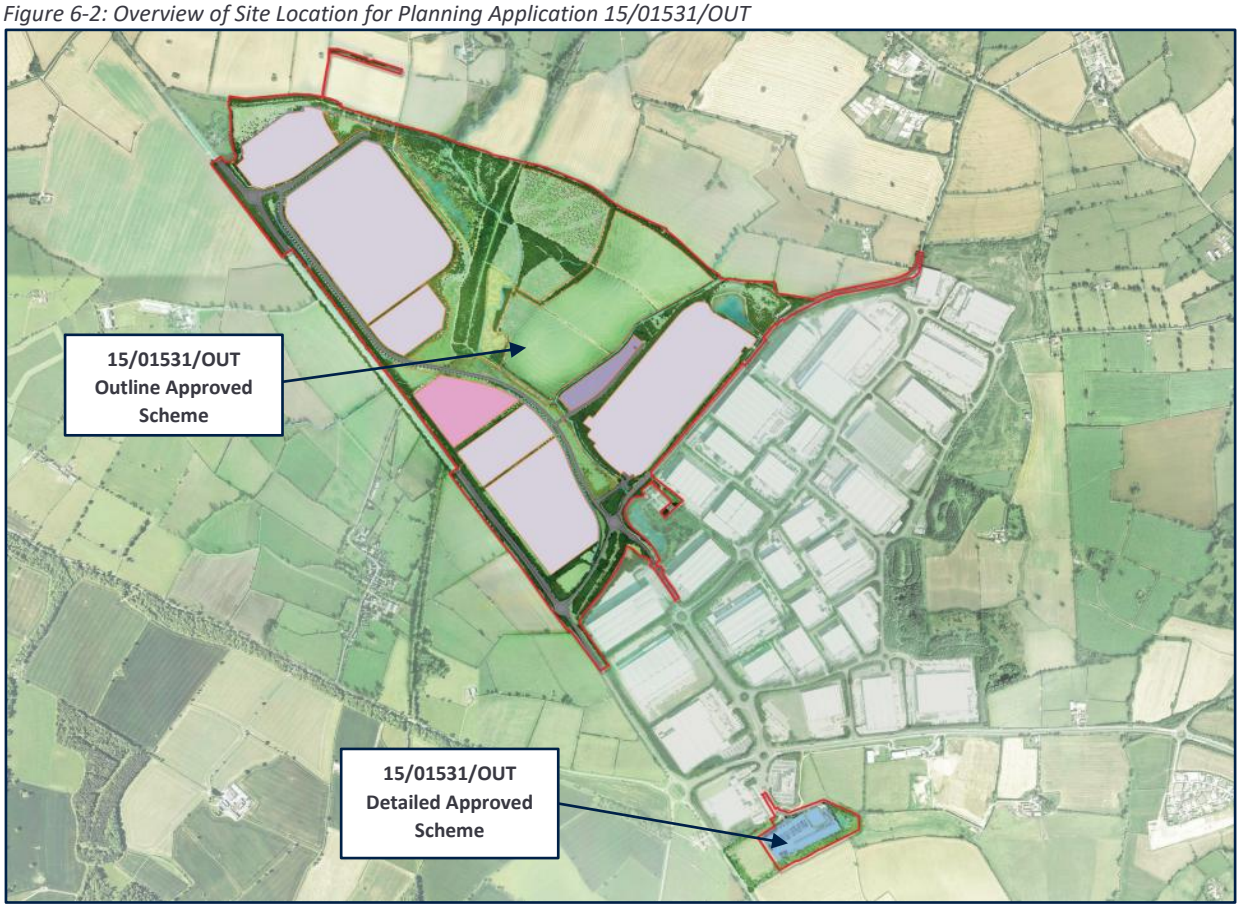
6.2.13 The outline element the *"erection of up to 419,800 sqm Storage and Distribution (B8) with ancillary offices (B1a), up to 3,700 sqm for a Logistics Institute of Technology (D1) with associated playing field, up to 9,000 sqm small business space (B1a, B1b), change of use of Bittesby House barns to exhibition centre (D1), the creation of a Country Park, other open space and landscaping works on land to the north of Mere Lane".* Additionally, the outline elements also included the formation of an access road *"from Magna Park, creation of roundabouts, partial realignment of Mere Lane, upgrading of A5 to dual carriageway, creation of roundabout access on A5"* along with associated drainage and landscaping works on land north of Mere Lane.

6.2.14 The detailed elements of the submission were to consider the creation of *"a 137 space HGV parking facility, associated gatehouse and HGV Driver Training Centre, vehicle wash and fuelling facilities, and a rail freight shuttle terminal"* with associated landscaping works and drainage requirements on land adjacent to Asda George Headquarters (Plot 7400) south of the A4303 Coventry Road.

6.2.15 The application was refused by HDC in June 2018, which resulted in a planning appeal (inquiry), which was allowed, subject to conditions in April 2019. The appeal was not subject to a transport related reason.

6.2.16 The location(s) of land parcels which consist of application 15/01531/OUT are shown at Figure 6-2.

Figure 6-2: Overview of Site Location for Planning Application 15/01531/OUT



Source: URS Transport Statement

6.2.17 In support of the proposals a TA was prepared on behalf of IDI Gazeley by URS (dated September 2015), which utilised the trip rates agreed from planning application 15/00919/FUL, as summarised in Table 6-1 of this note.

Symmetry Park, Lutterworth (App Ref: 15/00865/OUT)

6.2.18 In June 2015, a planning application seeking outline approval was submitted on land south of the A4303, which was at the time known as Symmetry Park, but more commonly 'Magna Park South'. The application was approved in July 2018.

6.2.19 The proposals obtained permission for the *"erection of up to 278,709 sqm of Storage, Distribution buildings (B8) with ancillary B1(a) offices"* as well as the *"creation of access onto A4303 and emergency services only access onto A5 and formation of a Lorry Park"* and other associated elements such as drainage, landscaping and other infrastructure with all matters reserved except for access. The location of the application site is shown at Figure 6-3.

Figure 6-3: Overview of Planning Application 15/00865/OUT

Source: Bing Maps

6.2.20 Supporting the submission, a TA was prepared by Peter Brett Associates (PBA) (dated June 2015), which set forecast trip generation based on site specific trip rates, similar to that of planning approvals 15/00919/FUL and 15/01531/OUT.

6.2.21 The PBA TA sets out that an initial assessment using the TRICS database was undertaken, however, the database does not contain comparable sites. As such, it was agreed with LCC that the vehicular trip generation for Symmetry Park would be based on site specific vehicular trip rates calculated from the existing Magna Park operations.

6.2.22 The PBA TA states that *"Volumetric traffic count survey data (24 hours) was purchased from LCC for Shackleton Way and Hunter Boulevard (the two Magna Park access roads)"* covering a period in 2014. Paragraph 5.2.7 of the PBA TA sets out that at the time of the survey Magna Park was occupied by 30 B8 distribution units with a total floorspace of 755,595 sqm.

6.2.23 As the data obtained from LCC was volumetric it was agreed that the *"trip rates have been split down into cars/LGVs and HGVs. The above split from the TRICS database is around 70-80% cars/LGVs. The observed traffic survey data from February 2015 from the peak hour ANPR surveys showed that the split was 75% cars/LGVs and 25% HGVs"*.

6.2.24 As such Table 5.3 of the PBA TA sets out the site specific trip rates for the proposals at Symmetry Park, which were utilised to forecast trip generation based on the 278,709 sqm floorspace. The trip rates are shown at Table 6-3.

Table 6-3: Trip Rates for Symmetry Park based on 2014 surveys of Magna Park

Period	Arrivals			Departures			Two-way		
	Cars/LGVs	HGV	Total	Cars/LGVs	HGV	Total	Cars/LGVs	HGV	Total
00:00	0.012	0.004	0.016	0.024	0.008	0.032	0.036	0.012	0.048

Period	Arrivals			Departures			Two-way		
	Cars/LGVs	HGV	Total	Cars/LGVs	HGV	Total	Cars/LGVs	HGV	Total
01:00	0.008	0.007	0.015	0.011	0.01	0.021	0.019	0.017	0.036
02:00	0.012	0.007	0.019	0.012	0.007	0.019	0.024	0.014	0.038
03:00	0.017	0.008	0.025	0.013	0.006	0.019	0.03	0.014	0.044
04:00	0.026	0.013	0.039	0.014	0.007	0.021	0.04	0.02	0.06
05:00	0.11	0.04	0.15	0.027	0.01	0.037	0.137	0.05	0.187
06:00	0.081	0.03	0.111	0.051	0.019	0.07	0.132	0.049	0.181
07:00	0.097	0.012	0.109	0.06	0.008	0.068	0.157	0.02	0.177
08:00	0.098	0.034	0.132	0.031	0.011	0.042	0.129	0.045	0.174
09:00	0.051	0.029	0.08	0.026	0.015	0.041	0.077	0.044	0.121
10:00	0.03	0.024	0.054	0.024	0.019	0.043	0.054	0.043	0.097
11:00	0.029	0.026	0.055	0.025	0.022	0.047	0.054	0.048	0.102
12:00	0.032	0.021	0.053	0.037	0.024	0.061	0.069	0.045	0.114
13:00	0.077	0.03	0.107	0.055	0.022	0.077	0.132	0.052	0.184
14:00	0.057	0.021	0.078	0.091	0.033	0.124	0.148	0.054	0.202
15:00	0.038	0.013	0.051	0.087	0.03	0.117	0.125	0.043	0.168
16:00	0.031	0.006	0.037	0.098	0.02	0.118	0.129	0.026	0.155
17:00	0.031	0.011	0.042	0.084	0.03	0.114	0.115	0.041	0.156
18:00	0.027	0.006	0.033	0.055	0.013	0.068	0.082	0.019	0.101
19:00	0.017	0.01	0.027	0.027	0.016	0.043	0.044	0.026	0.07
20:00	0.013	0.009	0.022	0.021	0.015	0.036	0.034	0.024	0.058
21:00	0.028	0.031	0.059	0.02	0.022	0.042	0.048	0.053	0.101
22:00	0.028	0.019	0.047	0.037	0.025	0.062	0.065	0.044	0.109
23:00	0.015	0.01	0.025	0.035	0.023	0.058	0.05	0.033	0.083
Total	**0.965**	**0.421**	**1.386**	**0.965**	**0.415**	**1.38**	**1.93**	**0.836**	**2.766**

6.2.25 The application was also supported by a number of Addendum / supplementary Transport Assessments produced by PBA. The most recent Second Supplementary Transport Assessment (SSTA) was dated July 2017, so was undertaken more recently than the two applications reviewed above and included more recent assessments of junctions on the network, with traffic surveys on the network obtained in February 2015.

7. BACKGROUND CONDITIONS – OBTAINED TRAFFIC SURVEYS

7.1 Introduction

7.1.1 In April 2025 Apex commissioned an independent traffic surveyor (PCC) to undertake Automatic Traffic Count's (ATC) within Magna Park and undertake a junction turning count at A5 Gibbet Hill roundabout.

7.1.2 The ATC's were undertaken between 1st April 2025 and 7th April 2025 and the junction turning count was undertaken on Thursday 3rd April. This was outside of school holiday periods in Leicestershire and Warwickshire and therefore representative of typical traffic conditions.

7.1.3 The purpose of undertaking the ATC's was to establish the existing level of vehicle generation associated with the operation of Magna Park. It is then possible to determine trip rates per 100sqm of occupied floorspace and compare the current trip rates with the previously accepted rates from obtained survey data in 2013/2014 as part of the approved development outlined in Section 6.

7.1.4 The location of the ATC surveys installed on the highway network to capture the arrival and departure profile of Magna Park are shown at Figure 7-1. Given the dual carriageway nature of some of the locations where survey information has been obtained, two ATCs have been laid, where needed to capture movements in each direction. For the purposes of this assessment, they have been set out as one ATC, with these assumed as ATC's 3 and 5, as set out in Figure 7-1.

Figure 7-1: Overview of Automatic Traffic Count Survey Locations

Source: Bing Maps

7.1.5 The junction turning count at the A5 Gibbet Hill roundabout allows a consideration of the changes in traffic flows through this junction since previous pre-pandemic baseline traffic surveys were obtained and used within accepted models. The changes have been considered and set out in Section 10. This has enabled a consideration of whether background traffic flows have reduced and if there is additional capacity at the junction than has previously been accepted.

7.1.6 A summary of the traffic survey data collections is provided in Table 7-1 and Table 7-2.

Table 7-1: Summary of ATC Traffic Survey Locations

Survey Reference	Link	Data Collected
ATC 1	Hunter Boulevard	7-day 24-hr flows
ATC 2	Wellington Parkway	7-day 24-hr flows
ATC 3	Shackelton Way	7-day 24-hr flows
ATC 4	Magna Park North (north of Mere Lane)	7-day 24-hr flows
ATC 5	Magna Park South (south of A4303)	7-day 24-hr flows

Table 7-2: Summary of JTC Traffic Survey Locations

Survey Reference	Junction	Data Collected
JTC 1	A5 Gibbet Hill roundabout	1-day peak period flows (07:00-10:00 and 16:00-19:00)

7.2 Hunter Boulevard (ATC 1)

7.2.1 Table 7-3 sets out the recorded total vehicle arrivals (westbound) and departures (eastbound) and two-way movements over a 5-day weekday average period and includes HGV percentages.

Table 7-3: ATC 1 - Hunter Boulevard Weekday Average Vehicle Flows

Period	Arrival (EB)					Departure (WB)					Two-way				
	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %
00:00	4	118	31	153	20.2%	0	51	15	65	22.4%	4	168	45	218	20.8%
01:00	2	114	24	140	17.2%	0	51	17	68	25.0%	2	165	41	208	19.7%
02:00	2	67	24	92	25.7%	2	58	17	77	22.5%	4	124	41	169	24.3%
03:00	2	82	20	104	19.5%	1	78	21	101	21.2%	3	160	42	205	20.3%
04:00	0	79	20	99	19.8%	2	128	26	155	16.5%	2	207	45	255	17.8%
05:00	2	126	30	158	18.9%	2	396	28	426	6.7%	4	522	58	584	10.0%
06:00	3	165	38	206	18.4%	0	314	33	347	9.5%	3	479	71	553	12.8%
07:00	2	273	47	323	14.6%	0	310	41	351	11.8%	2	583	88	674	13.1%
08:00	3	154	46	202	22.6%	1	281	46	327	14.1%	3	434	92	530	17.4%
09:00	2	154	49	206	24.0%	0	246	67	312	21.3%	2	400	116	518	22.4%
10:00	4	175	98	278	35.4%	1	211	89	301	29.6%	5	386	188	579	32.4%
11:00	4	176	129	309	41.8%	0	156	75	232	32.6%	4	331	205	540	37.9%
12:00	2	127	158	287	55.1%	0	97	67	165	40.8%	2	224	226	452	49.9%
13:00	3	162	105	269	38.8%	2	184	64	249	25.5%	5	345	168	519	32.4%
14:00	2	241	98	341	28.8%	20	203	58	281	20.6%	23	444	156	622	25.1%
15:00	3	243	89	336	26.6%	3	102	40	144	27.4%	6	345	129	480	26.9%
16:00	2	148	79	229	34.4%	4	78	31	113	27.5%	6	226	110	342	32.1%
17:00	2	144	62	208	29.8%	8	108	31	147	21.3%	10	253	93	356	26.3%
18:00	2	105	47	154	30.8%	0	81	52	133	39.4%	2	185	100	287	34.8%
19:00	2	161	50	213	23.5%	0	88	74	163	45.5%	2	250	124	376	33.0%
20:00	2	130	32	165	19.6%	0	94	61	155	39.4%	2	224	93	320	29.2%
21:00	1	121	34	156	21.9%	0	126	41	167	24.6%	1	247	75	324	23.3%
22:00	2	129	29	159	18.2%	0	148	33	181	18.0%	2	277	62	340	18.1%
23:00	3	210	36	249	14.4%	0	86	23	109	21.0%	3	296	59	358	16.4%
Totals	**56**	**3604**	**1376**	**5036**	**27.3%**	**47**	**3673**	**1051**	**4771**	**22.0%**	**103**	**7277**	**2427**	**9807**	**24.7%**

7.2.2 The Hunter Boulevard ATC identified an AM highway network peak period between 07:00-08:00 where a total of 674 two-way vehicle movements occurred with a HGV percentage of 13.1%. The PM highway network peak was identified to be between 14:00-15:00 where a total of 622 two-way movements occurred with a HGV percentage of 25.1%.

7.2.3 Over a daily period, the surveys identified that a total of 9,807 two-way vehicle movements occurred on Hunter Boulevard with a HGV percentage of 24.7%.

7.3 Wellington Parkway (ATC 2)

7.3.1 Table 7-4 sets out the recorded total vehicle arrivals (westbound) and departures (eastbound) and two-way movements over a 5-day weekday average period and includes HGV percentages.

Table 7-4: ATC 2 – Wellington Parkway Weekday Average Vehicle Flows

Period	Arrival (EB)					Departure (WB)					Two-way				
	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %
00:00	1	16	10	27	37.8%	0	30	4	35	12.6%	1	46	15	62	23.5%
01:00	0	15	6	20	27.5%	0	18	1	19	7.2%	0	33	7	40	17.6%
02:00	0	20	6	26	22.5%	0	18	3	21	13.2%	0	38	9	47	18.3%
03:00	0	26	9	35	26.7%	0	17	3	20	14.1%	0	43	12	55	22.2%
04:00	0	65	13	78	16.6%	0	33	6	39	15.3%	0	98	19	117	16.2%
05:00	2	249	44	294	14.8%	0	57	5	62	8.4%	2	306	49	356	13.7%
06:00	1	129	32	163	19.9%	1	77	16	94	17.4%	2	206	49	257	19.0%
07:00	1	182	31	215	14.6%	1	69	13	83	15.9%	2	251	45	298	15.0%
08:00	2	159	36	196	18.4%	0	76	19	95	20.2%	2	234	55	292	19.0%
09:00	1	95	26	122	21.6%	0	67	16	83	18.8%	1	162	42	205	20.5%
10:00	1	79	21	100	20.8%	1	68	20	88	22.7%	1	146	41	188	21.7%
11:00	0	74	23	97	23.2%	0	62	20	82	24.5%	1	136	43	180	23.8%
12:00	1	80	29	110	26.4%	2	63	29	94	30.4%	3	144	58	205	28.3%
13:00	1	146	29	177	16.6%	1	86	25	113	22.3%	3	233	55	290	18.8%
14:00	1	82	27	110	24.3%	2	145	22	168	13.0%	3	227	49	278	17.5%
15:00	0	76	24	100	23.9%	1	85	21	107	20.0%	1	160	45	207	21.9%
16:00	1	53	22	76	28.8%	1	124	18	143	12.5%	3	177	40	219	18.2%
17:00	1	56	18	75	23.9%	2	68	12	82	15.1%	3	124	30	157	19.3%
18:00	0	35	14	49	28.4%	1	51	10	61	16.3%	1	85	24	110	21.7%
19:00	0	36	11	47	22.8%	1	39	6	46	12.2%	1	76	16	93	17.6%
20:00	0	43	11	54	20.3%	0	39	5	45	12.1%	0	82	16	99	16.6%
21:00	0	69	12	82	14.7%	1	47	5	53	9.8%	1	116	17	134	12.8%
22:00	0	31	10	42	24.3%	2	83	5	90	5.8%	2	114	15	132	11.7%
23:00	0	22	6	29	22.2%	0	26	4	30	12.5%	0	49	10	59	17.2%
Totals	**15**	**1839**	**471**	**2325**	**20.2%**	**19**	**1447**	**290**	**1755**	**16.5%**	**34**	**3286**	**760**	**4080**	**18.6%**

7.3.2 The Wellington Parkway ATC identified an AM highway network peak period between 05:00-06:00 where a total of 356 two-way vehicle movements occurred with a HGV percentage of 13.7%. The PM highway network peak was identified to be between 13:00-14:00 where a total of 290 two-way movements occurred with a HGV percentage of 18.8%.

7.3.3 Over a daily period, the surveys identified that a total of 4,080 two-way vehicle movements occurred on Wellington Parkway with a HGV percentage of 18.6%.

7.4 Shackelton Way (ATC 3)

7.4.1 Table 7-5 sets out the recorded total vehicle arrivals (westbound) and departures (eastbound) and two-way movements over a 5-day weekday average period and includes HGV percentages.

Table 7-5: ATC 3 – Shackelton Way Weekday Average Vehicle Flows

Period	Arrival (NB)					Departure (SB)					Two-way				
	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %
00:00	0	13	1	14	8.7%	1	24	6	31	19.4%	1	37	7	45	16.1%
01:00	0	3	2	4	40.9%	0	5	5	10	46.9%	0	8	6	14	45.1%
02:00	0	2	0	2	18.2%	0	7	4	11	33.3%	0	9	4	13	30.8%
03:00	0	3	1	4	22.7%	0	13	9	22	40.2%	0	17	10	27	37.3%
04:00	1	6	6	13	43.9%	0	12	11	24	48.3%	1	18	17	37	46.7%
05:00	1	22	5	28	19.0%	0	32	15	47	31.3%	1	54	20	75	26.7%
06:00	0	19	10	29	34.7%	1	54	18	72	24.4%	1	73	28	101	27.4%
07:00	1	24	10	35	29.5%	0	37	22	59	36.8%	1	61	32	94	34.1%
08:00	0	24	11	35	30.6%	0	22	21	43	48.8%	0	46	32	78	40.8%
09:00	0	18	8	26	30.5%	1	18	23	42	55.2%	1	36	31	68	45.9%
10:00	0	15	9	24	38.0%	0	24	20	44	44.7%	0	39	29	68	42.4%
11:00	0	8	11	19	55.2%	0	17	30	47	63.7%	1	25	40	66	61.2%
12:00	0	11	8	19	42.6%	0	25	33	58	56.5%	0	36	41	77	53.1%
13:00	2	20	8	30	26.3%	1	50	23	73	30.8%	3	70	31	104	29.5%
14:00	1	25	9	35	24.7%	3	113	22	138	15.9%	4	138	31	173	17.7%
15:00	0	11	9	20	42.6%	0	63	16	80	20.6%	0	74	25	100	25.1%
16:00	0	12	5	17	26.7%	1	83	14	98	14.7%	1	95	19	115	16.5%
17:00	0	12	5	17	31.0%	1	61	14	76	18.2%	1	73	19	93	20.5%
18:00	0	5	4	9	48.9%	1	42	9	51	16.7%	1	46	13	60	21.5%
19:00	0	8	4	12	30.0%	0	23	11	34	32.7%	0	31	15	46	32.0%
20:00	0	11	5	15	29.9%	0	19	9	28	32.4%	0	30	14	44	31.5%
21:00	0	8	3	11	29.6%	1	25	5	31	17.4%	1	32	9	42	20.6%
22:00	0	9	2	11	21.4%	0	55	8	63	13.0%	0	63	11	74	14.2%
23:00	0	5	3	7	37.8%	0	36	6	42	13.5%	0	40	8	49	17.1%
Totals	**7**	**293**	**138**	**439**	**31.6%**	**12**	**860**	**353**	**1224**	**28.8%**	**19**	**1153**	**491**	**1663**	**29.5%**

7.4.2 The Shackelton Way ATC identified an AM highway network peak period between 06:00-07:00 where a total of 101 two-way vehicle movements occurred with a HGV percentage of 27.4%. The PM highway network peak was identified to be between 14:00-15:00 where a total of 173 two-way movements occurred with a HGV percentage of 17.7%.

7.4.3 Over the daily period the surveys identified that a total of 1,663 two-way vehicle movements occurred on Shackelton Way with a HGV percentage of 29.5%.

7.5 Magna Park North, north of Mere Lane (ATC 4)

7.5.1 Table 7-6 sets out the recorded total vehicle arrivals (westbound) and departures (eastbound) and two-way movements over a 5-day weekday average period and includes HGV percentages.

Table 7-6: ATC 4 – Magna Park North, north of Mere Lane Weekday Average Vehicle Flows

Period	Arrival (NB)					Departure (SB)					Two-way				
	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %
00:00	0	5	2	8	30.8%	1	33	5	40	13.5%	1	39	8	48	16.3%
01:00	0	7	2	9	22.2%	0	6	5	11	42.6%	0	13	7	20	33.3%
02:00	0	5	3	7	36.1%	0	11	5	16	32.5%	0	15	8	23	33.6%
03:00	0	7	3	10	34.0%	1	5	7	14	52.9%	1	12	11	24	44.9%
04:00	0	11	4	15	26.7%	0	11	5	16	33.3%	0	22	9	31	30.1%
05:00	4	133	13	150	8.7%	0	39	5	43	10.6%	4	172	18	193	9.1%

Period	Arrival (NB)					Departure (SB)					Two-way				
	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %
06:00	0	70	24	94	25.9%	1	32	10	43	23.1%	1	102	34	137	25.0%
07:00	1	163	41	205	19.8%	1	51	29	81	36.0%	2	214	70	286	24.4%
08:00	3	112	26	141	18.2%	1	36	25	62	40.3%	4	148	50	202	24.9%
09:00	0	63	27	90	29.6%	1	32	30	63	47.2%	1	95	56	153	36.9%
10:00	1	29	28	57	49.0%	0	24	28	52	53.8%	1	53	56	110	51.3%
11:00	0	30	23	53	43.8%	1	33	30	65	46.8%	1	63	54	118	45.4%
12:00	1	30	25	56	45.2%	1	37	30	68	44.2%	1	67	55	124	44.7%
13:00	1	77	28	106	26.5%	1	41	31	72	42.5%	1	118	59	178	33.0%
14:00	1	33	27	60	44.2%	2	125	32	160	20.3%	3	158	59	220	26.8%
15:00	1	50	25	75	33.2%	2	71	37	110	34.1%	2	121	62	185	33.7%
16:00	1	26	20	46	42.6%	1	153	31	186	16.8%	2	179	51	232	21.9%
17:00	0	34	16	51	32.0%	2	88	24	114	21.2%	3	122	40	165	24.5%
18:00	0	17	11	27	38.7%	0	34	15	49	30.0%	0	50	25	76	33.2%
19:00	0	15	8	22	33.9%	0	19	11	30	35.8%	0	34	18	52	35.0%
20:00	1	14	7	22	33.3%	0	14	10	24	41.7%	1	28	17	46	37.7%
21:00	0	23	6	28	20.4%	1	30	9	40	22.7%	1	53	15	68	21.8%
22:00	0	17	6	22	25.0%	2	60	10	72	14.1%	2	77	16	95	16.7%
23:00	0	10	4	14	26.5%	0	16	7	24	30.5%	0	26	11	37	29.0%
Totals	**13**	**978**	**377**	**1369**	**27.5%**	**20**	**1001**	**432**	**1453**	**29.7%**	**33**	**1979**	**809**	**2821**	**28.7%**

7.5.2 The Magna Park North ATC identified an AM highway network peak period between 07:00-08:00 where a total of 286 two-way vehicle movements occurred with a HGV percentage of 24.4%. The PM highway network peak was identified to be between 16:00-17:00 where a total of 232 two-way movements occurred with a HGV percentage of 21.9%.

7.5.3 Over the daily period the surveys identified that a total of 2,821 two-way vehicle movements occurred on the Magna Park North access road with a HGV percentage of 28.7%.

7.6 Magna Park South, south of A4303 (ATC 5)

7.6.1 Table 7-7 sets out the recorded total vehicle arrivals (westbound) and departures (eastbound) and two-way movements over a 5-day weekday average period and includes HGV percentages.

Table 7-7: ATC 5 – Magna Park South, south of A4303 Weekday Average Vehicle Flows

Period	Arrival (SB)					Departure (NB)					Two-way				
	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %
00:00	0	0	1	1	100.0%	0	0	1	1	100.0%	0	0	2	2	100.0%
01:00	0	0	0	0	0.0%	0	0	1	1	83.3%	0	0	1	1	71.4%
02:00	0	1	0	1	40.0%	0	1	0	1	20.0%	0	1	1	2	30.0%
03:00	0	1	1	2	45.5%	0	1	0	1	20.0%	0	2	1	3	37.5%
04:00	0	0	1	1	75.0%	0	1	1	2	66.7%	0	1	2	3	69.2%
05:00	0	46	4	50	8.3%	0	4	4	8	52.6%	0	49	8	58	14.1%
06:00	1	126	14	140	9.7%	0	23	7	30	21.9%	1	149	20	171	11.8%
07:00	0	132	27	159	16.7%	0	15	9	23	36.8%	0	147	35	182	19.3%
08:00	0	93	21	114	18.4%	0	12	16	29	56.3%	0	105	37	143	26.1%
09:00	0	74	22	96	22.8%	0	13	18	30	57.9%	0	87	40	127	31.2%
10:00	0	51	22	73	29.6%	0	16	19	36	54.2%	0	68	41	109	37.7%
11:00	0	25	19	44	43.0%	0	29	21	50	42.2%	0	54	40	94	42.6%
12:00	0	34	18	52	34.0%	0	33	18	50	34.9%	0	67	35	102	34.4%

Period	Arrival (SB)					Departure (NB)					Two-way				
	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %
13:00	0	40	19	59	31.6%	0	27	20	47	42.1%	0	67	38	106	36.2%
14:00	0	13	14	27	52.9%	1	90	21	112	19.0%	1	103	36	140	25.6%
15:00	0	9	14	22	61.3%	0	103	19	122	15.3%	0	112	32	144	22.4%
16:00	0	10	12	22	53.2%	1	109	17	128	13.5%	1	120	29	150	19.4%
17:00	0	6	9	16	58.8%	0	79	14	93	14.6%	1	85	23	109	21.1%
18:00	0	15	8	23	36.2%	0	58	10	68	15.2%	0	72	19	91	20.6%
19:00	0	6	3	9	32.6%	0	37	5	42	10.9%	0	43	8	51	14.8%
20:00	0	2	3	5	65.4%	0	9	2	11	21.8%	0	10	6	16	35.8%
21:00	0	11	4	15	26.0%	0	23	6	29	21.1%	0	35	10	45	22.8%
22:00	0	2	5	7	75.8%	0	29	6	35	16.6%	0	31	11	42	26.0%
23:00	0	2	2	4	50.0%	0	1	1	2	63.6%	0	3	3	6	54.8%
Totals	**2**	**700**	**242**	**945**	**25.7%**	**4**	**712**	**236**	**952**	**24.8%**	**6**	**1413**	**478**	**1897**	**25.2%**

7.6.2 The Magna Park South ATC identified an AM highway network peak period between 07:00-08:00 where a total of 182 two-way vehicle movements occurred with a HGV percentage of 19.3%. The PM highway network peak was identified to be between 16:00-17:00 where a total of 150 two-way movements occurred with a HGV percentage of 19.4%.

7.6.3 Over the daily period the surveys identified that a total of 1,897 two-way vehicle movements occurred on the Magna Park South access road with a HGV percentage of 25.2%.

7.7 Overall Magna Park

7.7.1 The trip generation for the entire Magna Park inclusive of flows from all ATC's has been set out in Table 7-8.

Table 7-8: All ATCs - Total Magna Park Vehicle Movements

Period	Total Arrivals					Total Departures					Total Two-way				
	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %
00:00	5	152	46	**202**	22.5%	2	138	31	**172**	18.2%	8	290	77	**375**	20.6%
01:00	2	138	33	**174**	19.2%	0	80	29	**109**	26.2%	2	219	62	**283**	21.9%
02:00	2	94	33	**128**	25.6%	2	95	29	**126**	23.1%	4	188	62	**254**	24.4%
03:00	2	119	35	**156**	22.5%	2	115	41	**158**	25.7%	4	233	76	**313**	24.1%
04:00	2	161	43	**206**	20.8%	2	184	50	**236**	21.0%	4	346	93	**443**	20.9%
05:00	9	577	96	**681**	14.1%	2	527	57	**585**	9.7%	10	1103	153	**1267**	12.1%
06:00	5	509	118	**632**	18.7%	3	500	84	**587**	14.2%	8	1009	202	**1219**	16.6%
07:00	6	774	156	**936**	16.7%	2	482	114	**598**	19.1%	8	1256	270	**1534**	17.6%
08:00	7	542	139	**688**	20.2%	2	427	128	**556**	22.9%	9	969	267	**1244**	21.4%
09:00	4	404	132	**540**	24.5%	2	376	153	**531**	28.8%	6	780	285	**1071**	26.6%
10:00	5	349	178	**532**	33.4%	2	343	176	**521**	33.8%	7	692	354	**1053**	33.6%
11:00	5	313	205	**523**	39.2%	2	296	177	**476**	37.2%	7	610	381	**998**	38.2%
12:00	4	282	238	**524**	45.5%	4	255	176	**435**	40.5%	7	537	415	**960**	43.2%
13:00	7	445	189	**642**	29.4%	5	388	162	**554**	29.2%	12	833	350	**1196**	29.3%
14:00	5	394	175	**574**	30.4%	28	675	155	**859**	18.1%	34	1069	330	**1433**	23.0%
15:00	4	389	160	**553**	29.0%	6	423	133	**563**	23.7%	10	812	294	**1116**	26.3%
16:00	4	250	137	**391**	35.0%	8	547	112	**667**	16.8%	13	797	249	**1058**	23.5%
17:00	3	253	111	**366**	30.2%	13	404	95	**513**	18.6%	16	657	206	**879**	23.4%
18:00	2	175	85	**262**	32.3%	2	264	96	**362**	26.5%	5	439	181	**625**	28.9%
19:00	2	227	75	**304**	24.7%	2	206	106	**314**	33.7%	4	434	181	**618**	29.2%

Period	Total Arrivals					Total Departures					Total Two-way				
	M/C	Car/Van	LGV/HGV/Bus	**Total**	HGV %	M/C	Car/Van	LGV/HGV/Bus	**Total**	HGV %	M/C	Car/Van	LGV/HGV/Bus	**Total**	HGV %
20:00	3	200	59	**262**	22.4%	0	175	88	**263**	33.5%	3	375	147	**525**	28.0%
21:00	1	232	59	**292**	20.2%	2	251	67	**320**	20.9%	4	483	126	**613**	20.6%
22:00	2	187	52	**241**	21.6%	4	375	62	**441**	14.0%	6	562	114	**683**	16.7%
23:00	3	249	51	**303**	16.7%	1	165	41	**207**	19.7%	4	414	91	**509**	17.9%
Totals	**94**	**7415**	**2604**	**10113**	**25.8%**	**101**	**7692**	**2362**	**10155**	**23.3%**	**195**	**15107**	**4966**	**20268**	**24.5%**

7.7.2 For the entire Magna Park study area, the survey data indicates that the AM peak hour is between 07:00 and 08:00 where a total of 1,534 two-way vehicle movements were recorded, with a HGV percentage of 17.6%. The PM peak hour was identified to be between 14:00 and 15:00 where a total of 1,433 two-way vehicle movements were recorded, with a HGV percentage of 23%.

7.7.3 Over a daily period, a total of 20,268 two-way vehicle movements were recorded within the overall Magna Park study area with a HGV percentage of 24.5%.

7.8 A5 Gibbet Hill roundabout (JTC 1)

7.8.1 In addition to the Magna Park traffic surveys, a peak period junction turning count survey was also undertaken at the A5 Gibbet Hill roundabout junction and the results are shown in Table 7-9. The flows are presented as PCUs to allow a comparison to be drawn against previous surveys.

Table 7-9: A5 Gibbet Hill roundabout traffic surveys (PCUs)

PCU	Arm A A5 North	Arm B Rugby Road	Arm C Gibbet Lane	Arm D A5 South	Arm E A426 SW	Total
AM peak hour	985	711	140	893	1091	**3820**
PM peak hour	624	806	96	1001	856	**3383**

7.8.2 As can be seen in Table 7-9 a total of 3,820 PCUs travelled through the junction in the AM peak hour, and 3,383 PCU's travelled through the junction in the PM peak hour.

7.8.3 This survey has been utilised as a baseline against which to compare previously undertaken and accepted surveys at the A5 Gibbet Hill roundabout.

8. BACKGROUND CONDITIONS – 2025 MAGNA PARK TRIP RATES

8.1 Introduction and Study Area

8.1.1 To establish up to date trip rates associated with the existing Magna Park operations, the ATC traffic data presented in Section 7 has been reviewed against the floorspace of the current occupiers of the site.

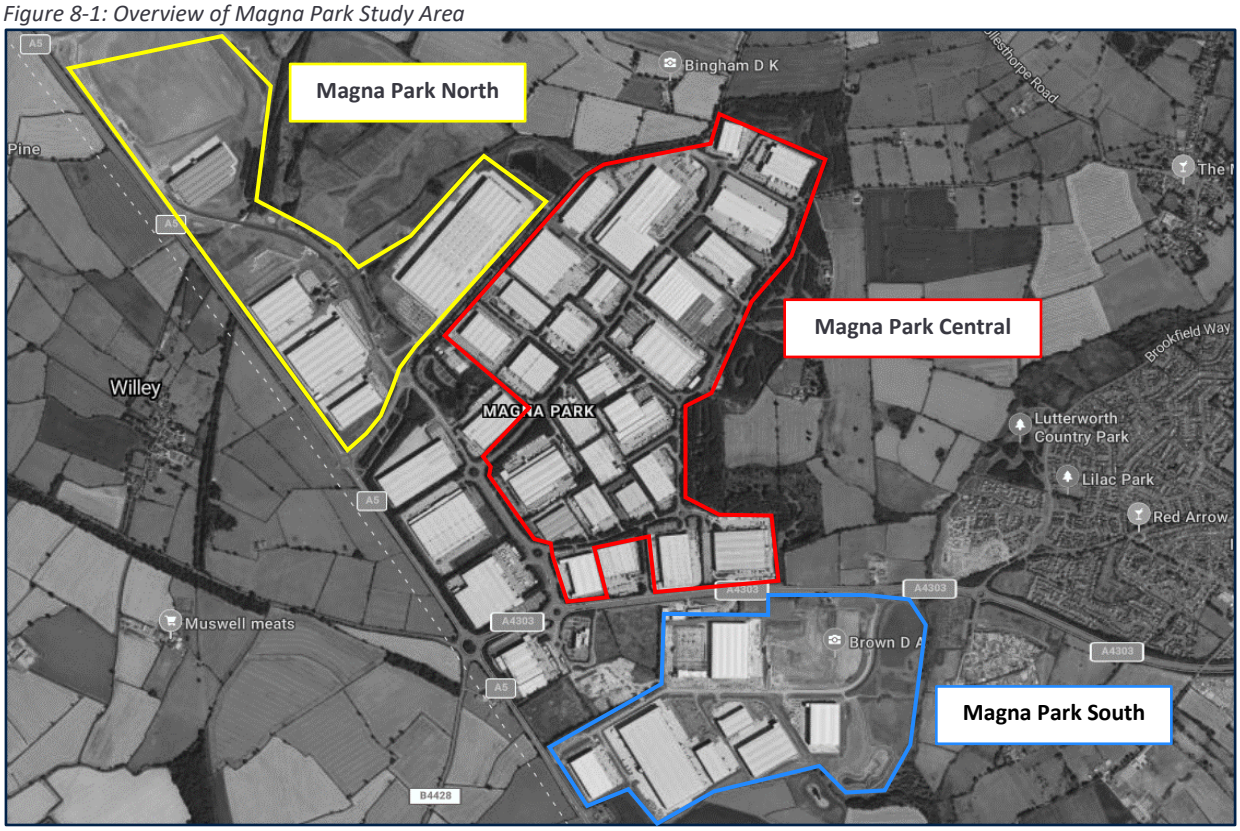
8.1.2 As such, the existing operational and non-operational floorspace has been identified within Magna Park through information provided by GLP and the access locations of each unit have been considered to ensure that the units are fully and solely served by the data collected by the ATCs.

8.1.3 The traffic surveys in Section 7 sought to isolate vehicle movements to key locations within the entire Magna Park to ensure that no through traffic movements were captured and therefore all vehicle movements to and from these surveys capture traffic associated with operational units. This therefore informs the 'Study Area' which has been split between three specific areas, as shown at Figure 8-1 and summarised as follows:

- **Magna Park Central:** There are three access points into this area from roundabouts at Hunter Boulevard / Argosy Way as well as a left-in, left-out junction from Shackelton Way / A4303.
- **Magna Park North:** Access is provided from a single location via the northern arm of the Mere Lane / Argosy Way roundabout.
- **Magna Park South:** Access is provided from a single location via the southern arm of the A4303 Coventry Road / Magna Park south roundabout.

8.1.4 Units accessed directly from Hunter Boulevard / Argosy Way have been excluded, as this route would also include through traffic between the A4303 and Mere Lane. Given the surveys capture the significant majority of the units at Magna Park, it was not considered necessary to obtain another 5-10 ATCs to capture the movements into and out of the individual accesses for the excluded units.

Figure 8-1: Overview of Magna Park Study Area



Source: Bing Maps

8.2 Magna Park Floorspace – All Units

8.2.1 A qualitative review of the current floorspace within Magna Park has been undertaken based on information provided by GLP. This has established all units which are currently occupied and which are situated within the study areas shown in Figure 8-1.

8.2.2 GLP provided details of all units within Magna Park, so to establish the relevant occupied units, this has been considered as follows:

- **Occupied floorspace:** this is where a plot is occupied and is operational, generating vehicle trips
- **Non-operational floorspace:** this is where a plot is either constructed but unoccupied, or a plot is yet to be constructed.
- **Excluded floorspace:** this floorspace is not included within a study area

8.2.3 The information provided by GLP indicates that there is a total of 52 plots within Magna Park. These plots are summarised at Table 8-1. The rows shaded in red are those which would fall outside of the study for the reasons set out above.

Table 8-1: Summary of Total Plots, Floorspace, Operator, Status and Location at Magna Park

Plot	Total GIA (sqm)	Occupier	Status	Magna Park		
				Central	North	South
2110	17,345	Bleckmann	Operational	✓	×	×
2300	26,149	Lidl	Operational	✓	×	×
2400	35,480	Armstrong Logistics	Operational	✓	×	×
3100	29,368	Asda	Operational	✓	×	×
3210	12,356	Armstrong Logistics	Operational	✓	×	×
3310	15,412	DHL International	Operational	✓	×	×
3320	17,019	VWR International	Operational	✓	×	×
3400	24,805	Britvic	Operational	✓	×	×
3420	14,296	BSS	Operational	✓	×	×

Plot	Total GIA (sqm)	Occupier	Status	Magna Park		
				Central	North	South
3520	17,301	Kenwood	Operational	✓	×	×
4100	35,356	British Telecom	Operational	✓	×	×
4200	46,657	Tech Data	Operational	✓	×	×
4400	24,155	Clipper	Operational	✓	×	×
4500	20,919	Vow	Operational	✓	×	×
5220	19,201	Unipart	Operational	✓	×	×
5310	11,168	P&O	Operational	✓	×	×
5320	38,292	Amazon	Operational	✓	×	×
5410	62,586	Asda	Operational	✓	×	×
5420	21,310	Eddie Stobart	Operational	✓	×	×
6130	9,495	CML Ltd	Operational	✓	×	×
3220	14,885	DHL Brother	Unoccupied	✓	×	×
3510	9,791	CML Ltd	Unoccupied	✓	×	×
4300	20,167	Disney	Unoccupied	✓	×	×
5110	19,847	Syncreon	Unoccupied	✓	×	×
5120	20,280	CML Ltd	Unoccupied	✓	×	×
5210	14,980	DHL	Unoccupied	✓	×	×
G	100,843	Wayfair (UK) Ltd	Operational	×	✓	×
MPN1	18,619	Bleckmann	Operational	×	✓	×
MPN2	46,757	Ironmountain	Operational	×	✓	×
MPN3	27,622	Ironmountain	Operational	×	✓	×
MPN4	28,981	LX Pantos	Operational	×	✓	×
MPN5	70,733		Under Construction	×	✓	×
MPN6	79,690		Not Constructed	×	✓	×
MPN7	38,239		Not Constructed	×	✓	×
MPS1	69,379	Amazon	Operational	×	×	✓
MPS2	11,728	Jingdong	Operational	×	×	✓
MPS3	27,934	Wistle	Operational	×	×	✓
MPS4	9,182	Movianto	Operational	×	×	✓
MPS6	19,690	Centica	Operational	×	×	✓
MPS7	23,848	Centica	Operational	×	×	✓
MPS8	33,092	Unipart	Operational	×	×	✓
MPS9	36,122	CEF	Operational	×	×	✓
MPS5	17,396		Unoccupied	×	×	✓
MPS10	12,739		Unoccupied	×	×	✓
MPS11	11,113		Unoccupied	×	×	✓
1100	39,460	Asda (SAC)	Operational	×	×	×
1300	43,179	Nissan / Renault	Operational	×	×	×
1400	39,176	Steinhoff	Operational	×	×	×
1500	25,563	Eddie Stobart	Operational	×	×	×
2200	18,209	Toyota GB Ltd	Operational	×	×	×
7000	20,446	Culina	Operational	×	×	×
7400	7,845	George HQ (offices)	Operational	×	×	×
Total	**1,476,201**					

8.2.4 Out of the 52 plots, Table 8-1 shows that there are a total of 40 operational plots within Magna Park. There are 12 plots which are either currently under construction, yet to be constructed, or are unoccupied. There are a further 7 plots which are not situated within the three study areas and therefore vehicle movements associated with these sites are not included in the ATC surveys.

8.3 Magna Park Floorspace – Study Area

Magna Park Central Floorspace

8.3.1 The operational plots contained within the Magna Park Central study where principal access is obtained from Hunter Boulevard, Wellington Parkway and Shackelton Way are set out at Table 8-2,

which includes total floorspace (sqm) and occupiers. This excludes the unoccupied units, as shown in Table 8-1.

Table 8-2: Magna Park Central Total Floorspace

Plot	Total GIA (sqm)	Occupier
2110	17,345	Bleckmann
2300	26,149	Lidl
2400	35,480	Armstrong Logistics
3100	29,368	Asda
3210	12,356	Armstrong Logistics
3310	15,412	DHL International
3320	17,019	VWR International
3400	24,805	Britvic
3420	14,296	BSS
3520	17,301	Kenwood
4100	35,356	British Telecom
4200	46,657	Tech Data
4400	24,155	Clipper
4500	20,919	Vow
5220	19,201	Unipart
5310	11,168	P&O
5320	38,292	Amazon
5410	62,586	Asda
5420	21,310	Eddie Stobart
6130	9,495	CML Ltd
Total	**498,667**	

8.3.2 Within the Magna Park Central study area, at the time of the surveys there was a total of 498,667 sqm of operational floorspace.

Magna Park North Floorspace

8.3.3 The operational plots contained within the Magna Park North study area to the north of Mere Lane are set out at Table 8-3, which includes total floorspace (sqm) and occupiers. This excludes the unoccupied units, as shown in Table 8-1.

Table 8-3: Magna Park North Total Floorspace

Plot	Total GIA (sqm)	Occupier
G	100,843	Wayfair (UK) Ltd
MPN1	18,619	Bleckmann
MPN2	46,757	Ironmountain
MPN3	27,622	Ironmountain
MPN4	28,981	LX Pantos
Total	**222,821**	

8.3.4 Within the Magna Park North study area, at the time of the surveys, there was a total of 222,821 sqm of operational floorspace.

Magna Park South Floorspace

8.3.5 The operational plots contained within the Magna Park South study area to the south of the A4303 are set out at Table 8-4, which includes total floorspace (sqm) and occupiers. This excludes the unoccupied units, as shown in Table 8-1.

Table 8-4: Magna Park South Total Floorspace

Plot	Total GIA (sqm)	Occupier
MPS1	69,379	Amazon
MPS2	11,728	Jingdong
MPS3	27,934	Wistle

MPS4	9,182	Movianto
MPS6	19,690	Centica
MPS7	23,848	Centica
MPS8	33,092	Unipart
MPS9	36,122	CEF
Total	**230,976**	

8.3.6 Within the Magna Park South study area, at the time of the surveys, there was a total of 230,976 sqm of operational floorspace.

Magna Park Total Floorspace

8.3.7 Table 8-5 provides the total operational floorspace across the three study areas at the time of the April 2025 traffic surveys.

Table 8-5: Total Magna Park Operational Floorspace

Magna Park Study Area	Operational Floorspace (sqm)
Central	498,667
North	222,821
South	230,976
Total	**952,464**

8.3.8 The operational floorspace for all operational units within the study areas in Magna Park is 952,464 sqm.

8.4 Magna Park Site Specific Trip Rate

8.4.1 Bespoke site specific 2025 trip rates have been calculated using the obtained ATC data, as presented in Section 7, and the operational floorspaces shown in Table 8-5.

Magna Park Central Trip Rates

8.4.2 To produce the trip rates for the Magna Park Central study area, the total vehicle movements for Magna Park Central have been established by adding together the recorded traffic flows from ATC 1 (Table 7-3), ATC 2 (Table 7-4) and ATC 3 (Table 7-5). The resultant trip generation for the Magna Park Central study area has been set out at Table 8-6.

Table 8-6: Magna Park Central Total Vehicle Movements

Period	Total Arrivals					Total Departures					Total Two-way				
	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %
00:00	5	146	42	194	21.8%	1	105	25	131	19.1%	6	251	67	325	20.7%
01:00	2	131	31	164	19.1%	0	74	23	97	23.7%	2	205	54	262	20.8%
02:00	2	88	30	120	24.9%	2	83	24	109	21.8%	4	171	54	229	23.4%
03:00	2	111	31	143	21.3%	1	109	33	143	23.2%	3	219	64	287	22.3%
04:00	2	150	38	191	20.1%	2	173	43	218	19.7%	4	323	81	409	19.9%
05:00	4	397	79	481	16.4%	2	484	48	534	9.0%	6	882	127	1015	12.5%
06:00	4	313	80	398	20.2%	2	445	67	514	13.0%	6	758	147	911	16.2%
07:00	4	480	89	573	15.5%	1	416	76	493	15.5%	6	895	165	1066	15.5%
08:00	4	336	93	433	21.4%	1	379	87	466	18.6%	5	715	179	899	19.9%
09:00	3	267	84	354	23.6%	1	331	106	438	24.1%	5	598	189	791	23.9%
10:00	5	269	128	402	31.9%	1	303	129	433	29.7%	6	572	257	835	30.8%
11:00	5	258	162	425	38.2%	1	234	125	361	34.8%	6	493	288	786	36.6%
12:00	3	218	196	417	47.0%	3	185	129	317	40.6%	6	403	324	734	44.2%
13:00	6	328	142	477	29.8%	4	320	111	436	25.6%	11	648	253	912	27.8%
14:00	5	348	134	486	27.5%	25	460	102	587	17.3%	30	808	235	1073	21.9%

Period	Total Arrivals					Total Departures					Total Two-way				
	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %	M/C	Car/Van	LGV/HGV/Bus	Total	HGV %
15:00	3	330	122	455	26.7%	4	249	77	331	23.4%	8	580	199	787	25.3%
16:00	4	214	105	323	32.7%	6	285	63	354	17.9%	10	498	169	677	24.9%
17:00	3	212	85	300	28.4%	10	238	58	306	18.8%	13	450	143	605	23.6%
18:00	2	144	66	212	31.0%	2	173	71	246	28.9%	4	317	137	457	29.9%
19:00	2	206	64	273	23.6%	1	150	91	242	37.4%	3	357	155	515	30.1%
20:00	2	184	48	234	20.4%	0	152	76	228	33.2%	2	337	124	462	26.7%
21:00	1	198	49	249	19.9%	2	198	52	251	20.6%	3	396	101	500	20.2%
22:00	2	169	42	212	19.6%	3	286	46	334	13.8%	5	454	88	547	16.0%
23:00	3	237	45	285	15.8%	1	148	32	181	17.8%	3	385	77	466	16.6%
Totals	**78**	**5736**	**1985**	**7799**	**25.4%**	**78**	**5979**	**1694**	**7751**	**21.9%**	**156**	**11716**	**3678**	**15550**	**23.7%**

8.4.3 The survey data indicates that the AM peak hour is between 07:00 and 08:00 where a total of 1,066 two-way vehicle movements were recorded, with a HGV percentage of 15.5%. The PM peak hour was identified to be between 14:00 and 15:00 where a total of 1,073 two-way vehicle movements were recorded, with a HGV percentage of 21.9%.

8.4.4 Over a daily period, a total of 15,550 two-way vehicle movements were recorded within the Magna Park Central study area with a HGV percentage of 23.7%.

8.4.5 The total recorded vehicle movements for the Magna Park Central study area have been divided by the total operational floorspace in the study area, which is 498,667 sqm (Table 8-5). This has then been multiplied by 100, to obtain a per 100sqm floorspace trip rate, for a comparison with the previously obtained trip rates for Magna Park from 2013 / 2014.

8.4.6 Table 8-7 sets out the Magna Park Central study area trip rates (per 100 sqm of floorspace) for light vehicles, HGVs and total vehicles.

Table 8-7: Magna Park Central Trip Rates – from 2025 surveys (per 100 sqm)

Period	Arrivals			Departures			Two-way		
	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total
00:00	0.030	0.008	0.039	0.021	0.005	0.026	0.052	0.013	0.065
01:00	0.027	0.006	0.033	0.015	0.005	0.019	0.042	0.011	0.052
02:00	0.018	0.006	0.024	0.017	0.005	0.022	0.035	0.011	0.046
03:00	0.023	0.006	0.029	0.022	0.007	0.029	0.045	0.013	0.057
04:00	0.031	0.008	0.038	0.035	0.009	0.044	0.066	0.016	0.082
05:00	0.081	0.016	0.096	0.097	0.010	0.107	0.178	0.026	0.204
06:00	0.064	0.016	0.080	0.090	0.013	0.103	0.153	0.030	0.183
07:00	0.097	0.018	0.115	0.084	0.015	0.099	0.181	0.033	0.214
08:00	0.068	0.019	0.087	0.076	0.017	0.093	0.144	0.036	0.180
09:00	0.054	0.017	0.071	0.067	0.021	0.088	0.121	0.038	0.159
10:00	0.055	0.026	0.081	0.061	0.026	0.087	0.116	0.052	0.167
11:00	0.053	0.033	0.085	0.047	0.025	0.072	0.100	0.058	0.158
12:00	0.044	0.039	0.084	0.038	0.026	0.064	0.082	0.065	0.147
13:00	0.067	0.028	0.096	0.065	0.022	0.087	0.132	0.051	0.183
14:00	0.071	0.027	0.098	0.097	0.020	0.118	0.168	0.047	0.215
15:00	0.067	0.024	0.091	0.051	0.016	0.066	0.118	0.040	0.158
16:00	0.044	0.021	0.065	0.058	0.013	0.071	0.102	0.034	0.136
17:00	0.043	0.017	0.060	0.050	0.012	0.061	0.093	0.029	0.121
18:00	0.029	0.013	0.042	0.035	0.014	0.049	0.064	0.027	0.092
19:00	0.042	0.013	0.055	0.030	0.018	0.049	0.072	0.031	0.103
20:00	0.037	0.010	0.047	0.031	0.015	0.046	0.068	0.025	0.093
21:00	0.040	0.010	0.050	0.040	0.010	0.050	0.080	0.020	0.100
22:00	0.034	0.008	0.043	0.058	0.009	0.067	0.092	0.018	0.110

Period	Arrivals			Departures			Two-way		
	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total
23:00	0.048	0.009	0.057	0.030	0.006	0.036	0.078	0.015	0.093
Total	**1.166**	**0.398**	**1.564**	**1.215**	**0.340**	**1.554**	**2.381**	**0.738**	**3.118**

Magna Park North Trip Rate

8.4.7 The recorded traffic flows captured as part of ATC 4 set out at Table 7-6 have been utilised to derive trip rates per 100 sqm based on the identified operational floorspace for the Magna Park North study area, which is 222,821 sqm.

8.4.8 The resultant Magna Park North study area trip rates (per 100 sqm of floorspace) for light vehicles, HGVs and total vehicles are shown at Table 8-8.

Table 8-8: Magna Park North Trip Rates – from 2025 Surveys (per 100 sqm)

Period	Arrivals			Departures			Two-way		
	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total
00:00	0.002	0.001	0.004	0.016	0.002	0.018	0.018	0.004	0.021
01:00	0.003	0.001	0.004	0.003	0.002	0.005	0.006	0.003	0.009
02:00	0.002	0.001	0.003	0.005	0.002	0.007	0.007	0.004	0.010
03:00	0.003	0.002	0.004	0.003	0.003	0.006	0.006	0.005	0.011
04:00	0.005	0.002	0.007	0.005	0.002	0.007	0.010	0.004	0.014
05:00	0.062	0.006	0.067	0.017	0.002	0.019	0.079	0.008	0.087
06:00	0.031	0.011	0.042	0.015	0.004	0.019	0.046	0.015	0.062
07:00	0.074	0.018	0.092	0.023	0.013	0.036	0.097	0.031	0.128
08:00	0.052	0.011	0.063	0.017	0.011	0.028	0.068	0.023	0.091
09:00	0.028	0.012	0.040	0.015	0.013	0.028	0.043	0.025	0.069
10:00	0.013	0.013	0.026	0.011	0.013	0.024	0.024	0.025	0.049
11:00	0.013	0.010	0.024	0.016	0.014	0.029	0.029	0.024	0.053
12:00	0.014	0.011	0.025	0.017	0.013	0.030	0.031	0.025	0.055
13:00	0.035	0.013	0.047	0.019	0.014	0.032	0.053	0.026	0.080
14:00	0.015	0.012	0.027	0.057	0.015	0.072	0.072	0.026	0.099
15:00	0.023	0.011	0.034	0.032	0.017	0.049	0.055	0.028	0.083
16:00	0.012	0.009	0.021	0.069	0.014	0.083	0.081	0.023	0.104
17:00	0.015	0.007	0.023	0.040	0.011	0.051	0.056	0.018	0.074
18:00	0.008	0.005	0.012	0.015	0.007	0.022	0.023	0.011	0.034
19:00	0.007	0.003	0.010	0.009	0.005	0.013	0.015	0.008	0.023
20:00	0.007	0.003	0.010	0.006	0.004	0.011	0.013	0.008	0.021
21:00	0.010	0.003	0.013	0.014	0.004	0.018	0.024	0.007	0.031
22:00	0.008	0.003	0.010	0.028	0.005	0.032	0.035	0.007	0.042
23:00	0.004	0.002	0.006	0.007	0.003	0.011	0.012	0.005	0.017
Total	**0.445**	**0.169**	**0.614**	**0.458**	**0.194**	**0.652**	**0.903**	**0.363**	**1.266**

Magna Park South Trip Rates

8.4.9 The recorded traffic flows captured as part of ATC 5 set out at Table 7-7 have been utilised to derive trip rates per 100 sqm based on the identified operational floorspace for the Magna Park South study area, which is 230,976 sqm.

8.4.10 The resultant Magna Park South study area trip rates (per 100 sqm of floorspace) for light vehicles, HGVs and total vehicles are shown at Table 8-9.

Table 8-9: Magna Park South Trip Rates – from 2025 surveys (per 100 sqm)

Period	Arrivals			Departures			Two-way		
	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total
00:00	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.001	0.001
01:00	0.000	0.000	0.000	0.000	0.000	0.001	0.000	0.000	0.001
02:00	0.000	0.000	0.000	0.000	0.000	0.000	0.001	0.000	0.001
03:00	0.001	0.000	0.001	0.000	0.000	0.000	0.001	0.001	0.001

Period	Arrivals			Departures			Two-way		
	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total
04:00	0.000	0.000	0.000	0.000	0.001	0.001	0.000	0.001	0.001
05:00	0.020	0.002	0.022	0.002	0.002	0.003	0.022	0.004	0.025
06:00	0.055	0.006	0.061	0.010	0.003	0.013	0.065	0.009	0.074
07:00	0.057	0.012	0.069	0.006	0.004	0.010	0.064	0.015	0.079
08:00	0.040	0.009	0.049	0.005	0.007	0.012	0.046	0.016	0.062
09:00	0.032	0.010	0.042	0.006	0.008	0.013	0.038	0.017	0.055
10:00	0.022	0.009	0.032	0.007	0.008	0.015	0.029	0.018	0.047
11:00	0.011	0.008	0.019	0.012	0.009	0.022	0.023	0.017	0.041
12:00	0.015	0.008	0.022	0.014	0.008	0.022	0.029	0.015	0.044
13:00	0.018	0.008	0.026	0.012	0.008	0.020	0.029	0.017	0.046
14:00	0.006	0.006	0.012	0.039	0.009	0.049	0.045	0.015	0.060
15:00	0.004	0.006	0.010	0.045	0.008	0.053	0.048	0.014	0.062
16:00	0.005	0.005	0.010	0.048	0.007	0.055	0.052	0.013	0.065
17:00	0.003	0.004	0.007	0.034	0.006	0.040	0.037	0.010	0.047
18:00	0.006	0.004	0.010	0.025	0.005	0.030	0.031	0.008	0.040
19:00	0.003	0.001	0.004	0.016	0.002	0.018	0.019	0.003	0.022
20:00	0.001	0.001	0.002	0.004	0.001	0.005	0.005	0.003	0.007
21:00	0.005	0.002	0.007	0.010	0.003	0.013	0.015	0.004	0.019
22:00	0.001	0.002	0.003	0.013	0.003	0.015	0.013	0.005	0.018
23:00	0.001	0.001	0.002	0.000	0.001	0.001	0.001	0.001	0.003
Total	**0.304**	**0.105**	**0.409**	**0.310**	**0.102**	**0.412**	**0.614**	**0.207**	**0.821**

Overall Magna Park Trip Rates

8.4.11 The trip rates for the entire Magna Park inclusive of Central, North and South study areas have been considered based on the total vehicle movements recorded from all ATC's as shown in Table 7-8.

8.4.12 The trip rates per 100 sqm have been based on the identified overall operational floorspace for the Magna Park study area, which is 952,464 sqm.

8.4.13 The resultant Magna Park South study area trip rates (per 100 sqm of floorspace) for light vehicles, HGVs and total vehicles are shown at Table 8-10.

Table 8-10: Total Magna Park Trip Rates (per 100 sqm)

Period	Arrivals			Departures			Two-way		
	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total
00:00	0.016	0.005	0.021	0.015	0.003	0.018	0.031	0.008	0.039
01:00	0.015	0.004	0.018	0.008	0.003	0.011	0.023	0.007	0.030
02:00	0.010	0.003	0.013	0.010	0.003	0.013	0.020	0.007	0.027
03:00	0.013	0.004	0.016	0.012	0.004	0.017	0.025	0.008	0.033
04:00	0.017	0.005	0.022	0.020	0.005	0.025	0.037	0.010	0.046
05:00	0.061	0.010	0.072	0.055	0.006	0.061	0.117	0.016	0.133
06:00	0.054	0.012	0.066	0.053	0.009	0.062	0.107	0.021	0.128
07:00	0.082	0.016	0.098	0.051	0.012	0.063	0.133	0.028	0.161
08:00	0.058	0.015	0.072	0.045	0.013	0.058	0.103	0.028	0.131
09:00	0.043	0.014	0.057	0.040	0.016	0.056	0.083	0.030	0.112
10:00	0.037	0.019	0.056	0.036	0.019	0.055	0.073	0.037	0.111
11:00	0.033	0.021	0.055	0.031	0.019	0.050	0.065	0.040	0.105
12:00	0.030	0.025	0.055	0.027	0.019	0.046	0.057	0.044	0.101
13:00	0.048	0.020	0.067	0.041	0.017	0.058	0.089	0.037	0.126
14:00	0.042	0.018	0.060	0.074	0.016	0.090	0.116	0.035	0.150
15:00	0.041	0.017	0.058	0.045	0.014	0.059	0.086	0.031	0.117
16:00	0.027	0.014	0.041	0.058	0.012	0.070	0.085	0.026	0.111
17:00	0.027	0.012	0.038	0.044	0.010	0.054	0.071	0.022	0.092
18:00	0.019	0.009	0.028	0.028	0.010	0.038	0.047	0.019	0.066
19:00	0.024	0.008	0.032	0.022	0.011	0.033	0.046	0.019	0.065
20:00	0.021	0.006	0.027	0.018	0.009	0.028	0.040	0.015	0.055
21:00	0.024	0.006	0.031	0.027	0.007	0.034	0.051	0.013	0.064

Period	Arrivals			Departures			Two-way		
	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total
22:00	0.020	0.005	0.025	0.040	0.007	0.046	0.060	0.012	0.072
23:00	0.026	0.005	0.032	0.017	0.004	0.022	0.044	0.010	0.053
Total	**0.788**	**0.273**	**1.062**	**0.818**	**0.248**	**1.066**	**1.607**	**0.521**	**2.128**

9. LAND WEST OF MAGNA PARK TRIP GENERATION

9.1 Overview

9.1.1 This section sets out a forecast of the vehicle trip generation likely to associated with the land west of Magna Park site. The forecast vehicle trip generation is based upon the total 2025 Magna Park trip rates (per 100 sqm) as set out at Table 8-10.

9.1.2 This vehicle trip generation is based on the existing travel behaviour at Magna Park. However, the vision for the land west of Magna Park is to increase sustainable travel over and above existing levels, as well as increase sustainable travel behaviour at the existing Magna Park site through the implementation of further improvements. **As such, the vision-led approach for the vehicle trip generation on the land west of Magna Park site would be to achieve a 10% reduction on the obtained 2025 trip rates.**

9.1.3 At this stage, the detailed layout of the proposal is yet to be established, however, initial analysis of the potential floorspace of the development units indicates that the site could cater for up to 6.2 million sqft of B2 / B8 use, which equates to approximately 576,000 sqm of floorspace. This is based on a c. 35% of the overall site area being occupied by the floorspace of units.

9.2 Site trip generation

9.2.1 The forecast vehicle generation for the land west of Magna Park site, based on a 576,000 sqm floorspace and the 2025 obtained trip rates is shown in Table 9-1. This does not include the 10% reduction which on the obtained rates which would be a target for the land west of Magna Park site. The trip rates have been shown to remain as observed in 2025 for robustness.

Table 9-1: Proposed land west of Magna Park vehicle trip generation

Period	Arrivals			Departures			Two-way		
	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total	Car/Van/MC	HGV	Total
00:00	95	28	**122**	85	19	**104**	180	47	**227**
01:00	85	20	**105**	49	17	**66**	134	37	**171**
02:00	58	20	**77**	59	18	**76**	116	37	**154**
03:00	73	21	**94**	71	25	**95**	144	46	**190**
04:00	99	26	**125**	113	30	**143**	212	56	**268**
05:00	354	58	**412**	320	34	**354**	673	93	**766**
06:00	311	72	**382**	304	51	**355**	615	122	**737**
07:00	472	94	**566**	292	69	**362**	764	163	**928**
08:00	332	84	**416**	259	77	**336**	591	161	**753**
09:00	247	80	**327**	229	93	**321**	475	172	**648**
10:00	214	108	**322**	209	107	**315**	423	214	**637**
11:00	192	124	**316**	181	107	**288**	373	231	**604**
12:00	173	144	**317**	157	107	**263**	329	251	**580**
13:00	274	114	**388**	237	98	**335**	511	212	**723**
14:00	241	106	**347**	425	94	**519**	667	200	**866**
15:00	237	97	**334**	260	81	**340**	497	178	**675**
16:00	154	83	**236**	336	68	**403**	489	150	**640**
17:00	155	67	**222**	252	58	**310**	407	125	**532**
18:00	107	51	**159**	161	58	**219**	269	109	**378**
19:00	139	45	**184**	126	64	**190**	265	109	**374**
20:00	123	35	**158**	106	53	**159**	229	89	**317**
21:00	141	36	**177**	153	41	**194**	294	76	**370**
22:00	114	32	**146**	229	37	**267**	344	69	**413**
23:00	152	31	**183**	100	25	**125**	253	55	**308**
Total	**4541**	**1575**	**6116**	**4713**	**1428**	**6141**	**9254**	**3003**	**12257**

9.2.2 This shows that the robust trip rates for the land west of Magna Park site are forecast to generate 566 two-way vehicle movements during the AM peak hour (07:00 to 08:00) and 866 two-way vehicle movements during the PM peak hour (14:00 to 15:00).

9.2.3 Over a daily period, a total of 12,257 two-way vehicle movements are forecast to occur, which on average, equates to 511 two-way movements per hour.

9.2.4 Based on a 10% reduction in trip rates, this would reduce vehicle movements to around 500 in the AM peak and 775 in the PM peak, as well as 11,000 over a daily period.

10. CONSIDERATION OF IMPACTS

10.1 Introduction

10.1.1 This section provides a high-level consideration of potential highway impacts if the land west of Magna Park site were to come forwards for development. This has considered changes in traffic flows that have occurred at Magna Park over time, as well as changes in flows on the wider highway network.

10.1.2 As is normal practice, a detailed and comprehensive transport assessment would be required at planning application stage, and the level of detail presented here is proportional to the current Regulation 18 stage of the local plan process.

10.2 Consented and 2025 Magna Park traffic flows

10.2.1 Section 5 of this TN presents the trip rates that were agreed from traffic surveys in 2013 and 2014 in support of consented (and now constructed) planning applications at Magna Park. To inform this TN, additional survey data was obtained to compare how trip generation has changed at Magna Park between 2013 / 2014 / 2025.

10.2.2 A summary of the trip rates for 2013 / 2014 / 2035 (per 100 sqm of floorspace) is provided in Table 10-1.

Table 10-1: Comparison of Magna Park vehicle trip rates (per 100sqm) in 2013 / 2014 / 2025

Survey	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			24-hour		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
2013 Survey	0.141	0.048	0.189	0.045	0.112	0.157	1.508	1.35	2.858
2014 Survey	0.132	0.042	0.174	0.042	0.114	0.156	1.386	1.38	2.766
2025 Survey	0.072	0.058	0.131	0.038	0.054	0.092	1.062	1.066	2.128

10.2.3 For ease of comparison, by applying the 2013 / 2014 / 2025 trip rates to the occupied operational floorspace within the study area of 952,464 sqm (as per the date of the report and set out at Section 8), the Magna Park vehicle trip generation would be as presented in Table 10-2.

Table 10-2: Comparison of Magna Park vehicle trip generation (952,464 sqm) in 2013 / 2014 / 2025

Survey	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			24-hour		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
2013 Survey	1343	457	1800	429	1067	1495	14363	12858	27221
2014 Survey	1257	400	1657	400	1086	1486	13201	13144	26345
2025 Survey	688	556	1244	366	513	879	10113	10155	20268

10.2.4 A net change analysis is presented in Table 10-3.

Table 10-3: Comparison of Magna Park vehicle trip generation

Survey	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			24-hour		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
2025 comparison with 2013 Survey	-655	+99	**-556**	-63	-554	**-616**	-4250	-2703	**-6953**
2025 comparison with 2014 Survey	-569	+156	**-413**	-34	-573	**-607**	-3088	-2989	**-6077**

10.2.5 A percentage change analysis between the 2025 and 2013 / 2014 flows is presented in Table 10-4.

Table 10-4: Percentage change in Magna Park vehicle trip generation

Survey	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			24-hour		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
2025 comparison with 2013 Survey	-48.8%	21.7%	**-30.9%**	-14.7%	-51.9%	**-41.2%**	-29.6%	-21.0%	**-25.5%**
2025 comparison with 2014 Survey	-45.3%	39.0%	**-24.9%**	-8.5%	-52.8%	**-40.9%**	-23.4%	-22.7%	**-23.1%**

10.2.6 As shown in Table 10-3 and Table 10-4, traffic flows have reduced significantly between the period 2013/14 to 2025, by up to nearly 7,000 (26%) trips per day within the study area, and around 600 (30%-40%) trips in each of the network peak hours.

10.2.7 The surveys do not cover the entire of Magna Park and as such, the overall change is likely to be greater still from the entire Magna Park from the consented and accepted position. The analysis clearly demonstrates that the previously agreed and accepted position of traffic flows at Magna Park was significantly higher than the flows that are now being generated. As such, the network should have spare capacity, as the existing Magna Park site has provided mitigation and contributions to accommodate the higher level of traffic flows on the network.

10.2.8 Potential reasons for the reduction in flows from the site are considered to be as follows:

- **Covid-19:** the pandemic has resulted in permanent changes to traffic behaviours, either in how frequent trips are made, or how they are now made (e.g. mode share shift).
- **Route optimisation**: Advances in technology have enabled better route planning and optimisation, reducing the number of trips needed to deliver goods.
- **Increased vehicle capacity**: Improvements in vehicle design and logistics strategies have allowed for larger loads, meaning fewer trips are needed to transport the same amount of goods.
- **Consolidation of shipments**: Companies are increasingly consolidating shipments to maximize efficiency, reducing the frequency of trips. A benefit realised as Magna Park expands.
- **Sustainability initiatives**: There is a growing emphasis on reducing carbon footprints, leading to more efficient use of vehicles and fewer trips.
- **Economic factors**: Rising fuel costs and other economic pressures have incentivised companies to find ways to reduce transportation costs, including minimising the number of trips.
- **Improved technologies**: Improved technology in warehouses has reduced the number of staff required within warehouses.

10.2.9 It is anticipated that this trend will continue, meaning that the trip rates obtained in 2025 being applied to future assessment scenarios will be extremely robust, particularly for the land west of Magna Park site, as the vision-led approach is for the site to have a higher level of sustainable transport movements than the existing Magna Park site, and a reduction of at least 10% in comparable vehicle trip rates.

10.2.10 Transport assessments are also now required to undertake a vision-led assessment, whereby various scenarios are considered. When this takes place as part of a detailed transport assessment supporting a planning application, it is expected that the assessment scenarios will forecast the continued downward trend in vehicle trip generation and consider a reduced vehicle trip rate scenario for both the land west of Magna Park, and Magna Park itself.

10.2.11 The land west of Magna Park trip generation, without any consideration of future trends or the vision for a higher level of sustainable transport movements than the existing Magna Park, has been presented in Table 9-1. To allow a comparison to be drawn, the AM, PM and daily flows have been extracted and presented in Table 10-5.

Table 10-5: Land west of Magna Park – Forecast Vehicle Trip Generation (576,000 sqm)

	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			24-hour		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
Vehicle Generation	416	336	753	222	310	532	6116	6141	12257

10.2.12 Applying the robust trip generation forecast for the land west of Magna Park to the Magna Park net change analysis in Table 10-3, the difference between the 2013 and 2014 Magna Park trip generation and the '*2025 Magna Park trip generation + land west of Magna Park*' scenario has been considered in the peak hours and over a daily period. This is presented in Table 10-6.

Table 10-6: Comparison of previous and 2025 Magna Park + Land west of Magna Park trip generation

Scenario	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			24-hour		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
2025 Magna Park Trip Generation + land west of Magna Park comparison with 2013 Trip Generation	-239	+435	**+197**	+159	-244	**-84**	+1,866	+3,438	**+5,304**
2025 Magna Park Trip Generation + land west of Magna Park comparison with 2014 Trip Generation	-153	+492	**+340**	+188	-263	**-75**	+3,028	+3,152	**+6,180**

10.2.13 As can be seen Table 10-6, the *'2025 Magna Park trip generation + land west of Magna Park'* scenario is significantly offset by the reduction in flows that have occurred at Magna Park since the 2013/14 traffic surveys were undertaken. This historic baseline position has been accepted by the highway and planning authorities and mitigation agreed accordingly. The increase in flows over and above this previously accepted position is relatively minimal in the AM peak hour and there is a minor benefit in the PM peak hour.

10.2.14 This level of movements does not consider the reductions that will occur on the network through the implementation of the sustainable travel measures as part of the land west of Magna Park site, nor the vehicle reductions that will occur through the various technological, economic and societal changes set out above. It also does not consider the continuing trend of reductions in vehicle movements at the existing Magna Park site.

10.2.15 The higher trip rates and generation across the sites were accepted by the various authorities as part of the various planning applications at Magna Park and mitigation has already been implemented, including contributions being secured and pooled towards an A5 Gibbet Hill roundabout improvement from this application (as well as other applications).

10.2.16 As such, it is considered that there should be capacity on the network for accommodating additional development at the land west of Magna Park site, subject to more detailed analysis, and there should be viable highway mitigation solutions to deliver the site appropriately and without a severe impact. Further and more detailed analysis and traffic modelling will be undertaken as part of any future work relating to the land west of Magna Park site.

10.3 Consideration of Impacts at the A5 Cross in Hand roundabout

Land East of Lutterworth (App Ref: 19/00250/OUT)

10.3.1 This application was approved in May 2022, and is situated in and around the M1 Junction 20 to the east of Lutterworth. This was a Hybrid planning application comprising of an Outline application for development (including demolition) of up to 2,750 dwellings, business, general industrial and storage

and distribution uses, two primary schools, neighbourhood centre and a full application for the development of a spine road and associated junctions with the A426.

10.3.2 The application was supported by a TA and Supplementary Reports produced by AECOM. The most recent Supplementary Report was from November 2019 and this included modelling of the M1 Junction 20 and the Frank Whittle roundabout using a microsimulation model. Traffic surveys were obtained in March 2016 to support the microsimulation model and 2026 / 2036 future year assessments were undertaken.

10.3.3 Further traffic surveys were also obtained in 2018 which inform modelling across the wider network, including at the Cross in Hand roundabout.

HGV Parking Facility, Adjacent to Mere Lane (App Ref: 22/02002/OUT)

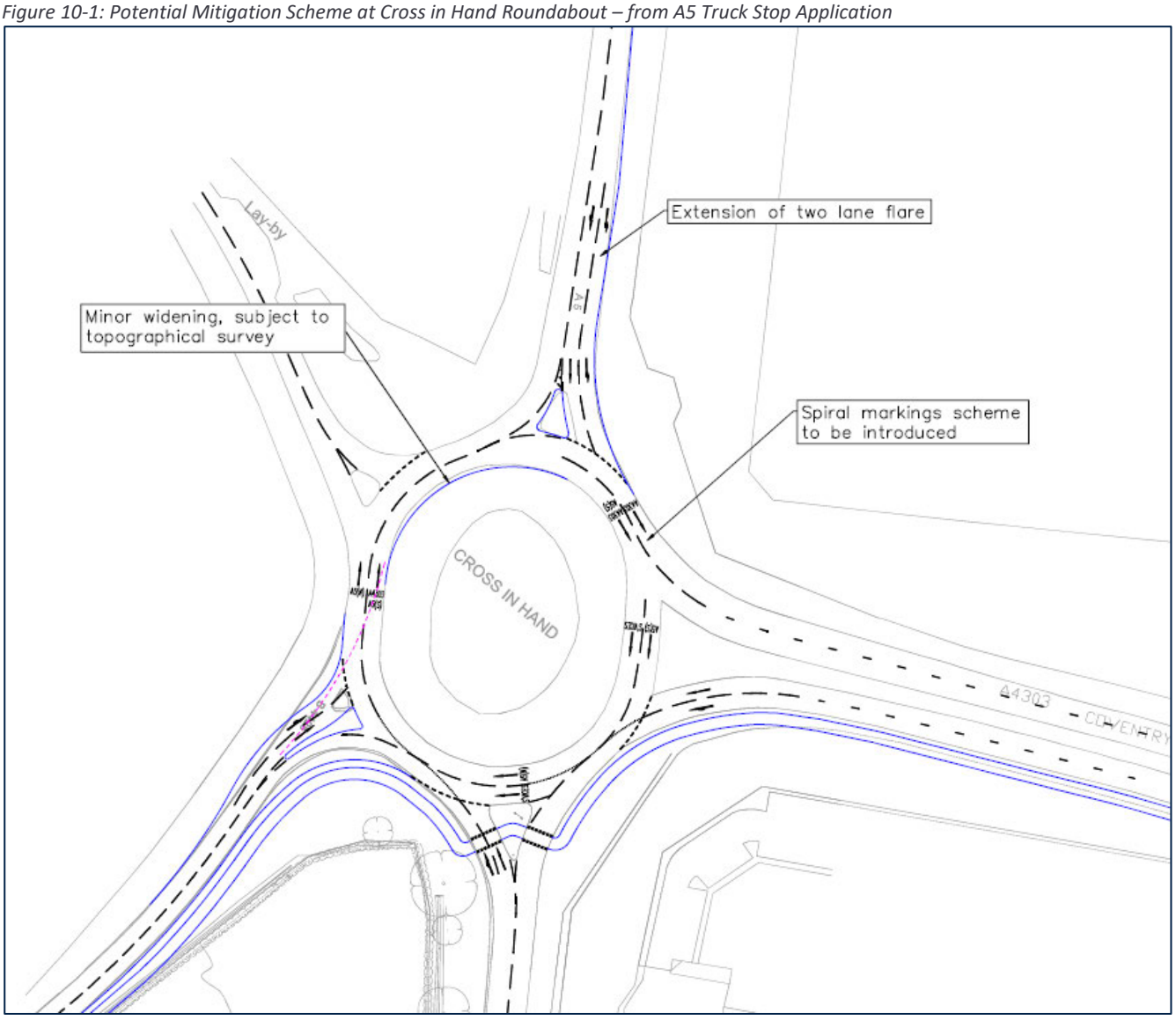
10.3.4 This application was approved in March 2024 in outline for a HGV parking facility, roadside amenity building (Use Class E/sui generis) and refuelling facilities. This site was adjacent to Mere Lane to the south of the Springfield Farm site.

10.3.5 The application was supported by a TA, produced by AECOM, which was dated 4th November 2022. This included turning counts at the Cross in Hand roundabout (as well as others), with survey information obtained in 2022.

10.3.6 The junction modelling within the TA shows the operation to be within capacity, with a worst case RFC at 0.80 on the A5(n) in the PM peak in a future year scenario. Given the future year scenario would also assume growth in background traffic on the network, it is considered extremely robust, as the Magna Park analysis demonstrates that flows are reducing in relation to the existing site.

10.3.7 The highway authority response to the application stated that the modelling at the Cross in Hand roundabout assessment considered that mitigation was in place, which is assumed relates to a previously refused truck stop application on Lutterworth Road (reference R20/0259). The mitigation proposed some minor widening, increases to flare lengths and spiral markings at the roundabout. This mitigation is deliverable within highway land (either via the local highway authority or National Highways). This mitigation scheme, which was designed by RSK has been reproduced in Figure 10-1.

Figure 10-1: Potential Mitigation Scheme at Cross in Hand Roundabout – from A5 Truck Stop Application



Source: RSK – For A5 Truck Stop Application, Drawing No. 662824-10-05 Rev B

Comparison of Traffic Flows

10.3.8 The land east of Lutterworth TA provides base traffic flows on the network in 2018. These flows have been compared with the traffic surveys obtained in 2022 for the approved HGV parking facility application and is presented in Table 10-7.

Table 10-7: Total Traffic Flows – 2018 compared with 2022 surveys

Junction No. and Name	2018 from land east of Lutterworth		2022 from HGV parking facility application		Change from 2018 to 2022	
	AM Peak Flows	PM Peak Flows	AM Peak Flows	PM Peak Flows	AM Peak Flows	PM Peak Flows
Cross in Hand Roundabout	2966	2821	2507	2286	**-459**	**-535**

10.3.9 This clearly shows a significant change in observed traffic which occurred through the junction between 2018 and 2022.

10.3.10 The models at this junction that have been accepted for the pre-pandemic planning applications (including Land East of Lutterworth) are likely to significantly overestimate the level of traffic on the network and the models will be extremely robust. As such, the junction is likely to have a greater level

of spare capacity than set out within these previously agreed and accepted models. The model based on 2022 flows also shows spare capacity at this junction, and that there is suitable and deliverable mitigation at the roundabout to accommodate higher flows.

Consideration of land west of Magna Park

10.3.11 The trip generation of the land west of Magna Park site (Table 10-5) has been considered in the context of the change in traffic flows that have occurred at the junction (Table 10-7) between 2018 and 2022. This is an extremely robust assessment as it assumes all development traffic passes through the junction, when in reality the access strategy would also distribute traffic through the Mere Lane roundabout. The comparison in movements is presented in Table 10-8.

Table 10-8: Cross in Hand Roundabout percentage impacts

Junction No. and Name	Change in junction flows from 2018 to 2022		Proposed allocation trip generation		Comparison	
	AM Peak Flows	PM Peak Flows	AM Peak Flows	PM Peak Flows	AM Peak Flows	PM Peak Flows
Cross in Hand Roundabout	-459	-535	+753	+532	+294	-3
Percentage change (relative to 2022 flows)	-	-	-	-	*11.7%*	*0.1%*

10.3.12 If all the land west of Magna Park vehicle movements travel through the junction, this is forecast to generate 294 additional trips in the AM peak hour (11.7%), and no material change in the PM peak hour over and above the previously accepted background 2018 flow position.

10.3.13 However, if as an example 25% of development trips do not travel through this junction (as they will use the northern A5 Mere Lane roundabout access and travel to/from the north), the difference would be approximately +100 trips in the AM (4%) and -130 trips (-5.7%) in the PM peak hours.

10.3.14 This volume of change is comfortably within typical daily variation rates of 5-10%. This is also based on forecast trip generation assuming vehicle generation for the land west of Magna Park site remains at 2025 levels. The vision-led approach to the site would be to increase sustainable travel compared to the existing levels at Magna Park, as well as reducing operational vehicle movements through increased economies of scale (benefits which have been seen in the current trends from 2013 – 2025).

10.3.15 Notwithstanding, should mitigation be required above and beyond the scheme shown for the HGV Parking facility, the strategic transport impact assessment (STIA) presented for the Harborough District Council (HDC) Regulation 19 stage draft local plan identifies an improvement at the junction, consisting of full junction signalisation and widening of the western arm to provide a dedicated left-turn only lane. The cost estimate for this improvement is £4.3 million.

10.3.16 A detailed transport assessment will be required at the planning application stage to determine the full impacts of the development, and whether mitigation is required. It is apparent however that the development impacts at the junction are significantly offset by the reduced traffic flows that have occurred since the position agreed prior to the pandemic, and if needed, the site can facilitate the delivery of a suitable mitigation scheme, either through minor widening and lane marking amendments or a contribution towards the strategically identified signalisation scheme. Either way, based on the high level assessment, it is considered that the land west of Magna Park scheme can be suitably accommodated at this junction.

10.4 A5 Gibbet Hill roundabout

10.4.1 A peak period junction turning count survey was undertaken in 2025 at the A5 Gibbet Hill roundabout junction, with the vehicle movements set out in Section 7.

10.4.2 This has been compared to traffic data contained in the East Lutterworth TA which was prepared in 2019, and forecast to 2026, as this represents a pre-Covid assessment baseline which has been accepted by the local highway authorities and National Highways. The 2025 obtained traffic surveys, and comparison against the East Lutterworth transport assessment forecast 2026 flows, are presented in Table 10-9 and Table 10-10. The 2026 forecast position represents the closest assessment year to the obtained 2025 data and is therefore considered most appropriate as a comparison.

Table 10-9: A5 Gibbet Hill roundabout traffic survey comparison - AM peak hour

PCU	Arm A A5 North	Arm B Rugby Road	Arm C Gibbet Lane	Arm D A5 South	Arm E A426 SW	Total
Lutterworth East - 2026 without dev	985	711	140	893	1091	3820
2025 obtained traffic survey	838	684	96	748	863	3229
	-147	-27	-44	-145	-228	-591
	-17.54%	-3.95%	-45.83%	-19.39%	-26.42%	-18.30%

Table 10-10: A5 Gibbet Hill roundabout traffic survey comparison - PM peak hour

PCU	Arm A A5 North	Arm B Rugby Road	Arm C Gibbet Lane	Arm D A5 South	Arm E A426 SW	Total
Lutterworth East - 2026 without dev	763	616	95	953	1066	3493
2025 obtained traffic survey	624	806	96	1001	856	3383
	-139	190	1	48	-210	-110
	-22.28%	+23.57%	+1.04%	+4.80%	-24.53%	-3.25%

10.4.3 As can be seen in Table 10-9 and Table 10-10, there are some significant differences between the respective data. The obtained 2025 surveys show that traffic flows have reduced significantly in the AM peak hour across all arms and in total (18.3% reduction). During the PM peak hour, the total traffic flows across the junction have reduced (by 3.25%) and there are significant variations in flows across the arms.

10.4.4 As such, any junction capacity modelling undertaken using historic data, especially pre-pandemic traffic data, should be treated with caution. New modelling should be undertaken using current day flows, with future forecasts including a vision-led approach that accounts for future traffic trends, particularly given the demonstrated significant decreases in vehicle movements generated by Magna Park over time. In essence, there are a lower level of vehicle movements through the junction than have been assessed previously and future year peak hour traffic flows (particularly from Magna Park) may reduce for a number of reasons as previously referenced.

10.4.5 The approved Magna Park South development (reference 15/00865/OUT) indicates that approximately 20% of traffic from Magna Park travels south to the A5 Gibbet roundabout. Therefore, to consider the impacts of the land west of Magna Park west site, 20% of the vehicle trips (Table 10-5) have been assigned through the roundabout. These flows, as well as a comparison to the change in traffic flows that have occurred at the junction (Table 10-9 and Table 10-10) is presented in Table 10-11.

Table 10-11: Change in A5 Gibbet Roundabout flows including land west of Magna Park

Junction No. and Name	Change in junction flows (based on observed 2025 against forecast 2026)		Land west of Magna Park trip generation (20% of total generation)		Resultant Comparison and % Change	
	AM Peak Flows	PM Peak Flows	AM Peak Flows	PM Peak Flows	AM Peak Flows	PM Peak Flows
A5 Gibbet Roundabout	-591	-110	+151	+160	-440	+50
Percentage change (relative to 2025 surveyed flows)	-	-	-	-	*-13.6%*	*+1.5%*

10.4.6 If 20% of the vehicle movements generated by the land west of Magna Park site travel through the A5 Gibbet Roundabout junction, this will result in a reduction of -440 vehicle trips in the AM peak hour (-13.6%), and an increase of just 50 trips (1.5%) in the PM peak hour compared with what has been previously assessed and agreed in a 2026 assessment year as part of the land East of Lutterworth development.

10.4.7 An increase of 1.5% in total traffic movements through a junction is unlikely to perceptible in the context of typical daily variation levels. This is also based on a robust forecast of vehicle generation from the land west of Magna Park site, given the focus on travel by sustainable modes and the potential reduction in vehicle movements which is likely to be realised over time in relation to the existing Magna Park site.

10.4.8 Additionally, contributions have already been secured from developers to mitigate development impacts at the A5 Gibbet Hill roundabout junction. As set out at Table 10-12, at least £5.2mil has been paid and this figure is currently pooled for the purpose of delivering junction improvements at A5 Gibbet Hill roundabout. The mitigation provided in relation to the Magna Park South site is also related to the impact of a significantly higher level of vehicle movements than is currently being generated.

Table 10-12: A5 Gibbet Hill roundabout - secured financial contributions

Reference	Site	Agreed financial contribution	Notes
Rugby Borough Council			
R20/0787	Coton Park East, Central Park Drive, Rugby	£569,455.55	Towards improvements to the A5/A426 Gibbet Hill Junction. To be paid in 3 instalments based on prior to occupation of 100, 200 and 300 dwelling. Payable to WCC.
R20/0272	Land Northeast of Castle Mound Way, Rugby	£207,700	Towards improvements at A5/A426 Gibbet Hill roundabout. Payable prior to first occupation. Payable to WCC.
R22/0551	Land Northeast of Castle Mound Way, Rugby	£207,700	Towards improvements at A5/A426 Gibbet Hill roundabout. Payable prior to first occupation. Payable to WCC.
R20/0336	Land off Long Hassocks, Rugby	£222,826	Towards improvements at A5/A426 Gibbet Hill roundabout. To be paid in 3 instalments based on prior to occupation of 50, 100, 150 dwelling. Payable to WCC.
Harborough District Council			
19/00250/OUT	Land East of Lutterworth Gilmorton Road Lutterworth	£1,214,490.24	For highways improvement works at the A5/A426 Gibbet Lane Roundabout. To be paid to Leicestershire County Council prior to commencement.
15/00865/OUT	Magna Park South	£2,751,164.10	For improvements to Gibbet Hill junction (GLP contribution to WCC)
Total		**£5,173,335.89**	

10.4.9 Of these contributions, c.£1.2mil has been paid to LCC, with the remainder paid to WCC. There may be other contributions not listed, and the applicant has sought to clarify this position.

10.4.10 In addition, a strategic transport assessment prepared by AECOM in support of the HDC draft local plan has identified improvements to the A5 Gibbet Hill roundabout consisting of full signalisation and lane widening on the A5 north arm, with an estimated cost of £4.2mil for its delivery.

10.4.11 Given that £5.2mil has already been secured, it appears that funding is already in place to deliver the recommended junction improvement, with a surplus of £1mil. If additional funding is needed beyond the £1mil surplus, developer contributions could be secured, depending on the scale of impact to be determined at application stage. The land west of Magna Park site could also contribute towards any identified further costs for a scheme, to ensure that a suitable and viable scheme can be delivered in a reasonable timeframe outside of the National Highways Road Investment Strategy (RIS) process, if needed.

10.4.12 Notwithstanding the above, a trip generation analysis of Magna Park has identified a downward trend of vehicle trips since 2013/2014 to 2025. Traffic surveys were undertaken in 2014 to inform the Magna Park South planning application (15/00865/OUT), and c.£2.8mil was paid to WCC for improvements to A5 Gibbet Hill roundabout as mitigation for the development impacts for a significantly higher level of traffic than has been generated.

10.5 West Midlands Strategic Employment Sites Study (WMSESS)

10.5.1 The WMSESS was a study produced in August 2024 about strategic employment sites and was intended to inform local plan making to the combined West Midlands Combined Authority. This specifically states that *"Labour shortage is an issue for both manufacturing and logistics occupiers. Occupiers feel most comfortable where there is access to large pools of labour near main settlements."* As set out in Section 4, Magna Park has good access to large settlements and labour which provides the site with a competitive advantage over other sites.

10.5.2 In terms of transport and highway capacity, the scope of this study did not include technical transport assessment or modelling but engagement with the relevant highway authorities was undertaken to inform analysis of known capacity issues on the network, and a ranking of junction was provided.

10.5.3 The analysis shows that the junctions along the A5 are constrained, albeit no modelling has been undertaken to inform this. The impact of the land west of Magna Park site on the key junctions on the wider network (including the Gibbet Hill roundabout and Cross in Hand Roundabout) would be considered as part of further, more detailed work, at the appropriate stage (i.e. further local plan representations or a planning application).

10.6 Impacts Summary

10.6.1 It has been demonstrated that the Magna Park trip rates have significantly reduced between 2013/2014 and 2025 and this is a trend that is likely to continue over time. The vision-led approach for the land west of Magna Park site is to increase sustainable travel compared to the existing Magna Park levels, to minimise the impact of vehicle movements on the network.

10.6.2 Traffic flows have significantly reduced at the Cross in Hand roundabout, increasing the available capacity at this roundabout, which has been shown to operate within capacity in an accepted model based on 2022 flows. This will assist in accommodating the traffic generated by the site. Not all movements associated with the land west of Magna Park site would travel through this junction, as there would also be an access onto the Mere Lane roundabout. A mitigation scheme involving widening and revised lane markings has been proposed as part of previously applications for this roundabout as a further signalisation scheme being identified by HDC at this junction. The land west of Magna Park site can facilitate the delivery of this improvement scheme through a suitable and proportionate contribution, and this mitigation is likely to be suitable to accommodate movements associated with the site.

10.6.3 A comparable analysis of traffic flows at A5 Gibbet Hill roundabout has been undertaken which shows that traffic flows have reduced by up to 20% at the junction since pre-Covid conditions in the peak hours, and the distribution by arm at the junction has also changed significantly. As such, any modelling undertaken previously using pre-Covid traffic flows is likely to be overly robust, and it is recommended that new detailed modelling is undertaken at the planning application stage, using up to date traffic survey data. This should also reflect the vision-led scenario testing for future year assessments and consider the vision-led approach for the site to increase the level of sustainable travel in comparison to the existing Magna Park levels.

10.6.4 The land west of Magna Park site is also forecast to send just 20% of traffic movements through this junction, which would lead to a minimal change in overall movements compared with the previously accepted position given the demonstrated significant reduction in flows at this junction. If needed, the site could also provide a reasonable and proportionate contribution towards the delivery of an improvement scheme at the junction, although a strategic scheme has been identified by HDC and existing funding appears to be in place to deliver this.

11. SUMMARY AND CONCLUSIONS

11.1 Summary

11.1.1 This Transport Note (TN) considers matters relating to the proposed employment allocations on land west of Magna Park Lutterworth, as part of Rugby Borough Council's (RBC) consultation on its Local Plan Preferred Options March 2025 document.

11.1.2 This note has been prepared to make transport representations to Rugby Borough Council's (RBC) consultation on its Regulation 18 Local Plan Preferred Options March 2025 document.

11.1.3 The sites included within the red line boundary for the land west of Magna Park, which form the subject of this note, are identified as 'Site 106: Land opposite MP Lutterworth', 'Site 57: North of Coal Pit Lane', 'Site 36: Cross-in-Hand Farm, Willey' and 'Site 35: Cross in Hand Farm, Monks Kirby' within the draft Local Plan.

11.1.4 The land west of Magna Park site is estimated to be able to accommodate c. 576,000 sqm (c.6.2 million sq ft) of B2 / B8 employment use.

11.1.5 Magna Park is located within the 'Golden Triangle', a region that is pivotal to the UK's supply chain and distribution networks due to its central location and connectivity to the strategic road network (SRN). The Golden Triangle area is within a four-hour drive of 90% of the British population, and specifically in the context of Magna Park Lutterworth, has good access to the SRN including the M1 and M6 motorways, and the A5 trunk road, all of which provides for efficient transportation and logistics operations.

11.1.6 Magna Park already has an extensive network of infrastructure catering for sustainable transport modes, including a shared pedestrian/cycleway connecting Magna Park to Lutterworth, and regular bus services from four key settlements. Magna Park also already implements successful travel planning initiatives.

11.1.7 It is possible to walk to the land west of Magna Park site from some local areas within suitable distances via continuous footways (connected via new infrastructure delivered as part of the scheme), and the site is also connected by good quality cycle routes to Lutterworth, making cycling a realistic and attractive option for potential future employees.

11.1.8 Bus services are extensive and suitable for serving typical shift working patterns, as well as connecting to four key residential areas (Leicester, Lutterworth, Hinckley and Rugby). The site also benefits from being connected to the FoxConnect on demand service. As such, there are good options for travel by bus.

11.1.9 The site will be committed to promoting a sustainable transport hierarchy in accordance with the aims of local policy and the vision-led approach supporting any planning application would encourage a high level of sustainable transport, as well as assist in reducing vehicle movements from existing Magna Park users through improving the overall sustainable transport offering. This will also include additional car sharing matches through the increase in employees in the area (with car sharing being an excellent travel option), as well as potentially increasing the frequency of bus services or ensuring the ongoing viability of bus services.

11.1.10 RBC commissioned an initial comparative analysis of the sustainable locations of local plan candidate sites and have set out the preferred sites based on this analysis. Given the assessments are based on MSOA or LSOA data, these are not site specific and therefore do not consider the exact transport

situation or context at each individual candidate site. As such, this note provides a direct comparison considering the context of each of the preferred sites against the land west of Magna Park. This shows that the land west of Magna Park is considered to provide the best location for access to public transport, whilst all sites are broadly similar in terms of access to active travel infrastructure.

11.1.11 The land west of Magna Park site benefits from measures that have been implemented at Magna Park and has the opportunity for delivering sustainable infrastructure which will connect with existing facilities and public transport routes. The ability to access existing infrastructure and deliver improvements to all modes of travel, which will also benefit the existing Magna Park site, provide a key advantage for the delivery of the land west of Magna Park.

11.1.12 In addition, there are economies of scale in respect of co-locating distribution and commercial operations adjacent to and within established commercial hubs such as Magna Park Lutterworth. It is now common place for business operators to coordinate shipments and deliveries, ensuring that vehicles travel at full capacity and minimising the number of trips that take place. This happens at a significant scale in Magna Park currently. These efficiencies are lost if such operations are spread more thinly across the district or county.

11.1.13 Magna Park is ideally situated to benefit from planned growth in the local area to connect to existing and future labour. can positively impact sustainable travel as there is enhanced local employment and opportunities to reduce carbon footprint. It also minimises travel distances for employment opportunities in this sector, as employees can travel to Magna Park rather than a further distance elsewhere.

11.1.14 The site can deliver improvements to the pedestrian and cycle network to enable continuous connections to the various parcels from the existing infrastructure.

11.1.15 Discussions would be held with public transport operators seeking to extend all existing bus services to Magna Park to route through the site, where feasible. If needed, a reasonable and proportionate contribution can be made to increase the frequency of one service, particularly during peak travel times, to further enhance the quality of services available to both existing and potential future employees.

11.1.16 The site also has the potential for providing a reasonable and proportionate contribution towards the FoxConnect service, as well as increasing the patronage of this service through the increased number of employees in the Magna Park area.

11.1.17 The site will encourage and promote sustainable transport via travel planning measures, which would utilise existing measures in place for Magna Park, this would include utilising the site specific car sharing scheme and expanding the number of users.

11.1.18 The land west of Magna Park site would therefore seek to generate a higher level of sustainable transport use than the existing levels at Magna Park. This will reduce the vehicle trip generation to lower levels than are currently experienced at the existing Magna Park.

11.1.19 The measures implemented as part of the delivery of the land west of Magna Park site will also assist in reducing vehicle movements at the existing Magna Park site through the benefits gained from an increased number of units and employees (i.e. more car sharing, walking and cycle buddying, increased linking of operational vehicle movements).

11.1.20 As such, the sustainable travel measures and co-location of distribution sites will assist in mitigating the vehicle movements generated by a potential development, in a way that may not be possible for other competing sites.

11.1.21 Historic applications have been reviewed in relation to agreed trip rates and generation for Magna Park, and these have been compared to surveys obtained in 2025. This showed that traffic flows have reduced significantly between the period 2013/14 to 2025, by up to nearly 7,000 (26%) trips per day within the study area, and around 600 (30%-40%) trips in each of the network peak hours.

11.1.22 Potential reasons for the reduction in flows from the site are considered to be as follows:

- **Covid-19:** the pandemic has resulted in permanent changes to traffic behaviours, either in how frequent trips are made, or how they are now made (e.g. mode share shift).
- **Route optimisation**: Advances in technology have enabled better route planning and optimisation, reducing the number of trips needed to deliver goods.
- **Increased vehicle capacity**: Improvements in vehicle design and logistics strategies have allowed for larger loads, meaning fewer trips are needed to transport the same amount of goods.
- **Consolidation of shipments**: Companies are increasingly consolidating shipments to maximize efficiency, reducing the frequency of trips. A benefit realised as Magna Park expands.
- **Sustainability initiatives**: There is a growing emphasis on reducing carbon footprints, leading to more efficient use of vehicles and fewer trips.
- **Economic factors**: Rising fuel costs and other economic pressures have incentivised companies to find ways to reduce transportation costs, including minimising the number of trips.
- **Improved technologies**: Improved technology in warehouses has reduced the number of staff required within warehouses.

11.1.23 As such, this demonstrates that there may be greater capacity on the network than previously accepted when the existing Magna Park sites were approved.

11.1.24 The surveys also established trip rates for 2025 for Magna Park. The trips generated by the land east of Magna Park site would be significantly offset by the reduction in flows that have occurred at Magna Park since the 2013/14 traffic surveys were undertaken. This historic baseline position has been accepted by the highway and planning authorities and mitigation agreed accordingly. The increase in flows over and above this previously accepted position is relatively minimal in the AM peak hour and there is a minor benefit in the PM peak hour.

11.1.25 Based on these surveys, a vision-led approach for the vehicle trip generation on the land west of Magna Park site would be to achieve a 10% reduction on the obtained 2025 trip rates.

11.1.26 Transport assessments are also now required to undertake a vision-led assessment, whereby various scenarios are considered. When this takes place as part of a detailed transport assessment supporting a planning application, it is expected that the assessment scenarios will forecast the continued downward trend in vehicle trip generation and consider a reduced vehicle trip rate scenario for both the land west of Magna Park, and Magna Park itself.

11.1.27 A high level analysis of traffic flow changes has been considered at the Cross in Hand roundabout and the A5 Gibbet Hill roundabout. This has been based on comparisons in background traffic between pre and post pandemic flows.

11.1.28 At the Cross in Hand roundabout, the development impacts at the junction are significantly offset by the reduced traffic flows that have occurred since the position agreed prior to the pandemic, and if needed, the site can facilitate the delivery of a suitable mitigation scheme.

11.1.29 A comparable analysis of traffic flows at A5 Gibbet Hill roundabout has been undertaken which shows that traffic flows have reduced by up to 20% at the junction since pre-Covid conditions in the peak hours, and the distribution by arm at the junction has also changed significantly. As such, any modelling undertaken previously using pre-Covid traffic flows is likely to be overly robust, and it is recommended that new detailed modelling is undertaken at the planning application stage, using up to date traffic survey data. This should also reflect the vision-led scenario testing for future year assessments and consider the vision-led approach for the site to increase the level of sustainable travel in comparison to the existing Magna Park levels.

11.1.30 The land west of Magna Park site is also forecast to send just 20% of traffic movements through this junction, which would lead to a minimal change in overall movements compared with the previously accepted position given the demonstrated significant reduction in flows at this junction.

11.1.31 Contributions have already been secured from developers to mitigate development impacts at the A5 Gibbet Hill roundabout junction. At least £5.2 million has been paid and this figure is currently pooled for the purpose of delivering junction improvements at A5 Gibbet Hill roundabout. The mitigation provided in relation to the Magna Park South site is also related to the impact of a significantly higher level of vehicle movements than is currently being generated.

11.1.32 If needed, the site could also provide a reasonable and proportionate contribution towards the delivery of an improvement scheme at the junction, although a strategic scheme has been identified by HDC, with an estimated cost of £4.2mil for its delivery, and existing funding appears to be in place to deliver this.

11.1.33 The land west of Magna Park site could also provide a reasonable and proportionate contribution towards any identified further costs for a scheme, to ensure that a suitable and viable scheme can be delivered in a reasonable timeframe outside of the National Highways Road Investment Strategy (RIS) process, if needed.

11.2 Conclusions and Next Steps

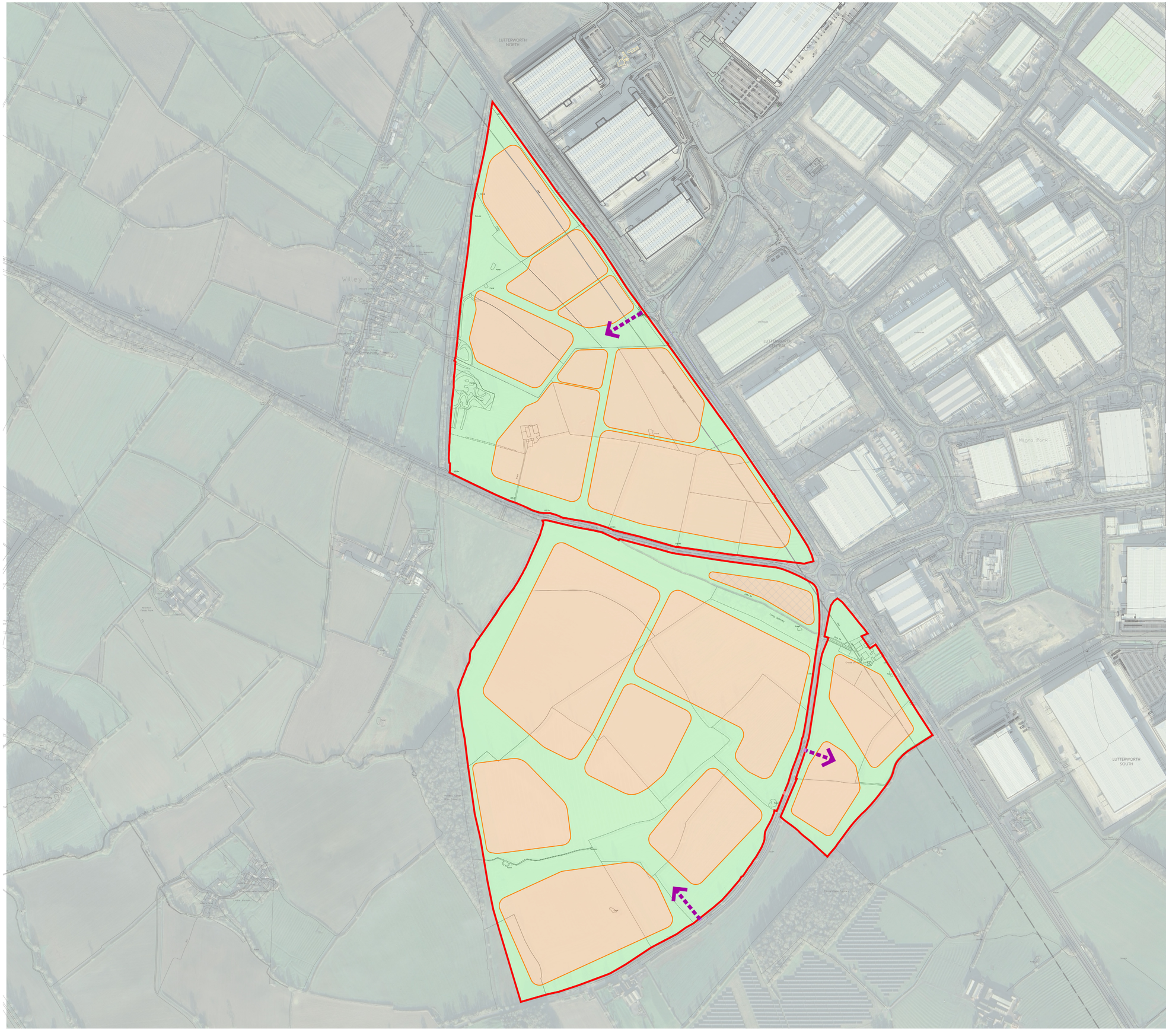
11.2.1 To conclude, it is apparent that a demand exists for a B2 / B8 warehousing and logistics development, and there are significant advantages of positioning this development within existing warehousing and logistics hubs, particularly in the Magna Park location.

11.2.2 The site will encourage and promote sustainable transport and generate a higher level of sustainable transport use than the existing levels at Magna Park. Suitable sustainable transport infrastructure improvements can be delivered to encourage sustainable travel. This will aid in reducing the vehicle trip generation to lower levels than are currently experienced at the existing Magna Park.

11.2.3 It is considered that there should be capacity on the network for accommodating development at the land west of Magna Park site, subject to more detailed analysis, and there should be viable highway mitigation solutions to deliver the site appropriately and without a severe impact. Further and more detailed analysis and traffic modelling will be undertaken as part of any future work relating to the land west of Magna Park site.

11.2.4 Detailed vision-led transport assessments would be required at the planning application stage, in accordance with normal best practice, to determine the impacts of the site and the necessary mitigation strategy.

Appendix A Parameters Plan



Schedule of Accommodation

Please refer to 'Schedule Notes' on drawing sheet.

Site No. 106		Ha	Acres
Harborough	:	3.96	9.78
Rugby	:	18.96	46.85
Total Site Area (Gross)	**:**	**22.92**	**56.63**
Net Developable Area	**:**	**14.15**	**34.95**
		sq m	sq ft
Total (GIA)	**:**	**80,207**	**863,336**
Site Density	:	35%	

Site No. 57		Ha	Acres
Harborough	:	3.94	9.73
Rugby	:	36.64	90.53
Total Site Area (Gross)	**:**	**40.57**	**100.25**
Net Developable Area	**:**	**26.25**	**64.87**
		sq m	sq ft
Total (GIA)	**:**	**142,000**	**1,528,475**
Site Density	:	35%	

Site No. 36		Ha	Acres
Rugby	:	89.12	220.22
Total Site Area (Gross)	**:**	**89.12**	**220.22**
Net Developable Area	**:**	**55.91**	**138.15**
		sq m	sq ft
Total (GIA)	**:**	**311,921**	**3,357,489**
Site Density	:	35%	

Site No. 35		Ha	Acres
Harborough	:	2.47	6.10
Rugby	:	11.54	28.53
Total Site Area (Gross)	**:**	**14.01**	**34.63**
Net Developable Area	**:**	**7.08**	**17.50**
		sq m	sq ft
Total (GIA)	**:**	**49,047**	**527,940**
Site Density	:	35%	

Total Harborough	:	10.36	25.61
Total Rugby	:	156.26	386.13
Total Site Area	**:**	**166.62**	**411.73**
Total Net Developable Area	**:**	**103.39**	**255.47**
Net Developable Area	**:**	**62.05%**	
		sq m	sq ft
Total (GIA)	**:**	**583,175**	**6,277,240**

NOTES:
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Contractors must verify all dimensions on site before commencing any work or shop drawings. This drawing is not to be scaled. Use figured dimensions only.

Subject to statutory approvals and survey.

Building areas are liable to adjustment over the course of the design process due to the ongoing construction detailing developments.

Please note the information contained within this drawing is solely for the benefit of the employer and should not be relied upon by third parties.

The CDM hazard management procedures for the Chetwoods aspects of the design of this project are to be found on the "Chetwoods - Hazard Analysis and Design Risk Assessment" and/or drawings. The full project design teams comprehensive set of hazard management procedures are available from the Principle Designer appointed for the project.

Notes:
Please note Title Plans have been scaled using Ordnance Survey features which may have altered over time. Complete accuracy cannot be guaranteed without further on-site survey.

Any dimensions given are to be confirmed with site measure.

Schedule Notes:
All sq. ft areas are based on the conversion factor of 10.763910417 to ensure accuracy.

However, decimals are hidden values which are rounded up / down which can sometimes result in the totals not always adding up.

NB.
- **SUBJECT TO SURVEYS, CONSTRAINTS & PLANNING.**
- **LAYOUT TO BE TRACKED.**
- **RED LINE INDICATIVE ONLY.**

North

0m 50m 100m 200m

Key

- Site Boundary
- Local Council Boundary (Leicestershire & Warwickshire)
- Net Developable Area
- Landscape Area
- HGV Parking Area
- Road Infrastructure

Rev	Revision Description	Date	Author/ Reviewer
P6	Site 36 access updated	14.05.25	MK/PS
P5	Red line adjusted	09.05.25	MK/PS
P4	Site annotations removed	09.05.25	MK/PS
P3	Site No.57 Site boundary adjusted	08.05.25	MK/PS
P2	Boundaries updated to client comments	01.05.25	MK/PS
P1	First Issue	28.04.25	MK/PS

PRELIMINARY

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Project
GLP Magna Pak West

Client
GLP

Drawing Title
Parameters Plan

Scale	Size	Drawn	Checked	Date
1:5000	A1	MK	PS	28.04.2025

Project	Originator	Zone	Level	Type	Role	Number	Rev.
5930	CA	00	00	DR	A	00060	P6

Appendix B CBRE Report – Magna Park, Lutterworth, Labour Study

Magna Park, Lutterworth

Labour Study

CBRE | Supply Chain Advisory

Prepared for:

GLP

April 2025

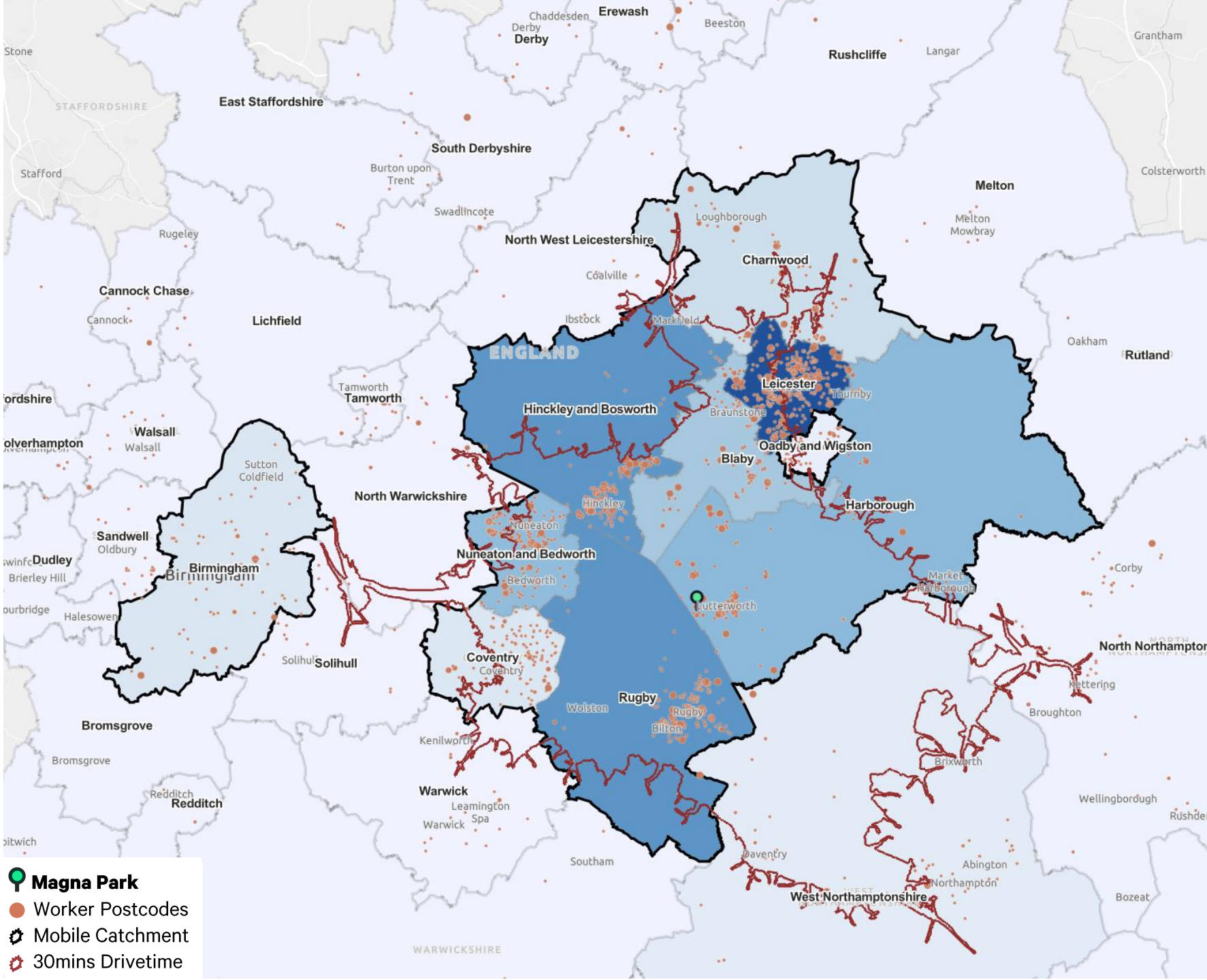
1 — Labour at Magna Park

Magna Park, Lutterworth attracts workers from across nearby areas

The adjacent map shows where existing workers at Magna park, Lutterworth are coming from and the workforce catchment (catchment detail on the following page).

Magna Park, Lutterworth is currently attracting workers from:

- Nearby cities; Leicester, Coventry and Birmingham
- Local towns; Lutterworth, Rugby, Hinckley and Nuneaton



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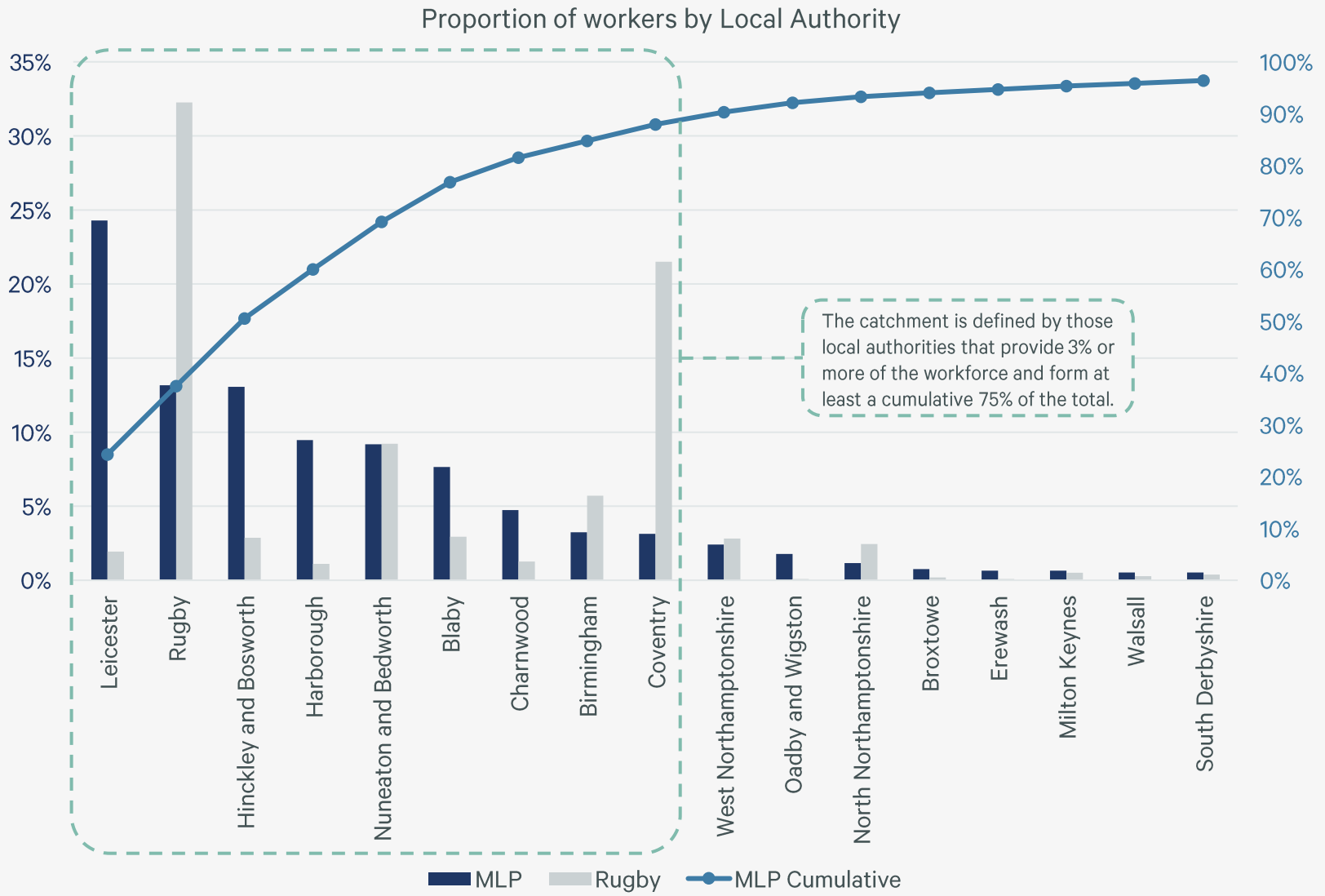
MLP is attracting more workers from Leicester than other warehouses in Rugby

The adjacent chart show the proportion of the total workforce that are coming from each local authority, and the definition of the true worker catchment.

The greatest proportion of workers (24%) at Magna Park are coming from Leicester. Whereas other warehouses in Rugby (locations can be seen in the appendix) are attracting 32% of their workforces from Rugby and pulling 21% from Coventry. This suggests that MLP is winning the battle for labour in Leicester and there is local opportunity to attract more workers from Rugby.



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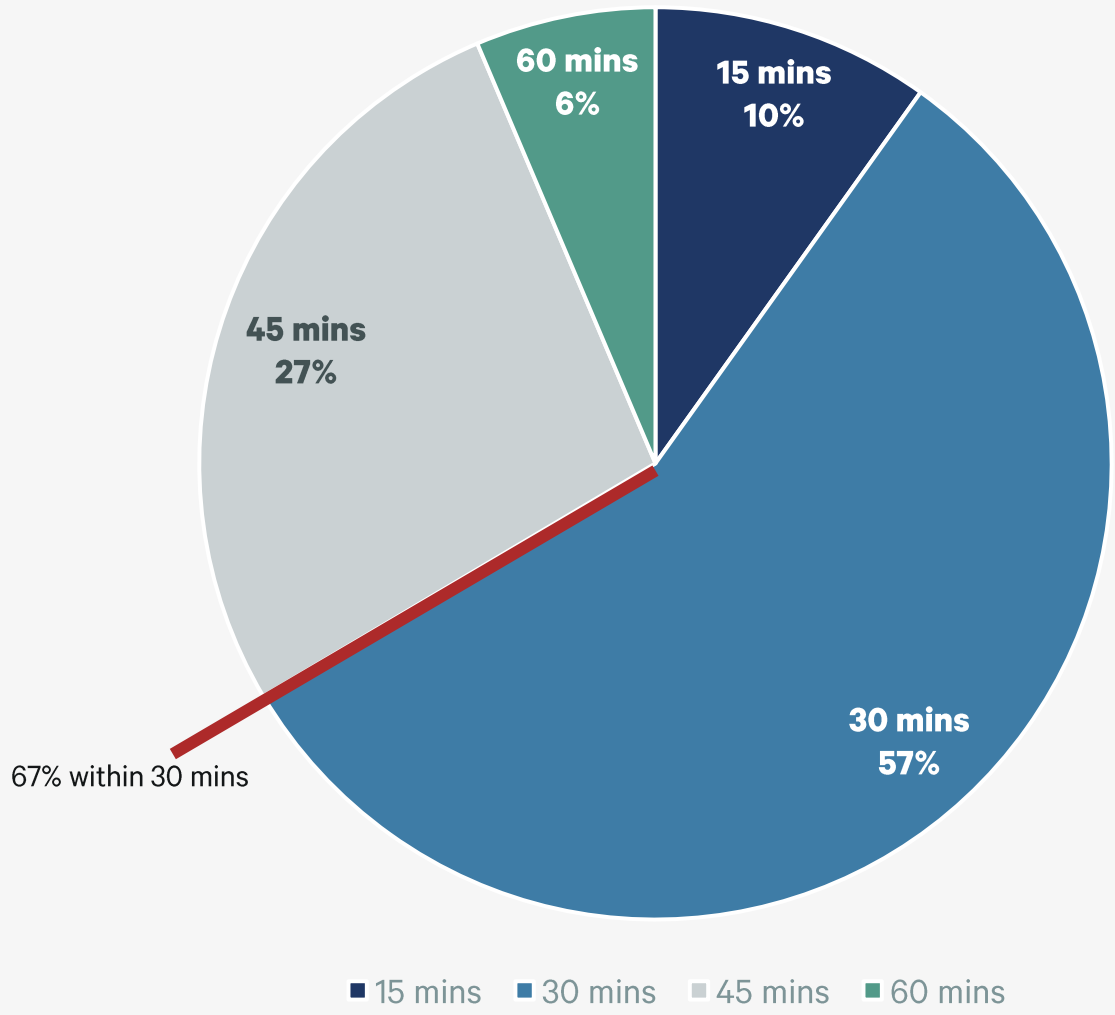
67% of workers are coming from within a 30-minute drivetime

Workers coming from within 30 minutes can be considered a stable and resilient source of labour, at less risk of taking alternative employment opportunities that shorten their commute.

We typically expect ~75% of workers to come from within 30 minutes. Whilst the rural nature of Magna Park, Lutterworth explains the greater proportion travelling from further away, efforts to continue to attract local available labour from nearby will help to ensure labour stability.

Proportion of workers by drivetime (mins)



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Good labour availability at Magna Park, sitting comfortably above the national average

There is a strong supply of labour at Magna Park, Lutterworth, benefitting from the extent of the catchment that incorporates a number of populus cities.

Whilst demand is also relatively high, as compared to the national average, there is sufficient supply.

Overall, the supply demand ratio of 8.54 sits comfortably above the national average (5.98) suggesting good labour availability at the park.

*N/A | data not published due to sample size being disclosive or low unemployment rate suggesting near 'full employment'

		Supply					
Local Authority District	**Proportion of Workers**	**Unemployed**	**Existing Workers**	**Returners**	**Total Supply**	**Total Demand**	**Supply Demand Ratio**
Leicester	24%	11,900	17,300	8,700	37,900	1,615	23.47
Rugby	13%	N/A	6,400	4,200	10,600	3,895	2.72
Hinckley and Bosworth	13%	N/A	6,200	N/A	6,200	2,735	2.27
Harborough	9%	1,900	1,300	4,600	7,800	5,720	1.36
Nuneaton and Bedworth	9%	N/A	10,800	2,900	13,700	1,635	8.38
Blaby	8%	N/A	6,100	2,600	8,700	1,100	7.91
Charnwood	5%	N/A	6,800	1,900	8,700	485	17.94
Birmingham	3%	35,600	55,800	24,400	115,800	6,935	16.70
Coventry	3%	12,800	18,100	18,800	49,700	6,205	8.01
Total	**88%**	**62,200**	**128,800**	**68,100**	**259,100**	**30,325**	**8.54**
			2024 National Average		*130,597*	*21,389*	*5.98*

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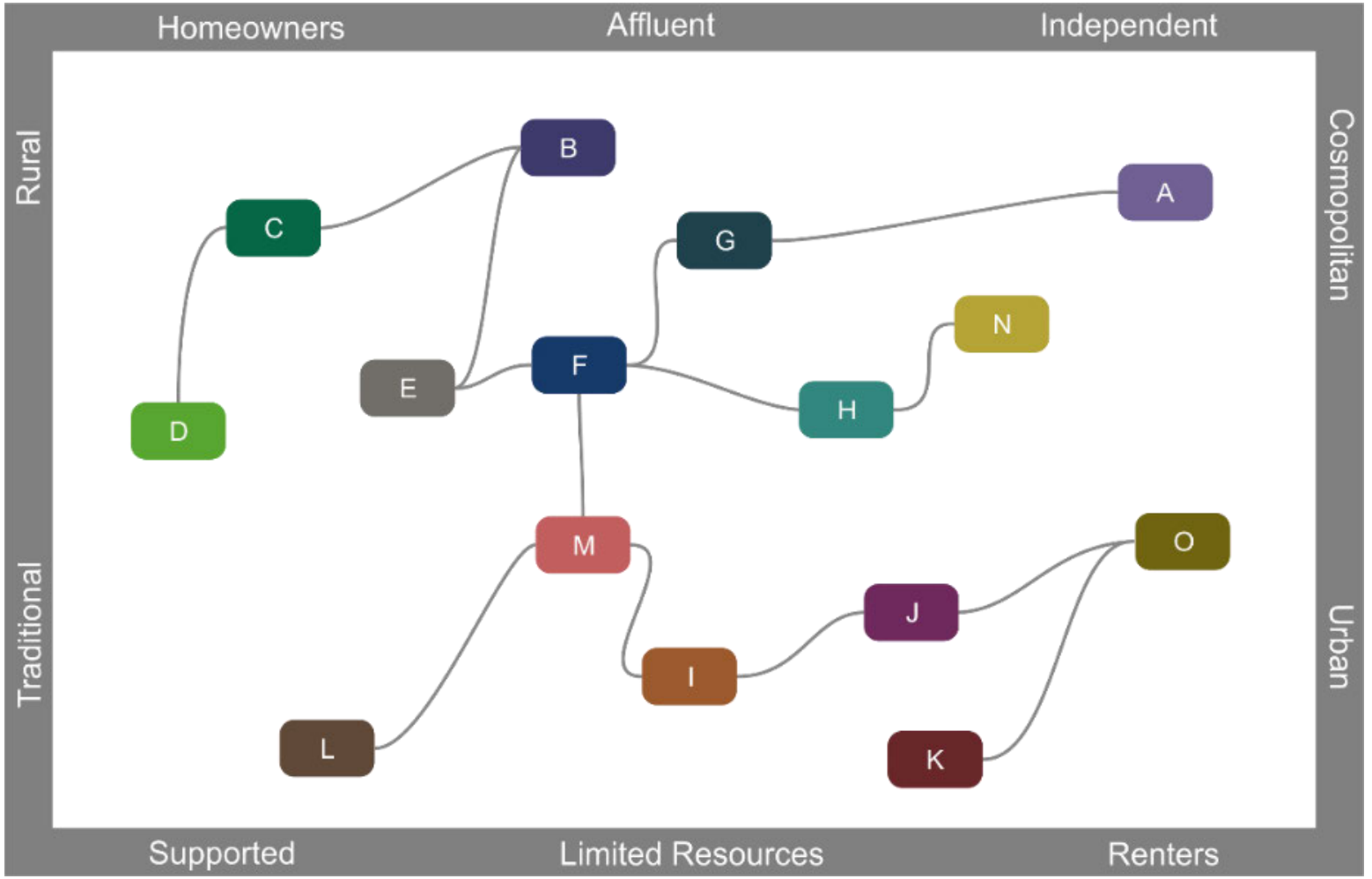
Understanding the workforce using Mosaic demographic segmentation

What is Mosaic?

Mosaic gives you a pin-sharp picture of today's consumer, reflecting the latest consumer and social trends. Over **850 million** pieces of information across **450 different data points** are condensed using the latest analytical techniques to identify summary Groups and detailed Types that are easy to interpret and help you to **understand an individual's likely interests and behaviour.**

CBRE use Mosaic to build an accurate picture of who is in the catchment and the workforce to enable occupiers and developers to better understand the types of people working in a warehouse and therefore what **incentives and initiatives** are likely to appeal most to them.



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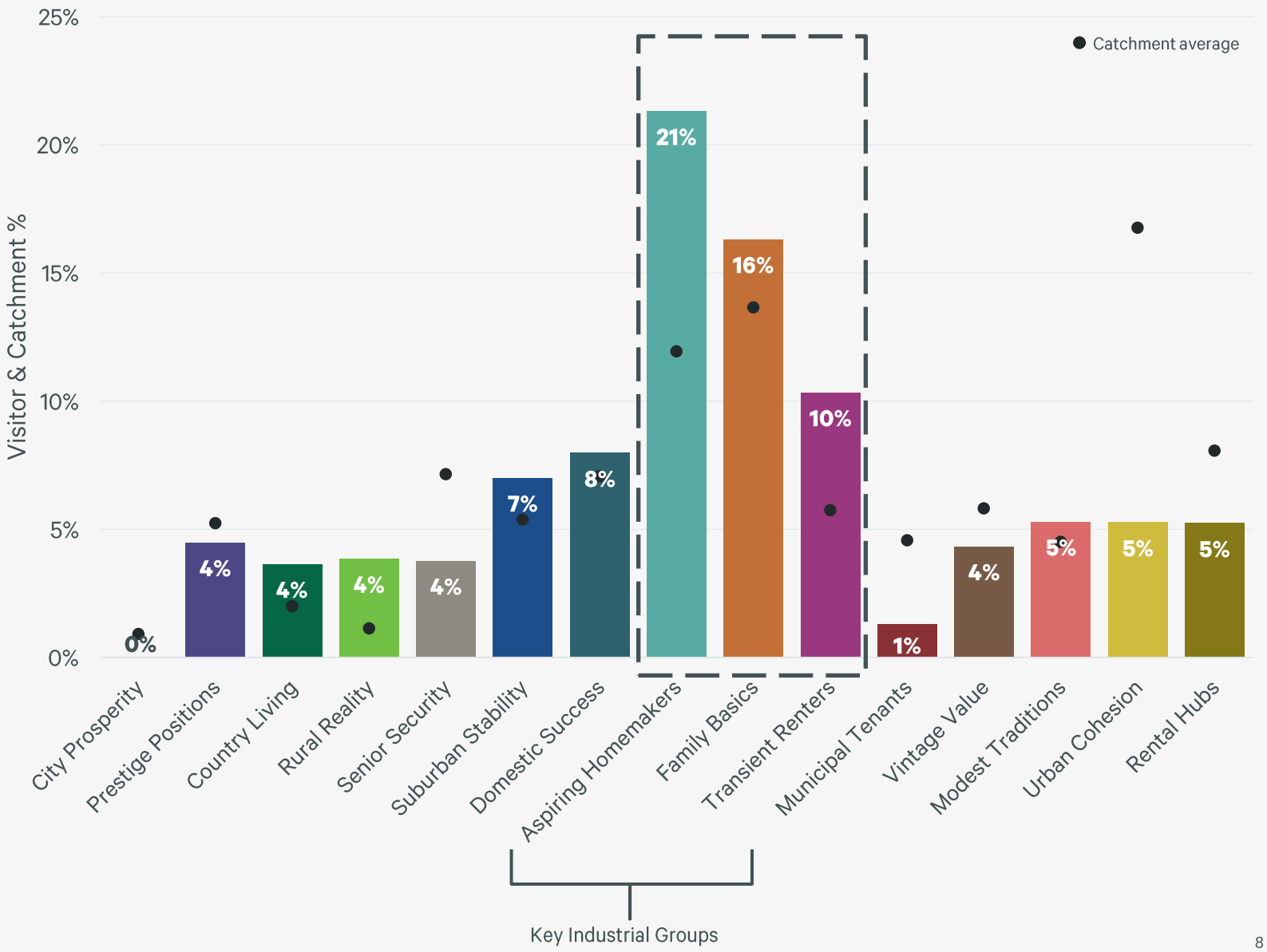
Typical warehousing groups are well represented in the existing workforce

The adjacent chart shows the proportion of workers from each group (the bars) and the catchment average for that group (the dot).

Aspiring Homemakers, Family Basics and Transient Renters make up almost half of the workforce combined. These groups are typically well represented in warehousing profiles. This suggests MLP is successfully attracting from a core source of warehouse labour available in the catchment. Efforts to retain these workers will help to ensure a stable and resilient future workforce.



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Opportunity to attract more from O: Rental Hubs

The adjacent chart table aligns to the chart on the previous page.

Group O: Rental Hubs are often seen in warehouse profile, typically in more urban locations. This group make up 8% of the catchment but only 5% of the current workforce. Given their propensity for warehouse work, and availability in the catchment in the more urban areas (Leicester, Coventry, Birmingham), targeting this group represents an opportunity to further boost supply of labour at Magna Park, Lutterworth.

More information on the key groups and incentives that will appeal most to them can be found in the appendix.

**Index | where the number is greater than 100, the group is well-represented in the workforce when compared to the catchment average.*

* The proportion of workers from each group in the worker profile have been indexed against the proportion of that group in the catchment. A score of 100 indicates the visitor profile matches the catchment. A score over 100 shows a group is overrepresented in the workforce.

Mosaic Group		Proportion of Workers	Index*	Key Group	Comment
H	Aspiring Homemakers	21%	178	✓	With a high index score and the largest portion of the existing workforce, this is a key labour pool.
I	Family Basics	16%	119	✓	A typical warehousing group, large portion of the catchment and existing workforce – a continued recruitment target.
J	Transient Renters	10%	180	✓	A high index score and a typical warehousing group. Should be attracted and retained as a key group.
G	Domestic Success	8%	113		A reasonable portion of the catchment and workforce and often seen in warehousing profiles – a target to attract more from this group.
F	Suburban Stability	7%	130		
M	Modest Traditions	5%	117		
N	Urban Cohesion	5%	31		
O	Rental Hubs	5%	65	✓	Although not a core warehousing group they are often well represented in warehouse profiles (typically more urban locations) – an opportunity.
B	Prestige Positions	4%	86		
L	Vintage Value	4%	74		
D	Rural Reality	4%	336		
E	Senior Security	4%	53		
C	Country Living	4%	181		
K	Municipal Tenants	1%	28		
A	City Prosperity	0%	3		

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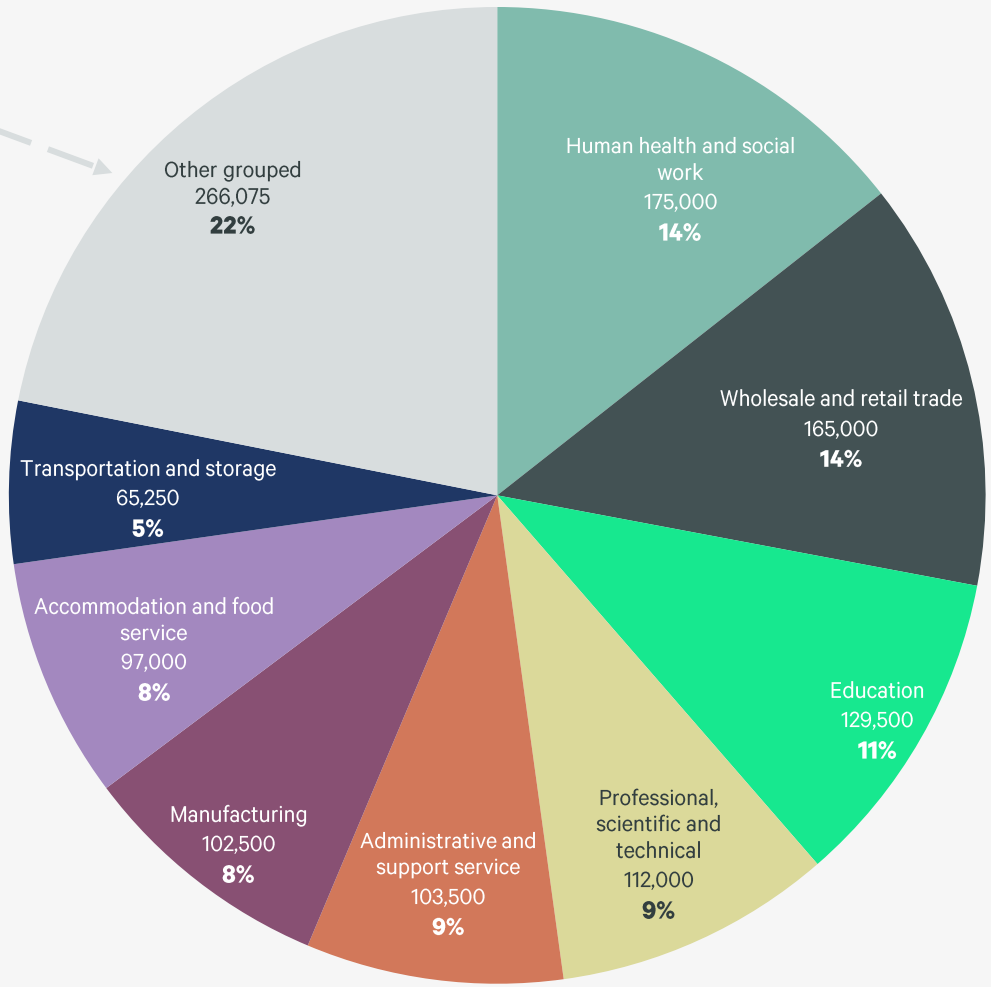
5% are employed in Transportation & Storage

The adjacent chart shows the proportion of the catchment that are employed in each sector.

There are 65,000 people employed in Transportation and storage, making up only 5% of overall employment. This overall catchment proportion is in line the UK average of 5%, albeit certain areas within the catchment have a higher propensity towards employment in the sector (Rugby and Harborough).

Proportion of workers by employment sector

*Included in 'other grouped'
- Public administration and defence
- Construction
- Information and communication
- Financial and insurance activities,
- Arts, entertainment and recreation,
- Other service activities
- Real estate
- Water supply
- Electricity, gas, steam
- Agriculture, forestry and fishing,
- Mining and quarrying



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Sectors in decline have transferable skills to logistics roles

The adjacent table shows both the absolute number of people employed in each sector in 2020 as compared to 2023, as well as the proportion of overall employment that sector represents.

Manufacturing and retail have seen a decline in the absolute number of people employed and in their share of overall employment. Many individuals in these sectors are likely to have transferable skills that are well aligned to logistics roles.

They represent an opportunity to target to further increase supply of labour at Magna Park, Lutterworth.

	Number of people employed by sector		Proportion of total employed by sector		
Industry Sector	**2020**	**2023**	**2020**	**2023**	**Change in share**
A : Agriculture, forestry and fishing	2,465	1,645	0.2%	0.1%	-0.1%
B : Mining and quarrying	260	580	0.0%	0.0%	0.0%
C : Manufacturing	103,000	102,500	9.0%	8.4%	-0.7%
D : Electricity, gas, steam and air conditioning supply	8,825	8,825	0.8%	0.7%	-0.1%
E : Water supply; sewerage, waste management and remediation activities	7,975	10,525	0.7%	0.9%	0.2%
F : Construction	41,250	40,750	3.6%	3.3%	-0.3%
G : Wholesale and retail trade; repair of motor vehicles and motorcycles	168,000	165,000	14.7%	13.5%	-1.2%
H : Transportation and storage	61,000	65,250	5.3%	5.3%	0.0%
I : Accommodation and food service activities	**67,000**	**97,000**	**5.9%**	**7.9%**	**2.0%**
J : Information and communication	33,950	38,600	3.0%	3.2%	0.2%
K : Financial and insurance activities	39,150	36,300	3.4%	3.0%	-0.5%
L : Real estate activities	17,250	19,900	1.5%	1.6%	0.1%
M : Professional, scientific and technical activities	103,750	121,000	9.1%	9.9%	0.8%
N : Administrative and support service activities	970,00	103,500	8.5%	8.5%	0.0%
O : Public administration and defence; compulsory social security	52,950	63,150	4.6%	5.2%	0.5%
P : Education	128,000	129,500	11.2%	10.6%	-0.6%
Q : Human health and social work activities	161,500	175,000	14.2%	14.3%	0.1%
R : Arts, entertainment and recreation	20,650	24,450	1.8%	2.0%	0.2%
S : Other service activities	27,250	21,350	2.4%	1.7%	-0.6%

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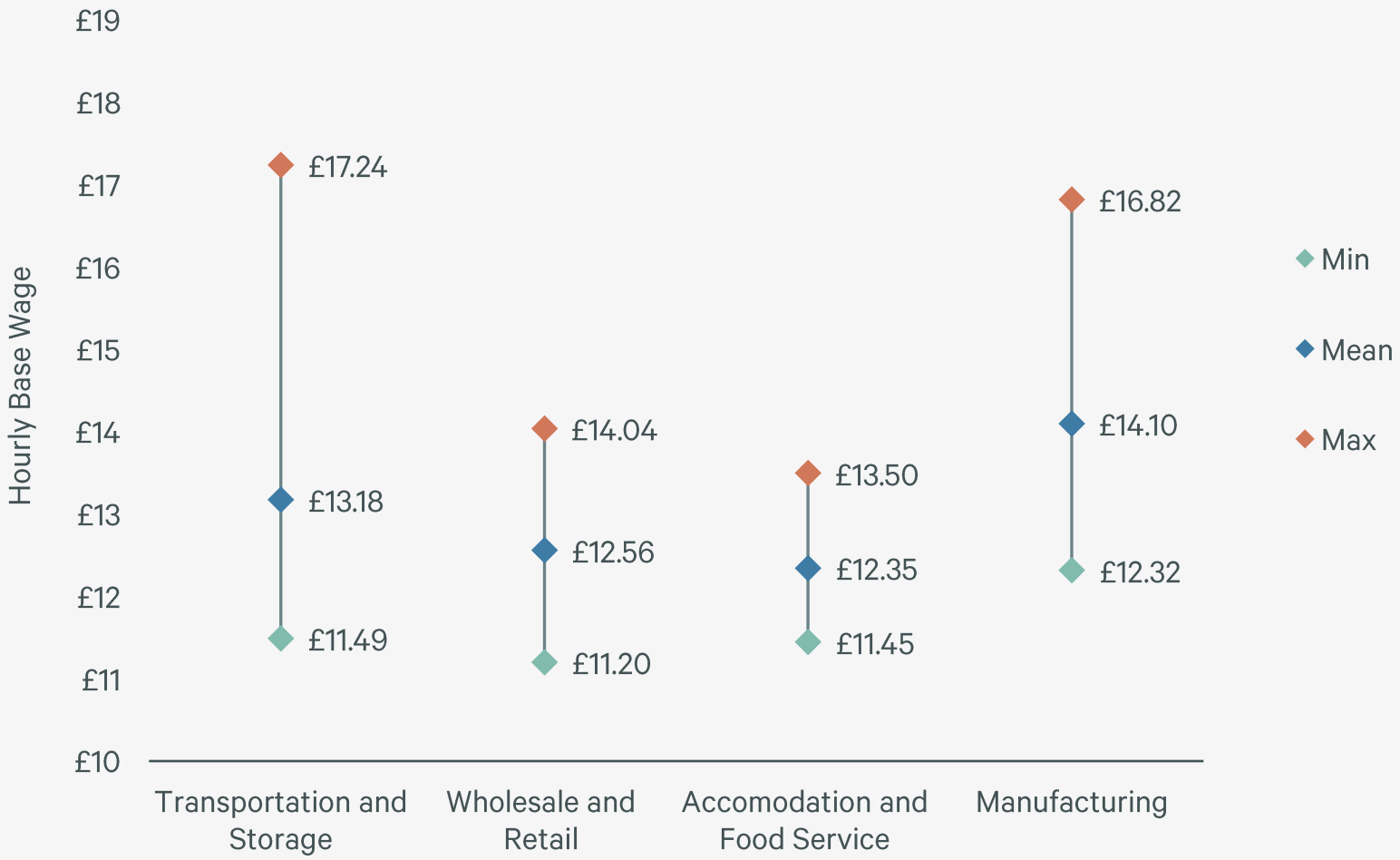
Employment in Transportation & Storage offers similar or improved earning potential

The adjacent chart shows hourly wage rates advertised in local job postings around Magna Park, Lutterworth.

Average wage rates advertised for warehouse roles are higher than in Retail. Transition into the sector would therefore offer increased earning potential to individuals seeking alternative employment, bringing wider economic benefits.

Overall wages advertised for warehouse roles are broadly in line with Manufacturing suggesting that salary expectations would unlikely prevent the transition.

Hourly wages by employment sector



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Limited barriers to entry into logistics roles and career progression opportunities

There are limited barriers to entry to the sector with basic job training provided. Therefore, school leavers and people from other industries can feasibly be targeted to boost future supply.

With varying roles available within a warehouse there are skills development opportunities as well as longer term career growth opportunities. This will be attractive to more aspirational individuals.

Transportation and storage

Skills: No prior experience required; training provided.

Good physical fitness.

Valid counterbalance licence for FLT roles.

Basic health and safety knowledge.

Benefits: Canteen and vending machines

Free parking and locker room

Company pension and life assurance

Career growth opportunities

Wages: £11.49- £17.24/hr

Wholesale and retail trade

Skills: No prior experience required; training provided.

Previous retail experience preferred for some roles.

Enthusiastic and willing to develop new skills

Benefits: Staff discounts

Holiday allowance

Private healthcare and wellness programs

Pension scheme

Wages: £11.20- £14.04/hr

Manufacturing

Skills: Willing to undertake training.

Previous experience preferred.

Ability to operate machinery safely.

Good physical stamina.

Benefits: Free parking

Enhanced holiday

Discount gym membership

Monthly bonuses

Career growth opportunities

Overtime available

Wages: £12.32-£16.82/hr

Accommodation and food service

Skills: Restaurant/ hospitality experience preferred

Level 2 food safety certificate

Quick service roles experience

Benefits: Discounts (O2, Specsavers, food, high street, online)

Employee discount

Flexible hours

Mental health support

Wages: £11.45 - £13.50/hr

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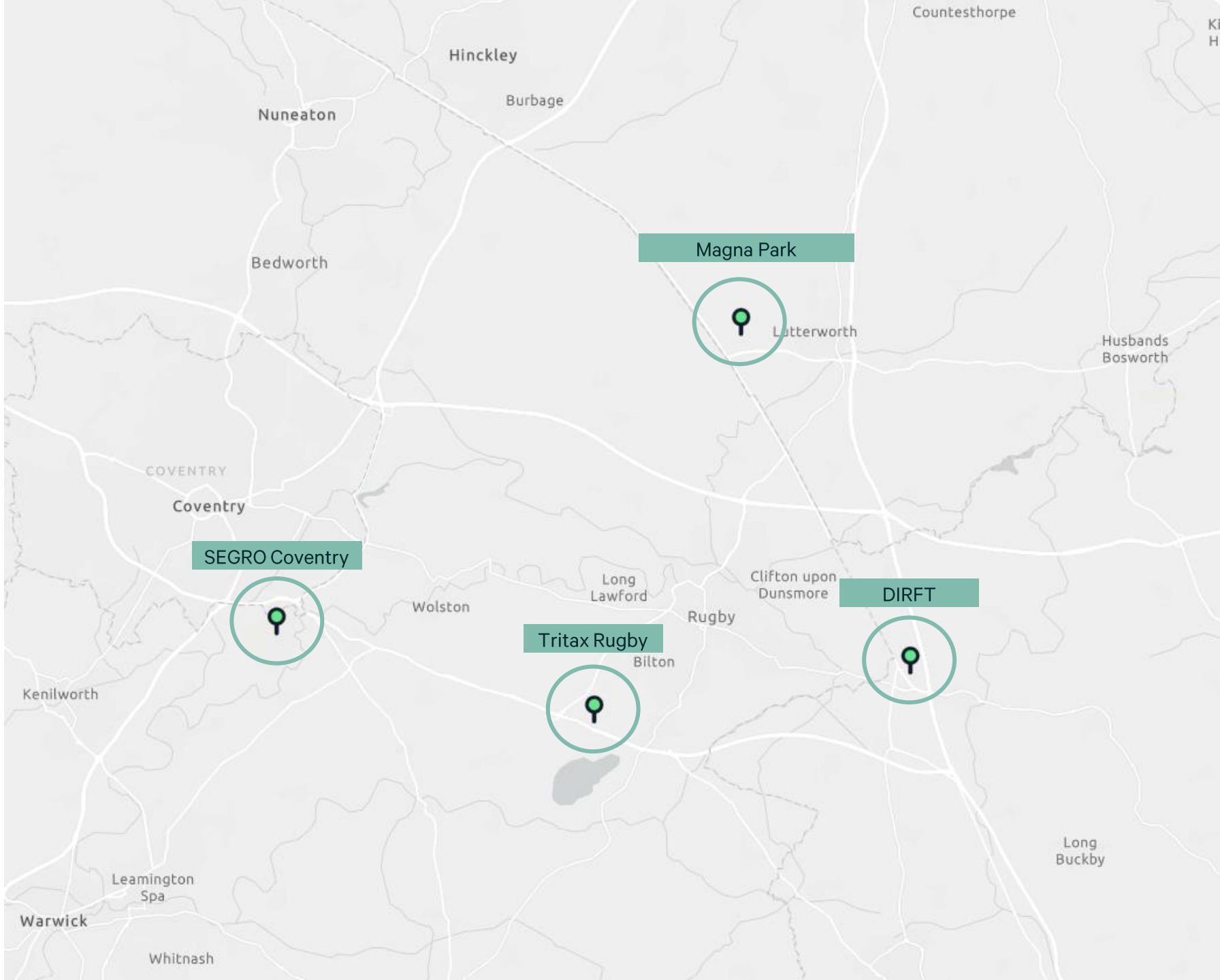
2 — Competitor Analysis

Benchmarking Magna Park, Lutterworth against the competition



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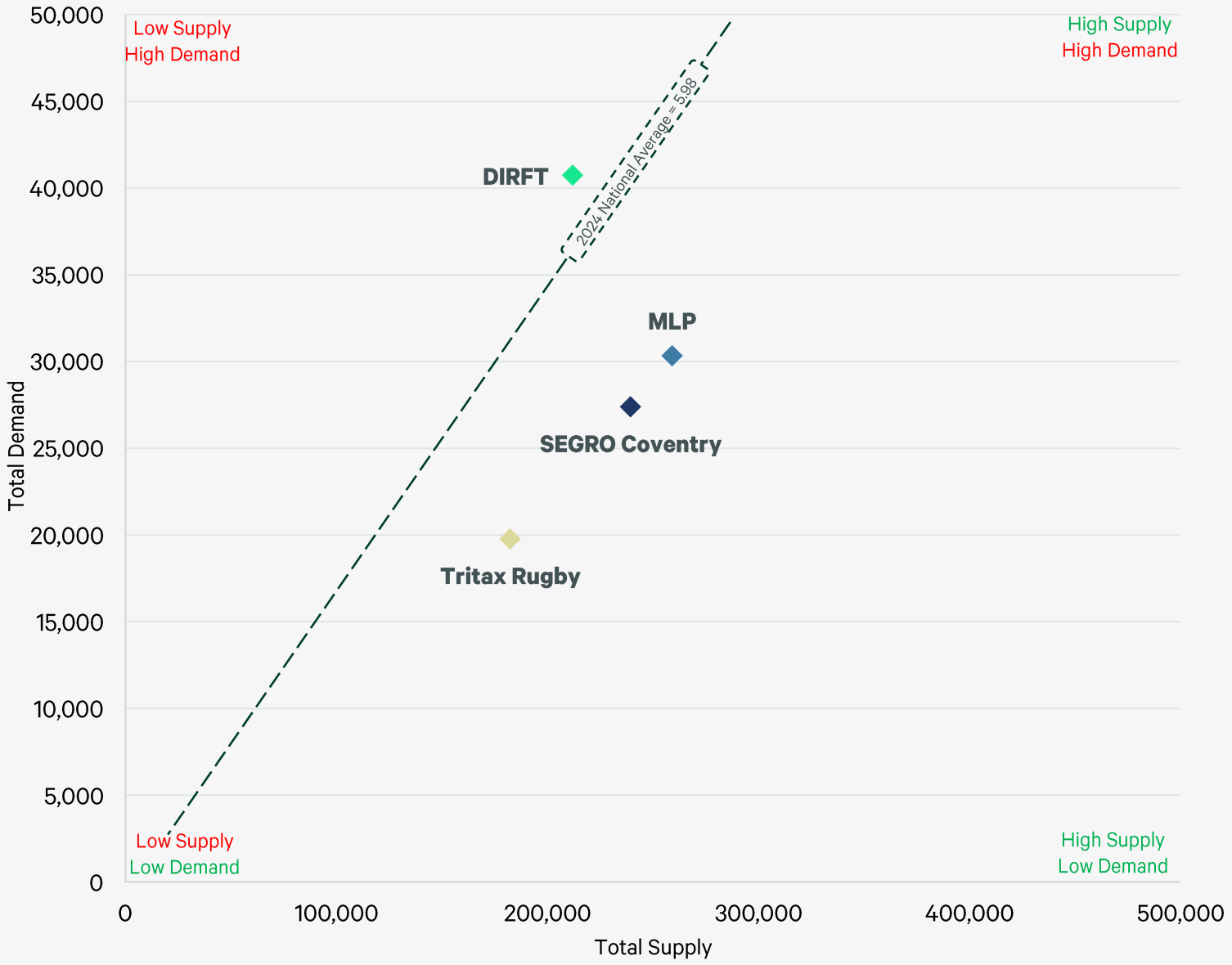
MLP has a larger supply of workers than nearby competitors

Magna Park, Lutterworth has the largest supply pool when compared to nearby locations, benefitting from being able to attract from nearby cities as well as neighboring towns. Of the 4 sites, MLP's catchment is best able to absorb additional demand for workers.

There is similar labour availability at Magna Park, Lutterworth and SEGRO Coventry. Tritax Rugby has the best ratio but a smaller supply of workers. DIRFT has the highest demand for labour which is stretching available demand, driving a ratio below the national average.

Location	Supply	Demand	Ratio
Tritax Rugby	182,300	19,770	9.22
SEGRO Coventry	239,400	27,390	8.74
MLP	259,100	30,325	8.54
DIRFT	211,900	40,735	5.20



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3 — Future Availability

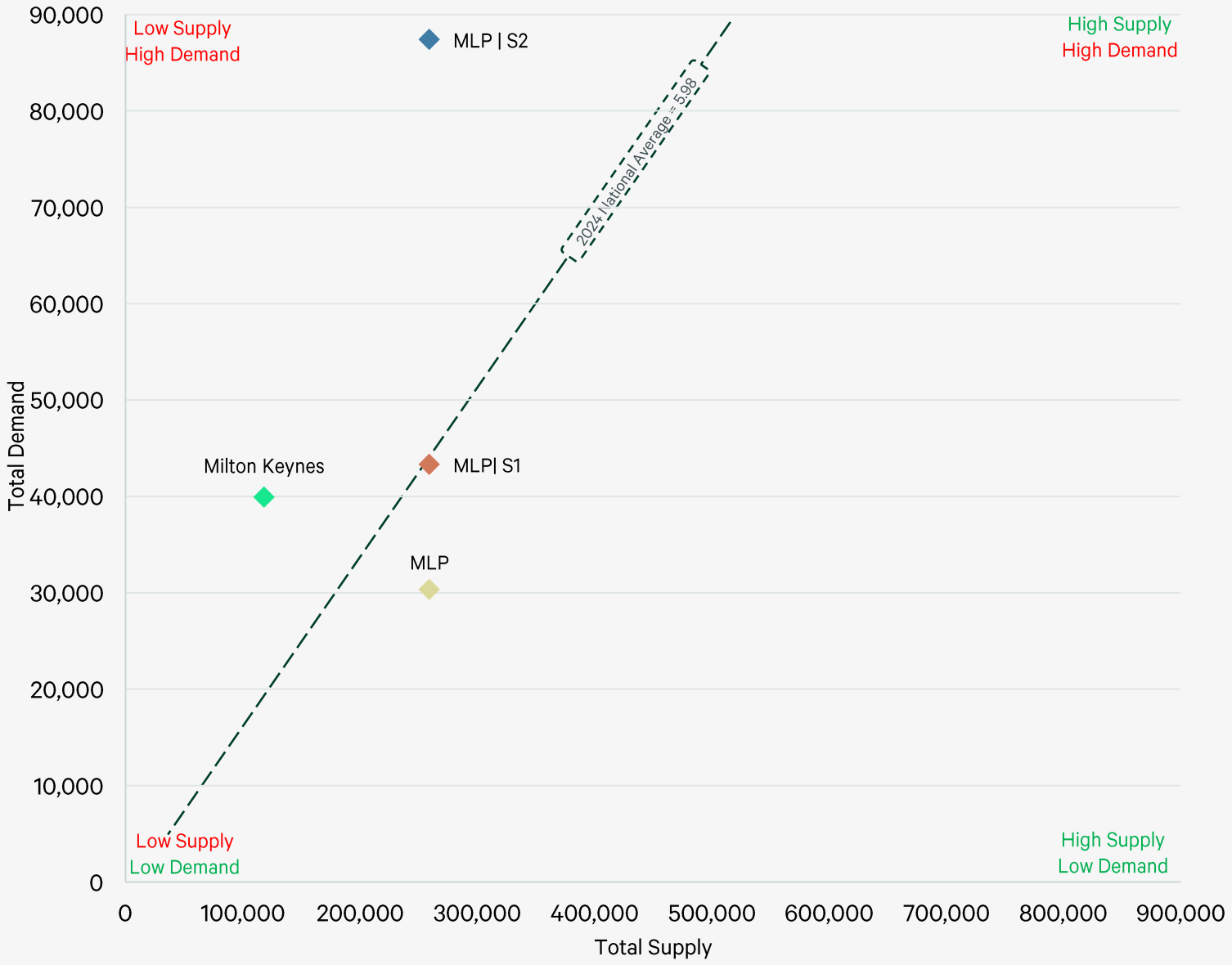
MLP's existing catchment could support an additional ~13,000 workers

The average supply demand ratio at logistics locations across the country sits at 5.98.

The existing catchment supply of workers at Magna Park, Lutterworth could support an additional 13,000 workers before the availability ratio dropped in line with that average **(MLP | S1).**

Labour availability in Milton Keynes is constrained, with a ratio of 2.96. The existing MLP catchment could support an additional 57,000 workers before the availability ratio dropped in line with Milton Keynes **(MLP | S2).**

Location	Supply	Demand	Ratio
MLP	259,100	30,325	8.54
MLP | S1	259,100	43,327	5.98
MLP | S2	259,100	87,422	2.96
Milton Keynes	118,300	39,915	2.96



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Future planned housing development could provide an additional ~17,000 workers over the next 20 years

The adjacent chart shows the potential additional workers that could be provided by housing development laid out in local plans.

The extension of Lutterworth (in Harborough) represents the largest potential opportunity in terms of future source of labour when considering proximity to MLP and existing propensity to employment in the Transportation and Storage sector.

Further detail on housing figures can be seen in the appendix.

Local Authority District	Planned housing (2025-2045)	Additional residents (2025-2045)	Employed in Transportation & Storage (%)	Potential additional workers (2025-2045)
Rugby	12,978	22,971	13.6%	3,124
Harborough	9,897	17,518	17.5%	3,066
Leicester	29,568	52,335	3.0%	1,570
Coventry	22,600	40,002	6.6%	2,640
Hinckley and Bosworth	10,560	18,691	12.1%	2,262
Nuneaton and Bedworth	7,326	12,967	8.6%	1,115
Blaby	1,916	3,391	4.6%	156
Charnwood	17,488	30,954	3.2%	991
Birmingham	31,136	55,111	3.6%	1,984
Catchment Total	**143,469**	**253,940**	**8.1%**	**16,908**
	Source | local plans	*1.77 working age adults per household. Source | Mosaic*	*Source | ONS*	

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Further industrial development adjacent to MLP could increase demand for warehouse staff by ~5,500

The adjacent table shows the calculation of potential future demand for workers.

*Sites included in 'Other industrial developments' can be seen in the appendix.

Development	Footprint (sqft)	Estimated workers
MP 1 | Phase 5 | Land South of George House	753,480	439
MP 2 | Land at Mere Lane, Magna Park	3,229,200	1,882
Site 325	5,523,008	3,219
Other industrial developments*	4,020,411	2,343
Total	**13,526,099**	**7,883**
	**Large sites under construction, approved, considered. Where planned footprint not known, 35% density applied to development area.*	*1 warehouse employee per 1,716 sqft (Prologis Annual Labour Survey)*

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Future supply and demand scenarios modelled to understand potential impact on labour availability at MLP

Future availability scenarios

Scenario			Values		
Name	**Supply**	**Demand**	**Supply**	**Demand**	**Ratio**
High	100% Housing Plans Realised	MLP Today	276,008	30,325	9.10
Today	MLP Today	MLP Today	259,100	30,325	8.54
Both Increase	50% Housing Plans Realised	Today + MP1&2 + Site 325 + Other	267,554	38,208	7.00
Demand Increase	MLP Today	Today + MP1&2 + Site 325 + Other	259,100	38,208	6.78
Low	MLP Today	Double Demand	259,100	60,650	4.27

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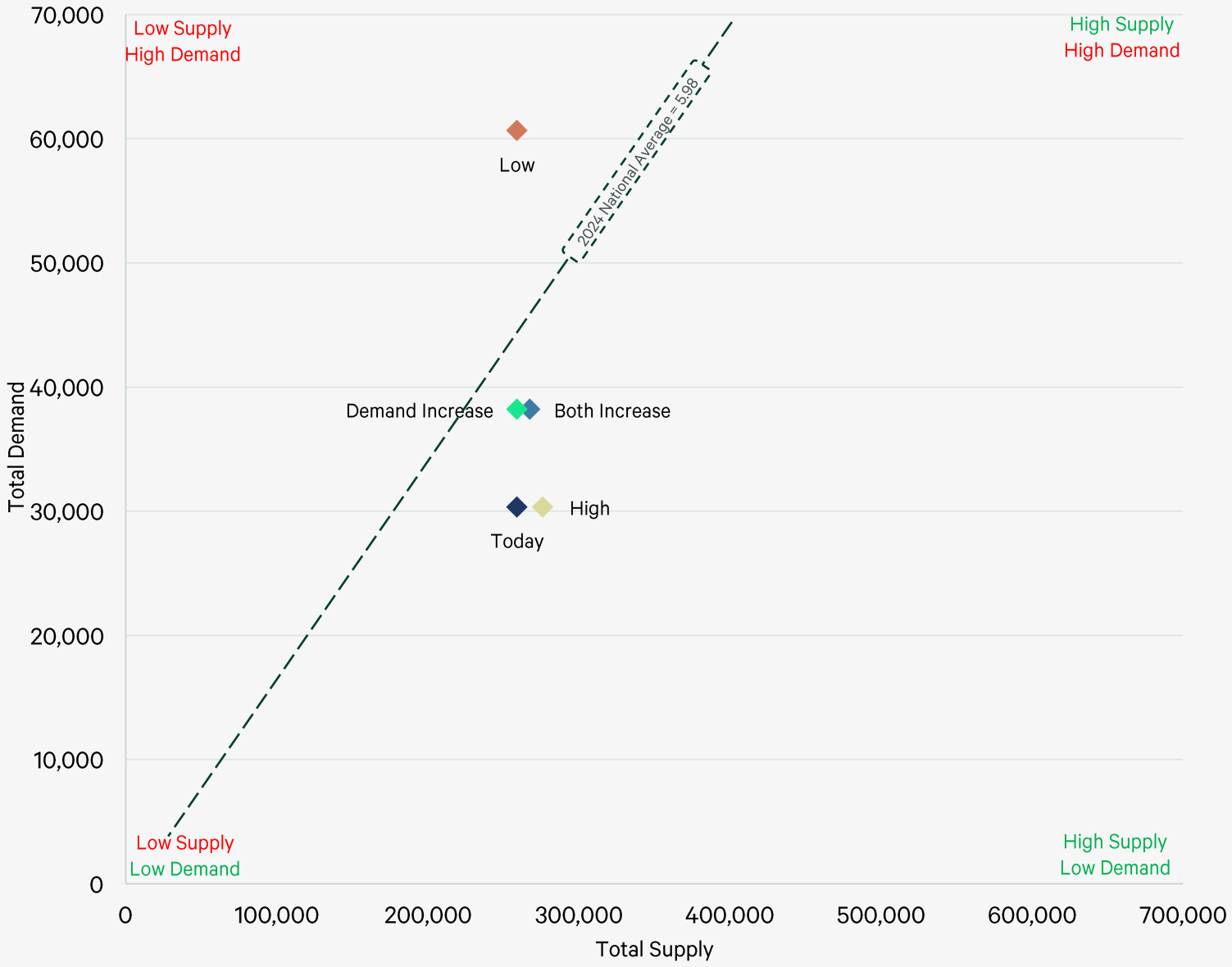
Future labour availability at MLP appears resilient, remaining favourable in many potential scenarios

Labour availability at MLP only drops below the national average when significant demand increases occur against no increase in catchment supply. The ratio remains above the national average in more likely scenarios.

Overall, the strong supply at Magna Park, Lutterworth insulates future availability from the impact of future increases demand for workers.



Appendix

H: Aspiring Homemakers

Younger households settling down in housing priced within their means

Family

Aspiring Homemakers have a high propensity to have younger children and a hectic personal life. These individuals will have significant demands on their time, trying to balance family life with work schedules.

Finance

This group are somewhat cost conscious and likely to make housing and lifestyle choices that are within their means. A high propensity own their homes with substantial mortgage repayments.

Commute

Aspiring Homemakers are likely to own a modest car and therefore drive to work.

Career

Individuals may have degree or further education qualifications. Tending to be at the start of their careers training and development prospects are attractive to this group.

Age
26-35
191 | 36.9%

Household income
£40,000 – £49,999
192 | 23.5%

Number of children
1
267 | 36.8%

Household composition
Pseudo family
209 | 22.6%

Residency type
Semi-detached
157 | 40.8%

Tenure
Owned
121 | 77.7%

Incentives

Compensation
Benefits — Wages

Commute
Public Transport — Car

Work Patterns
Fixed — Flexible

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I: Family Basics

Families with limited resources who budget to make ends meet

Family

Family Basics have a high propensity to have younger, dependable children and a hectic work life balance trying to make ends meet. These individuals will have significant demands on both their time and financial resources.

Finance

This group are particularly cost conscious and likely struggle to make ends meet. A higher propensity to receive some support, living within Council or Housing Association properties.

Career

Individuals unlikely to have any further education, any advancement on mandatory education would likely be an apprenticeship or Diploma. Career history is likely to consist of manual roles in routine or lower technical positions.

Commute

Family Basics are likely to own a low value car and therefore drive to work.

Age
36-45
160 | 29.9%

Household income
£20,000 – £29,999
160 | 31.3%

Number of children
2
253 | 31.5%

Household composition
Family + other adults
151 | 24.3%

Residency type
Terraced
198 | 49.9%

Tenure
Council/HA
292 | 51.5%

Incentives

Compensation
Benefits — Wages

Commute
Public Transport — Car

Work Patterns
Fixed — Flexible

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J: Transient Renters

Single people renting low-cost homes for the short term

Family

Transient Renters are most likely to be single individuals in young house shares. While some may just be starting out a family the majority will balancing social commitments with friends over childcare.

Finance

This group are fairly cost conscious with an average annual income of £25,000. They're likely to rent low-cost house shares, perhaps trying to save any limited disposable income to get on the property ladder.

Career

These individuals are young and at the very start of their careers. Many will not have any substantial education beyond school or may be working towards vocational qualifications. Any programs offering further education opportunities will attract the ambitious individuals among this group.

Commute

Transient Renters have a lower propensity to own a car and are therefore likely to use public transport to get to work. Good connections to residential hubs will make their commute easier.

Age
26-35
194 | 37.4%

Household income
£20,000 – £29,999
185 | 36.2%

Number of children
1
181 | 25.0%

Household composition
Single
128 | 50.9%

Residency type
Terraced
212 | 53.4%

Tenure
Rented
310 | 55.6%

Incentives

Compensation
Benefits — Wages

Commute
Public Transport — Car

Work Patterns
Fixed — Flexible

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O: Rental Hubs

Educated young people privately renting in urban neighbourhoods

Family

Rental Hubs are young singles and home sharers. Unlikely to have children in the home.

Finance

This group are somewhat cost conscious and likely to make housing and lifestyle choices that are within their means. Likely to live in rented flats with friends or a partner.

Commute

Early in their careers, some may have access to a car whereas some may be reliant on public transport.

Career

Individuals in the Rental Hubs group are at the early stage of their careers. They may have a degree or further education qualifications, making training and development prospects attractive to this group.

Age
26-35
202 | 39.0%

Household income
£30,000 – £39,999
155 | 24.8%

Number of children
No children
126 | 87.4%

Household composition
Single
142 | 56.2%

Residency type
Flat
354 | 81.9%

Tenure
Rented
333 | 59.9%

Incentives

Compensation
Benefits — Wages

Commute
Public Transport — Car

Work Patterns
Fixed — Flexible

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Housing development figures used for future additional worker supply calculations

	Planned Housing (2025-2045)																				
LAD	**25**	**26**	**27**	**28**	**29**	**30**	**31**	**32**	**33**	**34**	**35**	**36**	**37**	**38**	**39**	**40**	**41**	**42**	**43**	**44**	**45**
Rugby	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618	618
Harborough	657	657	657	657	657	657	657	657	657	657	657	534	534	534	534	534	/	/	/	/	/
Leicester	2,464	2,464	2,464	2,464	2,464	2,464	2,464	2464	2464	2464	2464	2464	/	/	/	/	/	/	/	/	/
Coventry	1,630	1,630	1,630	1,630	1,630	1,444	1,444	1,444	1,444	1,444	1,446	1,446	1,446	1,446	1,446	/	/	/	/	/	/
Nuneaton and Bedworth	1,163	1,559	1,446	1,341	818	580	419	/	/	/	/	/	/	/	/	/	/	/	/	/	/
Hinckley and Bosworth	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	660	/	/	/	/	/
Blaby	217	252	292	346	285	330	194	/	/	/	/	/	/	/	/	/	/	/	/	/	/
Charnwood	817	1,298	2,190	2,303	2,099	1,684	1,721	1523	1189	1000	891	773	/	/	/	/	/	/	/	/	/
Birmingham	4,448	4,448	4,448	4,448	4,448	4,448	4,448	/	/	/	/	/	/	/	/	/	/	/	/	/	/
Catchment Total	12,674	13,586	14,405	14,467	13,679	12,885	12,625	7,366	7,032	6,843	6,736	6,495	3,258	3,258	3,258	1,812	618	618	618	618	618

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‘Other Industrial Developments’ considered in future demand for workers calculation

Address	Area (sqft)
Sapphire Court Paradise Way, Coventry, Cv2 2tt, COVENTRY	96,117
Eastern Green, South Of A45, Coventry, CV5 7LG	645,600
Land At West Longbridge Off A38 Bristol Road South Longbridge	342,065
Peddimore Land north of Minworth, east of A38 and west of Wiggins Hill Road Sutton Coldfield Birmingham B76	4,154,253
Land To The South Of Gibbet Lane Shawell Leicestershire	645,600
Land East of Sampson Road North Birmingham B11 1BG	25,498
Land South Of The A5 Padge Hall Farm Hinckley Leicestershire	1,390,000
Former Severn Trent Land Wishaw Lane Birmingham B76	226,050
6 Uxbridge Road, land adjacent & part of 302 Melton Road	20,064
Herald Avenue, Coventry, CV5 6UB	28,804
Vacant Plot on Quinton Business Park Quinton Birmingham	77,750
Land Off Station Road Market Bosworth Leicestershire	26,631
Land to west of Drews Lane, Washwood Heath, Birmingham, B8	174,800
Former GKN Driveline Factory, Chester Road, Erdington, Birmingham, B24 0QY	271,421
Land north and south of Junction 9 of the M42 Adjacent to Lichfield Road	700,000
Land South of Wymeswold Industrial Estate Wymeswold Lane Wymeswold Leicestershire	59,500
A444 Land At Wilsons Lane, Coventry, CV6 6HN	538,000
Airfield Business Park Leicester Road Lubenham Leicestershire	107,600
Land On The North East of J10 M42 Dordon/A5, Polesworth	1,076,000
LAND NORTH EAST OF CASTLE MOUND WAY, CASTLE MOUND WAY, RUGBY	251,069
Rugby 106, Central Park Drive, Rugby, CV23 0WE	106,196
Bermuda 37, Walsingham Drive, Nuneaton, CV10 7RW	36,730
Unit 1, Vantage Way, Erdington, B24 9GZ	90,201
Unit 2, Vantage Way, Erdington, B24 9GZ	61,472
Sentinel Logistics Park, Castle Bromwich, Birmingham, West Midlands, B35 7AR	122,908
Sentinel Logistics Park, Castle Bromwich, Birmingham, West Midlands, B35 7AR	61,820
Sentinel Logistics Park, Castle Bromwich, Birmingham, West Midlands, B35 7AR	42,048
Sentinel Logistics Park, Castle Bromwich, Birmingham, West Midlands, B35 7AR	51,720
Sentinel Logistics Park, Castle Bromwich, Birmingham, West Midlands, B35 7AR	56,971

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Thank you.

Sarah Slater

Iona Marsden

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